Modern Slavery and Human Trafficking Guidance/Procedure

Modern Slavery and Human Trafficking – the Basics

The terms ‘modern slavery’ or ‘human trafficking’ encompass a wide range of crimes of exploitation.

*Modern slavery* includes slavery, servitude, forced benefit fraud, forced marriage and forced and compulsory labour. It may also involve coercing people into committing crime for others. Victims may be transported a few miles within a town or across continents to be forced into jobs they do not want. Victims can include adults and children and come from all walks of life and backgrounds including British nationals. A quarter of all victims are children.

The true extent of modern slavery in the UK is unknown but is considered to be significant. There have been year on year increases in the number of victims identified. It is estimated that in 2013 there were between 10,000 to 13,000 potential victims of modern slavery in the UK.

*Trafficking* is the movement of people by means such as force, fraud or deception with the aim of exploiting them. Trafficking in adults involves:-

- The act: recruitment, transportation, transfer, harbouring or receipt of persons.
- The means: threat or use of force or other forms of coercion such as abduction, fraud, deception, the abuse of power or of a position of vulnerability or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person.

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 come into contact with 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:


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 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.

Recent Examples of Slavery and Exploitation

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.
Question - Could your work have brought you into contact with the victims of any of these crimes? How would you know?

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 common signs:

- Is the person in possession of their legal documents or are these being held by someone else?
- Is there evidence of control over movement, either as an individual or as a group?
- Does the person have old or serious untreated injuries?
- Have they delayed seeing a healthcare professional, and are they vague, reluctant or inconsistent in explaining how the injury occurred?
- Do they have signs of psychological trauma?
- Does the person look malnourished, unkempt, or appear withdrawn?
- Do they have few personal possessions and often wear the same or unsuitable clothes?
- What are their living conditions?
- Where do they sleep e.g. in a caravan or outbuilding without water or heating?
- Do they sleep on the floor without sufficient bedding?
- Is the person withdrawn or appear frightened or anxious, unable to answer questions directed at them or speak for themselves and/or an accompanying third party speaks for them?
- Is the person afraid or distrustful of the authorities?
- Does the person perceive themselves to be in debt to someone else or in a situation of dependence?
- Is money is deducted from their salary for food or accommodation?
- Is a child’s parent or legal guardian absent?
- Is the quality of the relationship between the child and their adult carer poor and a reason for concern?
- Does the child move location frequently?
- Do they live in a property with bars covering the windows or is visibility into the property permanently obscured?
- Is access to back rooms of the property restricted or are doors locked?
- Is the person wearing inappropriate clothing for their job or seem to have noticeably poor personal hygiene, be fearful or unwilling to engage with the public?
- Does the person know their home or work address?

Indicators of forced labour

- The employer or manager is unable to produce documents required when employing migrant labour.
- The employer or manager is unable to provide record of wages paid to workers.
• Poor or non-existent health and safety equipment or no health and safety notices.
• Any other evidence of labour laws being breached.
• No or limited access to earnings or labour contract.
• Excessive wage deductions are being made.
• The victim is dependent on the employer for a number of services, for example work, transport and accommodation.
• Workers are required to pay for tools, food or accommodation via deductions from their pay.
• There is an imposed place of accommodation.

Indicators of domestic servitude

• The person is living with and working for a family in a private home.
• They are not eating with the rest of the family or being given only leftovers to eat.
• They have no proper sleeping place or sleeping in shared space for example the living room
• They have no private space.
• They are forced to work in excess of normal working hours or being 'on-call' 24 hours per day.
• The employer reports them as a missing person.
• The employer accuses the person of theft or other crime related to the escape.
• They are never allowed to leave the house without the employer.

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). 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 you complete an adult safeguarding alert identifying "modern slavery" as the abuse type which will be sent to the Safeguarding Service for consideration.

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 you are able to speak to the alleged victim in private, ask their consent to refer them to the Independent Trauma Advice service, Elmore Team on 01865 200130 and ask to speak to a member of the Trauma Team or email info@elmorecommunityservices.org.uk marked for the attention of the Trauma Team.

