Home Office

NRM process

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Home Office

1. How NRM decisions are made
2. Examples of ‘good’ NRM referrals and ‘bad’ NRM referrals
3. Noting the difference for children
4. Devolved decision-making panels for children
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How NRM Decisions Are Made

Home Office

Step 1: Does the account meet the definition?

- Part A (action), Part B (means), Part C (purpose)

Step 2: Does the account meet the required threshold?

"reasonable grounds to believe that a person is a victim of modern slavery (human trafficking or slavery, servitude, or forced or compulsory labour)".

How do we decide whether the threshold is met?

Level of detail
Consideration is given to the circumstances of the referral

Reasons why there may be a lack of detail
We may have medical evidence to support why there is a lack of detail
Or contained within the referral the FR will have explained this
It is not intended the decision maker makes this judgement on the information in the referral alone.

Consistency
Consideration given to whether there is evidence that such circumstances are present which may explain why the referred person has been unable to provide a consistent account of their exploitation

Timing
Consideration given to any reasons why there is a delay to disclosure

+ SUPPORTING EVIDENCE

Supporting Evidence

Home Office

Indicators of Modern Slavery

Are there specific indicators of modern slavery included in the referral?

It is important that the First Responder provides as much information as possible at the point of referral, including their record of external indicators.

“In order to identify a potential victim of modern slavery, frontline staff who might encounter a potential victim should be familiar with the indicators set out in this section. This includes First Responders, who need to know and understand the signs which may indicate a person is a victim of modern slavery in order to decide whether to refer a case to the National Referral Mechanism (NRM).

A First Responder’s decision as to whether to refer a potential victim into the NRM is a decision of professional judgment based on the evidence available to them. First Responders should consider the presence of any indicators of modern slavery, including for example the non-verbal presentation of the victim, what the victim says, situational and environmental factors and objective evidence regarding known patterns of modern slavery. Not all indicators of modern slavery will be present in all situations.

Information provided by the First Responder

Has the FR explained why they have referred the individual or provided additional evidence or information relating to the person’s exploitation? Is there any evidence raised by the First Responder regarding the credibility of the account?

How the referral came to be made

Was the individual identified by a FR? Did the FR make the referral as a result of an indicator they identified separate to the account provided by the individual concerned? Did the FR make the referral because they were asked to, by the individual or by a third party representing them?

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Good Referrals include –

As much detail as possible (any reasons for lack of detail)

Professional insight

Details of any observed Modern Slavery indicators

Circumstances of the referral

Any reasons why account may appear inconsistent

Any reasons for delay in disclosure

Contact details for FR

Clear if other evidence is available

Poor Referrals –

Lacking in detail – brief recap of PVs account

Info that is 'copy and paste'

No professional insight or indicators provided

No explanation or reasons for lack of detail, inconsistencies, timing of claim issues

No info to explain why PV has been referred in or details about circumstances of the referral

Not easy to follow

Examples of 'good' NRM referrals and 'bad' NRM referrals

Why are you making this referral?

It helps if you clearly outline your reasons, for example include:
Want makes you think this person may be a victim? Have you identified any MS indicators? Do you have any professional opinion/insight/judgement? How did the person appear? How did you meet the person? Anything linked to the circumstances of the referral?

I interviewed this person about their asylum claim. The PV stated that he had been a victim of forced labour. I have interviewed many victims of forced labour and my professional opinion is that the PV was being truthful about his account. I identified several MS indicators during my interactions – the PV appeared fearful and anxious when discussing this part of his account. I identified further indicators from his account including how he described that he was unable to leave, had his movements controlled, suffered injuries at the hands of his 'employer' and received no pay.

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Why are you making the referral? I am the interviewing officer who conducted PV's asylum interview.

Appears to be indicators of modern slavery

This person needs support

Why are you making the referral? Modern Slavery, physical and mental health

"A judge asked me to make this referral"

Safeguarding issues

I'm referring because this person has been subjected to human trafficking

Why are you making the referral? Professional insight (report filed by third party)

Children

I am referring this child as I suspect she involved in county lines exploitation. The child was encountered by Police on XX. She was found in possession of a several wraps of Class B drugs. Also on her possession was a £300 in cash and 2 mobile phones. The child was interviewed and provided a no comment interview. My professional opinion is that this child was being instructed by older males known to be members of a known OCG. There is an open investigation. The child appeared fearful of providing any information about any of her associates.

- No consent required for children
- It is not necessary for there to have been 'means' for a child to be a victim, because children cannot give informed consent to engage in criminal or other exploitative activity, and they cannot give consent to be abused or trafficked.
- Children cannot always provide as much detail as adults when they recall abusive experiences
- Child victims may be unable to, self-identify. Child victims may find it particularly hard to disclose and are often reluctant to give information. This may be because their stories are made up by their trafficker or exploiter, or the traffickers may have given them inaccurate information about the role of authorities, and they may have had bad experiences with corrupt authorities during their journey if trafficked. As a result, they may relate their experiences in an inconsistent way or with obvious errors. As such, First Responders and frontline staff should ensure they are familiar with child-specific indicators so that they can identify victims who do not self-identify
- Children who have been trafficked may also be uncertain about the places and countries they have travelled through as their traffickers are likely to withhold that information from them.
- In order to determine whether a child is a potential victim of modern slavery, those working with victims need knowledge and understanding about child victims of modern slavery as characteristics and issues may be different to adult victims, including their: added vulnerability, developmental stage & possible grooming by the perpetrator.
- The SCA will always request information from the LA before making a decision.

