



Home Office

Identification of Victims of Modern Slavery

Call for Evidence: Summary of Responses

Ipsos UK

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Summary and methodology

Overview of key findings

In October 2024, the Minister for Safeguarding and Violence Against Women and Girls pledged reforms to strengthen support for victims of modern slavery and committed to eliminating the National Referral Mechanism (NRM)¹ backlog within two years. The government subsequently launched a Call for Evidence to gather stakeholder input² (collecting 119 responses) and carried out 10 workshops. The aim was to inform the development of a more effective, future-proofed system for identifying victims of modern slavery, ensuring timely safeguarding and consistent access to support. The Call for Evidence explored three interconnected themes: victim definitions, initial identification, and formal identification.

A **summary of key findings** is presented below, with further detail in the subsequent section.

- **Trauma-informed approaches** were consistently emphasised as essential throughout each stage of the victim identification process. This highlighted the importance of using survivors' own language rather than less accessible terms like "modern slavery", and the need for unhurried interactions to be conducted in safe settings, with victims permitted to control the pace of disclosure.
- **Training gaps among practitioners** - including both First Responders (FRs)³ and other frontline professionals - were highlighted as barriers to successful victim identification and subsequent NRM referral. Misconceptions about the definitions of modern slavery and trafficking were seen as key risks to the process. Respondents called for mandatory, regularly refreshed scenario-based training co-designed with people with lived experience.
- Respondents stressed that **children require different approaches**, suggesting child-specific considerations across all areas. For example, some argued that legislation was insufficiently clear that children cannot consent to exploitation, and that

¹ The NRM is 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 the police or a local authority), and individual cases are assessed in two stages: (i) Reasonable Grounds (RG) and (ii) Conclusive Grounds (CG).

² The Call for Evidence and the questionnaire is available here: [Identification of victims of modern slavery - GOV.UK](#)

³ A First Responder Organisation (FRO) is an authority that is authorised to refer a potential victim of modern slavery into the NRM. There are both statutory FROs (public bodies established in law with legal and safeguarding duties e.g. police forces, local authorities) and non-statutory FROs (charities, NGOs or specialist organisations that are authorised to act as FROs because of their specialist expertise with particular victim groups). A First Responder (FR) is a practitioner working in an FRO.

practitioners should not be required to prove any “means” (such as coercion or deception) in child cases, in line with international law.⁴ When considering whether child NRM referrals should use different decision-making models from adults, many favoured devolved, multi-agency models for child cases (building on existing pilots), with national oversight to ensure consistency.

- **Multi-agency collaboration** was highlighted as important for successful victim identification. However, respondents observed significant challenges to this in practice - including poor inter-agency communication, “postcode lotteries” in service provision, and cases being passed between agencies or teams with no clear ownership. Successful examples included local authorities (LAs) with dedicated modern slavery coordinators and police Victim Navigators attending exploitation sites. Respondents called for standardised pathways, single points of contact, and better information-sharing between agencies.

Introduction

Modern slavery is an umbrella term encompassing human trafficking, slavery, servitude, and forced or compulsory labour, and it affects adults and children of all nationalities and genders in the UK. In 2025, a total of 23,411 potential victims of modern slavery were referred to the NRM.⁵ The hidden nature of modern slavery, however, makes early identification particularly challenging. For this reason, Non-Governmental Organisations (NGOs) estimate the actual number of victims to be substantially higher.

The government recognises that despite existing structures, systematic barriers to identification and support mean many victims may remain unidentified or unable to access help. In response to these challenges, in October 2024 the Minister for Safeguarding and Violence Against Women and Girls pledged reforms to strengthen victim support. A commitment was also made to eliminate the NRM decision backlog within two years. Together, these aimed to give victims certainty and appropriate support in a timely fashion, to aid their recovery from exploitation and to allow them to move forward with their lives.⁶

The Government launched this Call for Evidence to gather stakeholder input through:

- i. a public Call for Evidence (attracting 119 responses, many on behalf of organisations); and

⁴ International law refers here to the Palermo Protocol and ECAT (Council of Europe Convention on Action against Trafficking in Human Beings), which state that for child trafficking cases, only 'act' (e.g. recruitment, transport, harbouring) and 'purpose' (exploitation) need to be proven - the 'means' element (force, coercion, deception) is not required because children cannot consent to their own exploitation.

