

Modern Slavery and Human Trafficking

Guidance for homelessness
services

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Introduction

Modern slavery is the fastest growing crime in the world¹. 49 million people were living in modern slavery in 2021, of which 27.6 million were in forced labour.² Modern slavery encompasses human trafficking (including sexual exploitation forced criminality, organ harvesting, domestic servitude), slavery, servitude and forced or compulsory labour.³ Every country is affected by trafficking, either as a country where people are trafficked *from*, a country where people are trafficked *through*, or a country that people are trafficked *to*. The UK is all three of these, and there are clear links between trafficking, modern slavery, and homelessness.

These links are twofold: destitution and rough sleeping have been identified as one of the key factors increasing the risk of individuals being trafficked – evidence suggests that the majority of British nationals who have become victims of trafficking have been sleeping rough and/or had mental health needs or learning disabilities immediately prior to being trafficked.⁴ Conversely, accommodation is the number one support need of victims of trafficking once they have escaped their situations and been identified to authorities⁵.

Traffickers are increasingly seeing services that attract and support vulnerable individuals as prime locations to target people for exploitation. It is vital that homelessness services work together with partner agencies to ensure that vulnerable people are not put at increased risk while accessing their services.

Purpose of this guidance

This guidance has been written for staff and volunteers working in frontline homelessness services including:

- Local Authorities
- Hostels
- Outreach teams
- Assessment centres
- Soup runs
- Hospital Discharge Teams
- Night shelters
- Day centres

These agencies have an important role to play in the prevention of trafficking and modern slavery and in the protection and support of victims. Increasing awareness and

¹ <https://www.uk.issworld.com/en-gb/insights/insights/blog/why-modern-slavery-is-everyones-business>

² <https://www.ilo.org/global/topics/forced-labour/lang--en/index.htm>

³ <https://passage.org.uk/modern-slavery/>

⁴ Support Needs of Male Victims of Human Trafficking: Research Findings, Salvation Army 2013, p12 Available at: https://issuu.com/salvationarmyuk/docs/support_needs_of_male_trafficking_v

⁵ Support Needs of Male Victims of Human Trafficking: Research Findings, Salvation Army 2013, p13

education about modern slavery amongst frontline staff is a key area for the prevention of trafficking in the UK⁶. Frontline homelessness staff may be the only people to notice when an individual sleeping rough suddenly disappears or when someone is behaving suspiciously around groups of vulnerable people. It is the responsibility of all front-line agencies to do all they can to protect those at risk.

While children feature significantly in the overall picture of trafficking in the UK, this guidance focuses specifically on the trafficking of adults.

Background information

Definitions

What is trafficking?

Human trafficking is “the recruitment, transportation, transfer, harbouring or receipt of persons...for the purpose of exploitation”.⁷ Traffickers may use deception, coercion, threats, the abuse of power or the abuse of someone’s vulnerability to exert control over their victims.

- **Sexual exploitation** involving any non-consensual or abusive sexual acts performed without the victim’s permission. This can include prostitution, escort work and pornography, and victims can be men, women, and children.
- **Domestic servitude** involving the victim being forced to work in private households as nannies, housekeepers, carers, or maids, with restricted movement, no or very low wages and no or minimal privacy and comfort.
- **Criminal exploitation** involving a victim being forced to partake in criminal activity such as begging, shoplifting, theft, cannabis cultivation, benefit fraud, county lines and cuckooing.
- **Organ harvesting** involving people being trafficked for the use of their internal organs for transplant.
- **Forced labour** involving victims being compelled to work against their will, often in conditions akin to slavery. Victims will work very long hours with very little pay, often in dangerous or unpleasant conditions. People can be forced to work in any industry, however common industries that victims are trafficked into in the UK include: agriculture, factories, tarmacking/paving, construction, food processing, restaurants/hospitality, nail bars and beauty salons, and car washes.

⁶ The Anti-Trafficking Monitoring Group – All Change: preventing trafficking in the UK April 2012
www.antislavery.org/includes/documents/cm_docs/2012/a/atmg_executive_summary.pdf

⁷ <https://www.lexisnexis.co.uk/legal/guidance/human-trafficking-offences#:~:text='The%20recruitment%2C%20transportation%2C%20transfer,achieve%20the%20consent%20of%20a>

Six possible indicators of forced labour⁸

1. Threats or physical harm to self or family members
2. Restriction of movement
3. Debt-bondage (being forced to work to pay off a debt)
4. Withholding of wages or excessive wage reductions
5. Retention of passports and identity documents
6. Threat of reporting the worker to authorities if the worker is in the country illegally.

Forced labour is often controlled by illegal gangmasters (people who organise and use groups of workers to do temporary manual work) who will pay traffickers money to provide workers to be exploited. Gangmasters in certain industries are regulated by the [Gangmasters Licensing Authority](#) which plays a key role in preventing exploitation and tackling criminal activity: The [Modern Slavery Statutory guidance](#) also has an extensive list of indicators for modern slavery.

Points to remember:

- Trafficking can take place across country borders and within countries. People can be trafficked into the UK from other countries, between places within the UK and out of the UK for exploitation in other countries.
- Even if someone has given their consent to be moved, they can still be victims of trafficking if their consent was gained through force, coercion, or deception.
- Some individuals will not recognise themselves as victims of trafficking and may have been conditioned by their traffickers to believe they are willing participants.
- Often victims will suffer multiple forms of exploitation e.g. domestic servitude and sexual exploitation or forced labour and criminal exploitation.
- Trafficked people can be any nationality, age, or gender. Most victims of trafficking are from the UK, according to the [NRM Statistics](#).
- People smuggling is not the same as human trafficking. Human smuggling occurs when an individual seeks the help of a facilitator to enter a country illegally, and the relationship between both parties ends once the transaction ends.⁹

⁸International Labour Organisation www.ilo.org/global/lang-en/index.htm

⁹ www.humantraffickingfoundation.org/theissue/

Policy context and statutory responses

The Palermo Protocol

The UK is a signatory to the United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the UN Convention against Transnational Organised Crime. This is also known as the Palermo Protocol, which the UK Government signed in 2000 and brought into force in 2006¹⁰.

