

# Guidance for policing responders

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Policing responders should understand how to recognise victims of modern slavery and human trafficking (MSHT) and what actions they need to take. For the purposes of this APP, the term 'policing responders' is used to refer to all police officers, staff and volunteers who may initially encounter or identify a victim of MSHT. This includes:

- frontline officers
- police community support officers
- Special Constabulary officers
- call handlers
- front counter staff
- custody staff

Where possible, all relevant operational staff should have completed the [modern slavery general awareness course](#), (you will need to log in to College Learn). The details of staff who have completed the course should be recorded in accordance with force policy.

## Initial considerations – keeping the victim safe

Policing responders must take into account their statutory obligations under section 11 of the [Children Act 2004](#) and section 42 of the [Care Act 2014](#). They should follow the guidance in [Conducting effective investigations guidelines](#) and [Investigation APP](#).

In addition to this guidance, policing responders making first contact should use [professional curiosity](#) to better understand the circumstances and experiences of the victim. This will help them to identify whether exploitation, grooming, coercion or control is taking place. For further information, see [Vulnerability-related risks guidelines](#).

Policing responders should also be aware of the impact that trauma can have on a victim. Trauma can make it difficult and distressing for victims to remember and recall events in the detailed and chronological format that the criminal justice system requires. For further information, go to [The](#)

### trauma-informed code of conduct.

Policing responders should recognise control methods, vulnerability factors and signs of MSHT, record these details using the golden hour principles, and use these to inform the creation of hypotheses and instigate lines of enquiry.

## Age assessment

Where the age of a victim is uncertain and there are reasons to believe the person is under 18 years of age, the policing responder should treat them as a child. The victim should receive immediate access to protection, support, accommodation and advice, as stipulated by section 51(2) of the Modern Slavery Act 2015. If the victim looks older than the age they claim to be, a request should be made to a suitably trained social worker, nurse or approved mental health professional for an age assessment.

During this process, the child should be represented by an appropriate adult or child advocate and housed in secure accommodation with close adult supervision. Policing responders should ensure that the child's placement is kept confidential and that appropriate measures are taken to prevent the child from going missing with the risk of being re-exploited. The assessment should be explained clearly to the child, should take place in an appropriate facility and should not be rushed.

Policing responders should be aware of the potential for an adult to pose as a child to gain access to children, and they should take necessary precautions to prevent this.

The police should be contacted immediately when they suspect that a child is a victim of MSHT. Local authority children's services are the primary service providers for safeguarding and responding to the needs of a child victim of MSHT, regardless of their nationality or immigration status. They support the child and prompt a criminal investigation.

## Initial actions

To help gain the trust and confidence of the victim, policing responders should do the following.

- Carry out an immediate assessment of the victim's basic needs in accordance with the Victims' Code – including health, welfare, food and clothing – and take appropriate action. Most victims of MSHT, particularly children, will be eligible for enhanced rights. The victim might require

immediate referral to an appropriate medical facility or support service – for example, an NHS walk-in centre, accident and emergency, GP, sexual abuse referral centre (SARC), mental health service and/or drug and alcohol service. The first responder should check their local policy for information on how to make a referral.

- Carry out an assessment of the immediate risk to the victim – for example, from an **organised crime group (OCG)**. Also carry out an assessment of the risk a victim might present to others – for example, from disease, behaviour due to addiction or poor mental health.
- Consider whether the victim requires the services of appropriately skilled interpreters – for example, from Language Line or officers with relevant language skills.
- Ask the victim what they need to feel safe. Consider supporting the victim into a place of safety. Where possible, this should not be a police station. Instead, it should be somewhere they can feel more at ease and able to speak, such as a local authority safehouse or a Salvation Army church or community centre if available. Children can be removed to a place of safety under **section 46 of the Children Act 1989**.
- Notify the duty inspector, as defined in their force policy, as soon as possible.
- Limit questioning the victim to establishing their welfare and safety needs and gaining an initial account. Be mindful of **the impact that trauma may have on the victim's responses and memory**.
- Consider the **special measures available for achieving best evidence (ABE)**.
- Investigate the grooming, controlling or coercive behaviours of the suspect to better understand how the victim came to be in the exploitative situation. This should include, where appropriate, why the victim could not or would not leave the situation.
- Consider the fast-track deployment of a trained **modern slavery victim liaison officer (MSVLO)** or other specialist non-government organisation if available or alternatively designate a single point of contact (SPOC) for the victim.
- Ensure that the victim is made aware of how they can contact the police officer dealing with their case.
- Ensure that the victim has a safe contact number and is updated on the progress of the investigation, including where suspects are arrested, charged or bailed, as required by the **Victims' Code**. They should also be included in, and kept informed of, decision making.
- Seek consent from adult victims and refer into the **national referral mechanism (NRM)**.
- Make a referral to the relevant local authority department in accordance with statutory guidance for safeguarding children or vulnerable adults at risk – for example, via the multi-agency

safeguarding hub (MASH).

