



# OLDHAM SAFEGUARDING ADULTS BOARD, OLDHAM SAFEGUARDING CHILDREN PARTNERSHIP & OLDHAM COMMUNITY SAFETY PARTNERSHIP

## Modern Slavery Toolkit

A Toolkit providing an overview of Modern Slavery and a detailed pathway and guidance for everyone across Oldham to use



Author: Oldham Safeguarding Adults Board  
Adapted by: OSAB Policy, Procedure and Workforce Development  
Subgroup

With thanks to Pan Lancashire Anti-Slavery Partnership  
Version: 1.0

Adopted: May 2023  
Review Date: May 2024



## Contents

1	Introduction .....	3
2	What Is Modern Slavery? .....	3
3	Pathway and Detailed Guidance .....	3
4	Sharing Information .....	7
5	Modern Slavery Legislation .....	7
6	How Can You Identify Victims of Modern Slavery? .....	8
6.1	Identifying Victims .....	8
6.2	Sexual Exploitation .....	8
6.3	Child Abuse/Exploitation .....	8
6.4	Forced Labour .....	9
6.5	Criminal Exploitation and Child Criminal Exploitation (CCE) .....	9
6.6	County Lines .....	9
6.7	Organised Crime Groups (OCGs) .....	10
6.8	Other Criminal Activities .....	10
6.9	Cuckooing .....	10
6.10	Domestic Servitude .....	10
6.11	Homelessness and Modern Slavery .....	11
7	Safeguarding Children, Young People and Adults at Risk .....	11
8	Use of Interpreters .....	11
9	Code of Conduct For Professionals .....	11
10	Asylum Seeking Children and Adults .....	12
11	The National Referral Mechanism (NRM) .....	12
11.1	Overview .....	12
11.2	Consent .....	12
11.3	Example of Pathway Following NRM Referral .....	12
11.4	NRM Outcomes .....	13
11.5	Duty to Notify and/or No Consent to NRM .....	14
11.6	NRM Explanatory Booklets .....	14
12	Additional Information on Victim Support Services .....	14
13	Housing Support for Victims of Modern Slavery .....	15
14	Training and Resources .....	15
15	Modern Slavery Statements .....	16
16	Serious Violence Duty .....	16
17	Vietnamese and Albanian Cultural Information Booklets .....	16
	Appendix A Duty to Notify MS1 Form .....	17

## 1 Introduction

- 1.1 This document aims to explain plainly what Modern Slavery and Human Trafficking are and how everyone across Oldham can help tackle this complex and hidden crime. We may not be able to eradicate it completely, but we can make it more difficult for criminals who exploit others for their own personal gain.
- 1.2 Partnership is essential to effective action against modern slavery.
- 1.3 We want everyone across Oldham to know how to recognise it and have the confidence to report it to ensure the victims are supported and criminals are brought to justice.
- 1.4 This toolkit compliments each organisation's Safeguarding Policies and Procedures, the Oldham Safeguarding Adults Board's Multi-Agency Safeguarding Adults [Policy](#) and [Procedures](#), and the [Greater Manchester Safeguarding Children Procedures](#). It has been developed through a collaboration of the Oldham Safeguarding Adult Board (OSAB), Oldham Safeguarding Children Partnership (OSCP), the Oldham Community Safety Partnership and their partner organisations and recognised national guidance.

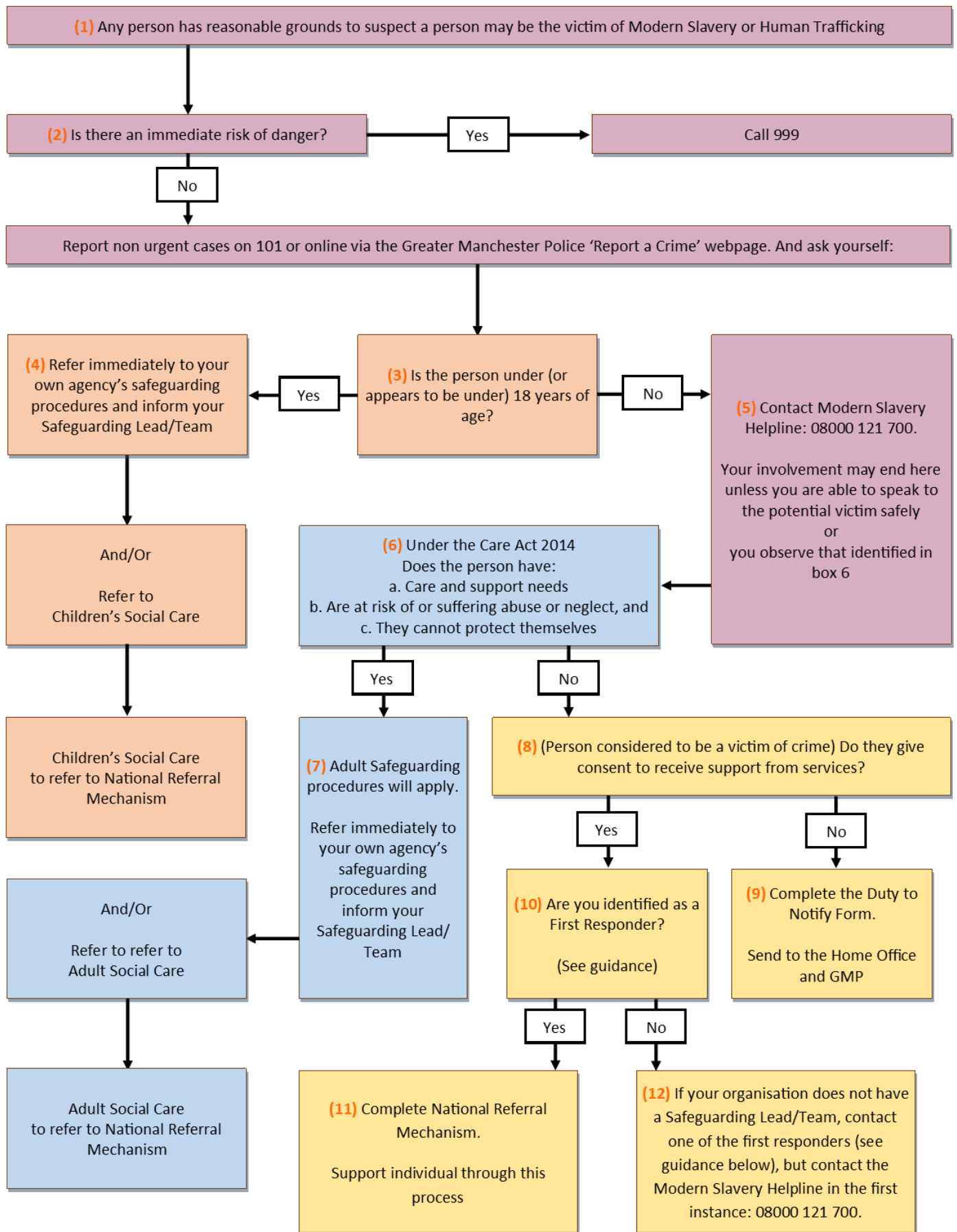
## 2 What Is Modern Slavery?

