

# Cumbria Modern Slavery & Exploitation Partnership

Modern Slavery Pathways and guidance  
Version 9 July 2025



This guidance has been developed in consultation with agency representatives from the following partnerships agencies:



# Contents

Introduction	3
Defining Modern Slavery	4
The Act – what is done	5
The Means – how it is done	5
The Purpose (exploitation) – why is it done	5
Sexual Exploitation	6
Adult Sexual Exploitation	6
Forced Labour	6
Child Exploitation / County Lines	6
Criminal Exploitation	7
Domestic Servitude	7
Safeguarding Children, Young People and Adults at Risk	8
Guidance for Local Authorities	9
Guidance for the National Health Service (NHS)	10
Guidance for Job Centre Plus / DWP	10
NGO – Non-Governmental Organisations	11
The Fire Service	11
National Referral Mechanism	11
First Responder Organisations	12
Child Victims	13
Support for Victims	15
How to refer modern slavery victims to the police	15
Police referral process for first responders / frontline workers	16
Modern Slavery & Human Trafficking Pathway	17
7 Minute Briefing - Modern Slavery	20
Referral Pathway for Victims of Modern Slavery and Human Trafficking	23

**Modern Slavery Helpline 08000 121 700**

(Confidential helpline support –  
24 hours a day, 365 days a year)

**Crimestoppers 0800 555 111**

## Introduction

Cumbria is a place many enjoy visiting and living in due to having the wild and rugged landscape of the Lake District. Cumbria is a vast county with our towns spread far apart. We have many villages, and lots of rural communities, some close to amenities and some isolated.

This document aims to explain plainly what Modern Slavery and Human Trafficking is, and how everyone across Cumbria can help to identify and assist in dealing with those involved in this complex and hidden crime.

As a partnership, we will put the people of Cumbria at the centre of everything we do. We will commit to supporting the victims of this exploitation and criminal conduct and offer appropriate service provision to the victims of Modern Slavery and Human Trafficking in Cumbria.

We seek to provide clear information which will enable practitioners and the wider community to feel confident in recognising signs of Modern Slavery and Human Trafficking (MSHT) building professional curiosity. The overall aim is to ensure the victims are properly identified and supported and, where possible, criminals are brought to justice.



## Defining Modern Slavery

Modern Slavery is covered by legislation across the Modern Slavery Act 2015 and encompasses a wide range of strands of exploitation as outlined in more detail below. Very often victims do not always recognise that they are being subject to exploitative criminal conduct and therefore may not make any overt disclosures to professionals or police.

The police would investigate the criminal side of any such conduct.

In simple terms, human trafficking is the movement of a person from one place to another into conditions of exploitation, using deception, coercion, abuse of power or the abuse of the person's vulnerability. Consent and a willingness of the victim to travel, can still be present when trafficking is taking place.

Human trafficking for exploitation can happen within our own UK borders and not something that has to start outside of the UK. Trafficking can be from one city to another or even within the same city or town, the requirement is for the movement of an individual.

**Any child** transported for exploitative reasons is considered to be a trafficking victim, whether or not they have been forced or deceived. All children must be protected and safeguarded.

**All victims of trafficking should be treated as a victim first, immigration status second.**

Modern slavery takes various forms and affects people of all ages, gender and races, adults affected are not always subject to human trafficking. Professionals should be mindful of factors that may cause additional vulnerabilities such as age, sexual orientation, gender identity, pregnancy, addiction or dependency issues and mental health for example.

Modern slavery is present within our communities, often hidden in plain sight and not necessarily always identified as being an aspect of modern slavery. Recent cases have highlighted homeless adults, promised paid work opportunities forced to work and live in dehumanised conditions, and adults with learning difficulties restricted in their movements and threatened to hand over their finances and work for no gains. Similarly it could be a vulnerable adult being forced to shoplift for another's gain.

From the 1st November 2015, specified public authorities have a duty to notify the Secretary of State any individual identified in England and Wales as a suspected victim of slavery or human trafficking, under section 52 Modern Slavery Act 2015.

The Safer Cumbria Modern Slavery Partnership promote that all those who come in contact with potential victims will complete the Duty to Notify form (DTN) if the victim is unwilling to be supported through the National Referral Mechanism (NRM). The NRM will be covered in more detail later in this document

There are three components to Modern Slavery

## **The Act – what is done**

Recruitment, transfer, transportation, harbouring or receipt of persons;

## **The Means – how it is done**

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) – why is it done**

To exploit a person through adult sexual exploitation, forced labour or services, forced criminality, domestic servitude or the removal of organs from a person.

