

Modern Slavery and Human Trafficking Guidance/Procedure

Contents

What Is Modern Slavery?	2
The National Referral Mechanism & The Salvation Army	3
The Victims' First Willow Project	3
Common Types of Slavery and Exploitation	4
Where could Slavery be happening?	4
Indicators of Modern Slavery	4
Recent Examples of Slavery and Exploitation	5
What action do I take if I identify a Possible Victim of Slavery or Trafficking?	6
Professional's duty to notify the Home Office of Potential Victims of Modern Slavery	7
Other Sources of Advice	8
National Referral Mechanism form for potential adult victims of modern slavery [GDPR]	9
Indicators of Exploitation and Modern Day Slavery checklist	17

WHAT IS MODERN SLAVERY?

The London Anti-Slavery Working Group's Adult Modern Slavery Protocol for Local Authorities helpfully explains the commonly used terminology: modern slavery, human trafficking, and exploitation. It is important to provide a common understanding for partners organisations involved in addressing these crimes.

Human trafficking Defined by the Palermo Protocol, all three elements below are required for adult trafficking cases. The "means" is not required for child trafficking cases as a child cannot give informed consent.		
1) The Act (Movement of people)	2) The Means (Coercive behaviour)	3) The Purpose (Exploitation)
Modern Slavery Defined by the Modern Slavery Act 2015, it encompasses human trafficking and all forms of exploitation.		
	2) The Means (Coercive behaviour)	3) The Purpose (Exploitation)

- 1) THE ACT:** Recruitment, transportation, transfer, harbouring or receipt of persons
- 2) THE MEANS:** threat or use of force, withholding documents, ritual oaths, finance control, debt bondage, abduction, blackmail, abuse of power over a vulnerability, deception, "Stockholm syndrome", grooming, restriction of movement, threat to friends or family, social stigma
- 3) THE PURPOSE:** including but not limited to sexual exploitation, labour exploitation and bonded labour, domestic servitude, criminal exploitation, forced fraud, forced marriage and organ harvesting Trafficking people is a criminal offence. The fact that the adult consents to the intended exploitation is irrelevant where any of the means (above) have been used.

Victims of modern slavery, exploitation and may be unwilling to come forward to law enforcement or public protection agencies, not seeing themselves as victims, or fearing further reprisals or death from their abusers against the themselves or family members. Victims may not always be recognised as such by those who come into contact with them.

The Modern Slavery Act 2015 places a duty on specified public authorities (including local authorities) to report details of suspected cases of modern slavery to the National Crime Agency. This is achieved through the National Referral Mechanism.

All professionals that meet adults in their everyday work need to be able to identify those adults who may have been trafficked and be competent to act to support and protect the adult from harm.

This guidance provides information on the types of slavery and exploitation that you should be aware of and the signs to look for. It also explains what to do if you are concerned that someone may be being exploited, trafficked or is the victim of slavery.

This guidance is supplementary to, and should be used in conjunction with, the latest edition of the Oxfordshire Safeguarding Adults procedures:

<http://www.osab.co.uk/wp-content/uploads/Procedure-summary.pdf>

The National Referral Mechanism & The Salvation Army

The National Referral Mechanism (NRM) is the process by which an individual is identified as a victim of modern slavery. Referrals to the NRM can only be made by authorised agencies known as First Responders. Authorised agencies in the UK are the police force, the UK Border Force, Home Office Immigration and Visas, social services and certain Non-Governmental Organisations including The Salvation Army. The National Referral Mechanism (NRM) is a framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support.

Specialist support for victims of modern slavery is provided by The Salvation Army. The Salvation Army provides specialist support for all adult victims of modern slavery in England and Wales. Our confidential Referral Helpline 0300 3038151 is available 24/7. Everyone the Salvation Army support receives access to a wide range of specialist services to meet their individual needs whether that is within a safehouse or through outreach support. This can include access to:

- confidential legal advice;
- health care;
- counselling; and
- educational opportunities
- financial support
- support in obtaining employment and housing

The Victims' First Willow Project

The Thames Valley Wide Exploitation & Complex Needs Service working across the counties of Berkshire, Buckinghamshire (inc Milton Keynes) and Oxfordshire, seeking to identify and support those individuals who are assessed as having been victims of exploitation or who are deemed to be at risk of exploitation through:

