Identification of Victims of Modern Slavery

Social Work Scotland response to Call for Evidence

October 2025

Introduction

Social Work Scotland is the professional body for social work leaders, working closely with our partners to shape policy and practice, and improve the quality and experience of social services. We welcome the opportunity to provide a response to the call for evidence on the Identification of Victims of Modern Slavery.

Background

The Call for Evidence on the Identification of Victims of Modern Slavery aims to gather information from various groups to improve the UK's system for identifying victims of modern slavery. There is a focus on enhancing the National Referral Mechanism (NRM), the current framework for formal identification and support.

The Call for Evidence seeks insights on victim definitions, the effectiveness of initial identification practices by First Responder Organisations, and how formal identification processes can be made more victim-focused, accurate, efficient, streamlined, and future-proofed.

The views expressed by Social Work Scotland's members in response to the Call for Evidence reflect a nuanced and practice-informed critique of the current systems and terminology surrounding the identification of victims of modern slavery. Member responses reveal a consistent concern with the accessibility, relevance, and effectiveness of existing frameworks, particularly the National Referral Mechanism (NRM) and associated statutory guidance.

Members question the utility of the term "modern slavery," arguing that while it carries legal and policy weight, it often fails to resonate with victims and practitioners alike. The term is seen as alienating, evoking historical connotations that obscure the lived realities of contemporary exploitation. Young people may not identify with the label, especially when their experiences involve coercion masked as choice. Consequently, the term may hinder both self-identification and professional recognition of exploitation. "Exploitation" is proposed as a more relatable and practical alternative, better suited to multidisciplinary safeguarding contexts.

The statutory indicators used to identify victims are similarly critiqued. While they offer a foundational framework, they are not widely relied upon by practitioners, who favour locally developed resources and guidance from organisations such as Action for Children and the Centre for Youth and Criminal Justice (CYCJ). These alternative materials are praised for their clarity, specificity, and grounding in real-life scenarios. Members argue that the statutory guidance lacks the nuance required to detect subtle forms of coercion and control, particularly in cases involving criminal and sexual exploitation of young people.

Training and multi-agency collaboration emerge as central themes throughout the Call for Evidence. Members stress that effective identification of victims depends not only on written guidance but also on dynamic, practice-led learning environments. Peer-to-peer training, lived experience narratives, and shared casework are highlighted as powerful tools for deepening understanding and fostering cross-sector cooperation. There is a strong preference for holistic approaches that consider exploitation in its various forms (sexual, criminal, labour, and beyond) rather than siloed categories.

Concerns are also raised about the limitations of the current legal definitions under the Slavery and Human Trafficking (Definition of Victim) Regulations 2022. Members identify significant gaps, particularly in relation to child criminal exploitation and online abuse, which are not adequately captured by existing frameworks. The lack of a statutory definition for child criminal exploitation is seen as a barrier to justice, often resulting in the prosecution of victims rather than perpetrators.

The consultation also explores the effectiveness of centralised versus devolved decision-making models. Members overwhelmingly favour devolved systems, citing Glasgow's pilot model as an example of good practice. Local decision-making is credited with enabling faster, trauma-informed responses, reducing the risk of criminalising victims, and strengthening multi-agency partnerships. However, concerns about consistency and capacity across different regions are acknowledged, with calls for national oversight to prevent disparities in victim support.

Finally, the importance of creating safe and supportive environments for initial victim interactions is underscored. Trauma-informed practice, professional confidence, and appropriate settings are deemed essential for encouraging disclosure and engagement. Members advocate for training that equips frontline professionals with the skills to recognise subtle indicators and respond sensitively.

In sum, Social Work Scotland's members advocate for a more flexible, locally responsive, and trauma-informed approach to identifying and supporting victims of modern slavery. Their views reflect a deep commitment to safeguarding and a desire to reform systems that, in their current form, often fall short of meeting the complex needs of those affected by exploitation.

This response to the Call for Evidence presents the key questions posed, and the feedback received from our members.

Questions

To what extent do you agree with the following statement?