⁵ <https://www.gov.uk/government/statistics/modern-slavery-nrm-and-dtn-statistics-end-of-year-summary-2025>

⁶ Home Office (2024) Modern slavery victims to be supported in fresh measures, [GOV.UK](https://www.gov.uk/government/news/modern-slavery-victims-to-be-supported-in-fresh-measures). Available at: <https://www.gov.uk/government/news/modern-slavery-victims-to-be-supported-in-fresh-measures>

- ii. a series of 10 workshops with statutory First Responder Organisations (FROs); non-statutory FROs and specialist NGOs; law enforcement stakeholders; devolved and local government officials; research organisations and academic researchers, and wider support workers.

It sought to inform the development of a more effective, future-ready system for identifying victims of modern slavery, ensuring timely safeguarding and consistent access to support through exploring three interconnected themes, namely:

- **Victim definitions:** the clarity of legal and operational definitions, including indicators and exploitation types. Views were sought on the practical application of definitions set out in the Slavery and Human Trafficking (Definition of Victim) Regulations 2022 (referred to as the 2022 Regulations) and associated statutory guidance, including the use of exploitation indicators.⁷
- **Initial identification:** how FROs and wider services recognise indicators of exploitation. Views on the effectiveness of current identification mechanisms and the role of FROs were sought, as well as views on collaboration between FROs and other frontline organisations in detecting potential victims, building trust and submitting referrals into the NRM.
- **Formal identification:** perspectives on how Competent Authorities (CAs) make Reasonable Grounds (RG) and Conclusive Grounds (CG) decisions that formally recognise victim status and trigger protection and support entitlements were explored⁸, as were strengths and drawbacks of different decision-making models (centralised, devolved, multi-agency).

The Home Office designed and ran the Call for Evidence and facilitated the stakeholder workshops. Ipsos were commissioned to analyse all responses and workshop discussions.

Call for Evidence Approach

The Call for Evidence was open to responses between 16 July and 8 October 2025. Individuals and organisations could participate through multiple channels: online, via email, and through written postal submissions.

A total of 119 responses were received from victims and survivors and individual members of the public, as well as from individuals and organisations spanning NGOs and civil society, FROs, LAs, Health and Social Care Trusts (HSCTs), academia, and law

⁷ [The Slavery and Human Trafficking \(Definition of Victim\) Regulations 2022](#)

⁸ In the UK, the CAs are the Single Competent Authority (SCA) and the Immigration Enforcement Competent Authority (IECA). The IECA is a Home Office authority that makes such decisions for a defined cohort of adult NRM referrals that typically arise in, or are closely linked to, immigration enforcement activity, in line with the Modern Slavery Statutory Guidance and the 2022 victim definition regulations. The SCA is the Home Office authority responsible for making Reasonable Grounds and Conclusive Grounds decisions for all other NRM referrals outside the IECA's remit.

enforcement. Respondents were predominantly based in England, with a minority from Northern Ireland, Scotland, Wales and overseas. The Annex provides a detailed breakdown of responses.

In parallel, the Home Office conducted 10 qualitative workshops between 28 August and 14 October 2025 to gather deeper insights. These brought together approximately 70 participants from: statutory FROs; non-statutory FROs and specialist NGOs; law enforcement stakeholders; devolved government officials; local authority (LA) representatives; research organisations and academic researchers; and wider support workers. The workshops explored a range of themes, namely:

- statutory FRO perspectives;
- non-statutory FRO perspectives;
- LA perspectives;
- law enforcement perspectives;
- adult sexual exploitation definitions;
- child exploitation definitions;
- legal definitions;
- perspectives from the three devolved administrations (Scotland, Wales and Northern Ireland).

Further details on the individual workshops and their participants can be found in the Annex.

Analytical approach

For a detailed description of methodology, see the Annex.

The Call for Evidence aimed to gather views, insights and evidence, summarised in this report, to inform future reforms. It did not seek to measure the popularity of specific proposals. As engagement was voluntary and self-selecting, certain individuals and organisations - particularly those working within or directly affected by the modern slavery sector - were more likely to contribute. The findings therefore are not representative of all stakeholders or the wider population. Response types also varied: some reflected individual experiences and opinions, while others were submitted on behalf of organisations, bringing together perspectives from multiple professionals or members.

Analysis of the responses to the Call for Evidence used an iterative coding framework, continuously refined as new themes emerged. Quality assurance checks were conducted throughout to verify accuracy and consistency of coding.

Analysis of workshop discussions identified both cross-cutting themes appearing across multiple sessions and unique insights specific to particular sectors or contexts.