Often victims will not identify as such, and even if they do there can be many barriers to engagement therefore it is vital to build trust, be professionally curious and ask questions within interactions. Some things to consider are listed below but this is not exhaustive.

- Is the victim in possession of their passport, identification or travel documents? Are these documents in their possession or with someone else, and does the victim know where their papers are and able to access them?
- Does the victim act as if they were instructed or coached by someone else to give a 'scripted answer'. Do they allow others to speak for them when spoken to directly – often exploiters present with a victim and can seek to be very 'helpful' by answering questions or trying to assist with a language barrier. Be aware that there is as likely to be an Alpha female as a male exploiter in the case of adult sexual exploitation
- Was the victim recruited for one purpose and forced to engage in some other job? Do they seem excessively tired, losing weight or struggling to keep appointments
- Can the victim tell you how much they are paid and in what way they receive their wages, do they have payslips and are they aware of their rights as a worker in the UK.
- Does the victim have freedom of movement? Can they tell you the bus route where they are staying, or the local supermarket closest to them? There are ways of getting information without asking direct questions in the beginning.
- Has the victim or family been threatened with harm if the victim does not comply with what is being asked of them
- Does the victim display outward signs of physical harm or neglect. Do they present with persistent sexual infections for example, or a worsening of anxiety or mental health issues
- Can the victim freely contact friends or family? Do they have limited social interaction or contact with people outside their immediate environment. Can they show you contact with family or friends on a phone for example, or say when they last had some contact with people important to them

**REMEMBER A PROFESSIONALLY CURIOUS CONVERSATION CAN IDENTIFY CONCERNS TO EXPLORE FURTHER**

[Professional Curiosity Guidance September 2022](#)

## Sexual Exploitation

The sexual exploitation of children and adults has been identified across the United Kingdom, in both rural and urban areas. It affects boys and men as well as girls and women.

Ordinary residential properties, hotels and holiday lets are being used more and more for “pop-up” brothels facilitated through popular booking methods such as Air BnB.

## Adult Sexual Exploitation

- Be moved between short term locations, sometimes from city to city or town to town in order to avoid police attention or contact
- Display a limited amount of clothing, of which a large proportion is sexual
- Display signs of substance misuse, self neglect or sexually transmitted infections
- Be forced, intimidated or coerced into providing sexual services with no control over their own adverts or range of services offered
- Be subjected to sexual assault or rape.
- Be unable to travel freely e.g. picked up and dropped off at work location by another person
- Have money for their services provided or collected by another person.

## Forced Labour

Forced labour takes place when the work is done under the menace of a ‘penalty’ ( eg threats of violence to them or family) or the person has not offered themselves voluntarily and is now unable to leave.

This may occur in car wash locations, nail bars, factories, agriculture and building work. Victims may experience:

- Threats or actual physical harm to themselves or family
- Restriction of movement or confinement in a certain location where they live or work
- 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 for accommodation, travel or the opportunity to work
- Withholding of documents e.g. passport/security card
- Threat of revealing to authorities an illegal immigration status
- Their employer is unable to produce documents required to support lawful and fair employment
- Poor or non-existent health and safety standards
- Requirement to pay for tools and food.
- Pay that is less than minimum wage and no contract
- Excessive work hours/ few breaks

## Child Exploitation / County Lines

### Child Exploitation (CE) | Cumbria Safeguarding Children Partnership

Child exploitation is a form of child 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/criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the offender

The victim may have been sexually/criminally exploited even if the activity appears consensual.



Sexual exploitation results in children and young people suffering harm and causes significant damage to their physical and mental health. It can also have profound and damaging consequences for the child's family. Parents and carers are often traumatised and under severe stress. Siblings can feel alienated and their self-esteem can be affected. Family members can themselves suffer serious threats of abuse, intimidation and assault at the hands of perpetrators.

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 (not in 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

## **Criminal Exploitation**

The victim is targeted and forced/deceived in to conducting some form of criminal activity such as shoplifting, forced begging, cannabis cultivation and benefit fraud.