The term 'modern slavery' is helpful for enabling individuals and organisations, such as first responders, police and support providers, to understand who may be a victim.

Why?

Are there other terms which can be used to describe "modern slavery"?

The term "modern slavery" is intended to provide a clear and serious framework for identifying and responding to exploitation. It has legal weight and is recognised in policy, which can help statutory agencies take action, however, members of Social Work Scotland find the term problematic. It often evokes historical or extreme imagery, which can make it difficult for people to relate their own experiences to it. For example, young people who are being criminally or sexually exploited may not see themselves as victims of "slavery" and therefore may not seek help or accept support. This disconnect can also affect professionals, who may understand concepts like trafficking or exploitation more readily than the broader and more abstract notion of modern slavery.

Members express concern that the term can alienate victims and create barriers to identification. It may reinforce the idea that exploitation only happens to people from other countries or communities, rather than recognising it as something that occurs within local contexts. Moreover, young people often reject labels like "victim" or "exploited," especially when they perceive themselves as making choices, even under coercion. This resistance to terminology can hinder engagement and support.

While no single alternative term was universally agreed upon by members of Social Work Scotland, "exploitation" was frequently mentioned as more accessible and relatable. It is already used in practice to describe criminal, sexual, and labour exploitation, and it allows for a more nuanced understanding of coercion and control. Framing exploitation within broader safeguarding language, such as harm or abuse, might be more effective, particularly in multidisciplinary settings.

Ultimately, the language used to describe these experiences must be trauma-informed, culturally sensitive, and recognisable to those affected. The goal is to

ensure that individuals can identify themselves as victims and access the support they need, without being alienated by terminology that feels distant or stigmatising.

To what extent do you agree with the following statement?

The current indicators in the Modern Slavery Statutory Guidance are useful for enabling individuals and organisations, such as First Responders, police and support providers, to identify who may be a victim of modern slavery.

Social Work Scotland and our members suggest that while the current indicators in the Modern Slavery Statutory Guidance may offer a basic framework, they are not widely regarded as sufficient or particularly useful by practitioners. Members noted that the statutory guidance is not their team's "go-to" resource. Instead, some local authorities have developed their own framework for identifying exploitation, which builds on the statutory indicators but adds more practical, tangible elements. Publications from Action for Children and the Centre for Youth and Criminal Justice (CYCJ) have been more effective in helping professionals understand and respond to exploitation.

Members state that while the statutory guidance provides a base level of understanding, it is the additional resources and frameworks that are more useful in practice. These alternative materials are described as being more detailed, user-friendly, and grounded in real-life examples, which makes them more applicable to the day-to-day work of identifying victims.

The statutory guidance may be too generic or abstract, lacking the specificity needed to address the evolving nature of exploitation, particularly in cases involving criminal and sexual exploitation of young people. Members emphasise the importance of multi-agency collaboration, peer-to-peer training, and lived experience narratives to truly understand the indicators of exploitation. These approaches are seen as more effective than relying solely on the statutory guidance.

While the statutory indicators provide a starting point, they are not considered sufficient on their own. Members prefer more detailed, practice-informed resources and frameworks that reflect the complexity and changing nature of exploitation.

Do you think there are any indicators missing from the Modern Slavery Statutory Guidance that would help individuals or organisations to identify who may be a victim of modern slavery?

Which ones?

Our members indicate that while the indicators in the Modern Slavery Statutory Guidance provide a foundational starting point, they are not considered comprehensive or fully effective by practitioners. Members describe the guidance as a "bare framework", noting that teams do not rely on it as their primary tool. Instead, they use locally developed frameworks and resources, such as those from Action for Children and the Centre for Youth and Criminal Justice (CYCJ), which build on the statutory indicators but offer more practical, detailed, and context-specific guidance.

One key area where the statutory guidance appears to fall short is in its ability to reflect the lived realities of exploitation, particularly in relation to criminal and sexual exploitation of young people. Members emphasise that the guidance lacks the nuance needed to identify subtle signs of coercion and control, especially in cases where young people do not see themselves as victims. The guidance also does not adequately address the evolving nature of exploitation, such as the changing tactics used in county lines operations or the complexities of online exploitation.