- Ensure that child victims are referred to the NRM and the [independent child trafficking guardian \(ICTG\) service](#).

On the first engagement with a victim, policing responders should maintain a clear and detailed log of all their interactions with the victim, including information about anything provided to them such as food, drink, clothing and accommodation. This log should continue throughout their engagement with the victim. All interactions and provisions should be proportionate and necessary to the victim's initial assessment of needs.

Policing responders should consider using body-worn video (BWV) to capture the demeanour, physical condition and [initial account of the victim](#) and images of the scene, in line with the [National Police Chiefs' Council \(NPCC\) Body-worn video guidance](#). This could help to support an investigation without having to rely on witness testimony if the victim is unable to give evidence in court.

The initial account could provide lines of enquiry regarding other victims and/or scenes and may become evidential on occasions where a victim decides not to support a prosecution. All communication should be calm and positive, not only through speech, but also movement, gesture, eye contact and expression. For further information about how to engage with victims, go to the Independent Office for Police Conduct (IOPC) report [Ending victim blaming in the context of violence against women and girls](#) and [Vulnerability-related risks guidelines – communication](#).

## Modern slavery victim liaison officer

Where available, a trained modern slavery victim liaison officer (MSVLO) should be assigned to support every MSHT incident and investigation. The role of the MSVLO should include the following.

- Securing the trust, confidence and cooperation of the victim to ensure their safety and support of an investigation.
- Facilitating entry into the NRM. This requires consent for an adult victim.
- Explaining the support they are entitled to under the NRM [modern slavery victim care contract \(MSVCC\)](#).

- Obtaining an initial account and relevant background details of the victim if not already completed by the policing responder. In some cases, a MSVLO will be the first responder.
- Facilitating ABE interview procedures to assist the investigation when appropriate.
- Facilitating the recovery of any forensic evidence from the victim – for example, via a crime scene investigator (CSI), SARC or early evidence kit (EEK).
- Acting as a SPOC for the victim in respect of police investigation procedures, to ensure that the victim receives appropriate guidance and information.
- Continuing to support the victim until an exit strategy is agreed with the lead investigator.
- Ensuring that the victim receives continued support from any relevant partners.

## Initial investigative actions

To inform their initial investigative actions, policing responders should use the guidance in the [modern slavery first contact booklet](#) (you will need to log in to College Learn), [Conducting effective investigations guidelines](#) and [Investigation APP](#). The responder should record all the necessary information relating to an incident of MSHT in the first contact booklet, including the details of potential victims of MSHT and evidence. The guidance in the booklet may also help to identify lines of enquiry – for example, in relation to risks to family and friends, travel information, health, financial, work, accommodation and suspects. The policing responder should carry out initial investigative actions, including the following.

## Preserving any scene

- Treat any location as a crime scene. This includes locations where the victim may have been, worked or slept, as well as vehicles that were used to transport the victim. Contact supervisors for resources to preserve the scene(s).
- Work with the assigned senior detective to enable an investigative response to commence.
- Assess whether there are other potential properties housing victims or containing evidence of MSHT.
- Consider victims and suspects as scenes themselves.
- Decide whether a CSI should attend and arrange for this to happen.
- Consider that there may be more than one scene.

## Securing evidence

- Capture any differences between the living accommodation of the victim and the suspect if appropriate. If the suspect is living a much better lifestyle than the victim, it potentially indicates how the suspect is gaining from the exploitation.
- Identify the location of cash, banking, travel and identification documents and digital devices. Secure these for evidence. They may show how the suspect has gained from the exploitation of the victim.
- Consider carrying out enquiries at neighbouring premises to identify potential witnesses and/or CCTV.
- Review missing person reports and return to home interviews for children, where available.