- 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
- Victim being arrested multiple times

## **Domestic Servitude**

This is arguably the most hidden of offences. It features the obligation to provide certain services and live on another person property without the freedom to leave or have autonomy. They 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, "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.

# Safeguarding Children, Young People and Adults at Risk

We have a collective multi-agency responsibility to identify children and adults at risk of being exploited and or trafficked and to safeguard and protect them from further risk or harm.

Children (those aged under 18) are considered victims of trafficking whether or not they have been coerced, deceived or paid to secure their compliance. They need only have been recruited, received or harboured for the purpose of exploitation. **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 under 18 years of age.**

Modern slavery is treated as a safeguarding issue, requiring a swift safeguarding response due to the risk and trauma suffered by victims.

If you suspect that a child or young person may be a victim, a referral must be made to the safeguarding hubs

Phone contact:

- Cumberland Safeguarding Hub **0333 2401727** or
- Westmorland and Furness Safeguarding Hub **0300 373 2724**

Professionals should complete the relevant single contact form:

[Westmorland and Furness Single Contact Form](#)

[Cumberland Single Contact Form](#)

Adults at risk as defined by the Care Act 2014 must be referred using adult safeguarding 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 him/herself against the abuse or neglect or the risk of it.

The Care Act 2014, Section 42 (2) requires a local authority to make statutory enquiries, or cause others to do so, where it has reasonable cause to suspect that an adult with care and support needs is experiencing, or is at risk of, abuse or neglect and as a result of those care and support needs is unable to protect him/herself against the abuse/neglect or the risk of it (see Care Act 2014, S42(1))

## [Care Act 2014](#)

A S42(2) enquiry establishes whether any action needs to be taken to prevent or stop abuse or neglect, and if so, what and by whom. If you are worried and concerned about a person please use the following

## [How to raise a safeguarding concern | Cumbria Safeguarding Adults Board](#)

If you have concerns about an adult in Allerdale, Carlisle, or Copeland contact Cumberland Council on **0300 373 3732**.

If you have concerns about an adult in Barrow, Eden or South Lakeland contact Westmorland and Furness Council on **0300 373 3301**.

Out of hours **01228 526690**



## Guidance for Local Authorities

A wide range of staff at councils have a role to play in identifying or supporting victims of modern slavery, including:

- Officers in services that regulate or otherwise engage with local businesses / housing and wider communities
- Officers in direct customer contact roles
- Officers in services involved in supporting individuals and families, for example social care and housing

### When a victim is identified

Local Authorities are First Responder Organisation and under section 52 of the Modern Slavery Act 2015, they have a statutory Duty to Notify the Home Office when they suspect a person may be a victim of modern slavery or human trafficking.

This is discharged by “referring a victim” into the National Referral Mechanism (NRM) ( further guidance is given below around NRM)

Modern Slavery is a form of child abuse, and normal safeguarding / child protection procedures should always be followed in regard to any potential victim, in line with the guidance outlined in “Working together to safeguard children 2023.” Working together to safeguard children 2023: statutory guidance

For adult victims, modern slavery and human trafficking is a form of abuse and councils should adhere to their roles and responsibilities under the Care Act 2014 Care Act 2014 and Housing Act 1996 Housing Act 1996 and the Homeless Reduction Act 2017 Homelessness Reduction Act 2017



## Guidance for the National Health Service (NHS)

The NHS is not a First Responder Organisation and healthcare professionals cannot refer directly into the National Referral Mechanism.

Victims of modern slavery are a vulnerable group and should be treated with the same sensitivity as other vulnerable groups, such as victims of domestic violence and child sexual exploitation.

If a health care professional is concerned that their patient is potentially a victim of modern slavery, they should take the following safeguarding principles into consideration and act on their concerns by following local safeguarding procedures.

Healthcare professionals must also be astute to their own safety in such consultations and should ensure they have appropriate support available. Health professionals should not offer the victim personal support outside of the professional boundaries and referrals.

- If there is an immediate dangerous threat to the staff or patients safety, try to encourage the patient to stay, remain calm and continue working in a trauma informed way and call 999 for the Police informing that they have someone with them who they consider a potential victim of modern slavery
- Safeguarding the victim must always be first priority. Adult victims of trafficking may have experienced complex physical and/or emotional trauma and may be Adults at Risk. Even where an adult has already been removed from a harmful situation, they are at significant risk of re-victimisation.
- If there is no immediate fear for welfare discuss your concerns with your Designated Safe-guarding Professional
- If there is no immediate risk and the adult consents / requests police involvement call the police non-emergency number 101 or email 101 via Cumbria Constabulary website.
- All victims, or suspected victims, of slavery under the age of 18 must be referred to Children's Services urgently under child protection procedures. Children in these circumstances must not be allowed to leave the department. Police must be contacted if the child absconds or is removed.