- 2.1 Modern Slavery is illegal. Modern Slavery is an umbrella term for all forms of slavery, human trafficking, and exploitation. It is defined as the recruitment, movement, harbouring or receiving of children, women, or men through the use of force, coercion, abuse of vulnerability, deception, or other means for the purpose of exploitation. It includes holding a person in a position of slavery, servitude, forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after. Recent cases have seen the targeting of people with a learning disability, homeless people and family members brought to the UK as refugees.
- 2.2 A person commits an offence if:
  - the person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude,
  - or
  - The person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.
- 2.3 Victims of modern slavery are likely to come into contact with a wide range of organisations, services, and public authorities in the course of their journey. Each of these organisations has an opportunity to disrupt the individual's trafficking experience and prevent further harm.

## 3 Pathway and Detailed Guidance

- 3.1 The pathway and detailed guidance of what to do in the event you have a disclosure of modern slavery, or you recognise someone may be a victim of modern slavery are included on the next three pages. The referral pathway (3.2) should be read in conjunction with the detailed guidance (3.3).

### 3.2 Referral Pathway for Victims of Modern Slavery and Human Trafficking



1.	Trust your instinct. You only have a reason to believe someone maybe a victim. You don't have to prove it.
2.	<p>Risk Assessment: In emergency cases and where immediate threat or emergency medical treatment is needed, or where the victim is still in the place of exploitation, please call 999.</p> <p>Modern slavery cases are likely to have a wider public protection aspect to them, e.g. there may be more than one victim, and therefore, considering the wider public interest, report non urgent cases on 101 or online via the <a href="#">GMP 'Report a Crime' webpage</a>.</p> <p>Also, if you have concerns that person may be being exploited, but do not believe you have enough information to be able to make a referral, you must share this information with GMP so they are aware and can begin to develop a picture and determine if any further action is necessary. To share information and concerns you should complete the <a href="#">GMP Partner Intelligence Form</a> and send it via email to <a href="mailto:FIB@gmp.police.uk">FIB@gmp.police.uk</a></p>
3.	If the victim says they are (or they appear to be) under 18 years of age then follow box 4. If not follow box 5.
4.	<p>Organisations will have their own safeguarding procedures to follow in line with the <a href="#">Greater Manchester Safeguarding Children Procedures</a> and these must be followed.</p> <p>In the first instance, contact your Safeguarding Lead or Team who will take details and refer to Children's Social Care. If you are not a member of an organisation, contact Children's Social Care directly and immediately providing as much information as you can.</p> <p>Children's Social Care will complete the National Referral Mechanism (NRM) and ensure the child/young person is protected from further abuse</p> <p>Contact Children's Social Care via 'Duty and Advice': 0161 770 7777.</p> <p>A separate referral should also be made to <a href="#">Barnardo's Independent Child Trafficking Guardianship service where there is no parent or guardian in place</a>.</p>
5.	<p>If you are unable to speak to the potential victim, contact the <b>Modern Slavery Helpline</b> and report your suspicions with as much detail as possible: 08000 121 700.</p> <p><b>This may be the end of your involvement unless you can speak to the person or identify anything as outlined in box 6.</b></p> <p>If it is safe to do so, have a conversation with the person. Use an approved interpreter/ language line; do not use anyone accompanying them.</p>
6.	<p>The Care Act 2014 is clear about the criteria for adult safeguarding and many victims of modern slavery do not have care and support needs* (e.g. they are able to care for themselves despite the situation they are in). Victims are also able to make decisions for themselves under the Mental Capacity Act even though exploitation involves coercion and control. Consider a <a href="#">Mental Capacity Assessment</a> including <a href="#">Executive Functioning</a></p> <p><b>However, if through conversation and/or from observation, the potential victim does appear to have care and support needs or lacks the mental capacity to make an informed decision themselves then follow box 7:</b> the OSAB Safeguarding Adults <a href="#">Policy</a> and <a href="#">Procedures</a>. Otherwise follow 8 onwards.</p> <p>*People who are in need of practical support to enable them to live as well as possible with any illness or disability they may have.</p>
7.	<p>Organisations will have their own safeguarding procedures to follow in line with the OSAB Safeguarding Adults <a href="#">Policy</a> and <a href="#">Procedures</a> and these must be followed.</p> <p>In the first instance, contact your Safeguarding Lead or Team who will take details and refer to Adult Social Care. If you are not a member of an organisation, contact Adult Social Care directly and immediately and provide as much information as you can.</p>