The Care Act

The Care Act 2014 provides a consistent route to establishing entitlement to public care and support for adults in England and Wales who have specific needs. The Act sets out a specific legal duty for Local Authorities to meet adult's 'eligible needs'. It is one of the first pieces of legislation in adult health and social care that specifically addresses exploitation as a 'form of abuse and neglect'.¹¹

Homelessness Reduction Act and Guidance, Chapter 25

This chapter of the HRA provides guidance on modern slavery in relation to applicants who are threatened with homelessness or homeless.¹²

The Council of Europe Convention on Action Against Trafficking of Human Beings (ECAT) & The European Convention on Human Rights (ECHR)

The ECAT is a comprehensive treaty mainly focussed on the protection of victims of trafficking and the safeguard of their rights. It also aims at preventing trafficking as well as prosecuting traffickers.¹³ The ECHR protects the human rights of people in countries that belong to the Council of Europe.¹⁴ These two international legal instruments are key to challenging Home Office poor decisions.

Modern Slavery Act 2015

The Modern Slavery Act became law in March 2015 and consolidated into one piece of legislation the offences relating to human trafficking and slavery. The Act extends to

¹⁰ <https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/modern-slavery-and-human-trafficking>

¹¹ 'Life Beyond the Safe House: for survivors of Modern Slavery in London', Human Trafficking Foundation, 2015. Available at: www.antislaverycommissioner.co.uk/media/1259/day-46.pdf

¹² <https://www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities/chapter-25-modern-slavery-and-trafficking>

¹³ <https://www.coe.int/en/web/impact-convention-human-rights/council-of-europe-convention-on-action-against-trafficking-in-human-beings#/>

¹⁴ [https://www.equalityhumanrights.com/en/what-european-convention-human-rights#:~:text=The%20European%20Convention%20on%20Human%20Rights%20\(ECHR\)%20protects%20the%20human,Human%20Rights%20and%20Fundamental%20 Freedoms](https://www.equalityhumanrights.com/en/what-european-convention-human-rights#:~:text=The%20European%20Convention%20on%20Human%20Rights%20(ECHR)%20protects%20the%20human,Human%20Rights%20and%20Fundamental%20 Freedoms)'.

England and Wales, with the devolved Northern Ireland and Scottish Assemblies passing their respective Human Trafficking and Exploitation Acts in 2015.¹⁵

The Modern Slavery Act contains a number of provisions such as:

- The introduction of life sentence penalties for perpetrators indicted on certain charges
- Statutory provision on non-prosecution; defence for slavery or trafficking victims who are compelled to commit an offence by their traffickers
- The establishment of an Anti-Slavery Commissioner to lead on protecting victims and increasing prosecutions
- Introducing a statutory clause on transparency in supply chains requiring businesses over a certain size threshold to regularly report on their actions to prevent modern slavery within their businesses and supply chains.

National Referral Mechanism (NRM)

The National Referral Mechanism (NRM) is a UK framework for identifying victims of human trafficking and ensuring they receive appropriate protection and support. All data on trafficking is published on the [government website](#). The NRM was introduced in 2009 in response to the Council of Europe Convention on Action Against Trafficking of Human Beings (ECAT)¹⁶.

There are several agencies that can make referrals to the NRM if they are concerned about potential victims of trafficking. A list of these agencies (or 'first responders') can be found [here](#).

If you are not one of these agencies, you will generally be expected to refer individuals to the NRM through your local police, however it is important to take into consideration the needs of the potential victim. Many potential victims are reluctant to talk or involve police, in which case reporting via local authority or charity may be more suitable.

Note that referral to the NRM (for adults) is voluntary. All referrals must include written consent of the potential victim.

¹⁵ 'Trafficking Survivor Care Standards', Human Trafficking Foundation, 2018. Available at: www.humantraffickingfoundation.org/news/2018/10/12/launch-of-updated-slavery-and-trafficking-survivor-care-standards

¹⁶ www.conventions.coe.int/Treaty/Commun/QueVoulezVous.asp?NT=197&CM=1&CL=ENG

Specialist Support

The Salvation Army¹⁷ holds the current Modern Slavery Victim Care Contract (MSVCC) and is jointly commissioned by The Home Office and Ministry of Justice to provide specialist support services to victims of trafficking in England and Wales while their cases are being investigated. This is offered in response to obligations set out by Article 12 of the Council of Europe Convention on Action Against Trafficking of Human Beings (ECAT).¹⁸

The Salvation Army have sub-contracted support services to several partner organisations and include the provision of safe houses, legal advice, counselling, transport, health care and education, training, and outreach. These services are offered to all individuals who have consented to being referred into the NRM and have received a positive Reasonable Grounds¹⁹ decision.

Support is provided for a minimum of 45 days and is known as a 'reflection and recovery' period.

[The Passage Modern Slavery Service](#) is the first and only organisation in the homelessness sector to recruit a dedicated Anti-Slavery team, providing support to survivors of modern slavery who are homeless or at risk of homelessness in Westminster. The Passage offers holistic support including primary services, signposting to First Responders, respite accommodation, health and mental health support and care until the survivor receives government support.

Provision of specialist support - The Medaille Trust

Leo was rescued from his traffickers by the Gangmasters Licensing Authority. He was brought to a Medaille Trust safe house where he was welcomed by staff speaking his language and other residents who cooked a meal for him on his first night. He was given new clothes, shoes, underwear, toiletries, towels, bedding and a mobile phone.