## Guidance for Job Centre Plus / DWP

If DWP frontline staff believe an applicant is facing clear risks to their welfare or safety, they are explicitly empowered by DWP policy and relevant legislation to take reasonable steps to address these risks.

DWP frontline staff should refer any applicant they think may be a potential victim to an inbox monitored by DWP's Serious Organised Crime (SOC) team for immediate assessment against the indicators of modern slavery.

Instructions on how to make this referral to SOC are housed on the Department's internal website, including a link to a self-populating email.

Where the SOC team suspect a person may be a victim of modern slavery this information will be passed on to the Police as a First Responder.

It is important that frontline staff in job centres are familiar with the indicators of modern slavery. In particular, staff may notice that victims are always accompanied to appointments and not given the opportunity to speak for themselves or may appear frightened or anxious during the appointment.

## NGO – Non-Governmental Organisations (First Responder and Non-First Responder Organisations)

Non-Governmental Organisations often come across victims of modern slavery and human trafficking as part of a service they provide. Organisations who may come across victims include advice services, legal representatives, homeless charities including drop in services, outreach, day shelters and soup kitchens as well as counselling services, housing services and those providing wider support to migrants including asylum seekers, support services for sex workers, unions and self-help groups.

Where these services may not be First Responder Organisations, they should have an understanding of who are First Responders in the local area. How to support a referral including ensuring consent is informed, for example by being in a position to explain to the possible victim what to expect, and wider specialist modern slavery charities who may be able to provide specialist advocacy and assistance to the victim.

## The Fire Service

Fire Services are **not** First Responders but may encounter victims of modern slavery during enforcement actions undertaken independently or with the police.

If a member of the Fire Service should have any concerns around possible victims of modern slavery or human trafficking, these concerns should be raised through the usual safeguarding mechanisms, or if the concerns are more urgent, then they should dial 999 for the Police immediately.

## National Referral Mechanism

[National referral mechanism guidance: adult \(England and Wales\) - GOV.UK](#)

The National Referral Mechanism (NRM) is a framework for identifying and referring potential victims of modern slavery and ensuring the appropriate support is received

## NRM Process

Only persons designated as First Responder Organisations can refer cases to the NRM.

## First Responder Organisations

A 'first responder organisation' is, in England and Wales, an authority that is authorised to refer a potential victim of modern slavery into the National Referral Mechanism. The current statutory and non-statutory first responder organisations are:

- Police forces
- Certain parts of the Home Office:
- UK Visas and Immigration
- Border Force
- Immigration Enforcement
- National Crime Agency
- Local authorities
- Gangmasters and Labour Abuse Authority (GLAA)
- Salvation Army
- Migrant Help
- Medaille Trust
- Kalayaan
- Barnardo's
- Unseen
- NSPCC (CTAC)
- BAWSO
- New Pathways
- Refugee Council

## Consent

Consent is required for an adult to be referred into the NRM. So they can give their informed consent, you must explain what the NRM is

- What support is available through it
- What the possible outcomes are for an individual being referred.

You should also make it clear that information may be shared or sought by the SCA from other public authorities, such as the police and local authorities, to gather further evidence on an NRM referral.

If an adult does **not** consent to enter the NRM, a separate duty to notify form should be completed. Guidance on the process and the MS1 form is available.

<https://www.modernslavery.gov.uk/start>



# Child Victims

If the potential victim is under 18, or may be under 18, you should complete a child referral form <https://www.modernslavery.gov.uk/start>

Child victims **do not have to consent to be referred** into the NRM and should be referred to wider child safeguarding processes for support.

Read the separate guidance and form for child victims

(<https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms>).

You can find the referral details on the following link

<https://www.modernslavery.gov.uk/start>

The form submits to a home office department called the Single Competent Authority (SCA)

They aim to make a **reasonable grounds decision** within 5 working days.

## Stage 1

A caseworker will look at the potential victim's case within 5 working days, whenever possible, and decide if there are reasonable grounds to believe they are a victim.