Devolved Decision-Making Panels for Children

Home Office

What is the Pilot Programme?

- There are currently twenty Local Authorities within the Devolved Decision-Making programme who make NRM decisions for children in their areas. Both the Reasonable Grounds and Conclusive Grounds decisions are taken through a multi-agency structure at one or more meetings, which must have representation from the three core safeguarding partners – the local authority, health and police.

Why do we have the Pilot Programme?

- The Pilot Programme began in June 2021 it forms part of a wider programme of activity to identify sustainable longer-term options for the NRM, it is aiming to test whether determining if a child is a victim of modern slavery within existing safeguarding structures is a more appropriate model for making modern slavery decisions for children.

What are the benefits?

- Quicker decision-making timescales.
- Increased awareness and understanding of the NRM and Modern Slavery
- Improved multi agency partnership working.

If you have any further questions, please contact:
childmspilots@homeoffice.gov.uk

How Reconsideration Requests Work

A reconsideration request must be made within **ONE MONTH** (**30 Calendar days**) of the RG or CG decision. Where this is outside 30 days exceptional circumstances should be considered.

- Where additional evidence can be provided which, taken with all the available evidence already considered, could demonstrate that the individual is a victim of modern slavery.
- There are specific concerns that a decision made is not in line with this guidance.

Individuals will only be entitled to **one reconsideration request** unless there are 'Good Reasons' for another reconsideration to take place.

- If we have received **new information** which would alter the decision – usually agree to reconsider.
- If we already had the **information but this was not engaged/considered** in the decision – agree to reconsider.
- If the request is being made on the grounds that the **decision was not made in line with guidance,** review the statutory guidance to determine whether the decision is sustainable.

A request for reconsideration should include the following information:

- *Name of the individual in receipt of a negative decision*
- *Date of birth*
- *Nationality of the individual*
- *NRM reference number*
- *Basis of request i.e., 'not in line with guidance' or 'new available evidence'*
- *Reasons for the reconsideration request, including new available evidence where applicable.*
- *Where new evidence is being provided, an explanation as to why this evidence was not provided earlier.*

If the reconsideration request is based on new information but you are unable to provide the information within one month of the decision, you should contact the CA as early as possible and request an extension.
You should provide your reasons for not being able to meet the one-month deadline (with evidence which supports your reasons) and a timeframe by which you expect to have obtained the relevant information.

Example A Overseas Case

Example A-1 — Referral

First responder details

First name	[redacted]
Surname	[redacted]
Email address	[redacted]@norfolk.gov.uk
Organisation	Norfolk County Council
Phone	01603[redacted]
Job title	social worker