	<p>Adult Social Care will complete the NRM and ensure the adult is protected from further abuse by working with adult and support services via initial risk assessment and a safeguarding strategy discussion/meeting.</p> <p>Contact Adult Social Care via Adult MASH: 0161 770 7777 or <a href="mailto:adult.mash@oldham.gov.uk">adult.mash@oldham.gov.uk</a> or <a href="#">online referral</a>. The Emergency Duty Team can be contacted outside office hours: 0161 770 6936.</p>
8.	<p>Victims of modern slavery are victims of crime, but they still have to give consent to receive support and you <b>must</b> obtain consent to refer to support services.</p>
9.	<p>If the potential victim does not give consent to have their details given to services who can support them, please inform them they can get support and help if they change their mind at any time. They should contact the Modern Slavery Helpline in the first instance: 08000 121 700.</p> <p>Inform the victim that by contacting the helpline they will assist in getting support through services who can assist with housing, immigration, benefits, health care etc. (often victims can then be supported into the NRM process).</p> <p>All staff in statutory and non-statutory settings have a duty to notify the Home Office of any individual who they believe is a suspected victim of slavery or human trafficking. We request that you complete the Duty to Notify Form (Appendix A) with as much information as possible (this must not contain the personal victims details if they do not wish them to be used) and send to:</p> <ul style="list-style-type: none"> <li>• GMP: <a href="mailto:gmp-sca@gmp.police.uk">gmp-sca@gmp.police.uk</a></li> <li>• The Home Office: <a href="mailto:dutytonotify@homeoffice.gsi.gov.uk">dutytonotify@homeoffice.gsi.gov.uk</a></li> </ul> <p>Alternatively, if your organisation has a Safeguarding Lead/Team, please inform them and they may complete this on your behalf. Please refer to your organisation's internal procedures.</p>
10.	<p>If the potential victim is willing to receive support, please remember that this opportunity is time limited. You must act fast as the victim needs to be supported through the National Referral process.</p>
11.	<p>Consider if you are identified as a First Responder. Only members of the following organisations can refer potential victims of Modern Slavery to the NRM:</p> <ul style="list-style-type: none"> <li>• Greater Manchester Police (GMP) - Report non urgent cases on 101 or online via <a href="#">the GMP 'Report a Crime' webpage</a>.</li> <li>• UK Border Agency - 0843 816 6363</li> <li>• Immigration and Visas - 0300 790 6268</li> <li>• Gangmasters Labour Abuse Authority (GLAA) - 0345 602 5020 (General Enquiries)</li> <li>• Local Authorities (only Social Care professionals) - See section 4 in relation to children and young people and section 6 in relation to adults (currently safeguarding cases only).</li> <li>• Salvation Army - 0300 3038151 (24 hour helpline)</li> <li>• Barnardo's - 0208 550 8822 (General enquiries)</li> <li>• Unseen - NB This is not a local service</li> <li>• NSPCC (Child Trafficking Advice Centre) - 0808 800 5000</li> <li>• Refugee Council - See website advice pages</li> <li>• Medaille Trust - 0161 817 2260</li> </ul> <p>NRM forms are sent to: <a href="mailto:nrm@nca.x.gsi.gov.uk">nrm@nca.x.gsi.gov.uk</a> and GMP: <a href="mailto:gmp-sca@gmp.police.uk">gmp-sca@gmp.police.uk</a>.</p>
12.	<p>If you are not a first responder but your organisation has a Safeguarding Lead/Team, please contact them immediately in the first instance.</p> <p>If your organisation does not have a Safeguarding Lead/Team, you can contact any of the first responders above, but we recommend you contact the Modern Slavery Helpline in the first instance: 08000 121 700.</p>

## 4 Sharing Information

4.1 Where there are concerns that a person is at risk of, or is experiencing exploitation, you are legally permitted to share information on a need to know basis with other relevant agencies who have a responsibility to safeguard any potential victims, this can be via a referral or through an multi-agency meeting. This includes sharing information without consent where a person may be being coerced or under duress, to prevent a crime being committed or where others are at risk, in the wider public interest, which is extremely likely in cases such as these.

## 5 Modern Slavery Legislation

5.1 There are many different characteristics that distinguish slavery from other human rights violations, however only one needs to be present for slavery to exist. Someone is in slavery if they are:

- Forced to work - through mental or physical threat;
- Owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse;
- Dehumanised, treated as a commodity or bought and sold as 'property';
- Physically constrained or has restrictions placed on his/her freedom of movement; and
- A victim of Human Trafficking.

5.2 Contemporary slavery takes various forms and affects people of all ages, gender, and races. Adults who are enslaved are not always subject to human trafficking. Recent court cases have found homeless adults have been promised paid work opportunities, enslaved, and forced to work and live in dehumanised conditions, and adults with learning difficulties have been restricted in their movements and threatened to hand over their finances and work for no gains.