Emergency accommodation and support may be provided during this time if the potential adult victim is at risk from their exploiter or of becoming destitute.

Cases that do not meet the reasonable grounds criteria will be closed at this stage unless there's a request for a reconsideration.

Where a negative reasonable grounds decision is returned, no further emergency accommodation or support will be available through the NRM.

## Stage 2

If there are reasonable grounds, the case will be investigated in more detail before deciding if there are conclusive grounds.

The potential victim will receive a recovery period of at least 30 days. If the potential victim has consented to receive NRM support, they will enter into support following the date of their positive reasonable grounds decision.

After this recovery period, a conclusive grounds decision will be made as soon as possible. NRM support will be available to potential victims at least until the conclusive grounds decision is made.

## If conclusive grounds decision is positive

The potential victim will receive a minimum of 45 calendar days' move-on support following their conclusive grounds decision.

Afterwards, the point of exit from support is determined by a [recovery needs assessment](#), with the type and length of ongoing support varying depending on the individual victim's recovery needs.

This assessment identifies the ongoing recovery needs related to modern slavery exploitation and informs a tailored needs-based transition plan for each victim.



## If the conclusive grounds decision is negative

The potential victim will receive move-on support for up to 14 working days after the receipt of the negative conclusive grounds decision. However, an extension request for an additional period of support can be made by the individual's support worker.

## Ask for a reconsideration

You can ask for a reconsideration of a reasonable grounds or conclusive grounds decision within one month.

It must be for one of these reasons:

- You received new information which would affect the outcome of the case
- There are specific concerns that a decision is not in line with the guidance

More information about asking for a reconsideration is available in annex E of the [modern slavery statutory guidance](#).

## If a potential victim does not want you to refer their case

The potential victim will not receive support through the NRM or get a formal decision.

You will still need to complete the online referral form but choosing the option to indicate the potential victim has not consented to referral into the NRM.

Designated organisations in England and Wales have a Duty to Notify (DtN) the Home Office when they encounter a potential victim of modern slavery.

A DtN is also sent to the police to help them:

- Investigate the exploiters
- Understand how and where modern slavery is happening

You can only raise a DtN in England and Wales – it is not available in Scotland and Northern Ireland.

The potential victim's personal information will not be shared with anyone, unless they agree to let the police contact them.

Duty to Notify forms can be found on the Home Office website:

<https://www.modernslavery.gov.uk/start>





## Support for Victims

Individuals who are recognised as a potential victim of modern slavery through the NRM have access to specialist tailored support for a period of at least 45 days while their case is considered, which may include:

- Access to relevant legal advice
- Accommodation
- Protection
- Independent emotional and practical help

Support in England and Wales is currently delivered by the Salvation Army and a number of subcontractors. The Salvation Army will assess each potential victim to determine what support is most appropriate.

You must explain this process to the potential victim and seek their consent before filling out the NRM form. If they consent to being referred you should indicate on the form the type of referral being made and you will be asked to confirm that the potential victim provided you with consent.

You should contact the Salvation Army as soon as possible to make the support referral (prior to the reasonable grounds decision, which has a target of 5 working days).

## How to refer modern slavery victims to the police

A potential victim of modern slavery is a potential victim of crime. All NRM forms should be referred to the police – either on the victim's behalf if they give consent, or as a third party referral if they don't give consent (provided this does not breach any obligation of confidence under the common law).

This referral should be made by the first responder/front line worker, or if the referral has not already been made by the time the NRM form is received the SCA. The police will then determine what action is appropriate, in line with Home Office Counting Rules.

This doesn't mean that potential victims are under any obligation to cooperate with the police. There is a separate section in the NRM form where it can be confirmed if they are or are not willing to engage with the police.

## Obligation of Confidence

The NRM process is already a multi-agency process and when a potential victim consents to enter the NRM, they should be aware that information will be passed on by the first responder / frontline worker in order to access the NRM. It is unlikely that an obligation of confidence would prevent referring this information to the Police.

If a first responder / frontline worker is unsure whether an obligation of confidence would be breached by referring a case to the police, they should contact their organisation's legal advisor for further guidance.

