

REFUSAL TO CONSENT

FACTORS INFLUENCING THE UPTAKE
OF MODERN SLAVERY SUPPORT UNDER
THE NATIONAL REFERRAL MECHANISM

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University of
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Rights Lab

Independent
Anti-Slavery
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Authorship and Acknowledgements

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The research was conducted with support from the project team identified below, with editorial support from Nicola Wright and Donna Phillips.

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The Rights Lab at the University of Nottingham is the world's largest, leading group of modern slavery researchers. Through our four research programmes, we deliver new and cutting-edge research that provides rigorous data, evidence and discoveries for the global anti-slavery effort. Our impact team provides an interface between the Rights Lab research programmes and civil society, business and government, and our INSPIRE project elevates survivor-informed research as a key part of knowledge production to help end slavery.

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The role of the UK Independent Anti-Slavery Commissioner (IASC) was established by the Modern Slavery Act (HM Government 2015). The IASC works to encourage good practice in the prevention, detection, investigation, and prosecution of modern slavery and human trafficking in the UK. The IASC 2024-2026 Strategic Plan outlines the core objectives for the Commissioner and her office which are to: (1) prevent exploitation and encourage a collaborative approach by making tackling modern slavery everyone's business; (2) protect vulnerable victims and improve identification and support; and (3) increase prosecutions and support victims through the criminal justice system.

Content Note

This report does not overtly mention any explicit or sensitive topics. However, discussion will refer to subjects related to modern slavery, human trafficking, and exploitation.

Terminology

Modern Slavery and Human Trafficking

Modern slavery and human trafficking are crimes involving the violation of human, migrant, and labour rights. Under the Modern Slavery Act ([HM Government 2015](#)) “modern slavery” serves as an umbrella term encompassing the offences of human trafficking, slavery, servitude, and forced or compulsory labour. Although widely adopted in practice in the UK, there remains considerable scholarly and practitioner debate regarding the use of “modern slavery” to describe the spectrum of human exploitation. As this report concerns care and support provision for survivors within the UK, it has adopted the UK legislative terminology of “modern slavery” but recognises the live and legitimate debate about what is and should be included in the term.

Victim and Survivor

Most organisations and academics in the UK anti-slavery sector refer to individuals who have experienced modern slavery and/or human trafficking as “survivors”. However, it should be noted that “victim” and “potential victim” are used within some academic papers, reports, and official UK Government documentation, when referring to a survivor’s formal identification status. As this report concerns the decision making of individuals prior to entering the National Referral Mechanism, the preferred term used throughout this report is “potential victim” due to the lack of formal identification status at this time.

The National Referral Mechanism

The National Referral Mechanism (NRM) is the UK’s framework for identifying and supporting potential victims of modern slavery. Anyone over the age of 18 must provide informed consent for a referral into the NRM. On referral, potential victims can access safe accommodation, legal advice, emotional support, and practical help via the Modern Slavery Victim Care Contract. Referrals to the NRM can only be made by authorised First Responders (FR). A list of all FR organisations can be found within the NRM Guidance ([Home Office 2024b](#)).

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Foreword

by Eleanor Lyons,
Independent Anti-Slavery Commissioner



When I became Commissioner, I commenced a series of visits across the UK to hear from survivors of modern slavery and the organisations that support them. They told me about their experiences with authorities, First Responder Organisations or charities, and how they found accessing care. One consistent thing that struck me when speaking to survivors was a growing reluctance and wariness about the National Referral Mechanism (NRM), and the concern that entering it would not provide the support they need.

This trend is echoed in the data too. In 2024, a peak of 5,598 ‘Duty to Notify’ (DtN) referrals indicated a rising trend of potential victims choosing not to seek the support offered through the NRM. The rate of DtN is growing at a faster rate than ever – and we need to understand why this is. Worryingly, this number is likely to be just the tip of the iceberg, with a number of organisations and victims telling me they do not complete DtN forms as the purpose of them is unclear.

That is why this research is so important. The Home Office currently only publishes a limited amount of DtN data, but through sourcing primary and secondary qualitative data, and quantitative analysis of publicly available NRM and DtN data, we can for first time get real insights and understanding on why a growing number of victims are choosing not to access support. This research also shines a light on what this may indicate about the efficacy of our NRM framework that is meant to identify and support victims.