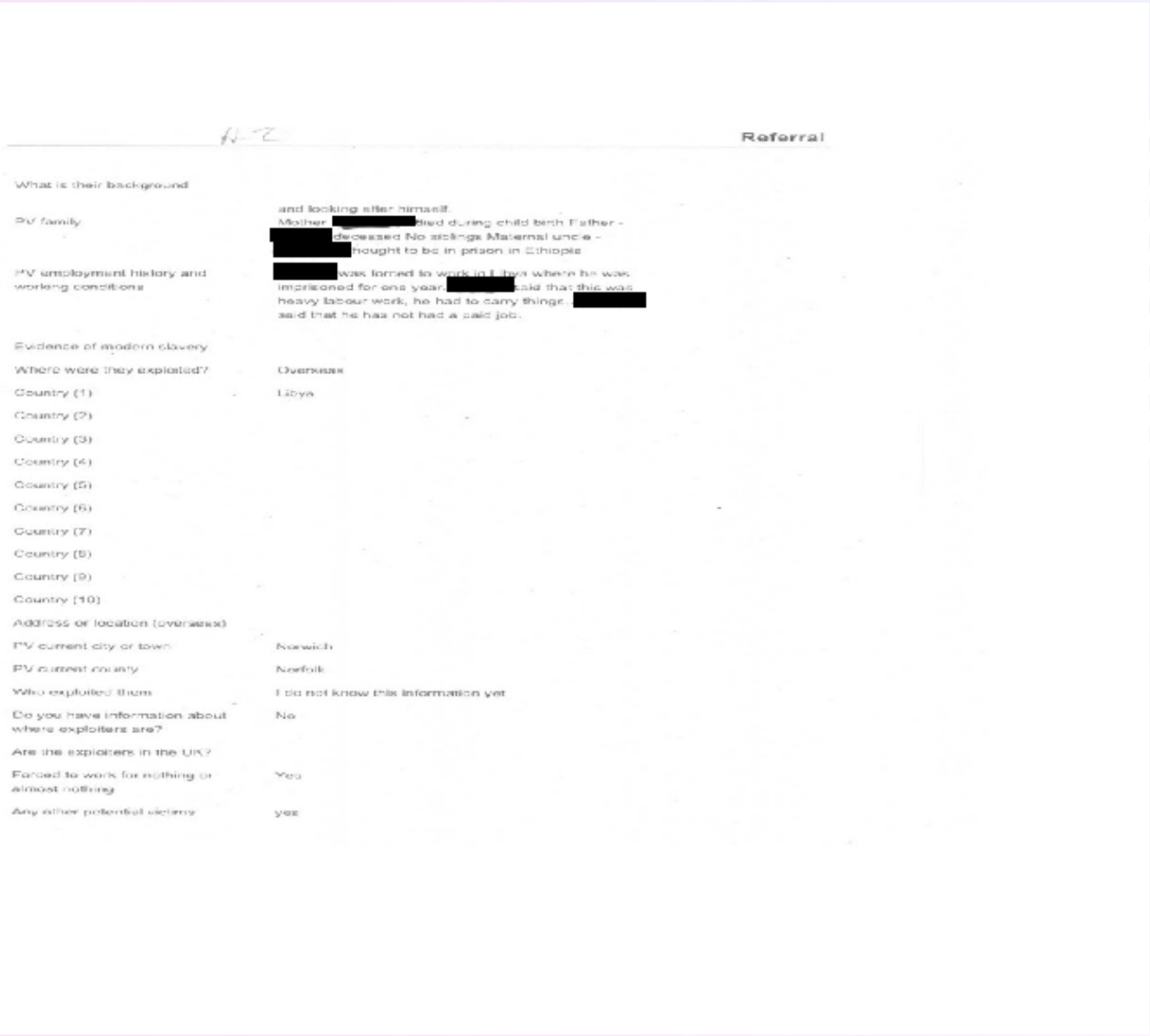
Potential victim details

First name	[redacted]
Surname	[redacted]
Alias	[redacted]
Date of birth known?	Yes
Date of birth	[redacted]
Preferred contact method	
Have children	No
Number of children	
Nationality	Eritrean
Dual nationality	
Interpreter needed	Yes
Interpreter language	Amharic
Need help with communication	No
Communication aid	
Gender	Male

What is their background

PV birthplace	[redacted] Eritrea
PV education	Attended school in Ethiopia until year three. [redacted] was looked after by his uncle but he started going to prison. It sounds like [redacted] was homeless for a time