Throughout this report, “respondents” refers to those who submitted survey or written responses to the Call for Evidence and “participants” to those who attended workshops. Note that “respondents” should not be confused with “First Responders” or “First Responder Organisations” - the latter being designated practitioners or organisations authorised to refer potential victims into the NRM.

While the analysis included quantitative coding, this summary uses descriptors to indicate scale - such as “a few”, “some”, “many” or “a majority” - rather than specific numbers, to provide a sense of the weight of different views while focusing on the substance of what was shared.

Findings

Findings from the Call for Evidence and workshop discussions are integrated here, organised around the three core themes of: victim definitions, initial identification, and formal identification.

The findings draw on contributions from the 119 responses to the Call for Evidence and approximately 70 workshop participants, representing diverse perspectives from across the modern slavery sector, as well as broader stakeholders and interested parties. Some contributions to the Call for Evidence reflected individual experiences and viewpoints, while others represented organisational positions drawing on multiple professional perspectives. These views represent stakeholder perceptions of the system, which may not always align with how the system does function or is intended to operate.

Views on victim definitions

Definitions and terminology

Respondents to the Call for Evidence and workshop participants reported that the term “modern slavery” functions primarily as a useful umbrella term for policy documents or public awareness but is rarely used in frontline practice. Instead, practitioners tend to prefer terms specific to exploitation type (e.g. human trafficking, sexual exploitation, criminal exploitation). When engaging with potential victims, survivor-centric language was preferred - plain descriptions of indicators that resonate with individuals’ own experiences, which help to build trust and enable self-identification.

Some respondents identified what they saw as a “language divide” in practice, where “modern slavery” is often reserved for non-UK nationals, while “exploitation” is used for UK nationals. Some believed this can create inconsistencies in frontline responses and the support which potential victims are provided. For example, participants in the child definition workshop described how UK children facing child sexual exploitation (CSE) or child criminal exploitation (CCE) are typically discussed in specialist “exploitation” panels rather than being recognised as modern slavery victims. They reported that, as a result, some children who appear to meet the threshold for modern slavery are not referred into the NRM and therefore miss out on formal victim status and associated protections.

Workshop participants reported that misunderstandings about definitions among practitioners can hinder victim identification. They described confusion between trafficking and smuggling, alongside a widespread assumption that trafficking requires physical movement from one location to another. Participants in the legal definitions workshop explained that UK law defines trafficking primarily as “arranging or facilitating travel” for exploitation, although they acknowledged that the definition of slavery, servitude and forced or compulsory labour does not have the same requirement for travel. In contrast, they noted that international frameworks like the Palermo Protocol and the Council of

European Convention on Action against Trafficking in Human Beings (ECAT)^{9,10} define trafficking more broadly through multiple actions - including recruitment, harbouring or receipt of a person - where movement is only one possible act, not a requirement. Some participants said this emphasis on "travel" in UK law, combined with practitioners' assumptions that physical movement must occur, leads to a strong focus on cross-border movement or clear, documentable journeys. Participants reported that this results in under-representation of local exploitation (where a person may be recruited and controlled but not moved), familial or community-based exploitation, as well as online or technology-facilitated exploitation where no travel occurs. As a result, potential victims in these scenarios may not be recognised as trafficked or referred into the NRM by practitioners.

Respondents also raised concerns about how consent is treated in UK law. They suggested that in the 2022 Regulations, consent is explicitly treated as irrelevant only in relation to travel in the definition of trafficking, not to the exploitation itself or the "means" used. This was seen as differing from international law, where any apparent consent is irrelevant where "means" (such as coercion or deception) are present, and is always irrelevant in child cases. Respondents saw this misalignment as a source of confusion for practitioners.

Reforms to definitions and guidance

To address these misunderstandings, respondents and workshop participants called for several changes. Many wanted definitions that align more closely with international standards like the Palermo Protocol and ECAT, with less emphasis on "travel" to avoid the exclusion of local or online exploitation.

Several respondents requested the explicit inclusion of criminal exploitation in definitions, as well as wording that captures emerging forms of exploitation (such as online and technology-facilitated exploitation).