This research has found that there can be many factors that may contribute to victims’ decisions not to enter the NRM. These include fear of authorities, lack of self-identification, inconsistent understanding of the NRM itself and concerns over immigration status, something which has been exacerbated by harmful Government rhetoric which has inaccurately conflated illegal migration and human trafficking.

This report’s findings strengthen the call for urgent action to make sure all victims feel confident they will receive the support they need if they enter the NRM. The NRM must be looked at afresh to make sure all victims’ needs are met. First Responder training should be rolled out and must be trauma-informed to allow individuals to make fully informed decisions. The Government response to modern slavery must be decoupled from immigration enforcement. Furthermore, DtN reporting should be mandatory across all relevant organisations so we can get more accurate data and a better understanding of what victims need.

Lastly, this report stresses the need for further survivor-led research. In addition to the data, we must listen to survivors themselves about why they are increasingly choosing not to enter the NRM. Listening and responding to those with lived experience of modern slavery is critical to understanding the true scale of modern slavery in the UK, how it is changing, and how we can ensure that all potential victims receive the support they need.

Eleanor Lyons.

Eleanor Lyons

Independent Anti-Slavery Commissioner



Executive Summary

On identification as a potential victim of modern slavery, adults must give informed consent to a referral into the UK's National Referral Mechanism (NRM). Over recent years, anecdotal evidence suggests there are increasing numbers of potential victims refusing to provide consent to a referral into the NRM and therefore are not receiving support. Seeking to explore key factors which might influence a potential victim's decision to consent to an NRM referral, this research engaged with academic and grey literature, primary and secondary qualitative data from 56 participants, and the quantitative analysis of publicly available NRM and Duty to Notify (DtN) statistics.

Key Findings

The research identified a wide range of factors which may influence a potential victim's decision not to consent to referral into the NRM. Influencing factors included: fear of immigration repercussions and authorities, the challenge of self-identification, fear of repercussions from exploiters, the inconsistent description and lack of understanding of the NRM, the questionable benefit of the NRM beyond formal recognition, and impacts from recent policy and legislation. With support from the Modern Slavery Victim Care Contract unavailable outside of the NRM, the research also found that potential victims often access other support aside from the NRM should a referral not be pursued.

Findings from the quantitative analysis confirm that DtN reports are increasing at a higher rate than referrals into the NRM. Furthermore, the non-completion of DtN reports by First Responder (FR) organisations suggests that DtN data cannot be relied upon for an accurate representation of the number of potential victims encountered who do not pursue an NRM referral. As a result, the research suggests that there is cause for concern surrounding the true scale of potential victims encountered who choose not to receive support.

Key Recommendations

Taking into account the complexity of factors influencing potential victim decision making, this report makes the following recommendations:

- 1. The NRM must provide the services and benefits promoted** through a comprehensive review of the experiences of those within it.
- 2. All First Responders must receive standardised training** to ensure that potential victims receive a consistent and comprehensive explanation of the NRM.
- 3. The UK Government must recommit to providing pre-NRM safe spaces** to ensure a trauma-informed approach when engaging with potential victims.
- 4. The UK Government must do more to de-couple modern slavery with immigration.**
- 5. Duty to Notify reporting must be made mandatory across all First Responder Organisations** to aid a more comprehensive identification of potential victims in the UK.
- 6. The UK Government must reassess the use of Duty to Notify data.**
- 7. Further survivor-led research should be conducted to build on findings of this report.**

Methodology

Aiming to develop a greater understanding of the reasons why potential victims may not consent to a referral into the NRM, this research asked the following questions:

- What are the key factors which influence the decision of potential victims of modern slavery to not consent to a referral into the NRM?
- Have recent changes to policy and legislation had any impact on this decision?
- Has there been an increase in potential victims choosing not to enter the NRM?
- What support is available for potential victims outside of the NRM?

To address these questions, this research engaged with the following data sources: (1) academic and grey literature, (2) secondary qualitative data obtained from ongoing doctoral research, (3) primary data collected through qualitative interviews, and (4) quantitative data analysis of NRM and DtN statistics publicly available from the Home Office.

Due to the dearth of studies which focus specifically on why potential victims may not provide consent to a referral into the NRM, the review of the literature explored the common challenges involved with identifying potential victims of modern slavery.

This research benefitted from the secondary analysis of longitudinal qualitative data collected as part of ongoing doctoral research exploring the implementation of recent legislation on the UK's response to modern slavery and supporting survivors. Engaging with 43 participants (representing NGOs, government, international organisations and survivors) via interviews and roundtable discussions, data from 34 participants in the doctoral study was found to be relevant for this research.