5.3 Human trafficking is the movement of a person from one place to another, using methods of deception; coercion; the abuse of power or of someone's vulnerability; and for the purposes of exploitation. It is possible to be a victim of trafficking even if their consent has been given to being moved. Human trafficking may occur across international borders or take place within one country.

5.4 Under [Section 52 of the Modern Slavery Act 2015](#), specified public authorities have a duty to notify the Secretary of State of any individual identified in England and Wales as a suspected victim of slavery or human trafficking.

5.5 We request that all those who come in contact with a potential victim complete the Duty to Notify Form if the victim is unwilling to be supported through the National Referral Mechanism (NRM).

5.6 There are three components to human trafficking:

The Act (or action)	Recruitment, transfer, transportation, harbouring or receipt of persons;
The Means	Threat or use of force, coercion, abduction, fraud, deception, abuse of power or position of vulnerability, giving or receiving of payments or benefits used to control a person
The Purpose (exploitation)	To exploit a person through prostitution, other forms of sexual exploitation, forced labour or services, forced criminality, slavery, servitude, or removal of organs from a person.



## 6 How Can You Identify Victims of Modern Slavery?

### 6.1 Identifying Victims

Consider the following questions:

- Is the individual in possession of a passport, identification, or travel documents? Are these documents in someone else's possession?
- Does the individual act as if they were instructed or coached by someone else? Do they allow others to speak for them when spoken to directly?
- Was the individual recruited for one purpose and forced to engage in another job? Was their transport paid for by facilitators, whom they must pay back through providing services?
- Does the individual receive little or no payment for their work? Is someone else in control of their earnings?
- Was the individual forced to perform sexual acts?
- Does the individual have freedom of movement?
- Has the individual or family been threatened with harm if they attempt to escape?
- Is the individual under the impression they are bonded by debt, or in a situation of dependence?
- Has the individual been harmed or deprived of food, water, sleep, medical care or other life necessities?
- Can the individual freely contact friends or family? Do they have limited social interaction or contact with people outside their immediate environment?

### 6.2 Sexual Exploitation

Sexual Exploitation is a type of sexual abuse, an abuse of a position of vulnerability, power, or trust, for sexual purposes leading to financial or social gain. An exploited child or adult at risk may be given things, like gifts, drugs, money, status, and affection, in exchange for performing sexual activities. They may believe they are in a loving and consensual relationship.

People forced into sexual exploitation may:

- Be moved between brothels, sometimes from city to city
- Be sleeping on work premises
- Display a limited amount of clothing, of which a large proportion is sexual
- Display substance misuse
- Be forced, intimidated, or coerced into providing sexual services
- Be subjected to abduction, assault, or rape
- Be unable to travel freely e.g. be picked up and dropped off at work location by another person
- Have money for their services provided, collected by another person

Be aware that ordinary residential housing/hotels are being used more and more for brothels.

### 6.3 Child Abuse/Exploitation

*'Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology' (DoE, 2017).*

You may notice a child that is:

- Often going missing/truanting
- Secretive
- Has unexplained money/presents



- Experimenting with drugs/alcohol
- Associating with/being groomed by older people (outside of their normal networks)
- In relationships with significantly older people
- Taking part in social activities with no plausible explanation
- Seen entering or leaving vehicles with unknown adults
- Showing evidence of physical/sexual assault (including Sexual Transmitted Infections)
- Showing signs of low self-image/self-harm/eating disorder

#### 6.4 Forced Labour

Forced Labour is where all the work is done under the menace of a penalty, or the person has not offered themselves voluntarily and is now unable to leave.

Victims may experience:

- Threat or actual physical harm
- Restriction of movement or confinement
- Debt bondage i.e. working to pay off a debt or loan, often the victim is paid very little or nothing at all for their services because of deductions
- Withholding of wages or excessive wage reductions
- Withholding of documents e.g. passport/security card
- Threat of revealing to authorities an irregular immigration status
- Poor or non-existent health and safety standards
- Requirement to pay for tools and food
- Imposed place of accommodation (and deductions made for it)
- Pay that is less than minimum wage
- Dependence on employer for services
- No access to labour contract
- Excessive work hours/few breaks.

Their employer may be unable to produce documents required.

Debt bondage is a form of forced labour and happens when a person is forced to work to pay off a debt. They are tricked into working for little or no pay, with no control over their debt. This is thought to be the most widespread form of slavery today.

#### 6.5 Criminal Exploitation and Child Criminal Exploitation (CCE)

Where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or adult at risk, with a view to engage them in criminal activity.

The victim may have been criminally exploited even if the activity appears consensual. Criminal exploitation does not always involve physical contact; it can also occur through the use of technology e.g. via social media.

#### 6.6 County Lines

County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas (within the UK), using dedicated mobile phone lines (deal line). They are likely to exploit children and adults at risk to move and store the drugs and money and they will often use coercion, intimidation and violence including sexual violence and weapons.

## 6.7 Organised Crime Groups (OCGs)

Organised Crime is defined as planned and coordinated criminal behaviour conducted by people working together on a continuing basis. Their motivation is often, but not always, financial gain.

## 6.8 Other Criminal Activities

Some victims are recruited and forced/deceived into conducting some form of criminal activity such as pick pocketing, begging, cannabis cultivation and benefit fraud.

The same indicators as those related to forced labour apply but for cannabis cultivation you may also notice:

- Windows of property are permanently covered from the inside
- Visits to property are at unusual times
- Property may be residential
- Unusual noises coming from the property e.g. machinery
- Pungent smells coming from the property.