The guidance focuses on identifying victims but does not provide sufficient indicators or profiles for identifying perpetrators of trafficking and exploitation. This one-sided approach may limit the ability of professionals to intervene effectively.

Social Work Scotland and our members call for more trauma-informed, practice-led resources that go beyond the statutory framework to support accurate and timely identification of victims.

What would help practitioners understand when sexual exploitation is a form of modern slavery? This may include guidance, training, toolkits. Your answer may reflect on sexual exploitation that affects adults or children, or both.

What would help practitioners understand when criminal exploitation is a form of modern slavery? This may include guidance, training, toolkits. Your answer may Identification of Victims of Modern Slavery: Call for Evidence 25 reflect on criminal exploitation that affects adults or children, or both.

What would help practitioners understand when labour exploitation is a form of modern slavery? This may include guidance, training, toolkits. Your answer may reflect on labour exploitation that affects adults or children, or both.

What would help practitioners understand when other types of exploitation (such as organ trafficking or domestic servitude) are forms of modern slavery? This may include guidance, training, toolkits. Your answer may reflect on other types of exploitation that affect adults or children, or both.

Our members highlight several key factors that would help practitioners better understand when exploitation constitutes modern slavery. One of the most important elements is the need for training that goes beyond written guidance and statutory indicators. Members emphasised that real understanding comes from engaging with lived experience, peer-to-peer learning, and multi-agency collaboration.

Even where teams have a strong grasp of risk indicators, it is the practical application through training sessions, multi-agency meetings, and shared casework, that builds meaningful understanding. One member described how delivering training to education, health, and criminal justice colleagues helped bridge gaps in knowledge and fostered a more unified approach to identifying exploitation. They also stressed the importance of using real-life examples and narratives, such as those presented by the Centre for Youth and Criminal Justice (CYCJ), which illustrate the complexity and evolving nature of exploitation.

Another point raised was the need to avoid siloed thinking. Members suggested that instead of separating types of exploitation, such as sexual, criminal, or labour, it is more effective to consider exploitation as a whole. This approach allows professionals to recognise overlapping vulnerabilities and patterns of coercion that may not fit neatly into one category.

National initiatives, such as the child sexual exploitation and abuse working groups, are developing learning and development frameworks that could support practitioners in understanding exploitation more holistically. Members also note the importance of integrating local learning and practice into national strategies.

In summary, what would help practitioners is not just clearer guidance, but a more dynamic and collaborative learning environment. This includes:

- Training informed by lived experience.

- Multi-agency discussions and shared casework.

- Practice-led frameworks that reflect current realities.

- A shift away from rigid categories toward a broader understanding of exploitation.

These elements together would support practitioners in recognising when exploitation is a form of modern slavery and responding appropriately.

Based on the UK's international obligations, do you think there are any forms of adult exploitation and/or child exploitation which are not captured by the

Slavery and Human Trafficking (Definition of Victim) Regulations 2022? This may include current, or new and emerging forms of exploitation.

The Slavery and Human Trafficking (Definition of Victim) Regulations 2022 offers a broadly workable framework for identifying victims of exploitation. However, our members have raised concerns about several areas where the current definitions fall short, particularly in relation to emerging and increasingly complex forms of harm.

One of the most pressing issues is the lack of a consistent, UK-wide definition of child criminal exploitation. This gap has significant implications for both victim identification and the prosecution of offenders. While professionals working with vulnerable young people often have the expertise to recognise signs of exploitation, especially in contexts such as county lines and drug trafficking, the absence of a statutory definition makes it difficult to pursue charges that reflect the true nature of the abuse. As a result, perpetrators are frequently prosecuted for the criminal activity itself, rather than for the exploitation of children, which undermines the protective intent of the legislation and leaves victims without full recognition or justice.

Another area of concern relates to the growing prevalence of online and cyber-enabled exploitation. Members question whether the current regulatory framework adequately captures the nature of harm that occurs entirely within digital environments. Exploitation through grooming, coercion, and abuse via social media or messaging platforms is increasingly common, particularly among young people. Yet these forms of harm often do not involve physical movement or trafficking, making them difficult to identify under traditional legal definitions. This disconnect risks leaving victims unprotected and perpetrators unchallenged.