Primary interviews and roundtable discussions were conducted with an additional 22 participants. Participants included Statutory and Non-Statutory First Responder (FR) Organisations (such as enforcement agencies, Local Authorities, and NGOs) and non-FR NGOs. All qualitative interviews and roundtables were conducted online, with transcripts analysed thematically through a combined inductive and deductive approach alongside data from the doctoral research.

Finally, a quantitative comparative analysis was conducted on publicly available NRM and DtN statistics. Focusing on data published from the Home Office between 2016-2024, this analysis explored the growth of DtN reports, and whether the growth in DtN reports has increased proportionally to the overall growth in NRM referrals and the identification of potential victims.

Key Findings

The Duty to Notify

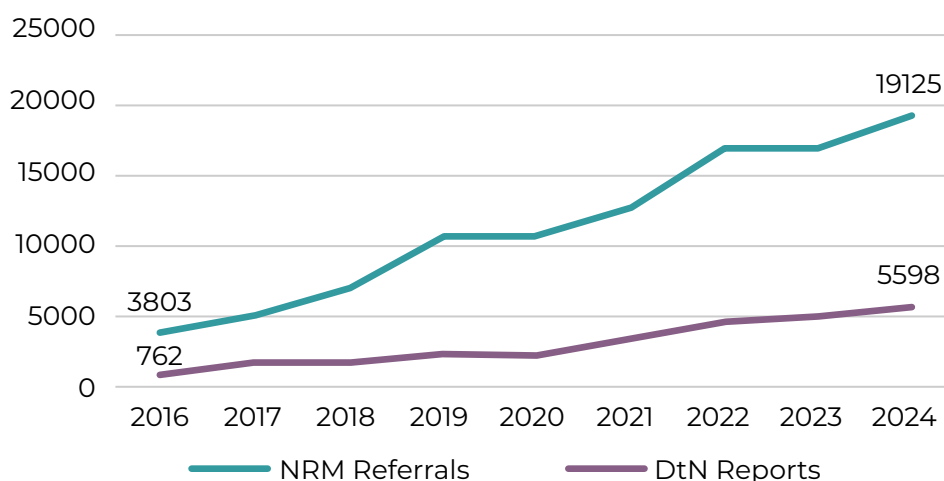
The “Duty to Notify” (DtN) was introduced through the Modern Slavery Act (HM Government 2015) and refers to the responsibility of statutory FRs to notify the Home Office of any individual encountered who is suspected to be a potential victim of modern slavery or human trafficking. Whilst only specified public authorities are under the statutory responsibility to complete a DtN report, all FR organisations are encouraged to complete DtN reports when encountering potential victims who do not provide consent to an NRM referral.

Whilst DtN reports were introduced in November 2015, the Home Office only began to include DtN statistics within their published NRM statistics in Quarter 2 of 2020, retrospectively including data on the number of DtN reports since Quarter 4 of 2015. Data recorded on potential victim nationalities, type of exploitation experienced, and the reporting agency, have also been included since 2020.

The NRM and DtN: Proportional Growth?

Figure 1 demonstrates the increase in DtN reports across the past 9 years, with 5,598 DtN reports made in 2024. A quantitative comparative analysis was conducted on Home Office NRM and DtN statistics recorded from 2016-2024, excluding the first record of DtN reports in the final quarter of 2015 in order to explore data represented across full year periods.

Figure 1: NRM Referrals and DtN Reports 2016-2024



3,803 referrals were made into the NRM in 2016, rising to 19,125 referrals in 2024, an increase of 403%. In comparison, 762 DtN reports were made in 2016, rising to 5,598 in 2024, an increase of 635%. With an additional 232% increase in comparison to the growth of NRM reports, this confirms that DtN reports have increased at a higher rate than referrals into the NRM.

With 17% of total potential victims encountered not providing consent to an NRM referral in 2016 and 23% in 2014, the annual data breakdown displays a fluctuating but positive increase in the total number of potential victims encountered who are recorded through a DtN report, increasing by 6% across the 9-year period. This change can also be observed when assessing the ratio of NRM referrals completed to DtN reports. Reaching a peak of 8 NRM referrals completed for every 1 DtN report made in 2019, the increased occurrence of DtN reports can be observed since 2020, with only 3 NRM referrals completed for every 1 DtN report in 2024. With the ratio rate returning to the ratio observed in 2017, this suggests that more potential victims are not consenting to a referral into the NRM, despite the increased identification and awareness surrounding modern slavery and the NRM in recent years.