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

Other Sources of Advice

The United Kingdom Human Trafficking Centre 24/7 help line number is 0844 7782406

The National Referral Mechanism 24/7 Salvation Army referral number is 0300 3038151

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.

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.

Reporting the matter to the NRM is not the same as reporting a crime to TVP and does not result in the police becoming involved.

**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.

Annex 1- National Referral Mechanism Adult Referral Form

National Referral Mechanism form for alleged adult victims of modern slavery

Please note the NRM cannot be sent to the Home Office unless it has been signed.

Please 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 alleged 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:


Where to send the form
The Home Office is currently piloting changes to the NRM system. Completed forms should therefore be sent to the following teams depending on the location the victim was identified:

- In West Yorkshire police force area and the South West (Avon and Somerset, Devon and Cornwall, Dorset, Gloucestershire, and Wiltshire police force areas) a local Slavery and Safeguarding Lead;
- In the rest of England and Wales to UK Human Trafficking Centre via email to UKHTC@nca.x.gsi.gov.uk or by fax to 0870 496 5534.

If you are unsure which police force area the individual was identified in, please check https://www.police.uk/.

Duty to notify: from 1 November, specified public authorities are required to notify any encountered potential victim of modern slavery in England and Wales to the Home Office and a copy of the forms should therefore also be sent to dutytonotify@homeoffice.gsi.gov.uk. To satisfy the duty all sections marked with a † must be completed. Where a victim does not consent to the NRM, a notification should still be completed using the MS1 form available at https://www.gov.uk/government/publications/duty-to-notify-the-home-office-of-potential-victims-of-modern-slavery.
### 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 (adults must sign the form prior to referral)
- [ ] Full NRM referral with support (support is optional; adults must sign both consent sections to receive support).
- [ ] Individual has been referred to The Salvation Army by First Responder / Slavery Safeguarding Lead (having signed relevant parts of the form).
Section B: Consent of potential victim
(The potential 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 a victim of crime the form will be shared with the police, either by the SSL / First responder or once referred to the Competent Authority. This does not mean the individual is required to cooperate with the police.)

Consent to the referral (mandatory)
I consent to my details including name and date of birth being submitted to the Competent Authorities (UK Visas and Immigration/ Immigration Enforcement/UK Human Trafficking Centre/Multi-Disciplinary Panel) and the Home Office, who where appropriate might contact other relevant agencies to assist in the identification and decision making process.

The police will also be provided with a copy of the NRM form – to assist in the detection and prevention of modern slavery offences. The police will record the incident in line with Home Office Counting Rules and consider further action, but may not pursue a case unless the individual engages with them directly.

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

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

I consent that my details, including name, date of birth and contact details, may be passed on to support providers The Salvation Army, and their subcontractors, for the purpose of assessing my support needs.

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

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:
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Other safe means of contacting the potential victim, such as via legal representative.
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UK current address...........................................................................................................
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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.
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**Section D: Contact details of person making referral**

Name: ........................................................................................................................................

Job title: ....................................................................................................................................

†Organisation: .......................................................................................... Unit or area..................

Tel: ........................................................................................................ Mobile: ........................................

Email: ........................................................................................................................................

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

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**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).................................................................................................
Oxfordshire Modern Slavery, Exploitation and Human Trafficking Checklist

What is this tool?
This is a checklist that you can use to help you decide whether an adult is at risk of Modern Slavery, Exploitation and Human Trafficking.

Who should use this tool?
This tool should be used by frontline practitioners working with adults at risk of Modern Slavery, Exploitation and Human Trafficking.

What is the tool for?
This tool is for you to make an initial assessment about the level or risk of exploitation; it is not intended to be a referral form. However, the checklist should form the basis of discussions when making a referral into safeguarding procedures and can be added to referral documentation as an appendix.