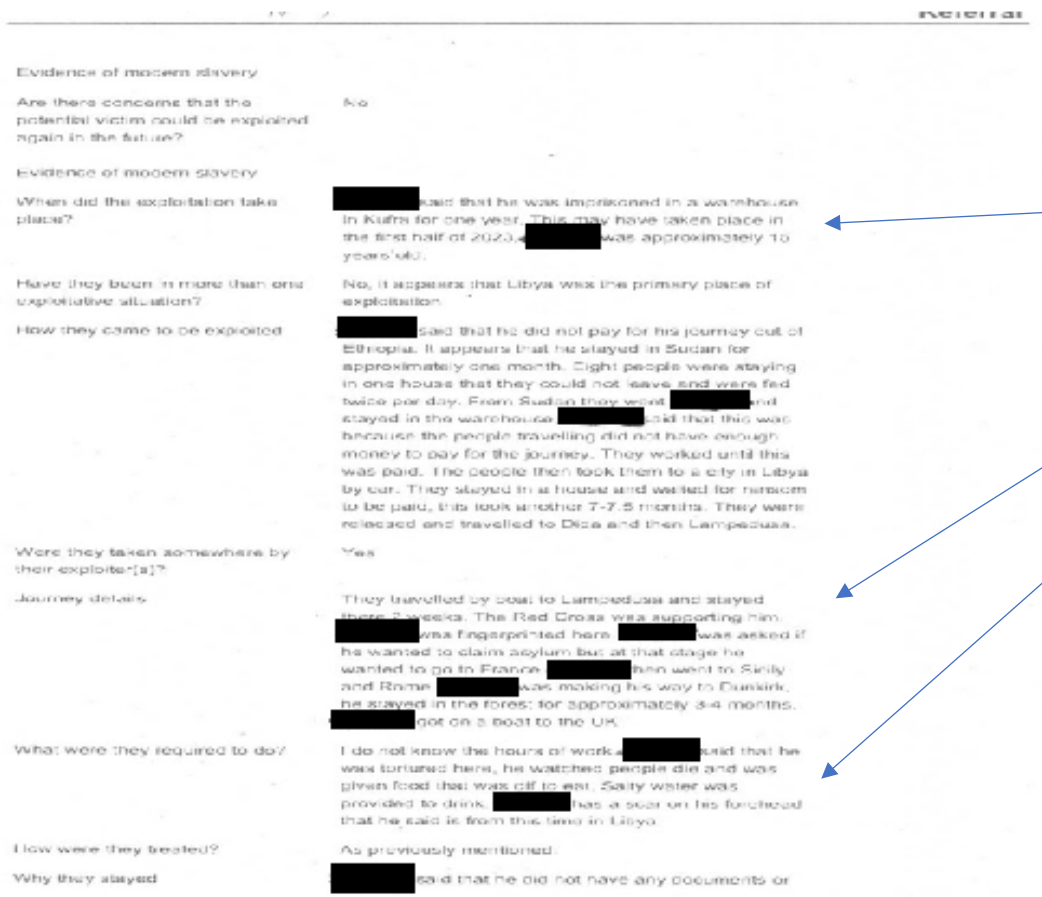
Example A Overseas Case



Referral

What is their background	
PV family	and looking after himself. Mother [redacted] died during child birth. Father - [redacted] deceased. No siblings. Maternal uncle - [redacted] thought to be in prison in Ethiopia
PV employment history and working conditions	[redacted] was forced to work in Libya where he was imprisoned for one year. [redacted] said that this was heavy labour work, he had to carry things. [redacted] said that he has not had a paid job.
Evidence of modern slavery	
Where were they exploited?	Overseas
Country (1)	Libya
Country (2)	
Country (3)	
Country (4)	
Country (5)	
Country (6)	
Country (7)	
Country (8)	
Country (9)	
Country (10)	
Address or location (overseas)	
PV current city or town	Norwich
PV current county	Norfolk
Who exploited them	I do not know this information yet
Do you have information about where exploiters are?	No
Are the exploiters in the UK?	
Forced to work for nothing or almost nothing	Yes
Any other potential victims	yes

Example A Overseas Case



Evidence of modern slavery	
Are there concerns that the potential victim could be exploited again in the future?	No
Evidence of modern slavery	
When did the exploitation take place?	[redacted] said that he was imprisoned in a warehouse in Kufra for one year. This may have taken place in the first half of 2023 [redacted] was approximately 19 years old.
Have they been in more than one exploitative situation?	No, it appears that Libya was the primary place of exploitation.
How they came to be exploited	[redacted] said that he did not pay for his journey out of Ethiopia. It appears that he stayed in Sudan for approximately one month. Eight people were staying in one house that they could not leave and were fed twice per day. From Sudan they went [redacted] and stayed in the warehouse [redacted] said that this was because the people travelling did not have enough money to pay for the journey. They worked until this was paid. The people then took them to a city in Libya by car. They stayed in a house and waited for ransom to be paid, this took another 7-7.5 months. They were released and travelled to Dirca and then Lampedusa.
Were they taken somewhere by their exploiter[s]?	Yes
Journey details	They travelled by boat to Lampedusa and stayed there 2 weeks. The Red Cross was supporting him. [redacted] was fingerprinted here. [redacted] was asked if he wanted to claim asylum but at that stage he wanted to go to France. [redacted] then went to Sicily and Rome. [redacted] was making his way to Dunkirk, he stayed in the forest for approximately 3-4 months. [redacted] got on a boat to the UK.
What were they required to do?	I do not know the hours of work. [redacted] said that he was tortured here, he watched people die and was given food that was off to eat. Salty water was provided to drink. [redacted] has a scar on his forehead that he said is from this time in Libya.
How were they treated?	As previously mentioned.
Why they stayed	[redacted] said that he did not have any documents or

Details are vauge

Example A Overseas Case

Referral

Evidence of modern slavery	
How and why did they leave the situation?	any parents to contact for ransom. It sounds like the traffickers just let them go to continue the journey.
When were the potential victim and exploiters last in contact?	Not sure
Is this the first chance they have had to report this?	Yes
Why are you making the referral?	I am making this referral as part of my duty as a social worker and for safeguarding purposes. I am not sure if [redacted] experience has harmed him yet, he does find this difficult to talk about.
Where and how was the interview carried out?	Brief Age Enquiry led by [redacted] and supported by [redacted] Started at 12.20pm 19.3.25 at private room in [redacted] Frequent breaks were given but no safeguarding concerns were raised at this time.
Are there other professionals or organisations involved with this case?	Yes
Details of other professionals or organisations involved	social worker - children's services GP and LAC Health Team placement provider and support workers optometrist dental college solicitor
Are there indicators or evidence that they could be acting dishonestly?	No
Detail the indicators or evidence that they could be acting dishonestly	
What documents or evidence will you submit with this referral?	At this stage there are no additional documents to submit.
Nature of Referral	
Country where reporting	England
Country based	England
Potential victim under 18	Child (17 or under)
Local authority details	