## Victim care

When engaging with a victim of MSHT, policing responders should do the following.

- Ensure that they do not treat the victim as an immigration suspect, as criminal matters take precedence. An insecure or uncertain immigration status of the victim should not impede safeguarding or investigative actions. For further information, go to [Information sharing with the Home Office where a victim or witness of crime is a suspected immigration offender](#).
- Separate all parties at the earliest opportunity, establish initial circumstances and keep accurate records. This will ensure that potential victims can be spoken to without potential suspects or alpha victims being present.
- Avoid speaking to the victim at the location of exploitation.
- Consider the possibility of other victims not at the premises.
- Gather information of vulnerability that might be used in evidence.
- Use independent translation services rather than persons at the scene, who may be suspects and/or not act in the best interests of the victim.
- Refer the victim to [local or national services](#) to ensure access to support.
- Explain the NRM to the victim and ask if they are willing to be referred, obtaining written consent. [Children do not need to give consent](#) and must be referred. Policing responders have a [statutory duty to notify](#) the Home Office when encountering potential victims of MSHT.

## Suspect considerations

When engaging with a suspect of MSHT, policing responders should do the following.

- Consider whether the suspect is also a potential victim, particularly in relation to criminal exploitation. These potential victims may be identified at crime scenes, while being arrested or in custody suites.
- Seek advice from supervisors or the duty senior detective, where possible, before making an early arrest.
- Establish whether the suspect has a vehicle, digital devices, documentation, passports, driving licences and/or employment records on their person or in any related property.
- If the suspects are living in the same property as victims, establish the rooms used. This may indicate the power difference between the victim and the suspect, which can be used as evidence.
- Use force intelligence units for fast time checks to assist with identification.
- Gather information and intelligence from police and non-police sources, including:
  - Police National Computer (PNC)
  - Police National Database (PND)
  - force incident reports
  - crime reports
  - crime intelligence
  - automatic number plate recognition (ANPR)
  - digital media
  - local authority

For further advice, go to the [prevention and disruption strategy](#) section of this APP.

## National referral mechanism

The [national referral mechanism](#) (NRM) is a framework for identifying and referring potential victims of modern slavery and human trafficking (MSHT) to the support they are legally entitled to.

## Police statutory duty

The police have a statutory duty to notify the Home Office when encountering potential victims of MSHT ([section 52 of the Modern Slavery Act 2015](#)). This duty is discharged by referring children and consenting adults into the NRM. [Policing responders should use the online form](#) to refer:

- a child (NRM referral)

- a consenting adult (NRM referral)
- an adult that does not consent to enter the NRM (duty to notify referral)

The form is submitted to the single competent authority (SCA).

For an adult to provide their informed consent, policing responders must explain what the NRM is, what support is available through it and the possible outcomes for an individual being referred. Policing responders should also make it clear that information may be shared or sought by the single competent authority (SCA) or the immigration enforcement competent authority (IECA) from other public authorities, such as local authorities, to gather further evidence on an NRM referral.

## Child victim

If the victim is – or is suspected to be – under 18 years of age, policing responders must safeguard the child first and must then refer them into the NRM. Child victims do not have to consent to the referral. Referrals should be made in consultation with the relevant local authority's children's social care team. Details of the allocated social worker should be included in the referral to the SCA.

## Independent child trafficking guardians

Independent child trafficking guardians (ICTGs) are independent advocates for trafficked children and act in their best interests. An ICTG's advocacy and involvement throughout the decision-making process is intended to:

- ensure that the child is protected from further harm
- prevent possible repeat victimisation, re-trafficking or going missing
- promote the child's recovery

ICTGs are independent of the authorities that are responsible for making decisions about the child.

Policing responders must **refer any potential child victims of MSHT to the ICTG service**, where available. This is in addition to following usual safeguarding routes and making NRM referrals. For further information, go to the NPCC **Interim guidance for independent child trafficking guardians**.

## Independent modern slavery advocate

An independent modern slavery advocate (IMSA) provides victims with independent advocacy so that they can make informed choices about their entitlements and recovery. This advocacy may be provided regardless of any other support the victim receives. IMSAs provide advocacy that is person-led and trauma-informed to improve the safety, resilience and empowerment of the victim. Policing responders should ask the victim for consent before referring them to an IMSA. For further information on how to make a referral, contact [Hope For Justice](#) and the [British Red Cross](#).