How to use this tool
Consider each individual case in relation to all of the criteria in each of the 1st two segments. Then consider either 3a, 3b or 3c (or a combination if more than one applies). The results can be used to determine the risk or presence of sexual exploitation. The results are not a definitive assessment of risk. They should provide you with a structure to inform your judgement, analysis and risk management. If the checklist identifies a risk or presence of exploitation then a referral into safeguarding procedures should be made. If any indicators of critical risk are identified then immediate action needs to be taken to safeguard the individual(s).

Details of the person completing this tool

| Name: | 
| Job Title: | 
| Agency / Organisation: | 
| Telephone: | 
| Email: | 

Details of the adult that the concern relates to

| Name: | 
| Date of birth | Age | Gender | 
| Address | 
| Contact number |
1. Vulnerability Factors

Presence of these factors indicates an increased risk of exploitation taking place.

<table>
<thead>
<tr>
<th>Mark the box if the risk factor is present.</th>
<th>Yes</th>
<th>No</th>
<th>Don’t know</th>
<th>Source / Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Isolation, lack of strong social networks</td>
<td>☐</td>
<td>☐</td>
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<td>2. Breakdown of family relationships</td>
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<td>3. Lack of engagement / inconsistent engagement with support networks (i.e. often misses appointments)</td>
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<td>4. Friends/peers are victims of exploitation</td>
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<td>5. History of local authority care</td>
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<td>6. History of abuse (including as a child)</td>
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<td>7. Low self-esteem</td>
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<td>8. Susceptible to grooming</td>
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<td>9. Bereavement or loss</td>
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<td>10. Dependency on alleged perpetrator(s)</td>
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<td>11. Substance misuse/dependency</td>
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<td>12. Needs for care and support</td>
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<td>13. Learning Disability/difficulty</td>
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<td>14. Unstable housing situation</td>
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</tbody>
</table>
2. At Risk Indicators

Presence of these indicators detect identifiable features of exploitation.

<table>
<thead>
<tr>
<th>Mark the box if the risk factor is present.</th>
<th>Yes</th>
<th>No</th>
<th>Don’t know</th>
<th>Source / Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Forced or coerced into making decisions</td>
<td>☐</td>
<td>☐</td>
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<td>2. Going missing for periods of time</td>
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<td>3. Unexplained increase or decrease in goods or monies</td>
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<td>4. Unable to provide legal documents e.g. passport, benefit books without reasonable explanation</td>
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<td>5. The person perceives themselves to be in debt to someone else or in a situation of dependence?</td>
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<td>6. Reduced contact with family, friends and other support networks.</td>
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<td>7. Concerning use of internet, social media and mobile phone.</td>
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<td>8. Self-harming</td>
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<td>9. Physical injuries without plausible explanation</td>
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<td>10. Old or serious untreated injuries? Have they delayed seeing a healthcare professional, and are they vague, reluctant or inconsistent in explaining how the injury occurred?</td>
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<td>11. Withdrawn or appear frightened or anxious, unable to answer questions directed at them or speak for themselves and/or an accompanying third party speaks for them?</td>
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<td>12. Appears malnourished, unkempt, or appear withdrawn with few personal possessions and often wears the same or unsuitable clothes?</td>
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<td>13. Involvement in petty crime</td>
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<td>14. Poor and unsuitable living conditions</td>
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<td>15. Funding use of drugs / alcohol / legal highs or tobacco through unknown sources</td>
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<tr>
<td>16. Unexplained contact with hotels/taxis/fast food outlets</td>
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<td>☐</td>
<td>☐</td>
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<tr>
<td>17. Reported to have been in locations where there are known concerns relating to exploitation</td>
<td>☐</td>
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<tr>
<td>18. The person doesn't know their home or work address</td>
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<tr>
<td>19. Associating with known perpetrators of exploitation</td>
<td>☐</td>
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<tr>
<td>20. Unexplained patterns of engagement i.e. disappearing from support systems with no contact or explanation.</td>
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<tr>
<td>21. Afraid or distrustful of the authorities?</td>
<td>☐</td>
<td>☐</td>
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</tr>
</tbody>
</table>
3. Critical Risk Indicators
   a) Presence of these indicators identify critical concerns of sexual exploitation.

