



Policy Title	Modern Slavery
Last Reviewed	December 2022
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Responsible Officer	Olaide Obajimi

***This Policy sets out guidance on how to identify and respond to a young person where there are concerns that they may be a victim or a potential victim of Modern Slavery. This Policy should be read in conjunction with Policy No: 3706 (Young person Trafficking):***

**A: SCOPE & DEFINITION:**

1. Modern slavery is a form of organized crime in which individuals including young people and young people are treated as commodities and exploited for criminal gain. Traffickers and slave drivers' trick, force and / or persuade young people and parents to let them leave their homes. Grooming methods are used to gain the trust of a young person and their parents, e.g. the promise of a better life or education, which in reality results in a life of abuse, servitude and inhumane treatment.
2. The *Modern Slavery Act 2015* provides for two civil prevention orders - the *Slavery and Trafficking Prevention Order (STPO)*, and the *Slavery and Trafficking Risk Order (STRO)*.

**B: POLICY IMPLEMENTATION - BACKGROUND INFORMATION:**

1. Young Person trafficking or young person modern slavery is identified as young person abuse which requires a young person protection response. It is an abuse of human rights, and all young people, irrespective of their immigration status, are entitled to protection under the law.
2. Young people are not considered able to give "informed consent" to their own exploitation (including criminal exploitation), so it is not necessary to consider the means used for the exploitation - whether they were forced, coerced or deceived, i.e. a young person's consent to being trafficked is irrelevant and it is not necessary to prove coercion or any other inducement.
3. Boys and girls of all ages are affected and can be trafficked into, within ('internal trafficking'), and out of the UK for many reasons. In all forms of exploitation - e.g. sex trafficking - young people can be groomed and sexually abused before being taken to other towns and cities where the sexual exploitation continues. Victims are forced into sexual acts for money, food or accommodation. Other forms of slavery involve young people who are forced to work, criminally exploited and forced into domestic servitude. Victims have been found in brothels or saunas, farms, in factories, nail bars, car washes, hotels and restaurants and commonly are exploited in cannabis cultivation. Criminal exploitation can involve young people as drug carriers, and in

begging, pick-pocketing, debt bondage (forced to work to pay off debts that realistically they will never be able to), organ harvesting, and benefit fraud.

4. Victims often face more than one type of abuse and slavery, for example they may be sold to another trafficker and then forced into another form of exploitation.
5. Young people and young people may be exploited by parents, carers or family members. Often the young person or young person will not realize that family members are involved in the exploitation.
6. Some young people may not be victims of human trafficking but are still victims of modern slavery. Slavery, servitude and forced or compulsory labor may also be present in trafficking cases; however, not every young person who is exploited through forced labor has been trafficked. In **all** cases, protection and support is available through the National Referral Mechanism (NRM) process. The NRM is a **victim identification and support process** for all the different agencies that may be involved (e.g. the *police, Home Office*, including *Border Force, UK Visas and Immigration, Local Authorities* and voluntary organizations).

## **C: RISK INDICATORS:**

### **1. *Specific Indicators:***

Signs that a young person has been trafficked for domestic slavery may not be obvious. Identifying the potential signs of young person slavery / trafficking in referrals can include the following specific indicators:

- 1.1 Discrepancies in the information victims have provided due to traffickers forcing them to provide incorrect stories;
- 1.2 Brought or moved from another country;
- 1.3 Reluctance to disclose details of their experience due to being in a state of total dependency;
- 1.4 An unrelated or a new young person discovered at an address;
- 1.5 Significantly older partner / Underage Marriage;
- 1.6 Unsatisfactory living conditions - living in dirty, cramped or overcrowded accommodation;
- 1.7 Missing - from care, home or school - including a pattern of registration and de-registration from different schools;
- 1.8 Young people found in brothels and saunas;