Unsure

Could the referral of waited for more details

Contact details could be added

Example A Overseas Case

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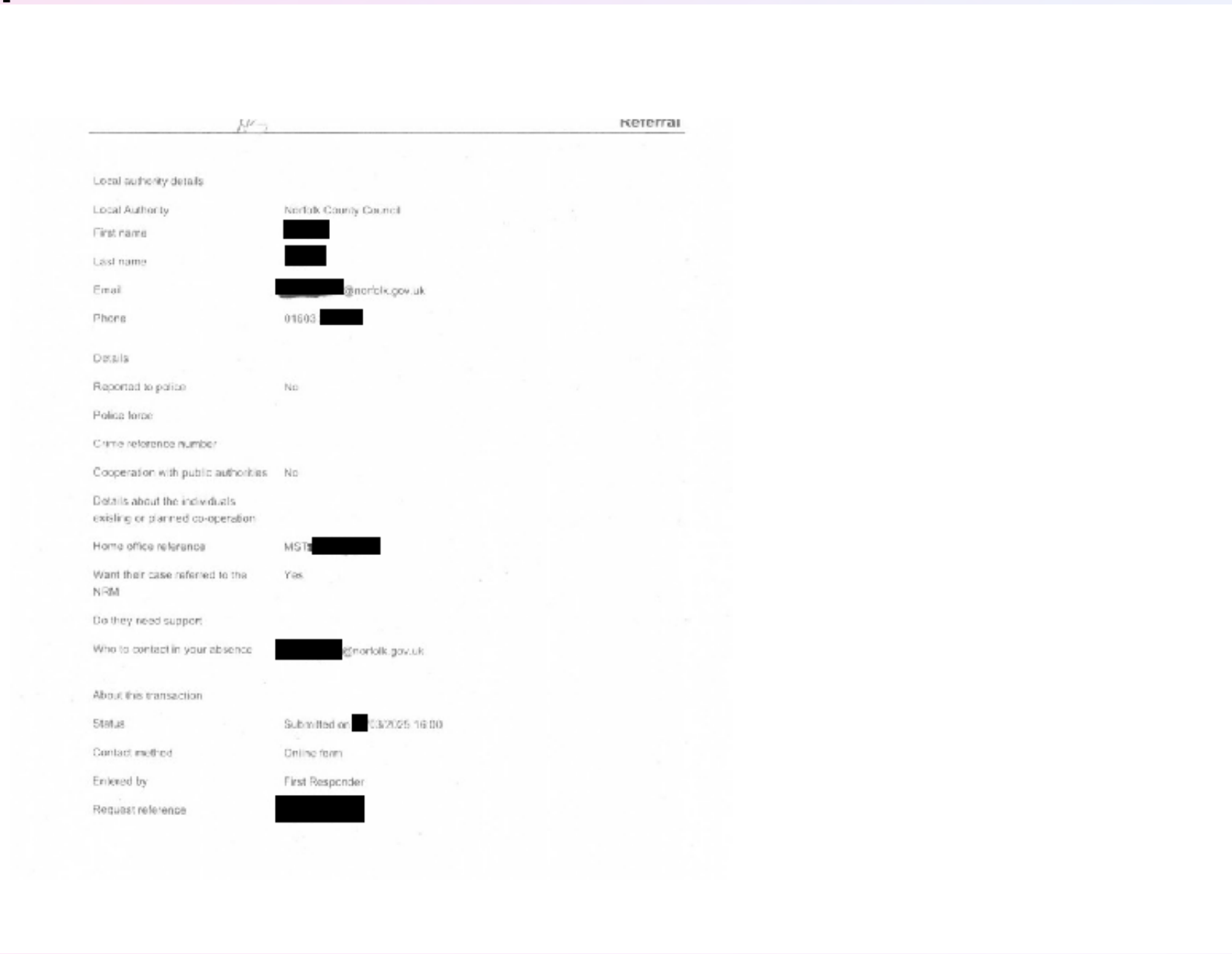

Referral

Local authority details

Local Authority	Norfolk County Council
First name	[redacted]
Last name	[redacted]
Email	[redacted]@norfolk.gov.uk
Phone	01603 [redacted]

Details

Reported to police	No
Police force	
Crime reference number	
Cooperation with public authorities	No
Details about the individuals existing or planned co-operation	
Home office reference	MST[redacted]
Want their case referred to the NRM	Yes
Do they need support	
Who to contact in your absence	[redacted]@norfolk.gov.uk

About this transaction

Status	Submitted on [redacted]03/2025 16:00
Contact method	Online form
Entered by	First Responder
Request reference	[redacted]

Example B UK child case

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Example B.1. **Referral**

First responder details

First name	[redacted]
Surname	[redacted]
Email address	[redacted]@norfolk.gov.uk
Organisation	Norfolk County Council
Phone	[redacted]
Job title	Social Worker