As he settled in, Leo was helped to receive medical treatment, obtain a national insurance number, open a bank account and register for benefits. He has also been supported to learn English and develop independent living skills such as cooking, cleaning, personal hygiene and budgeting.

¹⁷ www.salvationarmy.org.uk/supporting-adult-victims-0

¹⁸ www.gov.uk/government/uploads/system/uploads/attachment_data/file/236093/8414.pdf

¹⁹ For details of 'reasonable grounds' see: <https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/modern-slavery-and-human-trafficking>

When he first arrived, Leo was very paranoid and scared that his traffickers would find him. After some time in the safe house, he was able to relax, develop positive relationships with others, and feel more confident. He has now moved into a Medaille Trust outreach house. Here he lives with more independence and is working with local employment agencies to find work.

www.medaille-trust.org.uk

Investigation and Prosecution

Each referral to the NRM is allocated to the Home Office Single Competent Authority (SCA) which includes an Immigration Enforcement Competent Authority (IECA), which does the decisions for all foreign criminal offenders. They will investigate the case and make a decision on whether the individual can be confirmed as a victim of trafficking.

There are several steps involved in making the decision about whether someone has been trafficked. These are outlined in the [Modern Slavery Statutory Guidance](#).

The Competent Authorities have 45 days minimum (the reflection and recovery period) to investigate each referral and make a conclusive decision on whether the victim has been trafficked or not. If a positive Conclusive Grounds decision is made, the survivor enters the Move on Period for at least 45 days to ensure housing, employment and immigration status have been sorted.

Relevant case law

A United Kingdom Supreme Court judgment of 13th May 2015 (*Hotack v London Borough of Southwark 2015*) concluded that in deciding whether a homeless applicant is vulnerable, local councils should compare them to an 'ordinary person' rather than an 'ordinary homeless person', as was previously the case.²⁰ As a result, a survivor of trafficking is less likely to need to find evidence as to why they are more vulnerable than other homeless people. Simply proving that they are a trafficked person with a positive Conclusive Ground decision should evidence that they are more vulnerable than an 'ordinary person', making it easier to obtain priority for housing as a vulnerable homeless person. Knowledge of this court case will be useful to anyone supporting rough sleepers access statutory support via a local authority.

²⁰ www.supremecourt.uk/cases/docs/uksc-2013-0234-press-summary.pdf

Data and current trends

Facts and figures

There are many complex issues surrounding the problems of modern slavery which make it difficult to collect any accurate information on the scale of the problem in the UK today. Data collected from the NRM is published on the [government website](#).

While the NRM is the only mechanism currently in place to collect data, it is important to remember that this data does not present an accurate measure of modern slavery – there are many people who remain hidden and will not feel able to contact authorities about their experiences. Reasons for this are discussed below.

Current trends

While it is extremely difficult to gain an accurate picture of the extent and nature of human trafficking in the UK, NRM data can provide a useful and up-to-date snapshot. The information below shows key statistics from NRM data collected in Quarter 3 (July-September) 2022.²¹

- 4586 potential victims of modern slavery were referred into the National Referral Mechanism in Quarter 3 2022, a 10% increase compared to the preceding quarter.
- 4,652 reasonable grounds and 1,517 conclusive grounds decisions were issued this quarter; of these, 88% of reasonable grounds and 91% of conclusive grounds decisions were positive
- Overall, 46% (2,088) of potential victims claimed exploitation in the UK only and 44% (2,032) claimed exploitation overseas.
- The most common nationality referred was Albanian, which accounted for 28% (1,294) of all potential victims. The number of Albanian nationals, which reached its highest figure since the NRM began, has surpassed UK nationals for the third consecutive quarter. The second most commonly referred nationality was UK (23%; 1,076) and the third was Eritrean (7%; 324).
- Overall, of the 4,586 potential victims referred in this quarter, 79% (3,645) were male and 20% (937) were female.
- 50% (2,303) of referrals were for potential victims who claimed exploitation as adults and 43% (1,984) claimed exploitation as children.

²¹ <https://www.gov.uk/government/statistics/national-referral-mechanism-and-duty-to-notify-statistics-uk-july-to-september-2022>

Steps you can take

Raising awareness

Despite cases of modern slavery becoming increasingly prevalent, awareness of the issues surrounding these crimes is low. Frontline agencies must do all they can to ensure that staff, volunteers, service users and members of the community know about the issues and what to do if they witness or suspect that trafficking is taking place.

Raise awareness amongst service users and potential victims

Make sure your service users are aware of the risks of trafficking as well as their rights around UK employment, benefits and immigration law (see later section). Service users should be warned that if an opportunity sounds 'too good to be true', it probably is. They should also be told never to hand over their passport or identity documents to anyone other than those from official authorities.

- Distribute [leaflets and factsheets](#) about modern slavery in relevant languages
- Discuss modern slavery regularly in support sessions
- Encourage service users to report any approaches or suspicious behaviour
- Run an awareness raising event e.g. a celebration for Anti-Slavery Day 18th October²²

Raise awareness among colleagues, volunteers and partner organisations

Make sure that all staff are aware of what modern slavery is, how to spot the signs and how to support someone who may be at risk. Safeguarding, vigilance and information sharing should be a core part of individual roles. Talk to colleagues and partner organisations about the risks of modern slavery and encourage them to be alert and proactive when reacting to suspicions.

- Encourage all staff and volunteers to read this guidance
- Ensure that modern slavery, trafficking and exploitation feature on agendas of team meetings and handovers
- Consider appointing a 'lead worker' or 'team champion' with key responsibilities for trafficking and exploitation issues – sharing information between colleagues, encouraging good practice, and forming links with partners in other agencies, sectors and local authority areas.
- Create a clear support pathway of what to do should your staff receive reports of suspicious behaviour.