- **Sexual Exploitation** – those involved in prostitution or working in the commercial sex industry; those manipulated or coerced into sexual activities of any kind for another person's gain; human trafficking for purpose of sexual exploitation; grooming;
- **Modern Slavery** – forced labour; domestic servitude; organ harvesting; child trafficking for benefit fraud;
- **Financial Exploitation** – debt bondage; finances controlled by others; financial scams
- **Criminal Exploitation** – those manipulated or coerced or trafficked for the purpose of any illegal activity i.e., County Lines/drug trafficking, forced shoplifting, forced begging.
- **Other Exploitation** – the taking over a person's address for the purpose of any criminal activity i.e., for drug dealing/using (known as "cuckooing"), prostitution or storing stolen goods

As well as supporting victims of Modern Slavery, trafficking and exploitation the service will provide much-needed specialist support for victims of other forms of serious crime (excluding sexual and domestic abuse for whom specialist services already exist). They also see people who are potential victims who do not consent to an NRM referral.

The Victims First – Willow Project will work directly with victims and their families to provide:

- Crisis intervention
- Advocacy
- Longer term practical and emotional support

If you wish to make a referral or just seek advice please contact the Willow Project at enquiries@vfwillowproject.org.uk or 0753 824 1045

Common Types of Slavery and Exploitation

Domestic Servitude

This involves a victim being forced to work in private households, usually performing domestic chores and childcare duties. Their freedom may be restricted and they may work long hours frequently for little or no pay, often sleeping where they work. Nearly a quarter of reported victims of domestic servitude in the UK are children.

Forced labour

Victims may be forced to work long hours for little or no pay in poor conditions under verbal or physical threats of violence to them or their families. Force labour can occur in various industries, including construction; manufacturing, home improvement, gardening, hospitality; food packaging, agriculture, maritime and beauty (e.g. nail bars).

Criminal exploitation

This is the exploitation of a person to commit a crime, such as robbery, shop-lifting, cannabis cultivation, drug trafficking, etc.

Other Forms of Exploitation

Other forms of exploitation include sexual exploitation, organ removal, forced begging, forced benefit fraud, forced marriage and illegal adoption.

Where could Slavery be happening?

Modern slavery is happening here and now and is under-reported. Commonly, slavery and exploitation has been found in locations such as-

- Car washes
- Agricultural settings
- Nail bars
- Care homes
- Construction and building sites
- Factories
- Catering and hospitality
- Massage parlours
- Brothels

However, the alleged victims of this exploitation will be seen in many settings. They may seek or be taken for medical help if injured or unwell. They may live in accommodation rented for them such as houses of multiple occupancy. Some types of exploitation are hidden in domestic settings, such as domestic servitude or cannabis cultivation, and may only be seen when there is a compelling reason to visit the property concerned such as in the event of a fire.

Indicators of Modern Slavery

Signs of many types of slavery and exploitation are often hidden, making it hard to recognise potential victims. Victims can be any age, gender, ethnicity or nationality. This is a list of some of the general indicators:

- Behaviour – withdrawn, unwilling to make eye contact, fear of engaging with authorities

- Appearance – unkempt, malnourished, few personal possessions, untreated injuries, lack of access to medical care
- Work – long hours, little or no pay, few or no days off, inappropriate clothing and/or equipment for the job
- Debt bondage – in debt to, or dependant on someone else
- Accommodation – overcrowded, poorly maintained accommodation, curtains always drawn
- Control – restricted freedom of choice and/or movement, control over access to ID/travel documents/bank account, always accompanied, deprived of water/food/sleep, limited contact with family or friends

The 5 questions below may also help to identify a potential victim:

- Are you currently living a life that is what you expected and were told prior to coming to this area?
- Do you know where your personal identity documents/passport are and can you access them freely?
- If you no longer wanted to continue doing this job would you be able to leave and get another job?
- Have you ever had threats made to you or against your family if you do not do what you are told?
- Are you able to make contact with your family or friends?

Recent Examples of Slavery and Exploitation

In 2016, academic research indicated that there could be 2462 victims of Modern Slavery in the Thames Valley. This could provide a more up to date figure?
[https://thamesvalley.s3.amazonaws.com/Documents/Victims/Calculating%20the%20extent%20of%20modern%20slavery%20in%20Thames%20Valley%20\(1\).pdf](https://thamesvalley.s3.amazonaws.com/Documents/Victims/Calculating%20the%20extent%20of%20modern%20slavery%20in%20Thames%20Valley%20(1).pdf)

Vice and sex trade

Organised exploitation of vulnerable young women in the vice trade is prevalent everywhere. An example of this is as follows;

The brutal physical, financial and mental abuse used by a gang to control 53 women trafficked from Hungary and put to work in brothels in Eastbourne, Folkestone, Margate and Brighton. The gang used private dwellings and even student accommodation in a University to ply their illegal trade.