There is no obligation of confidentiality between the SCA and the victim, as this information has been received via a third party. The SCA is therefore entitled to process this information in accordance with the Data Protection Act 2018 and the General Data Protection Regulation and refer this information to the police to support the detection and prevention of crime. The SCA does not require consent from the victim to do so. The intention is to do this in all cases referred into the NRM where there has not already been a police referral.

## Police referral process for first responders / frontline workers

When completing the NRM form, the first responder / frontline worker should explain to the victim that their case will be passed on to the police (either by the first responder themselves or the SCA), as they are a potential victim of crime.

The victim is under no obligation to cooperate with the police to receive support through the NRM. If the potential victim indicates they will cooperate, then the police will contact them regarding the allegation. Otherwise, communication will be with the person who made the third-party referral.

The first responder / frontline worker should check whether a police referral has already been made in relation to this case. Where a referral has not been made, the table below outlines where the form should be sent:

### Where the location of the alleged exploitation is known

The Police force covering that area (where there have been multiple locations referral should be to the most recent location's police force)

### Where the location of the exploitation is unknown

The Police force covering the area where the victim resides at the point of the referral to the Police OR the Police force covering the area where the individual was encountered, if the individual does not have a fixed address.

### Where the exploitation took place overseas

The Police force covering the area where the victim resides at the point of the referral to the Police or the Police force covering the area where the individual was encountered, if the individual does not have a fixed address.

### Where the Police have not been contacted

The first responder / frontline worker should indicate on the form why not, including where this is because a referral has already been made by another party.

### Where a crime reference number has been provided

This should be added to the form, but if it is outstanding this should not delay submission of the NRM form.

## Single Competent Authority (SCA)

Decisions about who is recognised as a victim of modern slavery are made by trained specialists in the SCA.

All referrals to the NRM from First Responders must be sent to the SCA for consideration. The SCA also manages the data on NRM referrals.

The SCA makes decisions on all NRM cases, regardless of nationality or immigration status of the individual. The SCA therefore considers a case for:

- A UK National
- An European Economic Area (EEA) National
- A non-EEA National

# Modern Slavery & Human Trafficking Pathway

1. **TRUST YOUR INSTINCT.** You only have a reason to believe someone may be a victim. You DON'T have to prove it!
2. Risk Assess – In Emergency cases and there is an immediate threat or emergency medical treatment is needed or the victim is still in the place of exploitation – please call 999.
3. Does the victim say they are (or appears to be under) 18 years of age? Follow step 4 – if not follow step 5.
4. Organisations will have their own safeguarding procedures to follow in line with Cumbria Safeguarding Children Partnership Policies and Procedures and these must be followed.  
In the first instance, contact your Safeguarding Lead or Team who will take details and refer to Children Social Care.  
If you are not a member of an organisation then you need to contact Children's Social Care / Single Point of Contact (SPOC) directly and immediately giving as much information as you can.  
Children's Social Care/SPOC will complete the NRM and ensure the child / young person is protected from further abuse.
5. If you are unable to speak to the potential victim contact the **Modern Slavery Helpline** and report your suspicions with as much detail as possible on **08000 121 700**  
**At this point this may be the end of your involvement unless you can speak to the person or identify anything as outlined in 5a:**  
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.
- 5a. The Care Act 2014 establishes the duty on the Local Authority to undertake enquiries for those adults with support and care needs. Where no support or care needs have been identified all partner organisations may be required to work together to develop plans to ensure that victims are safe from exploitation
6. Agencies /Organisations have their own internal Safeguarding Adults procedures that are required to be compliant with the CSAB multiagency policy. In the first instance contact your Safeguarding Lead who will take details and refer to Adult Social Care.
7. Victims of modern slavery are potentially victims of crime but they still have to give consent to receive support through the NRM and you **must** obtain consent to refer them for that support.
- 7a. If the potential victim does not give consent to have their details given to the NRM inform them there are other services that can support them. They or you can contact the Modern Slavery Helpline in the first instance: **08000 121 700.**  
Inform the victim that by contacting the helpline they will receive support through services who can assist in housing, immigration, benefits, health care etc. (often victims can then be supported into the NRM process).

All staff in statutory and non-statutory settings are requested to complete the Duty to Notify Form 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:

- Cumbria Constabulary
- The Home Office: <https://www.modernslavery.gov.uk/start>

Alternatively, if your organisation has a Safeguarding Lead / Team please inform them and they may complete this on your behalf – refer to your own internal procedures.