²² www.antislaveryday.com/

Homeless Link

- Access training – services such as [Stop the Traffik](#), [The Passage](#) and [Hope for Justice](#) can tailor training specifically to meet the needs of homelessness agencies, as well as other frontline services.

Raise awareness within the community

Modern slavery is a criminal activity which affects entire communities. It is important that members of the public are aware of the issues, know how to spot the signs, and what action to take. People coming into contact with your service users, such as church groups, shopkeepers, park wardens, drug and alcohol services, health professionals, transport providers and members of the public are all perfectly placed to look out for signs of trafficking and exploitation. They all need to know what to do if they suspect that someone might be at risk.

- Run an awareness raising event / meeting inviting local support agencies and members of the local community. Stop the Traffik have a range of [resources](#) that can help you.
- Join or consider setting up a [community group](#). Stop the Traffik have a range of resources that can help you.
- Consider starting an awareness project or group with your service users which enables them to develop knowledge of their local services.
- Ensure that your service users have access the relevant out of hours numbers.
- Display posters within your service and distribute to other local services, shops and public spaces. [Stop the Traffik](#) and [Homeless Link](#) have a range of posters that you can use.

Spotting the signs

It is essential that frontline staff are vigilant and can identify when someone might be at risk of being trafficked or exploited. Knowing how to talk to service users to ascertain whether they may have been victims is an important skill. Similarly, you need to be able to identify suspicious behaviour and potential perpetrators and know what to do if you suspect or learn of criminal behaviour taking place.

Identifying people at risk

Whether targeting people in the UK or abroad, traffickers will almost always approach individuals that they can identify as vulnerable.

Types of vulnerability may include:

- Family breakdown and death of family members

- Gender and sexuality²³
- Experience of conflict or torture in country of origin
- Existing mental health problems
- Learning disabilities
- Alcohol / drug dependency
- Homelessness and destitution
- Desperation to seek a better life elsewhere, often as a direct result of a trafficker's 'promise'²⁴
- Lack of local / cultural knowledge
- Inability to speak the local language
- Isolation and lack of social/family networks
- Lack of awareness of immigration, labour, and welfare rights
- People seeking asylum or subject to immigration control

In relation to migrants, the following groups may be particularly vulnerable to exploitation by traffickers:

- EEA nationals with pre-settled status/no current status in the UK who have not found employment, are not actively seeking work, not studying, self-employed or self-sufficient
- Asylum seekers – often dispersed to Home Office accommodation away from London and the south-east, which can make them isolated and vulnerable. Some are denied Home Office support and become destitute.
- People who have been denied refugee status and are destitute or receiving Section 4 support.²⁵
- Destitute migrants who find themselves in a position of no recourse to public funds (NRPF).
- People who have been awarded refugee status and are in the period of transition from asylum seeker to refugee.²⁶ There is a high risk of homelessness at this time as people often try to migrate back to London where they may have cultural connections, but have no local connection. Many also become homeless at this point because the 28-day 'grace period' provided by the government is not sufficient time to transition into mainstream benefits.²⁷

²³ Salvation Army - Support Needs of Male Victims of Human Trafficking June 2013 research found that gender was a vulnerability for 20% of the victims they supported in 2011-12.

²⁴ Salvation Army June 2013 research found that this was a vulnerability for 59% of the victims they supported in 2011-12.

²⁵ www.gov.uk/government/publications/asylum-support-section-4-policy-and-process

²⁶ <https://homeless.org.uk/knowledge-hub/working-with-refugees-and-people-seeking-asylum/>

²⁷ www.redcross.org.uk/about-us/what-we-do/we-speak-up-for-change/improving-the-lives-of-refugees/refugee-move-on-period

For more information on working with these groups please see links to publications and websites in the 'Further Information' section of this guidance.

Identifying potential victims

Victims of modern slavery may not identify themselves as victims. They may appear extremely closed, distrusting and scared to talk to you. Traffickers and exploiters often develop complex strategies to keep their victims dependent on them, making it especially difficult for victims to escape or disclose details, even if protection and support are offered. Show patience, empathy and a genuine concern for victims' welfare. It is vital that you reassure them that they are now safe.

While it is unlikely that victims will tell you their stories straight away, there are several signs that may indicate that someone has been, or is a victim of modern slavery. Some signs (outlined below) are common to all forms of trafficking. For signs more specific to different types of exploitation see Stop the Traffik's 'Spot It' [web pages](#).

Indicators of trafficking – points to consider

- Does the individual display **low self-esteem and reticence**? Can you see any signs of **psychological trauma**?
- Does the person show **signs of abuse** (mental, physical or emotional)? Do they have **injuries** that could indicate physical control / restraint?
- Does the person display **fear or mistrust of services**? Are they scared of coming into contact with authorities?
- Does the person act as if they have been **instructed by someone else**? Are they reluctant to travel or move to a different locality?
- Is the person in possession of their **ID or legal documents**? If not, are they being held by someone else?
- Is **money** deducted from the person's salary? Do they talk about having to work to pay off debts, or working but not receiving any pay?
- Is the person in need of **medical care**? This may have been prevented by their traffickers.
- Have there been **threats** against the individual or their family members?
- Does the individual tell a **confusing story** about their whereabouts or how they travelled to the UK?

- Is there evidence to suggest that the individual has been **deceived or coerced**? Do they have an inaccurate understanding of immigration, employment, or benefits rights?
- Is the individual **dependent** on one person to meet more than one of their needs e.g. food, clothing, housing, work, alcohol?