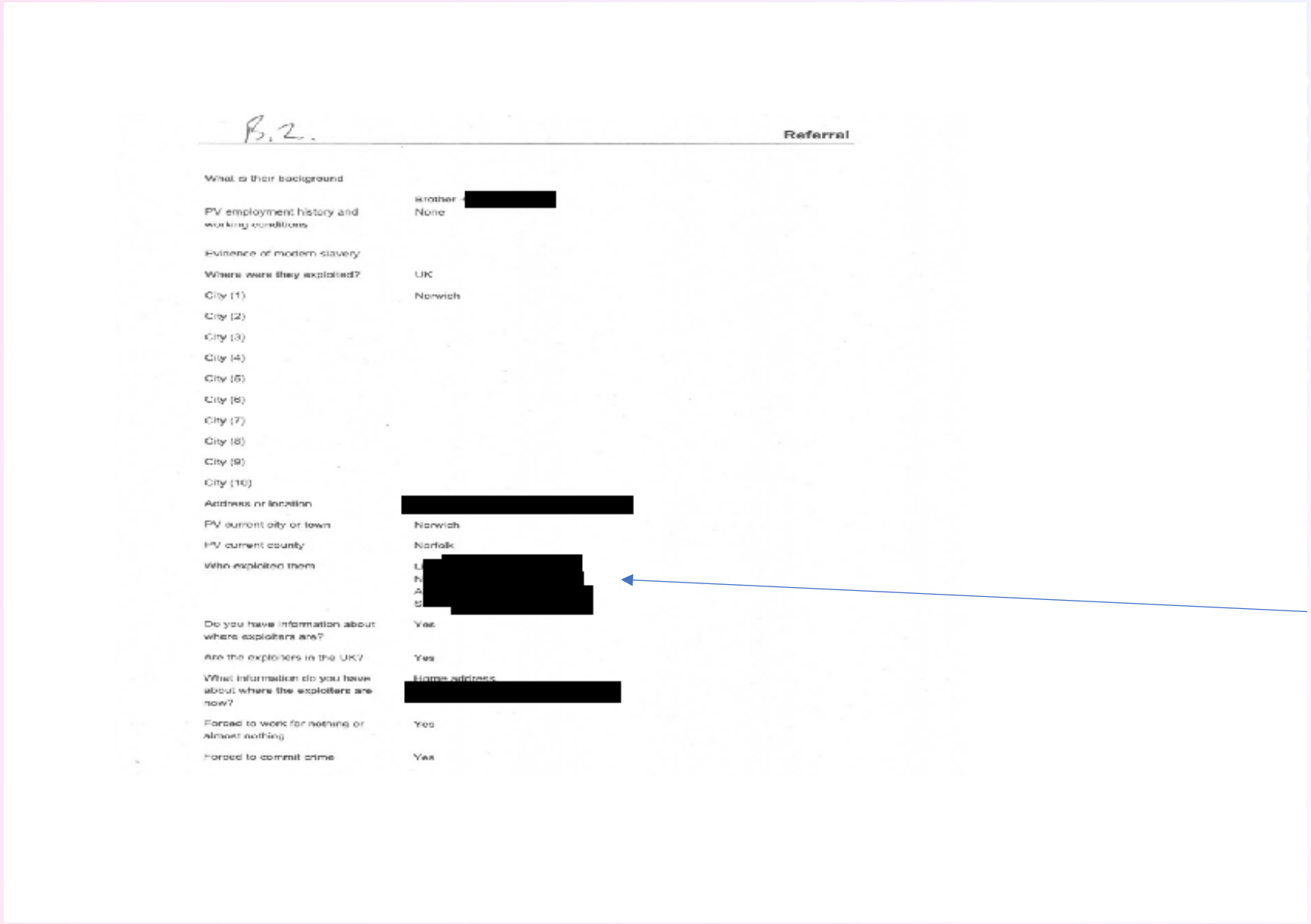
Potential victim details

First name	[redacted]
Surname	
Alias	
Date of birth known?	Yes
Date of birth	[redacted]
Preferred contact method	
Have children	No
Number of children	
Nationality	British
Dual nationality	Scottish
Interpreter needed	No
Interpreter language	
Need help with communication	No
Communication aid	
Gender	Male

What is their background

PV birthplace	United Kingdom
PV education	Attended [redacted] Norwich.
PV family	Mum [redacted] Dad -

Example B UK child case



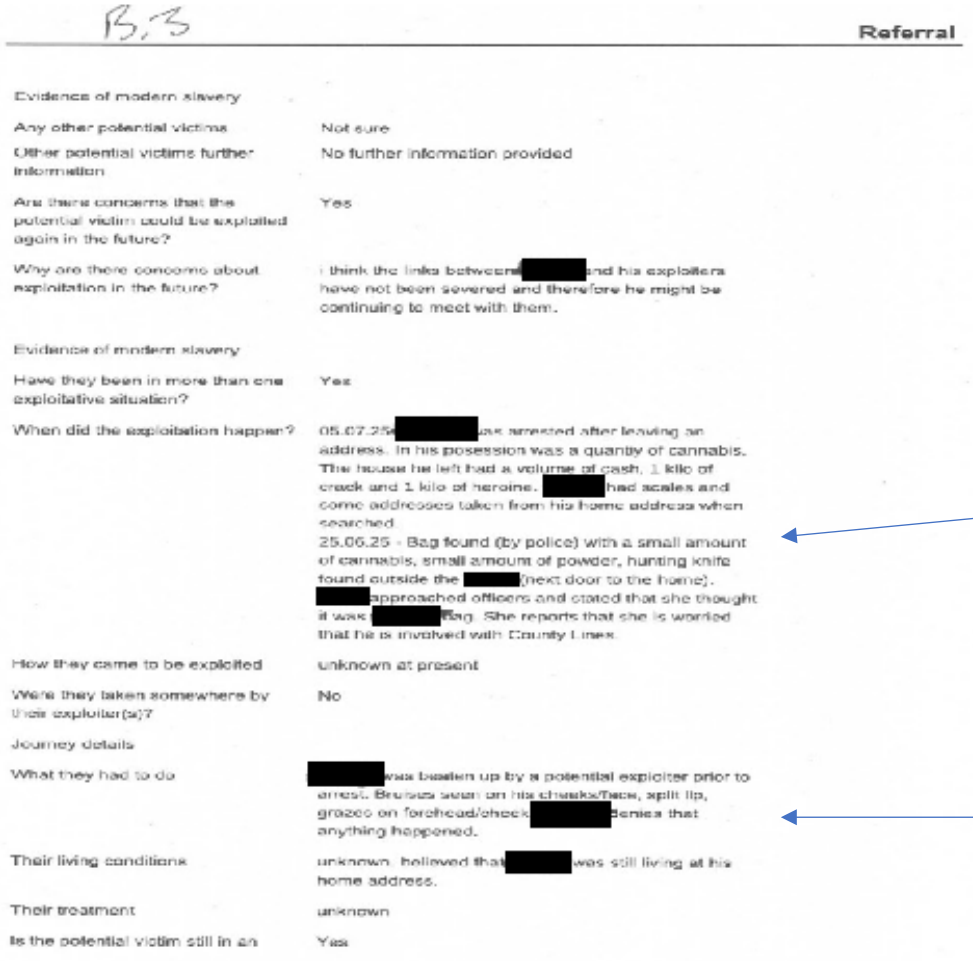
B.2.