Crime and drugs

Some traffickers threaten and coerce their victims into committing crime, for example street crime, burglary, rogue trading, handling drugs, bank or benefit fraud.

An example of this is as follows;

The number of cannabis farms found in people's homes has risen dramatically. Police have found more than 300 in 2014, a third more than 2009. Police say cannabis production is highly profitable for organised crime gangs seeking to finance other crimes.

Children have been found in cannabis factories used as gardeners. They are often locked in and forced to work in very unsafe environments as the people running the factories often drill huge holes across the house to meet the cannabis plants' extensive water and hot air needs.

Slavery and domestic servitude

The national press has reported many cases of people treated as forced labour or slaves in traveller sites, nursing homes and private dwellings. Sometimes they have been held in servitude for years or decades, with their belongings and identification documents removed.

An example of this is as follows;

The police raided three locations, including private properties and a travellers' site. This led to a number of people being convicted with slavery offences.

Forced labour

Some staff at cleaning, catering or care companies are 'debt bonded' and forced to work very long hours for very low incomes while they attempt to pay off ever-increasing amounts they 'owe' their traffickers for travel to the UK and living costs.

An example of this is as follows;

Care home owners were ordered to pay back £500,000 after illegally employing immigrant workers on 90p an hour. A husband and wife team flew in 4 workers from Mauritius, then made them work in their two care homes for up to 90 hours a week.

What action do I take if I identify a Possible Victim of Slavery or Trafficking?

If a professional becomes concerned that an individual is being exploited or is at risk of exploitation then they should act immediately. Raise the issue with your line manager and they will be able to provide you with some advice regarding your own agency's/service's procedures in this area.

Complete the **Modern Slavery and Human Trafficking checklist** - this will help you in your decision making and conversations with your line manager in terms of next steps. It is also helpful for the Safeguarding Service when sending through a safeguarding alert and for contact with TVP.

If you believe the alleged victim to be a child you should make an immediate safeguarding referral to the Multi Agency Safeguarding Hub (MASH), tel. 0345 050 7666. If in any doubt about age you should always treat the victim as a child if there is any reason to think the victim might be over 18 years of age.

If the alleged victim is an adult with care and support needs you should complete the online adult safeguarding alert (www.osab.co.uk/) identifying "modern slavery" as the abuse type which will be sent to the Adult Safeguarding Team for consideration, or contact adult social care on 0345 050 7666 .

Consider whether you can have a conversation with the alleged victim in private. You should not discuss your concerns with them other than in private. Other persons, including those they appear to know or trust or who may claim to be family members, might be exploiting the suspected victim and discussing your concerns with them might put the victim or others at risk. When considering how to communicate with the alleged victim linked to language and ethnicity use the appropriate interpreting services commissioned by your organisation.

Review the indicators of modern slavery and exploitation above and in annex 1 below and identify why you consider the person to be at risk of exploitation or are concerned about them being exploited.

If you can have a private conversation with the alleged victim establish if they are willing to consent to a referral them to Thames Valley Police (TVP).

If they do not consent, seek advice from your manager or organisation's safeguarding lead. **Generally, if you believe that there may be other alleged victims involved you should inform TVP because of the wider duty of care to the other alleged victims.**

If it is not possible to refer them to TVP and/or you are able to speak to the alleged victim in private, ask their consent to refer them to the Victims' First – Willow Project on Telephone 01844 487987 (0753 824 1045 out of hours) or email enquiries@vwillowproject.org.uk.

Referrals to the Police should be made by calling 101. Only calls to 999 should be made if you suspect immediate risk of harm.

What Should I Do If the Adult Lacks Mental Capacity To Consent To Be Referred To The Police or NRM?

You should presume that an individual has capacity to consent to a referral to the Police or NRM. If there is a reasonable cause to be concerned that the person lacks capacity to make an informed decision (unable to use, retain or weigh up the information to consent to a referral), you should refer to the Mental Capacity Act and follow the guidance regarding how to assess a person's capacity.

<https://intranet.oxfordshire.gov.uk/cms/group-content/mental-capacity-act-forms-and-policies>

Generally, if you reasonably believe the person lacks capacity you must inform TVP and make an on-line referral to Oxfordshire Adult Social Care in accordance with local safeguarding adults' policies.