Identifying suspicious behaviour and potential perpetrators

It is vital that you employ vigilance both within and in the locality of your service. Traffickers are clever and will use a range of tactics to get what they want. They may frequently change their approach to targeting victims, and it is important that front line agencies remain alert – identifying and reacting to these changes quickly, making it as difficult as possible for traffickers to continue to operate.

In areas with high levels of rough sleeping, there are several types of recruitment practices that may typically be in operation. Two of the most common of these are detailed below.

Labour exploitation for tarmacking and block paving industries

Members of organised gangs have been known to approach homeless people by targeting rough sleeping sites, soup runs and homelessness services. They look to recruit and exploit people for forced labour, performing manual work such as tarmacking or block paving, and are often run by families. This type of exploitation is thought to be the most common type of labour exploitation experienced by adult victims of trafficking in the UK.²⁸

What to look out for

Anecdotal reports from homelessness services often describe two people, often arriving in white vans, or sometimes expensive-looking cars. They will approach individuals and offer employment, accommodation, good wages and/or drugs and alcohol.

Who may be targeted?

Exploiters will target vulnerable men. This may include people with drug and alcohol dependency, learning disability or mental health needs, and people with no family or few people to miss them. Victims are predominantly British but can be of any nationality.

²⁸ <https://www.unseenuk.org/about-modern-slavery/types-of-modern-slavery/>

Traffickers posing as fellow rough sleepers

Traffickers have been known to pose as homeless, infiltrating groups of people sleeping rough or people using day centres and soup runs. They speak to people in their own language, informing them of opportunities for work. They may use phrases to the effect of “I was homeless like you but now I have work and money. I can help you achieve the same as I have...” This type of recruitment is used for different forms of exploitation. Traffickers will often recruit victims then transfer them over to gangmasters who will exploit them in various forms of work.

What to look out for:

Individuals who you have not seen using your service before who are reluctant to speak with staff. They may be well dressed and seem to be very friendly towards other service users, speaking to them in their own languages. They may recruit victims on the day, by showing them towards a van and driving off, or may arrange an alternative time for them to be collected.

Ask service users for information – what was said to them, what was offered, what arrangements were made?

Who may be targeted?

Vulnerable individuals – often foreign nationals who cannot speak English and are desperate to find work.

Anecdotal reports have also described members of trafficking gangs registering as volunteers in homelessness services and recruiting service users for forced labour in the guise of providing professional support. Recruitment tactics are likely to change over time and you should always be vigilant for any form of suspicious behaviour. Clear training and regular supervision around boundaries and code of conduct for staff and volunteers will help to manage and identify risks.

**Never approach potential perpetrators yourself.
They could be highly dangerous criminals – call the police.**

Reporting

Once you have identified potential victims, suspicious behaviour, or people at risk, you need to know what to do with the information you have.

Who to call and when

If someone is in immediate danger:

Call 999

If you are suspicious about something you have seen or heard about:

Call your local police 101

To call free from landlines and mobiles:

Modern Slavery Helpline 0800 0121 700

For victim support:

Call Salvation Army 0800 808 3733 (24/7 helpline)

For victim reporting:

Police 101

For anonymous reporting:

Call Crimestoppers 0800 555 111

To find out more about reporting online:

www.modernslavery.co.uk

Writing a report

If you witness suspicious activity and police cannot attend the scene immediately, you should write a detailed report about what you have seen.

- Include dates, times, locations, descriptions of physical appearances, accents, vehicles etc. Include as much detail as possible.
- Record vehicle registration numbers.
- Speak to potential victims and witnesses – try to establish details of what was said / offered / arranged. Add these details to your report.
- Ensure your report is filed safely in an appropriate place that can be easily accessed by colleagues.

- Warn potential victims and other service users – ask them to report any future sightings or approaches.
- Give your report to the Police.
- Inform colleagues and partner organisations – encourage vigilance and information sharing.

Informing the victim of their options

If you identify a potential victim of trafficking, you should ask the individual concerned whether they would like to report their experience to the Police.

Make sure they are aware of the different options available:

1. Formal complaint to the Police with referral to the NRM
2. Referral to the NRM without contact with the police
3. Report to the Police without making a complaint, providing information for the benefit of other victims
4. Referral to another first responder
5. Access to legal aid
6. No contact with Police – support with reconnection
7. No contact with Police – support to resettle in the community

Ensure that the victim has a clear understanding of the NRM process and what protection may be available if they agree to a referral. [West Midlands Anti-Slavery Network](#) have leaflets explaining the NRM in various languages.

Ensure that the victim understands all the possible outcomes of participating in Police/NRM investigations. See the [NCA website](#) for more information.

Many potential victims of trafficking identified are not referred to the NRM.²⁹ There are many possible reasons for this, some of which are detailed below.

Victims may:

- See their situation as 'normal' or better than how it was before.
- Prefer to stay where they are than risk having to return home.
- Feel ashamed, embarrassed, or responsible for what has happened to them.

²⁹ SOCA & UKHTC A Baseline Assessment on the Nature and Scale of Human Trafficking in 2011 (August 2012) <http://webarchive.nationalarchives.gov.uk/20130703102353/http://www.soca.gov.uk/about-soca/about-the-ukhtc/national-referral-mechanism/statistics>

- Have a complex relationship with their trafficker, involving dependency, trust or believing they are in love.
- Fear what their trafficker/exploiter may do to them or their family if they find out.
- Be scared, suspicious or untrusting of support services – especially if they are unsure of their rights to remain in the country, know that they are here illegally, or know that they have been involved in criminal activity.
- Be suffering trauma, shock or complex psychological issues and not being ready to talk about their experiences.

If a victim does not want to be referred to the NRM, it is still important to encourage them to inform the police, especially if other victims are being held in the same location. In providing this information you should reassure the victim that they are not involving themselves in a police investigation, they are merely providing information that could lead to the rescue of others.