Further gaps have been identified in relation to forms of exploitation that are more commonly recognised in international human rights frameworks but are not clearly addressed in UK legislation. These include practices such as debt bondage, forced marriage, and exploitation linked to irregular migration. Although such cases may fall within the spirit of the UK's international obligations, their exclusion from statutory definitions can limit access to protection and support for affected individuals.

In addition to definitional gaps, practitioners have expressed concern about the lack of prosecutorial clarity and consistency, particularly in cases involving children. Without a coherent legal framework that reflects the realities of modern exploitation, efforts to secure justice for victims are often fragmented and ineffective.

Taken together, these issues suggest that while the current regulations provide a useful starting point, they require revision to reflect the evolving nature of exploitation. A more inclusive and precise approach to defining victimhood, one that encompasses digital harm, child criminal exploitation, and internationally recognised forms of abuse, would strengthen the UK's response and ensure greater alignment with its legal and moral obligations.

Do you have any evidence of good practice for how organisations that are not designated as First Responder Organisations (FROs) refer individuals showing indicators of modern slavery to designated FROs? This may include, for example, safeguarding protocols, sharing referral protocols, local guidance outlining roles and responsibilities, or other collaborative arrangements.

One example involves a local authority where multi-agency collaboration has significantly enhanced the identification and referral process. Education services, although not designated as FROs, have become increasingly proactive in recognising signs of exploitation among young people. This progress has been facilitated through joint working arrangements, including pilot initiatives, shared safeguarding frameworks, and targeted community engagement. Informal outreach activities, such as sessions for parents and carers, have been used to raise awareness of exploitation indicators, including unexplained financial resources, possession of multiple mobile phones, and sudden behavioural changes. These efforts have helped families and schools to better understand the risks and to respond appropriately.

As a result of this proactive engagement, schools in the area have become more confident and consistent in referring concerns to designated FROs. The success of this approach lies in its emphasis on building trusted relationships, providing accessible education, and simplifying the referral process. It also reflects a broader cultural shift within the local safeguarding ecosystem, where exploitation is now more widely recognised and addressed across sectors.

Another example of good practice involves the integration of voluntary and community sector organisations into the wider safeguarding network. Practitioners have highlighted the importance of maintaining strong relationships with grassroots organisations, such as youth groups and support charities, which often have close contact with individuals at risk. These organisations are well-positioned to observe early signs of exploitation and, through established communication channels with statutory services, can raise concerns informally and receive guidance on appropriate next steps. This model of collaboration enhances the responsiveness of safeguarding systems and ensures that concerns are addressed in a timely and proportionate manner.

In another region, members noted that while child-focused safeguarding structures are well-developed, there is a lack of equivalent mechanisms for adults. This gap is particularly concerning in light of emerging forms of exploitation, such as those occurring in online environments. The observation underscores the need for parallel

systems that support adult victims and for clear local protocols that define roles and responsibilities across agencies.

Overall, effective referral from non-FROs to FROs is achievable and beneficial when supported by multi-agency collaboration, community engagement, and clear communication pathways. Locally developed guidance that complements national statutory frameworks plays a vital role in enabling these practices. Together, these approaches contribute to a more inclusive and responsive safeguarding environment, better equipped to identify and support victims of modern slavery in its evolving forms.

Do you have any evidence or examples of good practice in how your organisation fulfils its responsibilities as a First Responder? We are particularly interested in your internal processes, systems, or approaches that have proven effective in identifying and interacting with potential victims of modern slavery.

Since receiving devolved powers in 2021, Glasgow has developed internal systems that allow for timely and effective identification of victims of modern slavery, especially among young people involved in criminal exploitation. Teams are able to make reasonable and conclusive grounds decisions locally, which are then submitted to the Home Office for ratification. This process has significantly improved outcomes for young people, particularly in relation to criminal justice. An example was offered by a member where a 14-year-old autistic boy was arrested with two adults for drug-related offences. Because of Glasgow's devolved authority and swift decision-making, the Procurator Fiscal dropped the charges against the child, recognising him as a victim rather than a perpetrator.