Professional's duty to notify the Home Office of Potential Victims of Modern Slavery

From 1 November 2015, specified public authorities have a duty to notify the Secretary of State of any individual identified in England and Wales as an alleged victim of slavery or human trafficking. This duty is intended to improve the identification of alleged victims and help build a more comprehensive picture of the nature and scale of modern slavery, to improve victim identification and the law enforcement response.

The "duty to notify" is set out in Section 52 of the Modern Slavery Act 2015, and applies to the Police and Councils at the time of publication of this guidance (additional public authorities can be added through regulations).

If an alleged victim is being referred to the National Referral Mechanism (NRM) then the duty to notify the Secretary of State is fulfilled when making this referral. If the alleged victim is not being referred to the NRM then a separate notification should be made. Even if the person does not consent a MS1 referral must still be completed, but removing any information that identifies the individual. (The alleged victim should have the NRM referral clearly explained to them and sign the form to indicate their consent here. If they do not consent, the form cannot be accepted into the NRM and a duty to notify form (MS1) should be completed. You should also highlight that as they are an alleged victim of crime the form will be shared with TVP. This does not mean the individual is required to cooperate with TVP.

Guidance can be found on the Home Office website. The referral form is included in Annex 1 of this guidance.

If you refer the alleged victim to TVP you should discuss with the TVP who will notify the Secretary of State.

Other Sources of Advice

The Modern Slavery Helpline number is 0844 7782406

The National Referral Mechanism 24/7 Salvation Army helpline number is 0300 303 8151

The Victim First Willow Project number is 0753 824 1045 or via e-mail at enquiries@vfwillowproject.org.uk

The Oxfordshire Safeguarding Adults Team advice line is 01865 328232

There is an advice leaflet for the alleged victim which is available in different languages and can help you reassure the alleged victim about what help is available:

<https://www.gov.uk/government/publications/support-for-victims-of-human-trafficking>.

National Referral Mechanism form for potential adult victims of modern slavery [GDPR]

Adults cannot enter the NRM unless they have signed this form.

To note: this form is for all adult cases in England or Wales. For Scotland or Northern Ireland cases please see separate guidance and form.

For referral of potential child victims please refer to the specific child guidance and form.

How to complete the form

Throughout the form, items marked with an asterisk(*) should be supported by documentary evidence where possible. This form should be completed with reference to the linked guidance available on gov.uk

Where to send the form

Completed forms should be sent to the NCA Modern Slavery and Human Trafficking Unit via email to nrm@nca.x.gsi.gov.uk or by fax to 0870 496 5534.

If the identified individual has requested support contact the Salvation Army on 0300 303 8151 and send the completed form to MST@salvationarmy.org.uk.

Duty to notify

From 1 November 2015, specified public authorities are required to notify the Home Office about any potential victims of modern slavery they encounter in England and Wales. Completing this NRM form is sufficient to satisfy this duty to notify as long as all of the sections marked with a † are completed. However, if the potential victim does not want to be referred to the NRM, then an MS1 form should be completed and sent to dutytonotify@homeoffice.gsi.gov.uk. The MS1 form can be anonymous. The MS1 form and associated guidance is available at www.gov.uk/government/publications/duty-to-notify-the-home-office-of-potential-victims-of-modern-slavery. NRM forms **should not** be sent to the dutytonotify@homeoffice.gsi.gov.uk address.

Section A: Nature of referral (Indicate the nature of the referral and whether support is required and has been requested, to ensure the case is dealt with efficiently.)

Full NRM referral no support

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

Full NRM referral with support (support is optional, If a potential victim wishes to receive support they need to sign the following declaration. You should explain that support can include advice, accommodation, protection and independent emotional and practical help delivered by specialist charities)

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

Individual has been referred to The Salvation Army by First Responder (having signed relevant parts of the form).

Section B: Privacy Information Notice

(Please explain the below information to the potential victim and signpost them to the full Privacy Information Notice on gov.uk.)

How and why the Home Office will uses your information

The UK government signed the Council of Europe Convention on Action against Trafficking in Human Beings ('the Convention') on 23 March 2007. The Convention was ratified by the UK on 17 December 2008, and came into force on 1 April 2009. The UK is compliant with its international obligations through the creation of the UK's NRM, the system for identifying and supporting victims of modern slavery, which was established in 2009.

