

HMSP Guidance for Local Authorities summary

12.12. Local Authorities have a wide range of roles to play in tackling modern slavery. These roles include:

- **Identifying and referring potential victims into the NRM** - Possible victims of modern slavery could be identified by a number of frontline council staff, including children's and adult's services, housing teams, or those working in a range of different regulatory and environmental roles, community safety and general customer contact. It is important that councils ensure that all relevant frontline staff have received basic awareness training on what modern slavery and human trafficking is, identifying indicators of modern slavery and human trafficking and groups at particular risk.

Local Authorities are First Responder Organisations and, under section 52 of the Modern Slavery Act 2015, 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 NRM or by completing a notification to the Home Office when a potential adult victim does not consent to a referral. Councils must ensure that individuals acting as First Responders have adequate training to ensure they are clear about the steps they should take in the event that they identify a possible victim or victims of modern slavery and where such concerns should be referred to (i.e. the council's referral pathway). This training should be clear on who is responsible for making the NRM referral, whether it is the individual who has encountered the victim, a designated Modern Slavery lead, or Adult or Child Social Services.

Councils may find it helpful to distinguish between the broad range of frontline staff who are responsible for recognising the indicators of modern slavery and identifying potential victims, and a smaller group of frontline staff who are responsible for the First Responder functions of gathering information about what has happened to a suspected victim, making an NRM National Referral Mechanism referral, submitting a reconsideration request where appropriate and providing a point of contact for the SCA. More detailed and specialist training is likely to be required for this group of staff, for example on working with victims or vicarious trauma.

- **Supporting child victims** - Dependent on their functions and responsibilities, councils have statutory responsibilities to provide support to all suspected child victims of modern slavery. 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 2018.

- **Supporting adults at risk** – Adult victims of modern slavery may be at risk and there may be a role for Adult Safeguarding and an enquiry under Section 42 of the Care Act 2014. Modern slavery is a form of abuse and councils should adhere to their roles and responsibilities under the Care Act 2014, the Housing Act 1996 and the Homelessness Reduction Act 2017.
- **Providing accommodation to adult victims** – Adult victims who meet the eligibility criteria for Local Authority accommodation should be able to access safe and secure accommodation through the Local Authority.
- **Disrupting modern slavery** - Regulatory and community safety services may additionally be involved in joint action to disrupt suspected modern slavery in the local area.
- **Ensuring compliance with other statutory frameworks** - Local Authorities should ensure they comply with other relevant statutory frameworks, for example, on information sharing, GDPR and the Modern Slavery Act 2015.

12.13. Given the breadth of different roles and service areas potentially involved in modern slavery and human trafficking, councils may find it helpful to designate an existing role or team that can lead the organisation's work on modern slavery. This could involve acting as a first point of contact for modern slavery referrals and queries, ensuring a link with safeguarding responsibilities, and helping to coordinate activity and intelligence across different parts of the organisation.

12.14. Tackling modern slavery and human trafficking requires councils to work in partnership with local and national partners including the police, GLAA, health services and third sector and local businesses. Councils must ensure they are linked-in to local multi-agency arrangements for dealing with modern slavery and human trafficking and that referral pathways reflect both their own internal arrangements as well as local partnership structures.

12.15. Councils can draw on examples of good practice and training materials from a number of sources, including the Independent Anti-Slavery Commissioner and University of Nottingham's Anti-slavery partnership toolkit.

12.16. Referral pathways for frontline staff in councils will be shaped by the internal structures individual councils establish for managing modern slavery, the way in which a suspected victim has been identified, and by whom - for example, whether or not a victim has been identified in the course of a regulatory visit and remains in a situation of exploitation or has presented to the council as a victim.

12.17. However, the following general principles should apply across all Local Authority referral pathways:

- Designating an existing role or team to act as a modern slavery lead or first point of contact within the council may help coordinate intelligence and support across different service areas and cases, providing a critical starting and reference point in the referral pathway.
- Referral pathways should take account of the broader local partnership arrangements that have been put in place to tackle modern slavery and human trafficking, with relevant information and intelligence shared appropriately.
- Supporting victims and the underpinning referral pathways may require close and coordinated working between different services, for example between housing and social care. Two-tier areas should agree systems for joint working on modern slavery and human trafficking so that referral pathways effectively link relevant services in different councils.
- Depending on whether a potential victim chooses to enter the National Referral Mechanism or not they may need immediate support, or support once they exit the NRM.
- When a victim has been identified and appears to be at risk of immediate harm, the relevant frontline officer should contact the police on 999 and seek emergency assistance.
- Where a situation of ongoing possible exploitation has been identified but is not considered to present an immediate danger, this should be referred (via a council modern slavery lead if appropriate) to relevant local multi-agency arrangements for consideration of next steps. For suspected child victims, this would include local children's services alongside local modern slavery structures.
- Any planned disruption activity relating to suspected cases of modern slavery or human trafficking should involve prior consultation with relevant council and third sector support services – housing, safeguarding and social care – to ensure support can be accessed.

Note: All information in this guidance sheet is lifted from the statutory guidance available [here](#).