This internal process is supported by a robust framework that includes multi-agency meetings, peer review of decisions, and close collaboration with police and legal services. The devolved model allows for decisions to be made within two weeks, which is a stark contrast to the delays often experienced when cases are referred directly to the Home Office. These delays can have serious consequences for victims, including prolonged uncertainty, missed educational or employment opportunities, and continued exposure to risk.

Glasgow's approach also includes proactive engagement with education services and third sector organisations. Schools have become more confident in identifying and referring concerns, thanks to targeted training and awareness-raising initiatives such as coffee mornings for families. The city has also piloted collaborative programmes with organisations like Action for Children, which provide both individual and group support to young people identified as at risk.

Furthermore, the devolved decision-making model has created a ripple effect, encouraging other agencies to improve their understanding and response to exploitation. This has led to better integration of safeguarding processes, more consistent use of frameworks, and stronger relationships across sectors.

Do you have evidence or examples of training models or materials about how to identify victims of modern slavery that you have found to be effective?

How/why are they effective?

One of the most impactful training models described by members was peer-to-peer and multi-agency learning, which goes beyond static toolkits or written guidance. An example was offered where training has been delivered across education, health visiting, and criminal justice sectors, using real-life examples and lived experience narratives to illustrate the complexities of exploitation. This approach has proven effective because it allows professionals to engage with the nuances of coercion, control, and victim self-perception, elements that are often missed in standardised training materials.

A particularly powerful example cited by members was a training session delivered by the Centre for Youth and Criminal Justice (CYCJ), which featured the lived experience of a young man who had been exploited. The session, titled *The Long Game*, brought together professionals from multiple agencies and highlighted the challenges and gaps in current systems. The combination of lived experience and expert commentary helped practitioners understand not only the indicators of exploitation but also the systemic barriers that victims face. This model was praised for its emotional impact, relevance, and ability to foster cross-sector dialogue.

Another effective element of training mentioned was the use of local frameworks developed in Glasgow, which build on statutory guidance but offer more practical and context-specific tools. These frameworks are supported by publications from Action for Children and CYCJ, which provide tangible indicators and case-based learning. Practitioners found these resources more accessible and applicable than national guidance alone.

The effectiveness of these training models lies in their ability to:

- Reflect current and evolving patterns of exploitation.

- Engage professionals in active, collaborative learning.

- Use real-life scenarios to deepen understanding.

- Encourage multi-agency coordination and shared responsibility.

In summary, training that is grounded in lived experience, delivered collaboratively, and supported by practice-informed frameworks has proven to be more effective than traditional, standalone materials. These approaches help practitioners not only identify victims more accurately but also respond in a way that is trauma-informed and contextually appropriate.

What do you think can help victims and survivors of modern slavery feel safe and supported during the first interaction with professionals or services who may recognise indicators of exploitation? This may include, for example, the environment this interaction happens in, and the types of training that frontline professionals may need to support safe engagement.

Creating a safe and supportive environment during the first interaction with victims or survivors of modern slavery is critical to building trust and enabling disclosure. Social Work Scotland and our members highlight several factors that contribute to effective engagement, particularly the importance of trauma-informed practice, professional confidence, and multi-agency collaboration.

Members emphasise that victims are more likely to feel safe when professionals demonstrate a clear understanding of exploitation and are confident in their role. It was noted that in areas with fewer reported cases, professionals may feel uncertain about what to do when a potential victim is identified. This uncertainty can undermine the interaction and delay access to support. To address this, clear local and national guidance is essential, alongside access to knowledgeable single points of contact who can advise frontline staff.

The environment in which the interaction takes place also matters. One member explained that in their area, young people identified as potential victims, particularly unaccompanied asylum seekers, were quickly moved from police stations to child-friendly social work offices. This shift in setting helped reduce anxiety and created a more appropriate space for disclosure and support. Such examples underline the importance of ensuring that initial contact occurs in a calm, non-threatening, and welcoming environment.