Table 1: Percentage of Potential Victims Encountered Resulting in DtN between 2016-2024

Year	NRM Referrals	DtN Reports	Ratio of NRM Referrals: 1 DtN	Total Potential Victims Encountered	% of Total Potential Victims resulting in DtN
2016	3,803	762	5:1	4,565	17%
2017	5,135	1,634	3:1	6,769	24%
2018	6,972	1,688	4:1	8,660	19%
2019	10,604	1,272	8:1	12,876	18%
2020	10,575	2,175	5:1	12,750	17%
2021	12,691	3,193	4:1	15,884	20%
2022	16,906	4,580	4:1	21,486	21%
2023	16,990	4,929	3:1	21,919	23%
2024	19,125	5,598	3:1	24,723	23%

(Data taken from the Home Office NRM and DtN data tables [\(2025a\)](#))

Finally, Table 2 considers the percentage change in NRM referrals and DtN reports year on year. Looking at the percentage difference in reporting since the initial impacts of Covid-19 in 2020, which resulted in a percentage decrease across both NRM referrals and DtN reports, there has since, continued to be positive trend in reporting across the NRM and DtN reports. Following Covid-19, it was expected that referrals into the NRM and DtN would continue to rise, however whilst NRM referrals increased by 20% between 2020-2021, DtN reports increased at over double the rate of NRMs, with a 47% rise in DtN reports across the same period.

Table 2: Percentage Change in NRM Referrals and DtN Reports Year to Year

Years	% Change in NRM Referrals	% Change in DtN Reports
2016-2017	35%	114%
2017-2018	36%	3%
2018-2019	52%	35%
2019-2020	-0.3%	-4%
2020-2021	20%	47%
2021-2022	33%	43%
2022-2023	0.5%	8%
2023-2024	13%	14%

A further change is noted between 2022-2023. Whilst both referrals and reports continued to have a positive percentage increase in this period, NRM referrals dropped to only a 0.5% increase and DtN reports to an 8% increase.

Whilst the reason for these increases is not clear, they may be related to the introduction of key legislation around the same time periods, with the announcement of the Nationality and Borders Bill ([HM Government, 2021](#)) in 2021, and the announcement of the Illegal Migration Bill ([HM Government, 2023](#)) in 2023. Following the announcement of both Bills, professionals warned of the detrimental impact they could have on the identification of potential victims and their willingness to engage in NRM support due to the changes to the definition of victim, introduction of damage to credibility on late disclosure, the disqualification of support for those perceived to be making a claim in bad faith, and the intention to prevent anyone arriving in the UK via irregular means from accessing modern slavery support ([Human Trafficking Foundation 2022](#); [Hynes 2022](#); [Griffiths and Trebilcock 2023](#); [IOM UN Migration 2023](#); [Stevens et al. 2023](#); [Unseen 2023](#); [Waite et al. 2023](#)).

Based on this analysis, it can be concluded that DtN reports have increased at a higher rate in comparison to the overall growth rate in the identification of potential victims and NRM referrals, suggesting that there are increasing rates of potential victims encountered who actively choose not to consent to referral into the NRM. This report suggests the increased occurrence of DtN reports may be linked to legislative changes. However, further individual and system factors will also be explored in relation to making decisions regarding consent to an NRM referral.

The Accuracy of DtN Data

In addition to assessing the quantitative growth of DtN Reports, the research also explored the purpose and accuracy of DtN reports through qualitative data collection.

24 participants discussed the accuracy of DtN data. Of these participants, only three reported that DtN's accurately reflect the number of potential victims encountered who do not enter the NRM. The remaining 21 participants unanimously reported that DtN reports are grossly under completed and cannot be relied on for an accurate representation of the number of potential victims who refuse entry to the NRM.

"I would say it is a drop in the ocean of the people who are actually being exploited".

Participant 2

Reasons for the under reporting of DtN's varied between participant background, with participants from across different statutory backgrounds highlighting the challenge of completing DtN reports amongst the bureaucracy of so much paperwork, and the additional time it takes to complete a DtN report. Other statutory FRs discussed the lack of awareness from professionals of the need to complete a DtN report and the lack of guidance and training provided on how to do this.