Referral

What is their background	
PV employment history and working conditions	Brother [redacted] None
Evidence of modern slavery	
Where were they exploited?	UK
City (1)	Norwich
City (2)	
City (3)	
City (4)	
City (5)	
City (6)	
City (7)	
City (8)	
City (9)	
City (10)	
Address or location	[redacted]
PV current city or town	Norwich
PV current county	Norfolk
Who exploited them	[redacted]
Do you have information about where exploiters are?	Yes
Are the exploiters in the UK?	Yes
What information do you have about where the exploiters are now?	Home address [redacted]
Forced to work for nothing or almost nothing	Yes
Forced to commit crime	Yes

Good details so that further questions can be asked

Example B UK child case



B.3

Referral

Evidence of modern slavery	
Any other potential victims	Not sure
Other potential victims further information	No further information provided
Are there concerns that the potential victim could be exploited again in the future?	Yes
Why are there concerns about exploitation in the future?	I think the links between [redacted] and his exploiters have not been severed and therefore he might be continuing to meet with them.
Evidence of modern slavery	
Have they been in more than one exploitative situation?	Yes
When did the exploitation happen?	05.07.25 [redacted] was arrested after leaving an address. In his possession was a quantity of cannabis. The house he left had a volume of cash, 1 kilo of crack and 1 kilo of heroine. [redacted] had scales and some addresses taken from his home address when searched. 25.06.25 - Bag found (by police) with a small amount of cannabis, small amount of powder, hunting knife found outside the [redacted] (next door to the home). [redacted] approached officers and stated that she thought it was [redacted] bag. She reports that she is worried that he is involved with County Lines.
How they came to be exploited	unknown at present
Were they taken somewhere by their exploiter(s)?	No
Journey details	
What they had to do	[redacted] was beaten up by a potential exploiter prior to arrest. Bruises seen on his cheeks/face, split lip, grazes on forehead/cheek [redacted] denies that anything happened.
Their living conditions	unknown, believed that [redacted] was still living at his home address.
Their treatment	unknown
Is the potential victim still in an	Yes

The two incidents gives greater weight and background

Supporting details of control

Example B UK child case

B4

Referral

Evidence of modern slavery

exploitative situation? What is keeping the potential victim in the situation?	No evidence of ongoing exploitation. However regular meetings (fortnightly) with social workers, MACE police, and parents suggest that there are ongoing concerns for [redacted] and that he is still directly communicating with expolitors.
When were the potential victim and exploiters last in contact?	Not sure
Details of the last contact	Last known communication was 09.07.25 face to face just before [redacted] was arrested. However [redacted] has inferred that he has communicated with them after this, sharing that he knew that they were all released on the same day. No known threats.
Has the potential victim reported this before?	No
Why are they reporting this now?	[redacted] not in agreement with the NRM, because he feels like he is friends with these men/boys and he is choosing to act how he does. However [redacted] is a young 16 year old with neurodiverdities which can make him understanding others hard.
Did you identify any modern slavery indicators?	Yes
Details of modern slavery indicators identified	Reluctance to seek help [redacted] will not speak about his arrest or the events surrounding this, despite reassurance/encouragement [redacted] denys knowing the people involved despite evidence to the contrary. Physical [redacted] was assulted prior to arrest. controlled by others One theory is that [redacted] has been lured into selling drugs to people in Norwich.
Where and how was the interview carried out?	[redacted] was interviewed after arrest and replied no comment. [redacted] was AA. [redacted] has not been interviewed regarding exploitation by police or childrens services currently

Explains that others still involved

Gives a current position and possible reasons none co-operation

Example B UK child case

B.5.