Training is another key component and members stressed that professionals across sectors, including housing officers, nurses, and GPs, need to be equipped to recognise subtle indicators of exploitation and ask gentle, appropriate questions. Victims may not disclose directly, but they may offer clues that require professional insight and sensitivity to interpret. Training should therefore focus not only on indicators but also on communication skills, cultural awareness, and trauma-informed approaches.

When professionals across sectors know each other and understand each other's roles, they are better able to coordinate responses and provide consistent support. This is particularly important in cases where victims may interact with multiple services before exploitation is recognised.

What do you see as the benefits and drawbacks of the current centralised model, where modern slavery victim status decisions for both adults and children are made by national Competent Authorities (e.g. SCA/IECA)?

One of the most significant drawbacks identified is the delay in decision-making. Members described how referrals to the Home Office can take up to a year to reach a conclusive grounds decision. This delay has serious implications for victims, particularly young people, who may be left in limbo during a critical period of their lives. The uncertainty can affect their mental health, education, employment prospects, and engagement with support services. Members offer examples of young people who declined college placements or job opportunities due to the fear of pending prosecution, despite being victims of exploitation.

Another concern is the high threshold for evidence required by national Competent Authorities, especially for cases involving individuals close to turning 18. Practitioners reported that the Home Office often requires detailed statements and corroborating evidence that may not be feasible to obtain, particularly when victims are traumatised or unwilling to disclose full details. This contrasts sharply with the more flexible and trauma-informed approach taken by devolved decision-making authorities which can make conclusive decisions within two weeks.

The centralised model also presents challenges in continuity of care. It is not unusual for the Home Office to contact the original referring social worker, even after the case has been transferred or the worker has left their role. This lack of coordination can result in missed communications and delays in progressing the case.

Despite these issues, the centralised model does offer some benefits. It provides a consistent national framework and ensures that decisions are made within a legally defined structure. It may also offer a level of oversight and standardisation that is harder to maintain across multiple local authorities. However, these benefits are undermined when the system fails to respond in a timely and victim-centred manner.

In contrast, devolved models demonstrate how local decision-making can lead to faster, more effective outcomes. These models allow practitioners to respond quickly, reduce the risk of criminalising victims, and build stronger multi-agency partnerships. They also encourage greater engagement from education, health, and third sector organisations, creating a more holistic safeguarding environment.

While the centralised model offers consistency and legal structure, its drawbacks, particularly delays, high evidentiary thresholds, and poor coordination, significantly hinder its effectiveness. The evidence from devolved pilots suggests that localised decision-making, when properly resourced and supported, can better meet the needs of victims and align more closely with trauma-informed practice.

What do you see as the benefits and drawbacks of devolving modern slavery victim status decision-making for both adults and children to regional or local agencies? We are particularly interested in evidence about the capacity and readiness of local agencies to make these decisions.

One of the most significant benefits is the speed and responsiveness of local decision-making. One member offered an example where their local authority is able to make reasonable and conclusive grounds decisions within two weeks, compared to the lengthy delays often experienced under the centralised Home Office model. This rapid turnaround allows for timely interventions, including the withdrawal of criminal charges against exploited young people. Such outcomes can prevent the criminalisation of victims and ensure that safeguarding responses are prioritised.

Devolved decision-making also enables more nuanced, trauma-informed assessments. Practitioners are able to apply their local knowledge and professional judgement without being constrained by rigid evidentiary thresholds. This is particularly important in cases involving young people who may be unwilling or unable to provide detailed disclosures. The devolved model allows professionals to recognise exploitation based on patterns of behaviour, context, and risk, rather than relying solely on formal statements.

Another benefit is the ripple effect on multi-agency collaboration. Local authorities with devolved powers have prompted increased engagement from education, health, and third sector organisations. Schools, for example, have become more confident in identifying and referring concerns, supported by training and awareness-raising initiatives. The devolved model has also strengthened relationships with police and legal services, enabling more coordinated and effective responses.