Informing potential victims of their options – No Second Night Out

Felipe was referred into No Second Night Out by Camden Safer Streets team, having been found bedded down outside King's Cross Station. During his assessment by frontline workers, Felipe told staff he had been homeless since losing his job with tied accommodation in Lincolnshire. He had worked on farms and in factories intermittently, regularly changing jobs and going wherever his agency sent him. He had no ID or documentation from his previous employment and a quick online search revealed that this agency did not exist. Felipe was originally offered a job "working with food" in the UK whilst he was unemployed in Portugal and promised a good wage and free accommodation in a room in a shared house.

Upon arrival in the UK, the Felipe was paid a small amount, though often this was withheld as his employers told him it was for tax reasons. On average, he worked between 15-20 hours a day, and shared a caravan with other men in a similar situation. Despite not being permitted to leave the farm, he managed to escape one day and walked 40 miles to the nearest city before catching a train to London. Frontline staff were confident that from their assessment that there was enough information to make a referral to the NRM, and that offering reconnection back to Portugal was not appropriate in this occasion. NSNO staff explained why they thought that he had been exploited by his 'employers', and that they wanted to refer him to a specialist agency who could provide ongoing support. It was explained that he would need to go through another assessment on the phone with the Salvation Army, to which Felipe agreed.

Within 24 hours of being found rough sleeping on the streets of London, Felipe was referred into the NRM and into specialist accommodation while his trafficking case was considered.

Reporting to the police

If an individual decides to make a complaint to the police, they may need your help.

- Accompany them to the nearest police station or arrange for local police to come to your service.
- Explain that they wish to make a complaint about a serious crime and be persistent if necessary (not all police are aware of their role to make an NRM referral).

Working with the Police – Forced Labour Case (Camden Safer Streets Team)

A client was first found rough sleeping by outreach workers near Tottenham Court Road in London. He explained that he had been held captive by a family of Irish Travellers and been used for forced labour for several years until he had managed to escape. Despite being placed in a homelessness hostel in Kent, the family who had held him captive hired a private detective who managed to locate him. He was taken back to his captors and a tattoo of a horse with the words 'traveller's horse' was forcibly inscribed on his back.

The police raided the travellers' site several months later and the man was freed. He agreed to give evidence against the family in court, and several members were found guilty of slavery charges and given custodial sentences. While the man was helping the police, he was given accommodation in a safe house and then managed to move in with a partner once the trial had finished. Unfortunately, this relationship broke down and the man returned to sleeping rough in London.

After being found by Camden Safer Streets Team, he was supported to enter hostel accommodation where staff were informed of his experiences and a safeguarding alert was raised. Police advised that the man was still extremely vulnerable to being found by members of the traveller's family and their associates. Presenting as extremely naive to the risks, staff worked with the individual intensely to make sure that he understood how vulnerable he was and how careful he had to be. He also accessed Camden Mental Health Team who helped him to deal with the trauma he had experienced and offered to pay to have the tattoo removed from his back. He was given a mobile phone and was checked regularly by support staff and the police. After sourcing a new birth certificate, the individual was found alternative supported accommodation outside London where he continued to be monitored by local police to check that he was safe.

Managing Risk

Measures should be put in place to assess and minimise the risk to a potential victim once they have been identified.

- Update client risk assessments, support plans and file notes.
- Inform other professionals working with the victim, involve them in creating a joint risk management plan.
- Inform colleagues and ensure incidents are written in up in your logbook or equivalent recording system.
- Follow your organisation's procedures for safeguarding vulnerable adults.
- Take advice from local police on protecting your clients' welfare.
- Continue to be vigilant, paying close attention to those at risk.

It might also be necessary to put more general risk management procedures in place to protect other service users and staff.

Working in Partnership

Traffickers are often experts at avoiding detection, being members of organised gangs working in complex networks. Support agencies must work together to share information and collect intelligence to increase the chances of detection, protection of victims and arrest and prosecution of perpetrators. While this may start locally, for example through local Homelessness Forums, Strategic Migration Partnerships meetings and multi-agency rough sleeping response/Task & Targeting groups, it is also vital to share information more widely across different boroughs, local authority areas and national networks. Traffickers will frequently move between areas, especially if they feel that people are becoming suspicious.

Traffickers moving between areas

One agency described how groups of women subjected to forced begging were regularly moved from one borough to the next to avoid detection.

Another agency described how UK travellers looking to recruit vulnerable men would target a soup run in one borough until workers became suspicious, then move to another borough where they wouldn't be recognised.

While there is a need for information to be shared, clear systems and protocols need to be devised, ensuring that information sharing does not put people at greater risk. For example, [The Passage Multi-Agency Case Conference \(MACC\)](#) is a joint working protocol

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signed with Westminster City Council where a MACC is held within 48 hours of identification to agree on a common action plan to provide immediate support (including accommodation) until a person goes into a safe house. Conventional forms of communication may need to be adapted to reduce risks of criminal interception.

- Identify key agencies working in neighbouring boroughs/authorities and consider devising a protocol for sharing information and working in partnership
- Report cases to Stop The Traffik through their [online reporting mechanism](#).

Supporting victims and those at risk

Whether or not victims choose to participate in police investigations, agencies should continue to offer their support in the most sensitive and understanding ways possible. Support should be highly personalised, paying attention to all the vulnerabilities that individuals may be experiencing and referring to specialist provision wherever possible. Organisations providing support should refer to the [Trauma Informed Code of Conduct](#) for a best practice guide when working with survivors.

Some of the most pressing immediate needs of victims of modern slavery are accommodation, subsistence and clothing/toiletries. Following these, people had a range of support needs including counselling, mental health assessments, repatriation, asylum/immigration advice, ESOL, education/training, finding employment, health checks/treatment, family reunification, independent living skills, and sexual health assessment/treatment.