"What we've currently got is probably 6 or 7 forms. You've got to wade through all the stuff that isn't applicable to find the bit that is applicable. It's a mess and yeah, it definitely puts officers off without shadow of a doubt."

Participant 14

Across participants from a non-statutory background, only one participant reported completing DtN reports. When exploring reasons why DtN reports are not completed, NGO FRs emphasised their lack of statutory responsibility to complete a DtN report. Alongside the lack of responsibility, participants reported the intentional non-completion of DtN's unless a potential victim has specially provided consent to do so. Despite the DtN form being anonymised, participants felt that providing details on the potential victim's exploitation through a DtN form still violates the lack of consent for passing details to the Home Office through an NRM referral. Furthermore, data was also perceived to be unrepresentative due to the inability of non-FRs to complete DtN reports. Participants from non-FR NGOs reported that on encountering potential victims they will explain the NRM process, but should they choose not to consent to pursue a referral into the NRM, this potential victim is not recorded anywhere.

"I used to work at an NGO which actively felt that we shouldn't give any details to the Home Office unless the clients consented to that."

Doctoral Research Participant 7

The differing engagement with the DtN process can also be observed through the Home Office NRM and DtN data published between 2020-2024. As seen in Table 3, NGOs have only completed 0.2% of DtN's reports across the five-year period.

Table 3: DtN Reports by Referring Agency 2020-2024

Referring Agency	2020	2021	2022	2023	2024	% Of Referrals
Government Agency	1,133	1,822	3,119	3,428	4,121	67%
Local Authority	132	197	204	211	229	5%
Police	852	1,165	1,253	1,282	1,233	28%
NGO	11	6	4	7	15	0.2%
Unknown	1	-	-	-	-	0.004%

Data taken from the Home Office NRM and DtN data tables ([2022](#); [2023a](#); [2024a](#); [2025a](#))

These findings suggest that whilst DtN reports may be regularly completed by statutory FR organisations, engagement with potential victims who do not consent to an NRM referral remains under reported. With the intentional non-completion of DtN reports by non-statutory FRs, the challenges of bureaucracy which may result in reporting falling through the gaps of statutory FRs, and the inability of non-FR organisations to complete DtN reports, it is likely that the number of potential victims encountered who do not pursue an NRM referral may be significantly higher.

The Purpose of the DtN

When exploring reasons why FRs may not complete DtN reports, 14% of participants questioned the overall purpose of the DtN process. Participants reported that the DtN has no use outside of providing statistics to the Home Office, as they do not feed into any investigations to identify or prevent modern slavery from happening. Participants also reported frustration at the lack of benefit for potential victims should they complete a DtN report.

"Like the reason we're doing it is to help the statistics team in the Home Office. It's not to help victims. It's not to actually track down and prevent modern slavery from happening because we're not giving any information that could allow people to do that."

Participant 11



Data Keeping Outside of the NRM and DtN

A final consideration surrounding the DtN in this research related to the possibility that organisations may be completing their own data collection outside of the standard NRM and DtN forms. Across the 22 participants asked in the primary data collection, seven participants (32%) reported keeping their own records of potential victims encountered, recording details on those who entered the NRM and those who did not provide consent to an NRM referral.

Each of the seven participants who reported their own record keeping described recording information in a different way and to varying depths, however each described recording data which surpassed the required data submitted on the DtN form. Most participants reported keeping a log of age, gender, nationality and exploitation type. However, some organisations also recorded details such as perpetrator details, methods of control, type of recruitment, location of exploitation, industry of exploitation, minutes of meetings, and reasons for refusing consent to the NRM. Whilst this research did not analyse the different data keeping of these organisations, it is clear that there is significantly more information recorded across FR organisations than is recorded within DtN reports.

Whilst participants discussed the use of recorded data for identifying trends across referrals, and for monitoring the support needs and outcomes of a potential victim, participants also reported using the data as a method of justifying the resourcing within their service.

“And for me personally, this is really important because of the fact that I was very effective with recording all the cases that came to my attention, we were able now to start to build our capacity in relation to our response. So I was able to evidence that actually, look last year I had around 200 cases of potential modern slavery.”

Participant 18

This proactive recording of data by statutory and non-statutory FR organisations suggests that there is a plethora of information captured outside of the NRM and DtN reports, detailing the experiences of potential victims and vital information about perpetrators, which is currently unexplored and uncaptured through Home Office statistics.