Respondents raised specific concerns about how the 2022 Regulations address child victims. Participants in the legal definition workshop highlighted that the 2022 Regulations' reference to "any method" as being sufficient for child trafficking cases is ambiguous – it could imply that practitioners still need to identify some form of "means" (such as coercion or deception), when international law states no means requirement exists for children. Additionally, they noted that while the 2022 Regulations explicitly state that consent to travel is irrelevant for adults and children in trafficking, they do not make equally clear that a child's apparent consent to their exploitation is always legally irrelevant. Respondents stressed that UK legislation must state plainly that children cannot consent to their own exploitation and that, in line with international law, the means test should therefore not apply to children. When dealing with potential child victims, participants further suggested using plain terms (abuse, exploitation, coercion, control), and clear and consistent

⁹ <https://www.unodc.org/unodc/human-trafficking/protocol.html#:~:text=Terrorism%20prevention,Source:%20treaties.un.org>

¹⁰ <https://rm.coe.int/168008371d>

professional language (“modern slavery” or “child trafficking”) in referrals and multi-agency work to trigger the right actions.

The need for greater consistency in legal frameworks across the UK was also highlighted by many respondents and workshop participants. Some workshop participants noted the challenges posed by differing legal approaches across devolved nations. For example, while Scotland’s domestic trafficking offence does not require travel, NRM decisions use the UK-wide 2022 Regulations, which do. They argued this mismatch can lead to confused referrals and unequal access to support. Several participants stressed that reforms must both accommodate these distinct legal contexts and work towards more consistent UK-wide standards.

Many respondents wanted these legal concepts translated into plain-English guidance for practitioners with clear thresholds and practical steps to identify potential victims. They felt this would help frontline staff distinguish modern slavery and human trafficking from adjacent harms (such as breaches of labour law or smuggling), while still ensuring protection where exploitation exists.

Modern slavery indicators

When asked directly about the usefulness of current indicators of modern slavery in the Modern Slavery Statutory Guidance¹¹, respondents were broadly positive but highlighted areas needing improvement. While they found the existing list useful, some stressed it should be treated as a framework to support professional judgment, rather than as a rigid checklist. Some suggested adding clearer indicators to help practitioners spot signs of economic coercion and psychological manipulation, as well as behavioural warning signs. They also called for specific indicators covering immigration-linked dependency. For example, the absence of identity documents or a clear dependency on another party for accommodation and visas. Indicators for the unique vulnerabilities of children as well as the growing use of technology to facilitate exploitation would likely be welcomed, as would guidance set out in a practical format, tailored to specific professional settings.

Recognising different forms of exploitation

Detailed feedback on where more support was needed to enable practitioners to recognise when different situations constitute modern slavery rather than other harms was shared. Across all exploitation types, respondents and participants highlighted the difficulty practitioners face in identifying when harmful situations meet the threshold for modern slavery and warrant an NRM referral.

For sexual exploitation, a number of respondents reported that practitioners needed help distinguishing between someone choosing to sell sex and someone being controlled or coerced to do so in adult cases. Several workshop participants highlighted how the same

¹¹ <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>

situation can be treated differently by practitioners based on age - noting that behaviour considered exploitation for a 17-year-old may be viewed as consensual once they turn 18, despite no change in circumstances. They warned that this can result in some adults not being recognised as victims and therefore losing safeguarding or specialist support.

For criminal exploitation, several respondents described the difficulty in recognising when someone committing crimes was actually a victim of modern slavery being forced to offend. A few workshop participants pointed to the issue of "adultification" in practice where certain children, particularly older teenagers and Black boys, are treated as older than they are. They reported that, as a result, these children are often seen as choosing to engage in offending rather than being coerced or controlled, which can prevent them from being recognised as victims.

For labour exploitation, a number of respondents said practitioners sometimes struggled to identify when poor working conditions crossed into forced labour, especially when workers appeared to accept low pay or long hours. Less visible forms of exploitation like domestic servitude in private homes were considered to be particularly hard for practitioners to correctly identify.

Across all types of exploitation, respondents consistently stressed that practitioners need simple, practical tools – rather than complex legal definitions – to make distinctions confidently.

Several participants also emphasised that people will only report exploitation if they feel safe to do so, highlighting that mistrust of authorities and fear of immigration consequences often act as a barrier to disclosure. To address this, participants argued for reporting routes that are clearly separate from immigration enforcement to build the necessary trust for victims to come forward.

Views on initial identification of victims

Current process

Call for Evidence respondents consistently emphasised that early identification of potential victims relies on both robust systems and skilled, compassionate practice. Non-FRO services are often the first to encounter potential victims, meaning strong multi-agency collaboration, clear local referral pathways to designated FROs and reliable information-sharing protocols were seen as critical.

Respondents identified various examples of good practice in identifying potential victims of modern slavery, with perspectives varying by role. For example, non-FROs emphasised the importance of building trust over time with victims and collaborating effectively with designated FROs. FRO respondents focused on the importance of having internal processes such as step-by-step guides and clear referral flowcharts to ensure consistent case handling. Best practice examples included LAs with dedicated modern slavery

coordinators and multi-agency case meetings where the professional with the strongest relationship leads victim engagement.