- Complete a detailed needs assessment and support plan for each individual, being aware that victims may not immediately disclose all of their needs. It is likely that further needs will emerge as clients begin to feel comfortable and have more trust in your service.
- Support your client to get a health check and register with a GP as soon as possible.
- Recruit staff and volunteers who can speak relevant languages.
- Support individuals to re-establish connections with family members, if this is something they want.
- Provide support to return home if this is something they want (see Further Information below).

- To ensure survivors of modern slavery and trafficking receive the best possible care and that your service is able to support with sustained recovery, refer to the Trafficking Survivor Care Standards by the Human Trafficking Foundation.³⁰

In addition to providing the support identified in your client's needs assessment, there are certain things that you can do to reduce the vulnerability of individuals so that they are at reduced risk of being targeted by traffickers, thus helping to prevent exploitation from taking place.

Increase client knowledge of your service and the local area

Helping vulnerable individuals to feel 'at home' in their area can increase their confidence and reduce their vulnerability to trafficking and exploitation.

- Create a welcome pack or organise a tour of the local area. Include information and provide details of relevant local services including healthcare, police, housing, benefits, cultural/community organisations, travel and public transport, postal system, libraries, internet access, legal support, shops and essential provisions, social and cultural activities, leisure centres, and education.
- Provide support with integration into local culture, linking with community groups and cultural organisations, developing connections and local support networks.
- Provide information about your service including your service offer and rules in appropriate languages.
- Consider setting up a 'buddy' scheme involving existing service users who can speak the same language and provide peer support as new service users settle in.

Support people to learn English

Being unable to speak the local language can increase people's vulnerability and isolation. Traffickers will often target people purely for their inability to speak English and may actively prevent their victims from learning it. You may be able to offer ESOL classes in-house or help people to enrol on courses in local colleges.

Ensure people are aware of their rights

All individuals should have an accurate understanding of their rights and responsibilities regarding employment, social welfare, and immigration.

³⁰ www.humantraffickingfoundation.org/policy

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- Ensure people know how to access local legal advice services such as Citizens Advice³¹ and local Law Centres³². You may need to accompany service users to appointments or help with searching for advice online if necessary.
- Print off leaflets with advice in appropriate languages from agencies such as the Gangmasters Licensing Authority and Health and Safety Executive (see Further Information for relevant links).
- You can find excellent information on the Housing Rights Info³³ webpage for both migrants and those supporting migrants.

Support people to return home

Victims of trafficking often wish to return to their home towns or countries once they have escaped their exploitative situations. You must provide effective support in order to aid reconnection or refer people to agencies that provide specialist support. If you are referring to an agency to assist with reconnection, it is essential that you tell them about the associated risks and concerns you and the person you are supporting may have due to their experience of being trafficked.

Traffickers may be able to find victims even after they have left the country, so it is vital that victims do not return to situations with high levels of vulnerability and risk.

- Visit the St Mungo's '[Routes Home](#)' website for advice on reconnection and supporting non-UK nationals rough sleeping in London.
- See links to other specialist support and guidance below.

Reconnection of a trafficking victim

Slawimir was approached outside a homeless shelter in Prague, Czech Republic by a man offering to find him work and accommodation in the UK. The man offered to pay for Slawimir's travel to England, saying that Slawimir could pay him back from his first wage packet. Slawimir could not speak any English.

Slawimir's ID was taken from him, and he was taken in a minibus with seven other people to a house in Switzerland, where he was kept for three days, before being driven through France and across to England in a ferry. Having treated the men well on the journey and given them lots of alcohol on the boat, the minibus driver changed his attitude once they reached Britain and he started to shout at them. The minibus drove through England, stopping at several truck stops on route, where at each, one or two men were taken from

³¹ www.citizensadvice.org.uk

³² www.lawcentres.org.uk/

³³ www.housing-rights.info/index.php

the minibus and transferred to other vehicles. Drivers of the new vehicles were handed the men's ID and paid money to the minibus driver. Slawimir and one other man were left in the minibus when it reached Leeds. Here, they were transferred to a car, driven by a man that handed a roll of £20 notes to the minibus driver.

After one hour they arrived at a house where the two men were locked in a small room. The next day when the men refused to go to work, they were beaten up and told that they could disappear if they didn't do as they were told. They were shown photographs of a burnt-out house with bodies laid outside and told that this could happen to them and their families. The men were told that they belonged to the man, as he had paid a lot of money for them, and from now on they could only eat, drink and sleep when he allowed it.

Slawimir was given just one meal a day and often had to work from 5:30am to 1am. He did lots of different kinds of work such as building, tiling, factory work, as well as cleaning and childcare. He did not receive any pay and slept on a bit of carpet with one blanket.

After fifteen months, Slawimir managed to escape and made his way to the Czech embassy in London. Here he explained his experience and was referred to Thames Reach London Reconnection Team (LRT).³⁴ Staff in the LRT offered to help Slawimir to report his experience to the police and explained about the NRM and the support he could receive if he chose to be referred. Slawimir was too frightened to talk to the Police and chose not to be referred to the NRM. Instead, he decided that he would like to return to his country but was too scared to go back to Prague. Thames Reach worked in partnership with international humanitarian support agency Caritas, to find Slawimir supported accommodation back in a different part of the Czech Republic. They obtained emergency travel documents from the Czech embassy and accompanied Slawimir on his journey.

Seven weeks later Slawimir called Thames Reach to thank them for their help and said that he was warning other vulnerable people in the Czech Republic about what happened to him.

Support people to gain employment

As well as being aware of their rights under British employment law, individuals may need extra support in searching and applying for jobs (if they have a right to work). They may be used to different employment practices in their home country and have little knowledge of British systems and procedures.