## 6.9 Cuckooing

'Cuckooing' is a form of exploitation and the term used when an individual or a criminal gang target the home of a vulnerable person so they can use the property for criminal purposes such as drug-dealing, hiding weapons and other criminal activities. Criminals often befriend a vulnerable person in order to exploit them and use their property. The term takes its name from cuckoos who take over the nests of other birds.

There are different types of cuckooing:

- Using the property to deal, store or take drugs
- Using the property to sex work
- Taking over the property as a place for them to live
- Taking over the property to financially abuse the tenant.

Signs of cuckooing include:

- Increase in comings and goings or people entering and leaving at all times of day
- Increase in cars or bikes outside as offenders will often have new vehicles outside the property, or frequently use taxis or hire cars
- Possible increase in anti-social behaviour in and around the property
- The victim disengaging with support services/healthcare services
- The property being sparse of valuable possessions inside or in a state of disrepair.

## 6.10 Domestic Servitude

Domestic Servitude is a particularly serious form of denial of freedom; this includes the obligation to provide certain services and the obligation to live in another person's property without the possibility of changing those circumstances.

Victims may:

- Be living and working for a family in a private home
- Not be eating with the rest of the family
- Have no bedroom or proper sleeping place
- Have no private space
- Be forced to work excessive hours or be 'on call' 24 hours a day
- Never leave the house without the 'employer'
- Be malnourished
- Be reported as missing or accused of crime by their 'employer' if they try to escape.

## 6.11 Homelessness and Modern Slavery

Many individuals who are homeless already have substance misuse as additional vulnerabilities as well as mental ill health, learning disabilities and no family contacts. To be homeless or rough sleeping makes a young person or adult vulnerable when exposed to organised crime gangs and exploiters. The homeless community may be approached at soup kitchens or local rough sleeping spots and be offered employment, accommodation, wages, a place to sleep and even drugs and/or alcohol.

## 7 Safeguarding Children, Young People and Adults at Risk

- 7.1 Children under the age of 18 cannot consent to be trafficked or exploited and child protection procedures will apply.
- 7.2 Adults at risk as defined by the Care Act 2014 must be referred using adult safeguarding/protection procedures: Where a local authority has reasonable cause to suspect that an adult in its area (whether or not ordinarily resident) and that adult:
- has needs for care and support (whether or not the authority is meeting any of those needs) and
  - is experiencing, or is at risk of, abuse or neglect, and
  - as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.
- 7.3 If a victim is identified as having care and support needs, or is a child under the age of 18, local Social Care/Safeguarding Teams will carry out a risk assessment and strategy meetings may be held with multi agency partners. The urgency of this will depend on the current risks to the child/adult at risk as per safeguarding policy and procedures or through the NRM.

## 8 Use of Interpreters

- 8.1 It is recommended that only official/approved interpreters are used, and that the interpreter is aware of the sensitive situation. However, it is also recommended that:
- It is best practice not to leave the interpreter alone with a victim, especially in waiting rooms or reception areas
  - The interpreter should not have any other communication with the victim other than that intended
  - The interpreter should not leave with the victim
  - If a victim looks distressed when an interpreter is being used, cease the session immediately.
- 8.2 Further information can be found in the pathway and accompanying guidance on pages 3-6.

## 9 Code of Conduct For Professionals

- 9.1 This guidance is designed to enable professionals in all fields of discipline to:
- Establish and maintain a mutual relationship of trust with victim-survivors in any working context or environment
  - Impart a consistent sense of calm, security, and safety throughout the course of their work
  - Increase the confidence of victim-survivors and minimise the risks of causing distress and re-traumatisation
  - Remain safe and well in the course of their work, avoiding secondary traumatisation and professional 'burnout'.

## 10 Asylum Seeking Children and Adults

- 10.1 Evidence shows that unaccompanied migrant children and adults, or those accompanied by someone who is not their parent are particularly vulnerable. Immigration legislation impacts significantly on work to safeguard and promote the welfare of children, young people and Adults from abroad.
- 10.2 A significant number of children who are referred to local authority care as trafficked children or unaccompanied asylum seeking children (UASC), often go missing and many go missing within one week. It is thought that they are then trafficked internally, within the UK, or out of the UK.
- 10.3 Further safeguarding information can be found here [Unaccompanied Migrant Children and Child Victims of Trafficking and Modern Slavery](#).

## 11 The National Referral Mechanism (NRM)

### 11.1 Overview

**For those who do not work or have a Safeguarding Lead/Team to seek advice from or are not First Responders please contact the Modern Slavery Helpline to enable the victim to receive the support they need as quickly as possible.**

The NRM is the framework for identifying victims of human trafficking and to ensure they receive the appropriate protection and support. This may include:

- Accommodation
- Protection
- Access to legal advice
- Emotional and practical help.

### 11.2 Consent

**Adults must give their consent to their information to be shared for referral to the NRM** as it is a voluntary process. Only a First Responder can refer potential victims of Modern Slavery to the NRM: (see guidance on page 6). Consent includes explaining what the NRM is, what support is available through it and what the possible outcomes are for an individual being referred. The referral does NOT provide them with leave to remain in the UK, or that the referral would automatically result in a positive decision (and potentially the right to receive ongoing support).

### 11.3 Example of Pathway Following NRM Referral

- The First Responder completes the NRM online form: [Report Modern Slavery](#) and ensures this is as detailed as possible outlining the full circumstances. Once completed, the First Responder will be sent a link to download a copy. Older paper forms are no longer accepted.
- The Single Competent Authority (SCA) is part of the Home Office and is one of the competent authorities who identify and support potential and confirmed victims of modern slavery through the NRM. The SCA aims to make an initial 'reasonable grounds decision' within five working days wherever possible.
- The local authority adheres to duty of care processes. If the victim has no recourse to public funding and there is no duty to provide housing/support under safeguarding/human rights legislation, the First Responder contacts the Salvation Army for accommodation and/or outreach support: 0300 303 8151.