Factors Influencing Potential Victim Decision Making

To explore why there are increasing numbers of potential victims choosing not to enter the NRM, the qualitative data collection identified a wide range of factors that may influence potential victim's decision making with regards to consent to enter the NRM. Across the dataset, 43 participants (77%) discussed internal factors, identified as those affecting the potential victim as an individual, 47 participants (84%) discussed external factors which related to policy and professional practice, and 39 participants (70%) discussed factors which cut across both individual experiences and external influences, classifying them as a mixed factor. The table below summarises key factors identified within these categories, highlighting factors which were also raised across the literature (highlighted in purple).

Table 4: Factors identified by categorisation

Categorisation	Factors Identified
Internal	Factors including a lack of understanding of the NRM, fear of immigration repercussions and authorities, fear of repercussions from exploiters , nationality, being better off in exploitation, timeframes, self-identification , lack of trust, mental health and relocation within the NRM.
External	Factors including the inconsistent approach to describing the NRM, lack of appropriate identification, disbelief and criminalisation of victims, FR capacity, FR training, a lack of legal advice pre-NRM, and a lack of sufficient evidence.
Mixed	Factors including the lack of understanding of the NRM, impact of recent policy and legislation , the questionable benefit of the NRM, and difficulty in contacting potential victims.

The analysis of the qualitative data identified 28 overarching factors which may influence a potential victim to not consent to a referral into the NRM, with a further 29 factors subcategorised within these factors. The following findings therefore provide insight into the most prevalent influencing factors raised by participants, whilst incorporating key comparisons to those identified across the literature, with a full list of the influencing factors available in Appendix A. Anonymised direct quotations are included to illuminate some of the key findings presented.

Internal Factors Influencing Potential Victim Decision Making

The following section explores key factors relating to internal factors which may influence a potential victim's decision not to pursue a referral into the NRM. Of particular note across these factors, is the commonality of fear, with three of the four factors discussed relating to types of fear that potential victims may experience.

Fear of Immigration Repercussions

It is commonly understood that many victims are moved across international borders under the control of traffickers, with traffickers withholding the victim's identification documents and maintaining control through the victim's lack of legal immigration status ([College of Policing 2015](#); [Home Office 2025b](#)). As a result, a key challenge raised within the literature was the impact that the fear of immigration repercussions can have on a potential victim's willingness to come forward and identify, due to the risk of being criminalised for illegal entry and the fear of detention and deportation ([Haynes 2004](#); [Clawson et al. 2009](#); [Davis 2018](#); [Matos et al. 2019](#); [O'Brien et al. 2022](#); [Anti-Trafficking Monitoring Group 2023](#); [Magugliani et al. 2024](#))

It is therefore not surprising that 48% of participants reported fear of immigration repercussions, specifically the fear of detention and deportation, as the most prevalent reason given by potential victims when refusing consent to an NRM referral. Participants reported that if a potential victim had any issues surrounding immigration, they are unlikely to risk involvement with the Home Office. They discussed instances of potential victims having been warned of deportation by their exploiters, of potential victims having been told that entering the NRM would have a negative impact on their asylum claim, and the lack of trust that the immigration system is not designed to 'catch them out'.

"One was a guy who had been in the country for quite some time. He was here illegally, and listening to his story, he had been exploited and we went through pretty much the whole thing. And then it got to the end and he'd never had any contact with immigration at all, you know, he'd just come in back of a lorry or something. But some of the questions I was asking towards the end, I could almost hear the wheels clicking in his head and at the end of it, he said 'Actually, let me think about this. I don't want to do this now'. Which was a no. But he definitely figured out that this was going to bring him into contact with immigration."

Participant 21

Fear of Authorities

In addition to fear associated with the immigration system, fear of other authority figures was also cited by participants and in the wider literature. In particular, fear of the police and central government authorities, was a key factor making the identification and engagement of potential victim's challenging (ECPAT UK 2016; Davis 2018; Wilson 2020; Heys et al. 2022; Local Government Association 2022; Anti-Trafficking Monitoring Group 2023; Magugliani et al. 2024) Literature attributes this to a fear of criminalisation by the police, and the lack the trust that potential victims have in the ability of authorities to protect them due to the fear of repercussions should they be found to have reported or be cooperating with law enforcement (Farrell and Pfeffer 2014; Davis 2018; Judge et al. 2018; Heys et al. 2022; O'Brien et al. 2022). Furthermore, Matos et al. (2019) reports that some potential victims are fearful that police and other authority officials were working alongside traffickers.