The duty to notify form is available at <https://www.modernslavery.gov.uk/start>

- 7b. If the potential victim is willing to receive support remember this opportunity is time limited through the National Referral Mechanism (NRM) following consent.
- 8+9 Firstly, consider are you identified as a First Responder as only members of the following organisations can refer potential victims of Modern Slavery to the NRM:

<b>First Responders</b>	<b>Contact Number (where applicable)</b>
<b>Cumbria Constabulary</b>	Report non urgent cases on 101 or online at <a href="#">Report   Cumbria Police</a>
<b>UK Border Agency</b>	
<b>Immigration and Visas</b>	
<b>Gangmasters Labour Abuse Authority (GLAA)</b>	<b>0345 612 5020</b> (General Enquiries)
<b>Local Authorities</b> (this only applies to Social Care Professionals)  <b>Children's Services</b> E: <a href="mailto:safeguarding.hub@cumbriacs.cjsm.net">safeguarding.hub@cumbriacs.cjsm.net</a> E: <a href="mailto:cumberlandsafeguardinghub@cumbriacs.cjsm.net">cumberlandsafeguardinghub@cumbriacs.cjsm.net</a>  Cumberland Safeguarding Hub Westmorland and Furness Safeguarding Hub  <b>Adult Social Care</b>  To report an adult safeguarding concern, contact the appropriate Single Point of Access (SPA)  For adults who reside in Allerdale, Carlisle or Copeland contact Cumberland Council  For adults who reside in Barrow, Eden or South Lakeland contact Westmorland and Furness Council	See Sections 4 (children and young people) and Section 6 (adults) – currently safeguarding cases only.  <b>0333 240 1727</b>  <b>0300 37 32724</b>        <b>0300 373 3732</b>   <b>0300 373 3301</b>
<b>Salvation Army</b>	<b>0300 303 8151</b> (24-hour helpline)
<b>Barnardo's</b>	<b>0208 550 8822</b> (General Enquiries)
<b>Unseen – Modern Slavery Helpline</b>	<b>08000 121 700</b>
<b>NSPCC (Child Trafficking Advice Centre)</b>	<b>0808 800 5000</b>

First Responders	Contact Number (where applicable)
Refugee Council	<a href="#">Homepage - Refugee Council</a>
Medaille Trust	<a href="#">Charity supporting victims of Modern Day Slavery   Freedom from Human Trafficking   Rebuilding lives</a>

8+10 If you are not a First Responder but you have a Safeguarding Lead / Team in your agency please contact them in the first instance immediately.

If you do 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**.

## Additional information on victim support services

### British Red Cross (North West)

0151 702 5088

[www.redcross.org.uk/about-us/what-we-do/modern-slavery-and-trafficking](http://www.redcross.org.uk/about-us/what-we-do/modern-slavery-and-trafficking)

### Salvation Army

0300 303 8151

[www.salvationarmy.org.uk/modern-slavery](http://www.salvationarmy.org.uk/modern-slavery)

### Hope for Justice

0300 008 8000

[www.hopeforjustice.org/](http://www.hopeforjustice.org/)

### Migrant Help

0808 8000 630

[www.migranthelpuk.org/contact](http://www.migranthelpuk.org/contact)



## 7 Minute Briefing - Modern Slavery

Please see the following 7 Minute Briefing to share with teams

1

### What is Modern Slavery & Exploitation

To be exploited is to be used for someone else's personal gain. Modern slavery is an umbrella term that encompasses the criminal offences of human trafficking, exploitation and slavery.

Modern slavery is often hidden and may take place alongside a wide range of abuses and other criminal offences.

Modern slavery happens across the world and the UK. It is happening in Cumbria.

It can happen to people who come from the UK, or who have come here from other countries.

Modern Slavery should not be confused with illegal immigration or people smuggling. It doesn't have to be cross border – it can be within the same city or town. Moving a person from one room to another for personal gain is human trafficking. The victim is most likely to be from the UK as is the perpetrator, so this is not an area solely focused on foreign nationals.