Workshop participants highlighted successful examples, including His Majesty's Prison and Probation Service's (HMPPS) collaboration with NGOs (resulting in every prison having a trained modern slavery single point of contact and a standard modern slavery referral form that prison officers use when they identify a potential victim), and Victim Navigators embedded in law enforcement agencies who attend exploitation sites to explain the NRM process to potential victims.

Building staff capability through training

Call for Evidence respondents and workshop participants identified strong staff capability as critical to effective victim identification. Participants across workshops suggested there were significant gaps in training provision. Those from statutory FROs widely viewed current e-learning as a "tick-box exercise", with limited impacts on competency.

Respondents and workshop participants from both FROs and non-FROs reported that effective training should be scenario-based, role-specific, and use case studies to help practitioners apply theory to practice. Alongside this, some respondents called for training to be mandatory, regularly updated, and co-designed with people with lived experience. Those from FROs often emphasised the value of internal organisational support, such as dedicated modern slavery coordinators and internal guidance booklets. In contrast, respondents from non-FROs placed a stronger emphasis on multi-agency training to reinforce partnership working, delivered in flexible formats like webinars.

Several workshop participants described tiered training models. Those from FROs explained that some areas have implemented three levels of training: basic awareness for all staff on how to spot potential indicators and who to contact internally if they have concerns; enhanced content for those in frontline roles more likely to encounter potential victims; and advanced training for nominated FRs on trauma-informed interviewing and making NRM referrals. Priority topics included: distinguishing trafficking from smuggling; recognising online exploitation without offline movement; understanding consent and coercion; and jurisdiction-specific content. Participants acknowledged, however, that high staff turnover, particularly in police and LAs, limits institutional knowledge and erodes previous training investments.

First contact with victims

For a victim's first contact with services, respondents stressed that the approach must be trauma-informed and culturally competent. Many saw the skill of the FR as crucial - emphasising they should be empathetic, non-judgemental, and allow the interaction to be victim-led. They also stressed the importance of the environment, describing the need for private, non-clinical settings away from locations associated with police or immigration enforcement. Some respondents suggested using plain-clothes officers when a police presence was necessary.

To build trust with potential victims, respondents stressed the importance of empowering individuals with clear information about their rights and options and ensuring they can communicate effectively through qualified interpreters. They added that offering the continuity of a single, trusted point of contact was essential to prevent individuals from having to re-share their story.

For children specifically, workshop participants emphasised "safeguarding first". This means child protection procedures should be the initial focus with NRM referrals considered once safeguarding plans are established, rather than treating the NRM as the primary response.

Delivery challenges and proposed improvements

Many Call for Evidence respondents and workshop participants suggested that victim identification practices varied significantly across regions and sectors. They described multi-agency approaches to identification and NRM referrals as ideal but reported that inconsistent implementation practices limit their effectiveness. Many respondents highlighted poor communication between agencies, often exacerbated by significant resource pressures.

Non-statutory FRO workshop participants described a "postcode lottery" in terms of the coverage of NGO support for NRM referrals across the UK, meaning some areas have multiple services while others have none.

Respondents also identified trust barriers as particularly challenging, describing cases where victims who had built trust with non-FRO support services withdrew from the NRM process when required to engage with statutory FROs who they did not know.

Statutory FRO participants reported that some statutory bodies lack clear internal processes, resulting in cases being passed between teams with no one practitioner taking responsibility. They added that this can lead to such cases being referred to non-statutory FROs to complete NRM submissions, rather than statutory FROs fulfilling their legal responsibilities.

Proposed solutions to these challenges included:

- Tackling inconsistent practices through standardising referral pathways into FROs and strengthening local data-sharing partnerships.
- Addressing capability gaps via investment in specialist posts and interpreter access, alongside mandated training that embeds survivor-informed practice.
- Designating the NHS and probation service as FROs.
- Developing specialist capacity in statutory FROs to reduce reliance on non-statutory FROs.

Views on formal identification of victims

NRM decision-making models

The Call for Evidence explored three models for NRM decision-making, seeking views on the benefit and drawbacks of each, as well as which might best serve different cohorts:

- 1) The current centralised approach where Competent Authorities (CAs; encompassing the Single Competent Authority (SCA), and the Immigration Enforcement Competent Authority (IECA)), make decisions nationally;
- 2) Devolved decision-making, where LAs lead;
- 3) Multi-agency panels, bringing together statutory agencies, NGOs, and (potentially) survivors.