- 1.9 Young people spending a lot of time doing household chores, including cleaning and caring for other young people;
- 1.10 Young people found working in catering, nail bars;
- 1.11 Rarely leaving their home, with no freedom of movement and no time for playing;
- 1.12 Orphaned or living apart from their family, often in unregulated private foster care;
- 1.13 Limited English or knowledge of their local area in which they live;
- 1.14 False documentation, no passport or valid identification documents;
- 1.15 Few or no personal effects - few personal possessions and tend to wear the same clothing;
- 1.16 No evidence of parental permission for the young person to travel to the UK or stay with the adult;
- 1.17 Little or no evidence of any pre-existing relationship with the adult or even an absence of any knowledge of the accompanying adult;
- 1.18 The young person seeming to be a willing participant in their exploitation, e.g. involvement in lucrative criminal activity without benefitting from the proceeds;
- 1.19 Sexually transmitted infections, injuries of a sexual nature, or gynecological problems;

## **2. *Physical Appearance:***

- 2.1 Signs of physical or psychological abuse, including looking malnourished, unkempt, or withdrawn.
- 2.2 Physical illnesses - including work-related injuries through poor health and safety measures, or injuries as result of assault or controlling measures.
- 2.3 Physical indications of working; e.g. overly tired in school or indications of excessive manual labor.

## **3. *Psychological indicators:***

- 3.1 Suffering from post-traumatic stress disorder which may include symptoms of hostility, aggression, difficulty with recalling episodes, and concentrating.
- 3.2 Depression / self-harming and / or suicidal feelings;
- 3.3 An attitude of self-blame, shame and extensive loss of control;
- 3.4 Use and / or abuse of drugs and or / alcohol.

## **D: YOUNG PERSONS SAFEGUARDING MEASURES:**

1. Modern slavery is young person abuse, and there is the potential for the young person to suffer significant harm. Any potential victim of young person trafficking or slavery, servitude, or forced or compulsory labor, must be referred to the local Young people's Services, and any emergency medical treatment must be arranged as appropriate.
2. Once a potential victim of slavery has been identified, they should be informed of their right to protection, support, and assistance in any subsequent criminal proceedings taken against offenders. They should then be referred for processing and safeguarding through the National Referral Mechanism, ref clause 3 below.
3. **Referring a Potential Victim of Modern Slavery to the National Referral Mechanism (NRM):**

**The NRM is a victim identification and support process.**

- 3.1 Referrals to the NRM for consideration by the competent authority should be made by the local authority for all potential young person victims of modern slavery, as they may be entitled to further support - victims can be of any nationality, and may include British national young people, such as those trafficked for young person sexual exploitation or those trafficked as drug carriers internally in the UK.
- 3.2 The **Duty to Notify** - Local Authorities have a duty to notify the Home Office about any potential victims of Modern Slavery. For young people, completing the NRM form is sufficient to satisfy this requirement. There is no minimum requirement for justifying a referral into the NRM and consent is not required for young people.
- 3.3 It is important to communicate honestly with the young person about concerns and reasons for referring them into the NRM. If it is considered that the young person or anyone connected to them is in immediate danger the police should be contacted, and safe accommodation arranged for them.
- 3.4 Where there is reason to believe a victim could be a young person, the individual must be given the benefit of the doubt and treated as a young person until an assessment is carried out. An age assessment should only be carried out if appropriate to do so, and should not cause a delay in referring into the NRM.
- 3.5 There must be a victim-centered approach to identifying and eradicating all types of trafficking and modern slavery. This must include consideration of the following:
  - Dealing with the young person sensitively to avoid them being alarmed or shamed;
  - Building trust, as victims commonly feel fear towards the authorities;
  - Being aware of any additional vulnerabilities that the young person may have;
  - Possible gradual grooming process of the young person by a perpetrator.

- 3.6 It is important that staff make careful notes about what is disclosed, as a young person's credibility can be challenged if the young person is subject to immigration control on the basis of their disclosure being made in instalments. This will support the young person and help others understand the process of disclosure.
- 3.7 When questioning a potential victim, initially observe non-verbal communication and body language between the victim and their perpetrator.
- 3.8 It is important to consider the potential victim's safety and that of their loved ones. Confidentiality and careful handling of personal information is imperative to ensure the young person's safety. Any details that may compromise their safety must not be disclosed to anyone not directly involved in the case.