2

### Legislation

The Modern Slavery Act was introduced in 2015. The act gives law enforcement the tools to fight modern slavery, ensure perpetrators can receive suitably severe punishments for these appalling crimes and enhance support and protection for victims. Further info:

[Modern Slavery Act 2015](#)

3

### Types of Modern Slavery

An individual may experience multiple forms of exploitation or abuse. Modern Slavery takes many forms including:

- **Sexual exploitation** – This includes but is not limited to sexual exploitation and sexual abuse, forced prostitution and the abuse of children for the production of child abuse images/videos.
- **Domestic servitude** – This involves a victim being forced to work in predominantly private households, usually performing domestic chores and childcare duties. Their freedom may be restricted, and they may work long hours often for little or no pay, often sleeping where they work.
- **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.
- **Criminal exploitation** – This can be understood as the exploitation of a person to commit a crime, such as pick-pocketing, shoplifting, cannabis cultivation, drug trafficking (county lines) and other similar activities that are subject to penalties and imply financial gain for the trafficker.
- **Child Exploitation** is a form of abuse. It occurs when an individual or group takes advantage of an imbalance of power to encourage or compel a child or young person under 18 into an activity that benefits the perpetrator or facilitator. The perpetrator(s) might coerce, control, manipulate or deceive the young person. This activity includes, but is not limited to, sexual and criminal activity, wider forms of labour, forced begging and domestic servitude. (The Children's Society (2024))
- **Other forms of exploitation** – Organ removal; forced begging; forced benefit fraud; forced marriage and illegal adoption.



## 4

## Signs & Indicators of Exploitation

There are a number of signs that are common across all types of exploitation.

- **Physical Appearance** - bruises, untreated injuries, malnourished/unkempt, inappropriate clothing, agitated, anxious/withdrawn.
- **Restricted Freedom** - unable to move freely/dependent on another for travel, food and/or money, communication controlled, no identification/travel documents, vague or unclear about their address.
- **Isolation** - fearful/distrustful with strangers/authority figures, limited access to family/friends, language barriers.
- **Work** - vague/unclear about job, concerned they are in debt to another person for accommodation/travel, work excessive hours but has very little money.
- **Economic** - victims may come from a background of poverty, unemployment, lack of opportunity and debt bondage.
- **Social vulnerabilities** – vulnerabilities may include homelessness, being uneducated disabilities or learning difficulties, in the social care system, lack of family support or having a weak social network.

## 5

## The Victim

There is no typical victim of slavery – victims can be men, women and children of all ages, ethnicities and nationalities and cut across the population. But it is normally more prevalent amongst the most vulnerable, and within minority or socially excluded groups. Approximately two-thirds of victims are women, and a third are men. Every fourth victim of Modern Slavery is a child. Child victims are victims of child abuse and should therefore be treated as such using existing child protection procedures and statutory protocols.

## 6

## What to do

If you suspect modern slavery, call the police. Call **999** if it's an emergency, or **101** if it's not urgent.

To report an adult safeguarding concern, contact the appropriate safeguarding hub, based on whereabouts the adult lives: Contact Cumberland Council on **0300 373 3732** or contact Westmorland and Furness Council on **0300 373 3301**.

If you have urgent concerns for a child, or suspect that a child has been abused in anyway and needs an urgent response, please call the relevant Safeguarding hub: Cumberland Safeguarding Hub on **0333 240 1727** or Westmorland and Furness Safeguarding Hub on: **0300 373 2724**

For advice and guidance, call the Modern Slavery Helpline on **08000 121 700**.

It does not matter if you do not have evidence, you should always report because your piece of information may help to save someone.

## 7

## National Referral Mechanism (NRM)

Anyone who might be a victim of modern slavery is offered the chance to enter the National Referral Mechanism (NRM). The NRM is the system used in the UK to identify people who have experienced modern slavery and human trafficking, ensure they receive appropriate support and protection.

Referrals to the NRM can only be made by authorised agencies known as First Responders. First Responders are responsible for identifying potential victims, gathering information and referring them to the NRM.

Further details can be found [here](#)

## Further Resources

Modern Slavery Helpline: [Modern Slavery Helpline](#)

Cumbria Safeguarding Adults Board [Home page](#) | [Cumbria Safeguarding Adults Board](#)

Cumbria Safeguarding Childrens Partnership [Child Trafficking and Modern Slavery](#) | [Cumbria Safeguarding Children Partnership](#)

The Children's Society [www.childrenssociety.org.uk](http://www.childrenssociety.org.uk)

Salvation Army [What is Modern Slavery](#) | [The Salvation Army](#)



# Referral Pathway for Victims of Modern Slavery and Human Trafficking