However, there are potential drawbacks. There is the risk of a postcode lottery, where victims may receive different levels of support depending on the capacity and expertise of their local authority. Smaller or less experienced areas may struggle to match the effectiveness of larger cities, particularly if they lack operational experience or established multi-agency frameworks.

There is a need for national consistency and oversight, noting that Glasgow's model remains a pilot and that scaling it across the country would require formal

authorisation and support from the Home Office. Without this, other areas may be unable to replicate the model, even if they are willing and prepared to do so.

Devolving decision-making to local agencies offers clear benefits in terms of speed, contextual understanding, and multi-agency engagement. However, successful implementation depends on adequate resourcing, training, and national coordination to ensure consistency and avoid disparities in victim support. The evidence so far demonstrates that, with the right structures in place, local agencies are capable and ready to take on this responsibility effectively.

What do you see as the benefits and drawbacks of multi-agency involvement in modern slavery victim status decision-making for both adults and children?

One of the clearest benefits is the ability to draw on a wide range of professional expertise. Members emphasise that exploitation is complex and often subtle, requiring input from multiple agencies to fully understand the risks and circumstances. For example, Glasgow's devolved decision-making model is embedded within a multi-agency framework, involving education, health, police, and third sector organisations. This collaborative approach ensures that decisions are informed by diverse perspectives and real-time intelligence, which enhances accuracy and responsiveness.

Multi-agency involvement also facilitates early identification and intervention. Education staff, who are not designated First Responder Organisations, have become more confident in recognising indicators of exploitation and referring concerns, thanks to joint training and awareness-raising initiatives. This has led to more timely referrals and better outcomes for young people. The integration of third sector organisations, who often have close relationships with vulnerable individuals, further strengthens the safeguarding network and ensures that concerns are not missed.

Another benefit is the alignment of decision-making with existing safeguarding processes. Glasgow has integrated modern slavery decision-making into its Interagency Referral Discussion (IRD) process, allowing for seamless coordination and avoiding duplication. This model ensures that exploitation is treated as a core child protection concern, rather than a separate or siloed issue.

However, there are concerns about consistency across local authorities, and members note that smaller or less experienced areas may lack the capacity or operational knowledge to participate effectively in multi-agency decision-making. This could lead to disparities in how victims are identified and supported, depending on where they live.

There is also a risk that without clear national guidance and oversight, multi-agency models may vary significantly in structure and effectiveness. For example, adult safeguarding processes, such as Adult Support and Protection (ASP), may not always be well-suited to addressing modern slavery, and multi-agency meetings need to be carefully designed to avoid confusion or procedural delays.

In a multi-agency decision-making model, which organisations or professionals do you think should be involved in the decision-making process for adult and child cases?

Members highlight the value of integrating modern slavery decision-making into existing safeguarding structures, such as Interagency Referral Discussions (IRDs), to ensure consistency and avoid duplication[1]. This approach promotes timely, informed, and trauma-sensitive decisions across all relevant sectors.

Do you think certain types of NRM referrals (e.g. for those exploited overseas only, those exploited in the UK only, different exploitation types) are better suited to any of the specific decision-making models? Please explain your reasoning.

Certain types of NRM referrals may be better suited to specific decision-making models, depending on the nature and context of the exploitation.

Referrals involving domestic exploitation, such as child criminal exploitation, county lines activity, or sexual exploitation occurring within the UK, are often better handled by local or regional agencies. These cases benefit from local knowledge, established multi-agency relationships, and the ability to respond quickly. As demonstrated in Glasgow's devolved model, local decision-making allows for timely safeguarding and avoids unnecessary criminalisation of victims, particularly children.

In contrast, cases involving overseas exploitation, cross-border trafficking, or complex immigration issues may be more appropriately managed by national Competent Authorities. These bodies are better equipped to handle international coordination, immigration status considerations, and legal complexities that local agencies may not have the capacity to address.

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[1] https://www.gov.scot/publications/national-guidance-child-protection-scotland-2021-updated-2023/documents/

Ultimately, a flexible model that allows for both centralised and devolved decision-making, based on the type of exploitation and the readiness of local agencies, would ensure more effective and equitable outcomes for victims.