Referral

Evidence of modern slavery	
Your professional insight	as he is defensive about speaking about the arrest. [redacted] will be interviewed by MACE/Police and Childrens' Services regarding our exploitation concerns next week. [redacted] has been linked to an address where a high volume of drugs have been found. [redacted] has suggested that he does not know the address but messages suggest that he has a long (over a year) relationship with the residents. [redacted] knowledgeable about drugs, their costs, and drug dealing. Some of these comments include ones that make him appear coached. 'you should never keep drugs in the house'. [redacted] is not phased by the police investigation, and presents as relaxed and unbothered where others might appear naturally stressed. [redacted] still goes out daily, apparently without a mobile phone.
Are there other professionals or organisations involved with this case?	Yes
Details of other professionals or organisations involved	Social Worker - [redacted] Police MACE officer - [redacted]
Do you have any concerns about the potential victim's credibility?	No
Detail the indicators or evidence that they could be acting dishonestly	
Nature of Referral	
Country where reporting	England
Country label	England
Potential victim under 18	Child (17 or under)
Local authority details	
Local Authority	Norfolk County Council
First name	[redacted]
Last name	[redacted]

Opinion given important can be supported by additional documents and known history of PV and exploiters

Details of others

Example B UK child case

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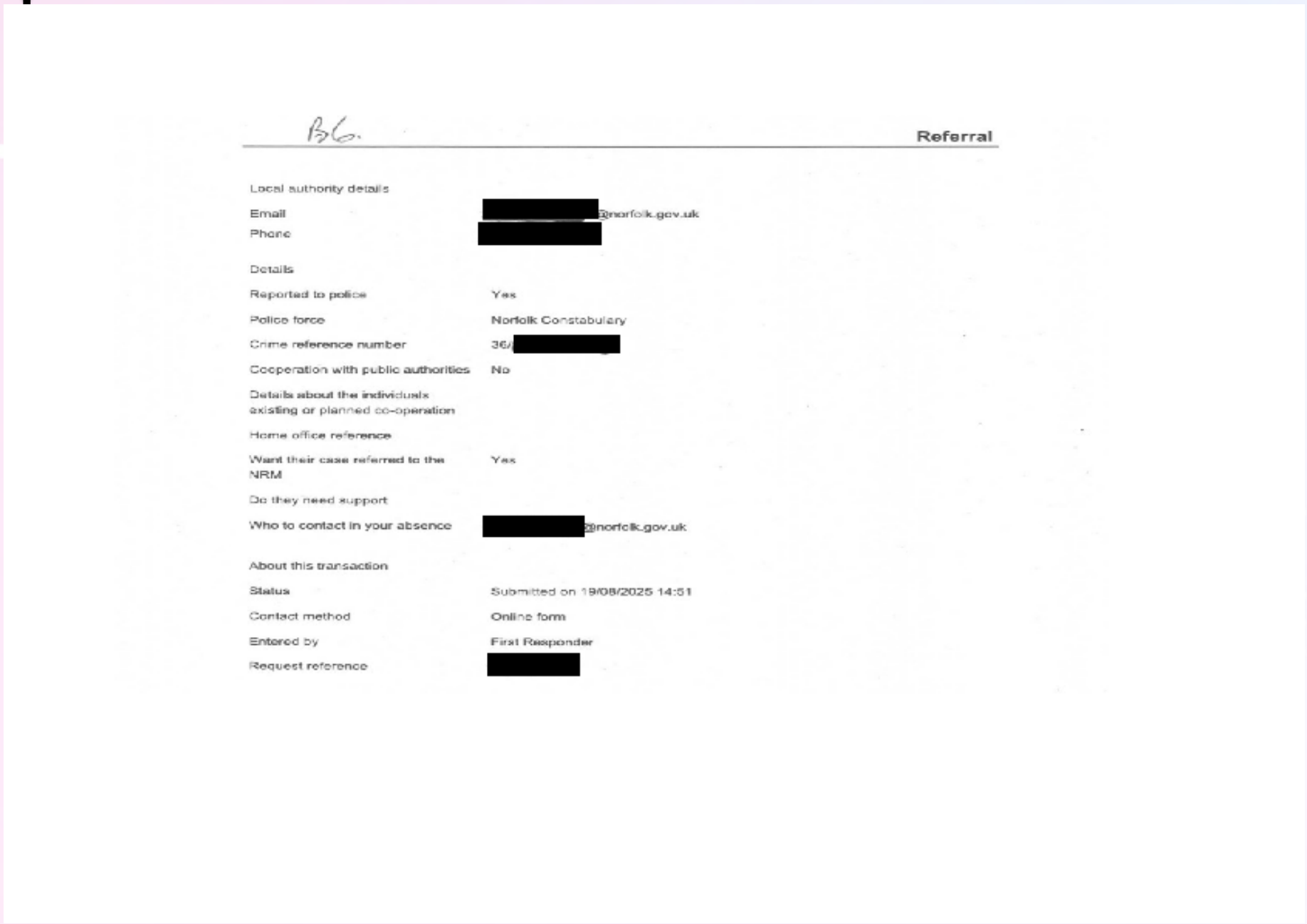

BG.

Referral

Local authority details

Email [redacted]@norfolk.gov.uk

Phone [redacted]

Details

Reported to police	Yes
Police force	Norfolk Constabulary
Crime reference number	36/[redacted]
Cooperation with public authorities	No
Details about the individuals existing or planned co-operation	
Home office reference	
Want their case referred to the NRM	Yes
Do they need support	
Who to contact in your absence	[redacted]@norfolk.gov.uk

About this transaction

Status	Submitted on 19/08/2025 14:51
Contact method	Online form
Entered by	First Responder
Request reference	[redacted]