It is worth noting that models do not exist in isolation, and suggestions encompassed combined versions of the models. While the UK currently centralises decision-making for adults, a devolved pilot for children, which combines aspects of the devolved model and the multi-agency model, has been piloted and has recently been rolled out to a larger number of LAs as well as the entirety of Northern Ireland.¹²

Overall, many Call for Evidence respondents wanted formal identification to be consistent, fair, and trauma-informed. They called for clearly defined roles for all key stakeholders (including CAs, FROs, LAs, police, support providers and legal representatives). Respondents also sought clear standards for how NRM decisions are made (including evidence requirements, timescales, safeguarding expectations and the application of legal thresholds) to ensure predictable and transparent outcomes across all areas and case types.

A core tension in NRM decision making models was highlighted repeatedly: respondents and participants saw a need for formal identification to be consistent, expert-led, and legally robust, but also locally informed, trauma-aware, and trusted by victims.

Respondents acknowledged strengths of the current centralised model, such as the potential for standardisation, specialist expertise, and national data collection. However, many suggested that it felt detached from victims' lived experiences and that its perceived links to immigration control can erode trust in practitioners and processes associated with

¹² The child devolved-decision making pilot is a UK government initiative that transfers responsibility for making modern slavery decisions for child victims from the Home Office to local safeguarding teams. This pilot aims to provide more timely and locally tailored support by involving multi-agency groups, including local authorities, health services, and police, in the decision-making process. Ten sites were selected for the first phase of the pilot which launched in June 2021, with an additional ten sites selected to join the second phase of the pilot between February and April 2023. The third phase was launched in April 2025, expanding the pilot by eight additional sites. Guidance set out by the Home Office for devolved-decision making sites can be found [here](#).

the NRM. Some respondents perceived inconsistent practice between the SCA and IECA, suggesting that different negative decision rates are a reflection of this inconsistency.

In contrast, respondents viewed devolved and multi-agency NRM models as closer to victims and local contexts. They reported this could lead to faster NRM decisions and better victim safeguarding.

Workshop participants with experience of the devolved decision-making pilots for children were generally positive about the pilots, reporting faster decisions, improved outcomes due to local contextual understanding, and stronger multi-agency ownership of decisions. Participants in the Northern Ireland workshop discussed plans for a regional child panel from January 2026, while participants in the Scotland workshop generally supported devolved, multi-agency approaches for children and suggested exploring adult pilots, potentially drawing on Scotland's Adult Support and Protection framework. Participants in the Wales workshop expressed openness to exploring multi-agency models for adults, potentially integrating NRM decision-making into Multi-Agency Risk Assessment Conferences (MARACs).¹³ Law enforcement participants, however, generally preferred retaining independent CAs over devolved decision making, though they agreed better information-sharing was essential.

When asked which organisations should be involved in multi-agency panels, Call for Evidence respondents consistently prioritised LAs and HSCTs, followed by police and support providers, with NHS and mental health services seen as important contributors. There was broad agreement across respondents and participants that police should not lead decision-making processes due to limited resources, except in cases of local exploitation requiring an immediate law enforcement response.

The perceived benefits of a devolved and multi-agency approach were weighed against implementation risks by respondents, including creating a "postcode lottery" driven by inconsistent local expertise, resourcing constraints and coordination challenges. Many favoured a hybrid approach: maintaining national standards and central oversight while enabling local multi-agency panels to make decisions where the necessary capability and governance structures are in place. Respondents and participants stressed that any devolved arrangements would require national quality assurance to prevent inconsistent outcomes across areas.

Evidence gathering and information sharing

Across all models, improved evidence gathering processes were seen as key. Respondents desired straightforward, case-specific information requests from CAs, rather than vague or generic forms. They emphasised that victims need early access to legal advice and qualified interpreters, with many suggesting a named contact or Victim

¹³ A MARAC is a locally held meeting where statutory and voluntary agency representatives (e.g. police, probation, health and housing) share information about people at high risk of abuse. Any agency can refer an adult or child they believe to be at high risk of harm. The aim of the meeting is to produce a co-ordinated action plan to increase an adult or child's safety, health and well-being.

Navigator role to coordinate, support, and reduce the need for repeated retelling when moving through different processes – including police investigations, NRM referrals, and compensation claims – which respondents said can be re-traumatising.