## Housing and safeguarding

In the period between NRM referral and the [reasonable grounds decision](#) being made, the policing responder should ensure the victim is safeguarded. They should contact the Salvation Army, which may be able to offer support to the victim, before the reasonable grounds decision is made. Policing responders should also contact their local authority, who have an [obligation to assist victims of MSHT](#) who may be identified as 'in priority need' for support. Local authorities also have a duty to safeguard and protect children. Policing responders should contact their local authority as early as possible to allow them to prepare, particularly if multiple victims are expected.

Policing responders are also advised to work with local anti-slavery charities to further support the victim.

- If the victim is destitute, the [Salvation Army](#) may be able to offer support.
  - [The Human Trafficking Foundation](#) website highlights accommodation in specific areas.
  - Enquire whether their force area has local safe houses.
  - Enquire whether there are local arrangements with charities or local authorities to provide housing in the first five days.
1. Where it is necessary for police to find temporary accommodation for a victim, they should conduct a risk assessment to ensure that the premises are safe and to meet the needs of the victim.
  2. For further information, see the MSOIC guidance [Victim safeguarding initial actions officer's responsibilities](#).

## NRM decision making

The SCA and IECA are Home Office bodies. They are responsible for making decisions regarding referrals for potential victims of MSHT, whether the incident occurred in the UK or across

international borders. The decision-making takes place in two parts.

1. A reasonable grounds decision is expected to be made within five days to determine whether there are reasonable grounds to believe, **based on specific evidence**, that a person is a victim of MSHT. Policing responders should ensure that this specific evidence is included in the referral. Failure to provide this specific evidence may mean that a potential victim cannot receive a positive reasonable grounds decision or the support they are entitled to.
2. A conclusive grounds decision is expected no sooner than 30 days after the reasonable grounds decision to determine whether, “on the balance of probabilities”, there are sufficient grounds to decide that the individual is a victim of MSHT.

Following the submission of an NRM, the investigator has an ongoing duty to provide updates to the competent authorities by responding to the referral receipt email. These updates enable the competent authority to make decisions using the full facts from the police investigation into the MSHT crime.

## **Positive reasonable grounds decision**

Following a positive reasonable grounds decision, individuals who are recognised as potential MSHT victims are automatically referred to tailored support from a specialist support worker for a period of at least 30 days while their case is considered further. This may include:

- access to relevant legal advice
- accommodation if the victim is destitute, at risk or does not have any other access to housing
- protection
- independent emotional and practical help

The Salvation Army and a number of subcontractors currently deliver help and advice to victims of MSHT. If the individual requires immediate support, the Salvation Army should be contacted as soon as possible, in addition to the NRM referral being made. The Salvation Army will assess each potential victim to determine what support is most appropriate. For further information, see the **[Modern slavery statutory guidance for England and Wales and non-statutory guidance for Scotland and Northern Ireland](#)**.

## **Crime recording**

When making an NRM referral or a duty to notify (DtN), policing responders must record a crime and it must be investigated. Where practicable, include the crime number in the referral, but do not delay the referral to do so, it can be provided by email to the SCA later.

All referrals, if committed in England and Wales, received by the force from the competent authority, should be recorded as a crime of modern slavery, class 106 (previously N200). There is no requirement to await a reasonable grounds decision from the competent authority. If a negative reasonable grounds decision is subsequently received, this should not result in the automatic cancellation of a crime.

If the exploitation took place overseas only, with no links of either the offender, victim, or location of crime in the UK, then a crime does not need to be recorded. Relevant intelligence should still be uploaded and shared with UK forces and international law enforcement through established channels.

Where the SCA sends a referral to a police force, but the location of the incident cannot be confirmed as being within their force's area, the force should return the referral to the SCA.

Where a force receives an NRM notification but determines that no crime has been disclosed, there is no requirement to record a crime. The force should instead create an intelligence record to ensure the information is retained appropriately.

For further information on crime recording, go to:

- [Home Office Crime Recording Rules for Frontline Officers and Staff 2025/26](#)
- [Crime recording rules \(appendix C\)](#)

## MSHT partners

There are a [large number of agencies](#), including charities that specialise in MSHT, who may become aware of or involved in MSHT as part of their work. Many of these partners are useful in the pre-planning or intelligence-building phase of an investigation and on [planned days of action](#). Policing responders should consider whether they can help with their case.

# Tags

APP