This fear of authorities was reported by 38% of participants as a key factor in potential victim's refusal to consent to an NRM referral. Whilst participants discussed the unwillingness of potential victims to engage in police investigations due to the fear of repercussions, participants also discussed potential victim's fear of not being believed by authorities and the cultural shame if found to have reported to the police. Finally, participants attributed fear of authorities to experiences of corrupt authorities within other countries.

"If you mentioned the going to the police in their own country, well, they just wouldn't do it. Particularly the females will say there's, in Albania, there's no point in me going to the police. I'm likely to be beaten up and raped by them. There is a fear of not understanding culturally that the police here are not to be feared like they are in their own culture."

Participant 20



The Challenge of Self-Identification

It is acknowledged that the psychological harm victims experience through deception, manipulation and control, often makes potential victims unable to recognise the true nature of their circumstances or to acknowledge that they are victims of exploitation (Villacampa and Torres 2017; Davis 2018; Davis 2019; Heys et al. 2022; Local Government Association 2022; Savitski 2023). The challenge of self-identification may be compounded by feelings of stigma or shame due to feeling complicit in their exploitation (Murphy et al. 2022; O'Brien et al. 2022), or through the enforced attachment and dependence to their exploiter (Heys et al. 2022). Research commissioned by the Modern Slavery Policy and Evidence Centre (MSPEC) explored 5,321 DtN reports between 2020-2021, identifying reasons relating to self-identification as one of the four macro themes potential victims gave for not entering the NRM. They found that potential victims stated they were not a victim or denied experiencing exploitation in 15% of DtN reports analysed (Magugliani et al. 2024).

The challenge of self-identification was also raised by 23% of participants in this research. Participants highlighted the challenge that many potential victims experience in self-identification as a victim due to the inability to resonate with the language of exploitation (discussed further on page 18). Other challenges to self-identification included the belief that potential victims consented to their exploitation, cultural differences in expectations of working conditions, cultural shame, and the attachment or relational ties to their exploiter. Across the interviews, 30% of participants highlighted the impact of nationality and culture on refusal to consent, with a number of participants specifically referring to increasing refusals from Chinese and Vietnamese nationals, which they attributed to cultural factors influencing their decision, such as stigma and shame.

"I think that the biggest single reason that people don't go into the NRM is because they don't see themselves as a victim of modern slavery. Which is a huge challenge for professionals to deal with, not just for the NRM, but for getting any meaningful safeguarding in place for that person. We have a lot of people who think that they're doing something consensually and actually it's consent under duress as we would see it."