- Explain JobCentre Plus and the requirements of Universal Credit.

³⁴ This service is commissioned by the GLA and is now delivered by St Mungo's: www.routehome.org.uk

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- Support individuals to complete job searches and explain the ways in which jobs may be advertised.
- Support people to complete CVs, covering letters and application forms.
- Support people to prepare for interviews and source appropriate clothing.
- See other links to useful information below.

Further Information

Employment rights

Health and Safety Executive

Downloadable film for use with ESOL groups: www.hse.gov.uk/migrantworkers/video-migrant-workers.htm

Documents in different languages: www.hse.gov.uk/languages

How to raise a Health & Safety concern: www.hse.gov.uk/contact/concerns.htm

Gangmasters Licensing Authority (GLA)

Multi-lingual guide on workers' right available at:

www.gla.gov.uk/publications/resources/

Support to obtain a National Insurance Number

www.gov.uk/apply-national-insurance-number

UK NARIC (support to translate international qualifications)

<http://ecctis.co.uk/naric/>

Acas helpline

Provides free and confidential telephone advice for workers and employers on workers' rights, including agency work, National Minimum Wage and working hours. The helpline has a free translation service available in over 100 languages: www.gov.uk/pay-and-work-rights-helpline

Focus on Labour Exploitation (FLEX) 'The FLEX Guide to Legal Remedies for Victims of Trafficking': www.labourexploitation.org/publications/flex-guide-legal-remedies-victims-trafficking-labour-exploitation

Working with migrants

Homeless Link Guidance

- [Supporting people with uncertain or restricted eligibility due to their immigration status.](#)
- [Working with refugees and people seeking asylum](#)
- [‘Roadmap’ Report for tackling non-UK National homelessness](#)

Migrant Help

www.migranthelpuk.org

Refugee Council

www.refugeecouncil.org.uk/

Kalayaan

www.kalayaan.org.uk

Asylum Aid

www.asylumaid.org.uk

Resources and toolkits

The Passage – Modern Slavery Toolkit

<https://passage.org.uk/modern-slavery-toolkit/the-toolkit/>

Human Trafficking Foundation

Trafficking Survivor Care Standards (2018)

www.humantraffickingfoundation.org/policy/

St Mungo’s (Routes Home)

Advice for homelessness organisations working with EU Victims of Trafficking

<https://www.mungos.org/app/uploads/2022/05/Reconnection-Best-Practice-Guidelines-28.03.22.pdf>

Home Office: Multi-lingual leaflets for victims of human trafficking available at:

www.gov.uk/government/publications/support-for-victims-of-human-trafficking

Reconnection and voluntary return

St Mungo’s (Routes Home)

<https://www.mungos.org/routes-home/>

Home Office Voluntary Departures Service

Voluntary Departures Team: www.gov.uk/return-home-voluntarily

Assisted Voluntary Returns: www.gov.uk/return-home-voluntarily/assisted-voluntary-return

Benefits advice for migrants

Citizens Advice

<https://www.citizensadvice.org.uk/benefits/claiming-benefits-if-youre-from-the-EU/>

Locating your local bureau: www.citizensadvice.org.uk

What to take to an appointment:

www.adviceguide.org.uk/england/about_this_site/what_to_bring_to_a_bureau.htm

Specialist support

Salvation Army

<https://www.salvationarmy.org.uk/international-development/areas-work/anti-trafficking>

Medaille Trust (safe-housing and support for trafficking victims)

<https://www.medaille-trust.org.uk/>

Helen Bamber Foundation

www.helenbamber.org/

Freedom from Torture

www.freedomfromtorture.org

Legal advice for victims of trafficking

The AIRE Centre

Provides free legal advice to individuals and advisers in the voluntary sector on European law rights.

www.airecentre.org

Accessing support services abroad

Caritas

www.caritas.org/what-we-do/migration/how-caritas-works-in-migration/

Campaigns and research

Antislavery International

<https://www.antislavery.org/slavery-today/>

Focus on Labour Exploitation (FLEX)

www.labourexploitation.org

Human Rights Watch

www.hrw.org/

International Labour Organization

www.ilo.org/global/about-the-ilo/lang--en/index.htm

Stop the Traffik

<https://www.stophetraffik.org/what-is-human-trafficking/definition-and-scale/>

Human Trafficking Foundation

www.humantraffickingfoundation.org

Anti-Slavery Day 18th October

www.antislaveryday.com

Reports

The Passage

The Passage [Modern Slavery Reports](#) provide details of emerging trends and patterns and a breakdown of demographics for those they have identified as victims of modern slavery.

Kalayaan

Still enslaved: The migrant domestic workers who are trapped by the immigration rules (2014)

www.kalayaan.org.uk/documents/tied%20visa%202014.pdf

Anti-Slavery Group reports

www.antislavery.org/reports-and-resources/research-reports/slavery-uk-reports/

Joseph Rowntree Foundation

Detecting and tackling forced labour in Europe (2013)

www.jrf.org.uk/sites/files/jrf/forced-labour-europe-full.pdf

Salvation Army

www.salvationarmy.org.uk/Anti_Human_Trafficking_Latest_Report

United Nations Office on Drugs and Crime

Toolkit to Combat Trafficking in Persons (2006)

www.unodc.org/pdf/Trafficking_toolkit_Oct06.pdf

What We Do

Homeless Link is the national membership charity for frontline homelessness services. We work to improve services through research, guidance and learning, and campaign for policy change that will ensure everyone has a place to call home and the support they need to keep it.

Homeless Link

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2-5 Minorities
London
EC3N 1BJ

www.homeless.org.uk
[@HomelessLink](https://twitter.com/HomelessLink)

**Let's End Homelessness
Together**