What changes could help improve the process of gathering and sharing information with the Competent Authorities to inform victim status decisions after an initial referral has been made (i.e. Reasonable Grounds and Conclusive Grounds decisions, and any reconsiderations of these decisions), while enabling these decisions to be made in a timely and efficient way?

One key issue is the lack of continuity in communication. Our members noted that the Home Office often continues to contact the original referring social worker, even after the case has been transferred or the worker has left their role. This creates delays and confusion, especially when the new case holder is not informed or involved. A more dynamic system for updating contact details and case ownership would improve efficiency and ensure that requests for further information reach the appropriate professional.

Another challenge is the length of time taken to reach conclusive grounds decisions. Members describe how delays of up to a year can leave victims in a prolonged state of uncertainty, affecting their mental health, education, and access to support. To address this, clearer guidance on what information is required at each stage of the process, particularly for conclusive grounds decisions, would help professionals prepare more robust submissions from the outset. This could include standardised templates, checklists, or examples of good practice.

There is also a need for better integration between local safeguarding processes and national decision-making. In devolved areas, decision-making is embedded within multi-agency frameworks, allowing for faster and more informed assessments. Replicating this model more widely, or ensuring that Competent Authorities have access to multi-agency input, could improve the quality of decisions and reduce duplication.

Finally, members call for more accessible and transparent communication from Competent Authorities. This includes timely updates on the status of referrals, clear explanations of decisions, and opportunities to clarify or challenge outcomes. Improved digital systems for secure information sharing and case tracking would support this goal.

Do you think that having two decisions in the NRM (Reasonable Grounds followed by Conclusive Grounds) supports effective identification of victims of modern slavery?

The two-stage decision-making process within the National Referral Mechanism (NRM), comprising the Reasonable Grounds and Conclusive Grounds decisions, does not consistently support the effective identification and protection of victims of modern slavery, particularly in practice.

While the Reasonable Grounds decision can trigger a reflection and recovery period, offering temporary protection and access to support, our members highlight significant concerns about the impact of delays between the two decisions. The time taken to reach a Conclusive Grounds decision can extend to several months or even a year, leaving victims, especially children and young people, in a prolonged state of uncertainty. This period of limbo can have serious consequences, including disengagement from education, reluctance to pursue employment, and heightened anxiety about potential prosecution or immigration outcomes.

The distinction between the two decisions can also be confusing for both professionals and victims. Many frontline workers are unclear about the evidentiary thresholds required at each stage, and victims may struggle to understand why their status remains unresolved despite initial recognition. This undermines trust in the system and can discourage further engagement.

In contrast, devolved decision-making models demonstrate that timely and locally informed decisions can significantly improve outcomes. Glasgow's ability to reach Conclusive Grounds decisions within two weeks has enabled practitioners to intervene quickly, prevent criminalisation, and provide meaningful support. These decisions are made within a multi-agency framework, allowing for a more holistic and trauma-informed assessment.

While the two-stage model may have theoretical value in ensuring thorough scrutiny, its practical limitations, particularly the delays and lack of clarity, suggest that it may not be the most effective mechanism for identifying and supporting victims. A streamlined or locally managed process, supported by clear guidance and multi-agency collaboration, would better align with the needs of victims and the realities of frontline practice.

To summarise, although the Reasonable Grounds stage offers initial protection, the overall two-stage process often delays justice and support. Reforming the system to enable faster, context-sensitive decision-making, especially for vulnerable groups such as children, would enhance its effectiveness and ensure that victims are recognised and safeguarded without unnecessary delay.

Conclusion

The insights shared by Social Work Scotland's members underscore the need for reform in how modern slavery is understood, identified, and addressed within the UK. Their collective experience reveals that current systems and terminology often fall short of capturing the complexity and evolving nature of exploitation, particularly among children and young people.

A shift toward more trauma-informed, locally responsive, and practice-led approaches is recommended, not only to improve identification and support but also to ensure that victims are recognised and protected in a timely and meaningful way.

By embracing multi-agency collaboration, lived experience, and flexible decision-making models, the UK can move closer to a safeguarding framework that is both effective and compassionate.

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