The Home Office in its capacity as the competent authority, under the Convention, is responsible for identifying and supporting victims of modern slavery, in addition to detecting and preventing the commission of modern slavery offences.

More information about the ways in which the Home Office may use your personal information, including the purposes for which we use it, the legal basis, and who your information may be shared with can be found at:

[Privacy Information Notice.](#)

[Personal Information Charter.](#)

Indication of willingness to engage with police (optional) (Referral to the NRM and access to NRM support is not dependent on engaging with the police. However, if a victim is willing to engage with the police the police will engage with them to keep them informed of any action taken in relation to their modern slavery experience. Information will still be shared with the police where an individual will not engage – see above.)

I am willing to be contacted by the police in relation to my modern slavery experiences, and would like to be kept up to date on action taken.

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

Section C: Potential victim personal details

*Last name: *First name(s):

Also known as:

*D.O.B:/...../..... Age: Sex:

*Nationality:

Language(s) spoken:

Any English spoken: Y or N Interpreter needed: Y or N

Immigration status (where known):

Other communication aids required (for example sign language): Y or N Details:

.....

Home Office (immigration) reference where known:

UK visa or work permit reference:

Any other reference numbers (e.g. National insurance number, or your organisation's reference number):

.....

Safe telephone number on which to contact the potential victim, such as a personal mobile number:

Other safe means of contacting the potential victim, such as via legal representative:

.....

UK current address:.....

.....

Can address be used for correspondence relating to victim identification and support? Y / N

If not, please provide an alternative safe address for postal communications if available:

.....

.....

Section D: Contact details of person making referral

Name:

Job title:

.....

Organisation: Unit or area:

Tel: Mobile:

Email:

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

Section E: General details of the encounter

Date of encounter:/...../.....

Location of encounter (provide address if different from above):

.....

.....

Responsible police force area for this location:

.....

Have you reported the case to the police:

- yes
- no
- NRM referral 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?

.....

Crime reference numbers relating to this incident of modern slavery (where available):

.....

If you have not referred the case to the police, what was the reason for this?

.....

General information about the suspected modern slavery

Suspected victim of (tick any that apply):

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

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

- Under 18
- 18 or over

The country or territory where the modern slavery is believed to have occurred

.....

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).....

Section F: general indicators for modern slavery (mark all that apply and add any not listed under 'other' – this is not an exhaustive list. Record further details of how indicators presented in Section J)

Please tick all relevant boxes

1. Distrustful of authorities
2. Expression of fear or anxiety
3. Signs of psychological trauma (including post traumatic stress disorder)
4. The person acts as if instructed by another
5. Injuries apparently a result of assault or controlling measures
6. Evidence of control over movement, either as an individual or as a group
7. Found in or connected to a type of location likely to be used for exploitation
8. Restriction of movement and confinement to the workplace or to a limited area
9. Passport or documents held by someone else
10. Lack of access to medical care
11. Limited social contact / isolation
12. Limited contact with family
13. Signs of ritual abuse and witchcraft (juju)
14. Substance misuse
15. Person forced, intimidated or coerced into providing services
16. Doesn't know home or work address
17. Perception of being bonded by debt
18. Money is deducted from salary for food or accommodation
19. Threat of being handed over to authorities
20. Threats against the individual or their family members
21. Being placed in a dependency situation
22. No or limited access to bathroom or hygiene facilities
23. Self identifies
24. Any other, please provide details in section J

Section G: Indicators of forced or compulsory labour (mark all that apply and add any not listed under 'other' – this is not an exhaustive list. Record further details of how indicators presented in Section J)

Are any of these indicators present? (tick as applicable)

Yes please tick all relevant boxes in section G

No continue to section H

1. No or limited access to earnings or labour contract
2. Excessive wage reductions, withholding wages, or financial penalties
3. Dependence on employer for a number of services for example work, transport and accommodation
4. Any evidence workers are required to pay for tools, food or accommodation via deductions from their pay
5. Imposed place of accommodation
6. Found in poor living conditions
7. Evidence of excessive working days or hours
8. Deceived about the nature of the job, location, or employer
9. Any other, please provide details in section H
10. Employer or manager unable to produce documents required when employing migrant labour
11. Employer or manager unable to provide record of wages paid to workers
12. Poor or non-existent health and safety equipment or no health and safety notices
13. Any other evidence of labour laws being breached

Where indicators are identified record full details in section J

Section H: Indicators of domestic servitude (mark all that apply and add any not listed under 'other' – this is not an exhaustive list. Record further details of how indicators presented in Section J)