<table>
<thead>
<tr>
<th>Mark the box if the risk factor is present.</th>
<th>Yes</th>
<th>No</th>
<th>Don't know</th>
<th>Source / Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Groomed or abused via internet or mobile technology</td>
<td>☐</td>
<td>☐</td>
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<tr>
<td>2. Controlling partner e.g. preventing access to services</td>
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<tr>
<td>3. Fear of partner</td>
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<tr>
<td>4. Disclosure of domestic abuse</td>
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<tr>
<td>5. Exchanging sexual activity for accommodation</td>
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<tr>
<td>6. Being trafficked for the purpose of sex</td>
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<tr>
<td>7. Disclosure of sexual assault/exploitation</td>
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<tr>
<td>8. Withdrawing allegations of sexual assault / exploitation</td>
<td>☐</td>
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<tr>
<td>9. Abduction, assault, rape and forced imprisonment</td>
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<tr>
<td>10. Meeting adults / older peers through the internet</td>
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<tr>
<td>11. Evidence of risky/inappropriate sexual behaviour</td>
<td>☐</td>
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<tr>
<td>12. Inconsistent use of contraception (risk of STI’s)</td>
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<td>☐</td>
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<tr>
<td>13. Regular and/or concerning access of sexual health services</td>
<td>☐</td>
<td>☐</td>
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<tr>
<td>14. Change in appearance and/or sexualised dressing</td>
<td>☐</td>
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<tr>
<td>15. Being bought/sold for sex</td>
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<tr>
<td>16. Multiple pregnancies, miscarriages or terminations</td>
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<tr>
<td>17. Recruiting others into sexual exploitation</td>
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</tbody>
</table>
b) Presence of these indicators identifies critical concerns of forced labour.

<table>
<thead>
<tr>
<th>Mark the box if the risk factor is present.</th>
<th>Yes</th>
<th>No</th>
<th>Don't know</th>
<th>Source / Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. The employer or manager is unable to produce documents required when employing migrant labour.</td>
<td>☐</td>
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<tr>
<td>2. The employer or manager is unable to provide record of wages paid to workers.</td>
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<tr>
<td>3. Money is deducted from the persons salary for food or accommodation?</td>
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<tr>
<td>4. Poor or non-existent health and safety equipment or no health and safety notices.</td>
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<tr>
<td>5. Is a worker wearing inappropriate clothing for their job or seem to have noticeably poor personal hygiene, be fearful or unwilling to engage with the public?</td>
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<tr>
<td>6. Any other evidence of labour laws being breached.</td>
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<tr>
<td>7. No or limited access to earnings or labour contract.</td>
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<tr>
<td>8. Excessive wage deductions are being made.</td>
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<tr>
<td>9. The victim is dependent on the employer for a number of services, for example work, transport and accommodation.</td>
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<tr>
<td>10. Workers are required to pay for tools, food or accommodation via deductions from their pay.</td>
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<tr>
<td>11. There is an imposed place of accommodation.</td>
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</tbody>
</table>
### c) Indicators of domestic servitude

<table>
<thead>
<tr>
<th>Mark the box if the risk factor is present.</th>
<th>Yes</th>
<th>No</th>
<th>Don’t know</th>
<th>Source / Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. The suspected victim is living with and working for a family in a private home.</td>
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<tr>
<td>2. They are not eating with the rest of the family or being given only leftovers to eat.</td>
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<tr>
<td>3. They have no proper sleeping place or sleeping in shared space for example, the living room.</td>
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<td>4. They have no private space.</td>
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<td>5. They are forced to work in excess of normal working hours or being ‘on-call’ 24 hours per day.</td>
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<tr>
<td>6. The employer reports them as a missing person.</td>
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<td>7. The employer accuses the person of theft or other crime related to the escape.</td>
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<tr>
<td>8. They are never allowed to leave the house without the employer.</td>
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</tbody>
</table>