The two-stage Reasonable Grounds (RG) and Conclusive Grounds (CG) decision-making process

The two-stage decision-making process was generally supported in principle. Respondents noted that a quick RG decision enables early support while the period before the CG decision allows for victims to begin the process of recovery and for evidence to be gathered.

However, respondents and workshop participants described various implementation problems with the two-stage decision making model. For example, lengthy waits between decisions can delay NRM case progression and leave potential victims in prolonged limbo, undermining stability and recovery. Too short a time between stages can, though, also be problematic. Workshop participants operating in Wales described CG decisions arriving so rapidly after RG that the recovery and reflection period was cut short, with people forced to leave safe accommodation before they are ready. This reportedly increases the risk of re-exploitation. Participants across workshops argued that the duration of support provided to victims should be based on their recovery needs rather than decision timescales, with minimum support periods protected regardless of decision speed.

A recurring concern was the perceived “cliff-edge” of support after positive CG decisions. When support ends abruptly, individuals can be left struggling to access housing or employment and at a heightened vulnerability to re-exploitation.

Respondents also described examples of poor communication from CAs, including vague information requests, decision letters that were difficult to interpret, and FROs not being informed of decisions.

Views on the RG threshold itself were notably divided. Some respondents felt it was set too high, while others questioned whether RG had become a “rubber stamp” rather than a meaningful assessment. Workshop participants acknowledged that the guidance sets out appropriate safeguarding-style thresholds: “reasonable grounds to believe” at RG and “balance of probabilities” at CG. However, they reported that in practice decision-making can appear to require criminal-level evidence or extensive corroboration. Participants emphasised this gap between guidance and practice risks excluding victims from support, particularly in complex cases where evidence is limited or slow to obtain.

Law enforcement workshop participants particularly questioned the value of the two-stage process for children, arguing it adds bureaucracy without clear benefit since children's safeguarding operates regardless of NRM decisions. Several suggested a simpler, single-stage decision process for UK children who already have domestic safeguarding protections, while maintaining the current process for non-UK children where CG decisions support asylum claims and longer-term protection.

Annex: Methodology

Questionnaire

The Call for Evidence questionnaire comprised four sections: an introductory section capturing respondent context and demographics, followed by three thematic sections aligned with the Call for Evidence’s core themes (victim definitions, initial identification, and formal identification within the NRM). The full questionnaire can be found in the original Call for Evidence publication.¹⁴

In total, the survey comprised 37 questions, including all routed items. Of these, 23 were open-ended, allowing participants to provide detailed qualitative insights (with response word limits ranging from approximately 30 to 500 words), while 14 were closed-ended, using formats such as: multiple choice; Likert scales (a rating scale measuring the extent of respondent’s attitude towards a statement e.g. “strongly agree” to “strongly disagree”); and yes or no responses. A total of 22 questions were asked to all respondents, with the remaining 15 routed to specific respondent groups based on their role, experience or previous answers. This enabled targeted data collection from relevant stakeholders such as FRs, victims, or support organisations.

The table below details the distribution of question types (closed- and open-ended) across each section:

Section	Question type	Total
Initial questions	Closed-ended questions	3
	Open-ended questions	1
Victim definitions	Closed-ended questions	5
	Open-ended questions	8
Initial identification	Closed-ended questions	2
	Open-ended questions	4
Formal identification	Closed-ended questions	4
	Open-ended questions	10

¹⁴ The questionnaire can be found here: [Identification of Victims of Modern Slavery - Call for Evidence](#) (pp. 19-30).

Participation channels

The Call for Evidence was open for responses between 16 July and 8 October 2025. During this period, individuals and organisations were able to participate through multiple channels:

- **Online submission** via the Home Office website (SmartSurvey)
- **Email submissions** sent directly to the Call for Evidence inbox
- **Written submissions by post**

Workshops

To complement the submissions, the Home Office conducted a series of workshops to gather deeper qualitative insights. Ten workshops were delivered between 28 August and 14 October 2025, each lasting between 1.5 and 2 hours. These sessions brought together diverse stakeholders including statutory partners, NGOs, sector specialists, and operational representatives.

A summary of each workshop and its stakeholder audience is provided in the table below.