Are any of these indicators present? (tick as applicable)

Yes please tick all relevant boxes in section H

No continue to section I

1. Living with and working for a family in a private home or place of accommodation
2. Not eating with the rest of the family or being given only leftovers, or inadequate food
3. No private sleeping place or sleeping in shared space for example the living room
4. No private space
5. Forced to work in excess of normal working hours or being 'on-call' 24 hours per day
6. Employer reports them as a missing person
7. Employer accuses person of theft or other crime related to the escape
8. Never leaving the house without permission from the employer
9. Any other, please provide details in section J

Where indicators are identified record full details in section J

Section I: Indicators of sexual exploitation (mark all that apply and add any not listed under 'other' – this is not an exhaustive list. Record further details of how indicators presented in Section J)

Are any of these indicators present? (tick as applicable)

Yes please tick all relevant boxes in section I

No continue to section J

1. Advertises for sexual services offering individuals from particular ethnic or national groups
2. Sleeping on work premises
3. Movement of individuals between brothels or working in alternate locations

4. Individuals with very limited amounts of clothing or a large proportion of their clothing is 'sexual'
5. Only being able to speak sexual words in local language or language of client group
6. Having tattoos or other marks indicating 'ownership' by their exploiters
7. Person forced, intimidated or coerced into providing services of a sexual nature
8. Person subjected to crimes such as abduction, assault or rape
9. Someone other than the potential victim receives the money from clients
10. Health symptoms (including sexual health issues)
11. Any other, please provide details in section J

Where indicators are identified record full details in section J

Section J: evidence to support reasons for referral

Please use this section to:

- Expand on the circumstances or details of your encounter or contact with the potential victim, providing background to how the information was provided (for example on first encounter during police operation). Please set out in as much detail as possible exactly what you think has happened to this person that makes them a potential victim of modern slavery, and why you think the story is credible – for example external supporting evidence, or the behaviour and appearance of an individual.
- provide evidence of the indicators that you have identified in sections F to I
- note whether it is likely that further information will be become available at a later date
- provide any other relevant information that you consider may be important and wish to include for example living or working conditions, behaviour, appearance, demeanour
- movements in or to the UK, including dates (if known)
- suspected place of exploitation (if known)
- name of agent, exploiter or trafficker (if known)
- name of other victims (if known)
- record any action you have taken including referral to other agencies (for example The Salvation Army, police, UK Visas and Immigration) where appropriate
- note any immediate concerns regarding the potential victim's health, psychological well-being or safety.

(If a further sheet is required, please indicate that section J is continued and provide with referral form)

Please provide a narrative below to support the reasons for the referral
(supporting documents can also be submitted in conjunction with this narrative)

DRAFT

Indicators of Exploitation and Modern Day Slavery

Please tick where applicable. If, having completed this form you are concerned about an individual, or for assistance and advice, please contact Nicola Bell on 0753 824 1045 or email nicola@vfwillowproject.org.uk

Living Conditions	
Imposed place of accommodation	
Lacking personal possessions	
No private space	
No private space to sleep, or sleeping in a shared space (e.g. living room)	
Overcrowding of accommodation (e.g. number of people exceeds number of bedrooms)	
Not free in place of residence to come and go as they please	
Poor living conditions	
Working Conditions	
Deceived about the nature of the job, location or employer	
Dependence on employer for a number of services (e.g. work, transport, housing)	
Employer reports them as a missing person	
Employee is not in receipt of wage slips or has a Contract of Employment	
Employee is paid less than minimum wage	
Employer unable to provide record of wages paid to workers	
Employer unable to produce documents required when employing migrant labour	
Evidence of excessive working days/hours	
Evidence workers are required to pay for tools, food or housing via pay deductions	
Sexual Exploitation	
Sex working but not being paid	
Sex working to earn money for someone else (indebted to or feel indebted)	
Under 18 and sex working (PLEASE REFER DIRECTLY TO CSE COORDINATOR)	
Mental and Physical Health	
Expression of fear or anxiety	
Found to be malnourished or suffering continuous ill health	
Showing signs of physical abuse (e.g. bruising, reoccurring injuries)	
Signs of psychological trauma (including post-traumatic stress disorder)	
Subject to controlling behaviour	
Always someone constantly with them and who may speak on their behalf	
Distrustful of authorities	
Evidence of control over movement	
Limited contact with family, friends or other social contacts	
Passport or personal documents held by someone else	

Action Taken:	
Signed:	
Date:	