- If the victim remains in the borough, a plan is developed around safety, housing, mental/physical wellbeing, legal advice, immigration options, work options, social/cultural needs. An advocate/key worker from whichever support service the victim is working with remains in contact with them until the result of the NRM is known.
- A positive 'reasonable grounds decision' entitles the potential victim to a recovery and reflection period for a minimum of 45 days, and until the 'conclusive grounds decision' is made.
- The second stage, the 'conclusive grounds decision', is currently taking over 500 days to be made. The first responder keeps the Home office updated throughout this period with information about the case to enable them in their decision making.
- During the process, the risks and needs of victims are assessed at various points. Support is provided and can include safe accommodation, translation and interpretation services, assistance accessing compensation, access to vocational training and employment opportunities, subsistence, access to relevant medical and legal services, and assistance for a safe repatriation and return.
- People will not automatically receive leave to remain in the UK or right to work in the UK unless they already have this or have been granted it through legal means during NRM process.
- Alternatives to NRM support, may be claiming treaty rights for EU, seeking legal advice regarding asylum (which should be covered by legal aid) or other applications for leave to remain in the UK.

#### 11.4 NRM Outcomes

- 11.4.1 There is a detailed process that is undertaken following referral to the NRM and this document does not intend to set this out in full however a short explanation of possible outcomes following referral to the NRM can be found below (please note, these explanations are extremely condensed).
- 11.4.2 The 'Reasonable Grounds' Decision - to establish whether an individual is a victim of human trafficking, two decisions have to be made. This may involve seeking additional information from the first responder or from specialist Non-Governmental Organisations (NGOs) or social services. At 'Reasonable Grounds Decision' stage, the trained decision makers decide whether there are reasonable grounds to believe an individual is a victim of slavery, servitude, and forced or compulsory labour.
- 11.4.3 Evidence must be provided that someone submitted to the NRM is a potential victim. This evidence may include:
- *Indicators of Modern Slavery*: Are there specific indicators of modern slavery included in the referral?
  - *Travel Records*: Is there confirmation, for example, that the individual was in a country where the claim is centred. However, travel records, without some other specific evidence, will not usually be sufficient to meet the RG threshold.
  - *Added vulnerability*: Is the victim in a demographic known to be particularly vulnerable to Modern Slavery such as children or those whose age of maturity or developmental stage is that of a child? Does the victim present with vulnerabilities?
  - *Witness statements*: Is there supporting evidence from an independent witness, e.g., a police officer?
  - A detailed explanation of why the individual has been referred. Additional evidence or information relating to the person's exploitation and any evidence raised regarding the credibility of the account,
  - Evidence against any suspect that can be considered,
  - *Views of trusted third parties other than the Police*: For instance, Adult or Child Safeguarding Services, Independent Child Trafficking Guardians (where appointed).

11.4.4 The ‘Conclusive Grounds’ Decision - the conclusive grounds decision is made as soon as possible after the recovery and reflection period. This is based on the ‘balance of probabilities’ in that there are sufficient grounds to decide that the individual being considered is a victim of human trafficking or slavery, servitude, and forced or compulsory labour.

11.4.5 If the SCA decides that there are not reasonable or conclusive grounds to accept the person is a potential victim of modern slavery, they will not offer support for a recovery and reflection period. There is a process for appeal against a ‘reasonable grounds’ or ‘conclusive grounds’ negative decision, which is believed to be incorrect. Individuals can challenge this by way of a Judicial Review, or it may be appropriate to ask the SCA to reconsider the decision.

## 11.5 Duty to Notify and/or No Consent to NRM

If consent is not given to refer to the NRM, we request that a Duty to Notify MS1 form is completed (Appendix A). This can be completed without the victims consent but Section C which contains details about the victim, their name, address etc. must be omitted. Adult victims who do not consent to the NRM may still give consent for their details to be given in the Duty to Notify form, but a signature must be obtained for current data protection processes to be fulfilled. Please note the NRM is different to the Duty to Notify MS1 form. The Duty to Notify MS1 form is only used when a victim wishes to remain anonymous.

## 11.6 NRM Explanatory Booklets

The West Midlands Anti-Slavery Network has produced a multilingual explanatory document which explains in detail, the National Referral Mechanism (NRM) for use by First Responders for potential victims of Modern Slavery at the point of identification. It includes realistic and accurate information from professionals about the process a potential victim could expect if they were to consent to an NRM referral and the potential outcomes and opportunities if they decided not to consent to an NRM referral. The booklets can be accessed on their website: [NRM Explanatory Booklets](#).

## 12 Additional Information on Victim Support Services

12.1 Partners in Oldham are currently developing resources for victim support in Oldham and the Modern Slavery (Victim Support) Bill introduced to the House of Lords in January 2020 would give victims at least 12 months of guaranteed support. Until then, any of the below organisations can assist victims. In particular, those who do not consent to the NRM and/or wish to be repatriated to their own country will need support to do so.