Workshop focus	Attendees	Number of attendees
Statutory FR Workshop	LA representatives, Immigration Enforcement, Border Force, UK Visas and Immigration (UKVI) and law enforcement partners	14
Non-Statutory FR Workshop	Non-statutory FROs	6
Adult Sexual Exploitation Definition Workshop*	NGOs, academics, law enforcement partners	14
Child Definition Workshop*	NGOs, LA representatives, police and research organisations	7
Legal Definition Workshop*	Legal academics	6
Scotland Devolved Administration Workshop	Representatives nominated by the Scottish Government including NGOs, police and healthcare	6

Workshop focus	Attendees	Number of attendees
Wales Devolved Administration Workshop	Representatives nominated by the Welsh Government including NGOs, police and healthcare	9
Northern Ireland Devolved Administration Workshop	Representatives nominated by the Northern Irish Department of Justice including police, NGOs and healthcare	6
Local Authorities Workshop*	Range of LAs with varying service provision (including LAs with and without a devolved decision pilot and with and without an ICTG service), Local Government Association	9
Law Enforcement Workshop*	Modern Slavery and Organised Immigration Crime Unit, National County Lines Coordination Centre, National Crime Agency, Crown Prosecution Service, Gangmasters and Labour Abuse Authority, Immigration Enforcement, Border Force, Other Government Departments, representatives from devolved administrations	11

* For these workshops, representatives from each of the devolved administrations were proposed by the local governments and invited to attend by the Home Office.

Number of responses to the Call for Evidence

A total of 119 responses were received through the online questionnaire and email submission routes. The table below provides a breakdown, disaggregated by respondent type (individuals versus stakeholders and organisations) for each response mode.

Response method	Responses from individuals	Responses from stakeholders/organisations	Total
Online response forms	11	70	81
Email	0	38	38

Response method	Responses from individuals	Responses from stakeholders/organisations	Total
Post	0	0	0
TOTAL	11	108	119

Among these responses, 11 participants responded as an individual member of the public and five as a person with lived experience of modern slavery.

108 responses were received from a broad range of organisations and stakeholder groups, reflecting diverse professional and institutional perspectives. These included:

- 40 represented UK-based NGOs or civil society organisations
- 17 responded on behalf of LAs or Health and Social Care Trusts
- 13 respondents participated as academics or on behalf of academic institutions
- 8 represented law enforcement bodies

Of these, 32 respondents identified themselves as FROs or representing FROs.

A small number of responses (below 5) were received from other stakeholder types, including legal practitioners, international organisations, and parliamentarians and elected representatives.

The majority of respondents were based in England (88), with additional responses from Northern Ireland (6), Scotland (6), Wales (2) and overseas (1).

Receipt and handing of responses

The Home Office received responses through the three participation channels outlined above. Upon receipt, the Home Office undertook initial processing which included redacting personally identifiable information and assigning unique serial numbers to maintain a clear audit trail throughout the analysis process. The anonymised and catalogued responses were then transferred to Ipsos UK via secure, encrypted file-transfer portals, ensuring compliance with the Data Protection Act (2018) and UK GDPR requirements.

All responses, regardless of format or submission route, underwent identical handling procedures, including tracking, logging, and verification checks, to ensure dataset completeness and integrity.

Ethics and safeguarding

Given the sensitive nature of modern slavery and potential for distressing content, Ipsos UK's Ethics Board assessed the project before analysis commenced. Additional safeguards were implemented to protect researcher and coding staff wellbeing, including clear escalation routes for concerning content; regular rotation of coding tasks to prevent prolonged exposure to distressing material; and access to support resources and debriefing opportunities.

Analysis and coding of responses

Responses to the Call for Evidence were analysed using a two-stage approach: a structured coding framework to categorise submissions and concurrent qualitative thematic analysis to identify emerging patterns. The coding framework, developed from an initial review and refined iteratively, was applied by a specialist team using a secure system (Ascribe), with regular quality checks and Home Office review to ensure consistency and appropriate interpretation. Email submissions were mapped to relevant questions for comparability, and broader reflections included in the qualitative analysis, although material not linked to specific questions is not presented in the main body of this report.

Workshop analysis used full transcripts provided by the Home Office. The dual approach involved: first examining each workshop for unique sector-specific insights, then identifying cross-cutting themes across all sessions. This captured both widespread patterns and distinct contributions.

Interpretation of findings

Participation in the Call for Evidence was voluntary, and respondents constitute a self-selecting group rather than a representative sample of all stakeholders. As such, the findings reflect the views of those who chose to respond, with all results presented as numbers rather than percentages. Submissions ranged from individual perspectives to organisational responses synthesising input from multiple contributors, which cannot be directly compared or weighted. The purpose of the Call for Evidence was not to assess the prevalence or popularity of particular views, but to gather relevant insights and experiences to inform future policy development. Accordingly, the findings should be regarded as a catalogue of perspectives rather than a representative survey of stakeholder opinion.