National Modern Slavery Helpline	08000 121 700	<a href="https://www.modernslaveryhelpline.org/">https://www.modernslaveryhelpline.org/</a>
Greater Manchester Victims Services	0161 200 1950	<a href="https://www.gmvictims.org.uk/">https://www.gmvictims.org.uk/</a>
British Red Cross (North West):	0151 702 5088	<a href="https://www.redcross.org.uk/about-us/what-we-do/modern-slavery-and-trafficking">https://www.redcross.org.uk/about-us/what-we-do/modern-slavery-and-trafficking</a>
Stop the Traffik		<a href="https://www.stophetraffik.org/">https://www.stophetraffik.org/</a>
Salvation Army:	0300 303 8151	<a href="https://www.salvationarmy.org.uk/modernslavery">https://www.salvationarmy.org.uk/modernslavery</a>
Hope for Justice	0300 008 8000	<a href="http://hopeforjustice.org/">http://hopeforjustice.org/</a>
Migrant Help	0808 8000 630	<a href="https://www.migranthelpuk.org/contact">https://www.migranthelpuk.org/contact</a>
Unseen UK		<a href="https://www.unseenuk.org/">https://www.unseenuk.org/</a>
Coalition to stop slavery		<a href="https://coalitiontostopslavery.org/">https://coalitiontostopslavery.org/</a>
Greater Manchester Challenger		<a href="https://www.programmechallenger.co.uk/">https://www.programmechallenger.co.uk/</a>

If you are a service that supports victims of Modern Slavery and you would like your details adding here please email: [Oldham.SafeguardingAdultsBoard@oldham.gov.uk](mailto:Oldham.SafeguardingAdultsBoard@oldham.gov.uk).

## 13 Housing Support for Victims of Modern Slavery

- 13.1 If an adult receives a positive reasonable grounds decision through the NRM, they are entitled to support. This is provided through a central government-funded modern slavery victim care contract (MSVCC) and includes safe house accommodation, financial support, and a support worker to help with access to wider services including, but not limited to, health and mental health services, translation, and legal representation.
- 13.2 Whilst waiting for a response from the NRM, emergency accommodation can be sought from the local housing authority. This can be provided under Part 7 of the Housing Act 1996 if the authority has reason to believe that the applicant may be homeless, eligible for assistance and has a priority need. If housing authorities believe an individual may be vulnerable as a result of being a victim of modern slavery, following a referral to the NRM, housing authorities should ensure that interim accommodation is available while they are waiting for an initial Reasonable Grounds decision and/or while the housing authority carries out its enquiries.
- 13.3 If the individual is not eligible for assistance via the Housing Act 1996, for example, due to immigration status, the Localism Act 2011 section 1 gives councils' special powers to provide accommodation/support even when there is no recourse to public funds. Section 5.3 states that where a person does not have eligible care and support needs and the local authority has decided not to use section 19(1) of the Care Act 2014 to meet non-eligible needs, it will need to consider whether to use its general power of competence under section 1 of the Localism Act 2011. This gives the local authority a power to do anything that an individual generally may do, and may exercise this power in any way, including for the benefit of residents.

## 14 Training and Resources

- 14.1 Across Oldham, Modern Slavery training has been agreed to meet the needs of all workers, from those who require or would like a basic awareness (through self-directed online learning or face to face learning) to training in more detail for those who work directly with children, young people, families and adults. Please see the Safeguarding Children and Adults Boards websites for further details:
- [OSAB Multi-Agency Training](#)
  - [OSCP Multi-Agency Training](#)
- 14.2 Please find links below to specific resources that are available:
- [Modern Slavery Statutory Guidance](#)
  - [Home Office Modern Slavery Awareness & Victim Identification Guidance](#)
  - [NHS Health Education England Identifying and Supporting Victims of Modern Slavery Learning Resource](#)
  - [Home Office Promotional Material](#)
  - [Home Office 7-Minute YouTube Infographic: Modern Slavery is closer than you think.](#)
  - [Oldham Modern Slavery 7-Minute Briefing](#)
  - [Oldham Modern Slavery and Regulated Care 7-Minute Briefing](#)
  - [Oldham Cuckooing Guidance](#)
  - [Oldham Cuckooing 7-Minute Briefing](#)
  - [County Lines Awareness Video from the National County Lines Coordination Centre](#)
  - [National Referral Mechanism Awareness Video from the National County Lines Coordination Centre](#)



## 15 Modern Slavery Statements

- 15.1 Modern slavery extends far beyond regional and national borders. Mobile phones, clothing, shoes, technology, and food: many of the products we buy and use every day, are produced by people trapped in modern slavery. This can extend throughout our supply chains, and we have a responsibility for addressing problems through enhanced procurement practices.
- 15.2 Organisations are asked to publish a Modern Slavery Statement supporting partners and the Government drive to eradicate, disrupt and respond to Modern Slavery. This demonstrates organisational steps to tackle modern slavery, respect for human rights, treating people fairly and equitably, and recognising the needs of the diverse communities. This is inclusive of recruitment processes, training, communication processes, and the inclusion of statements in contracts with providers.

## 16 Serious Violence Duty

- 16.1 The Police, Crime, Sentencing Act 2022 imposed new duties to collaborate and plan to prevent and reduce serious violence. Under the new duty, which came into effect on 31 January 2023, the specified authorities for a local government area must collaborate with each other to prevent and reduce serious violence in the area.
- 16.2 For Oldham the specified authorities are:
- Oldham Council (including Youth Justice Service)
  - Greater Manchester Police
  - HM Prison and Probation Service
  - Greater Manchester Fire and Rescue Authority
  - NHS Greater Manchester Integrated Care
- 16.3 The Community Safety Partnership, which is inclusive of the specified authorities, has a statutory duty under section 6 of the Crime and Disorder Act 1998 to formulate and implement a strategy to prevent people from becoming involved in serious violence in the area, and for the reduction in instances of serious violence in the area. The strategy, which must be published by 31 January 2024, will be developed following a strategic needs assessment of serious violence in the borough and will include modern slavery, human trafficking and other forms of criminal exploitation. The Community Safety Partnership will be supported by the Greater Manchester Violence Reduction Unit.

## 17 Vietnamese and Albanian Cultural Information Booklets

- 17.1 The West Midlands Anti-Slavery Network has produced Cultural Information Booklets with the aims of increasing engagement with and improving outcomes for victims and perpetrators of crimes from these communities by improving cultural awareness amongst frontline professionals. The resources can be used by any professional who supports people from Vietnam and Albania. The booklets can be accessed on their website: [Vietnamese and Albanian Cultural Information Booklets](#).

## Duty to Notify Form MS1 Notification of Potential Victim of Modern Slavery Form

**THIS IS NOT A REFERRAL TO THE NATIONAL REFERRAL MECHANISM – PLEASE VISIT <https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms> FOR THE CORRECT FORMS TO REFER AN INDIVIDUAL FOR ASSESSMENT AND SUPPORT.**

This form should be completed by a specified public authority when they encounter a suspected victim of modern slavery in England or Wales **and an NRM referral is not being made**. This is to satisfy the duty to report suspected victims of modern slavery to the Home Office, under Section 52 of the Modern Slavery Act 2015. To see whether your organisation is covered by the duty, and for further information on a notification, please see the accompanying guidance.

This form can also be completed on a voluntary basis by other organisations in order to assist in building the picture of modern slavery in the UK, where potential victims are not willing to enter the NRM. However, organisations not subject to the duty will not be automatically relieved from obligations of confidence under the common law.

Completed forms should be sent to: [dutytonotify@homeoffice.gsi.gov.uk](mailto:dutytonotify@homeoffice.gsi.gov.uk) and [gmp-sca@gmp.police.uk](mailto:gmp-sca@gmp.police.uk). Information marked with an asterisk is required by Regulations made under Section 52 of the Modern Slavery Act 2015.

Where a referral to the National Referral Mechanism has been made, this form **does not** need to be completed as long as the NRM form provides all the required information (indicated on the form) and a copy is sent to [nrm@nca.x.gsi.gov.uk](mailto:nrm@nca.x.gsi.gov.uk) and [gmp-sca@gmp.police.uk](mailto:gmp-sca@gmp.police.uk).

**Section A: Contact details of person making notification**

A1: Name: .....

A2: Job title:.....

A3: \*Organisation: .....

A4: Unit or area.....

A5: Tel: ..... A6: Mobile: .....

A7: Email: .....

A8: Signature:

Date: ...../...../.....

---

**Section B: Information ordinarily required in all notifications**

**B1:** \*The victim's gender:

- male  female  undefined / other

**B2:** \*The victim's nationality: .....

**B3:** Age at the time the slavery or human trafficking is believed to have first occurred:

- \*Under 18  
 18 or over

**B4:** \*The country or territory where the slavery or human trafficking is believed to have occurred.....

**B5:** \*The police area in which the victim was identified:

.....

**B6: Suspected victim of (tick all that apply)**

- \*human trafficking  
 \*Slavery, servitude, forced or compulsory labour

**B7: Suspected form of exploitation or forced service:**

- \*domestic servitude (i.e. occurred wholly or partly within residential premises )  
 \*forced or compulsory labour  
 \*provision of sexual services or the commission of sexual offences by the victim  
 \*criminal services (i.e. involved the commission of an offence by the victim)  
 \*removal of organs  
 unknown  
 other (*please state*).....

.....

**B8:** Have you reported the case to the police:

- \*yes  
 \*no  
 notification is being made by the police

\*If yes, was the case reported to the police in England, Wales, Scotland or Northern Ireland?

.....

\*If reported to the police in England or Wales, which police force was the case reported to?

.....

If no, for what reason?

.....

**B9: Crime references relating to this individual**

.....

**Section C: Further information required in a notification relating to a victim under the age of 18 or by consent for an adult**

**C1: basis for providing additional information**

**C2: Is the suspected victim a minor?** (*Consent is not required to identify a child in the notification.*)

Yes

No

**C3: Adult consent to be identified in the notification** (*Potential adult victim should sign the form to indicate their consent here. If they do not consent, an anonymous referral should be made and this section of the form should not be completed.*)

I consent to my details including name and date of birth being submitted to the Home Office who, where appropriate, will make an onward referral to the police for information and intelligence purpose.

I am / am not willing to be contacted by the police in relation to this notification (*delete as appropriate*).

**C4: Safe contact address if willing to engage with the police:**

.....

.....

**C5: Safe phone number if willing to engage with the police:**

.....

Signed (potential victim):

.....

Date: ...../...../.....

**C6: \*Victim's last name:** .....

**C7: \*Victim's first name(s):** .....

Also known as:

.....

**C8:** \*Victim's date of birth: ...../...../.....

**C9:** The names of persons suspected to have perpetrated the suspected slavery or human trafficking of the victim:

not known

\*suspected perpetrators:

.....

.....

.....

**C10:** The names of persons to have also been victims of slavery or human trafficking by the same perpetrators:

not known

\*suspected victims:

.....

.....

.....

**C11:** any additional information you consider relevant to the notification (free text):

.....

.....

.....

.....

.....

.....

.....

.....

A large rectangular box with a solid black border. Inside the box, there are 15 horizontal dotted lines, evenly spaced, providing a guide for handwriting practice.