Participant 11

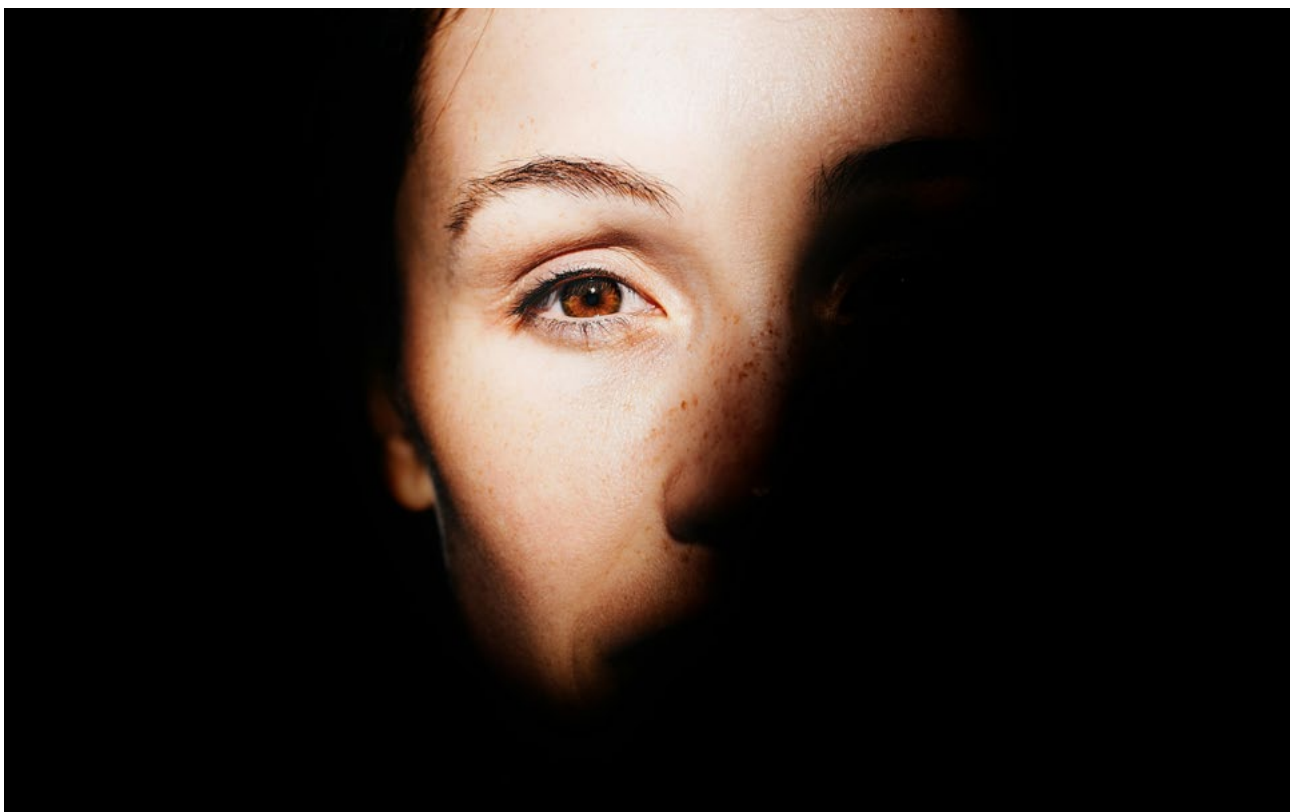
Fear of Repercussions

It is widely understood within the literature that potential victims fear consequences from their exploiters, particularly the risk of harm to themselves and family members, as a result of reporting their experiences ([Farrell and Pfeffer 2014](#); [ECPAT UK 2016](#); [Davis 2018](#); [Judge et al. 2018](#); [Matos et al. 2019](#); [Wilson 2020](#); [Heys et al. 2022](#); [O'Brien et al. 2022](#); [Magugliani et al. 2024](#)).

Across the qualitative data within this project, 21% of participants reported the impact that the fear of repercussions can have on a potential victim's willingness to consent to an NRM referral or to engage in a police investigation. Participants felt that the fear of the exploiter finding out they have reported their exploitation is one of the biggest concerns raised by potential victims, with the fear of retribution on family members significantly outweighing the potential victims desire for individual protection and support.

"You're never going to tell anybody, if a cop comes asking you if you are in an exploitative situation, you're going to say nothing. You'd rather go to prison for six months because they'll go after your family at home, they'll go after your friends, they'll go after your kids, your grandma's... So, little old me and my mates come knocking on your door and saying, hey, you're being exploited, you want to go into the NRM? and they're like 'absolutely not'."

Participant 2



Other Factors Influencing Potential Victim Decision Making

Having addressed a number of influencing factors specifically affecting the internal decision making of a potential victim, the remaining sections of this report explore other factors which may influence potential victim decision making, grouping those categorised as internal, external and mixed factors into broader themes as necessary.

The Inconsistent Description of the NRM

With the Anti-Trafficking Monitoring Group (2023) reporting that potential victims may struggle to access the NRM due to poor explanation of the system, one of the first questions in the primary data collection asked participants to share how they describe the NRM. Of the 22 participants asked, five participants immediately highlighted the difficulty they find in describing the NRM.

Eight participants referenced the use of existing resources to aid their description, utilising set scripts, multi-agency created leaflets, and the government website. Across the remaining 14 participants, each participant described taking a different approach to discussing the NRM with potential victims, with several participants recognising the lack of consistency in the approaches taken by professionals and the potential impact this may have on potential victim understanding of what the NRM is. The lack of consistency was often attributed to the lack of a standardised approach and the lack of understanding of the NRM by professionals.

"I think one of the key things about NRM is who is explaining it to them. We have first responder agencies. [Redacted] is a first responder agency, but I can guarantee you ask anybody else, they'd be like what's the NRM, what's you know? So I think it depends on who is explaining it to them."

Participant 17

In their description of the NRM process, all participants reported outlining the general process of the Reasonable and Conclusive Grounds decisions, and the positive benefits of the NRM. However, five participants highlighted their purposeful inclusion of the potential consequences of a referral for a potential victim. Participants discussed consequences which related to the timescales surrounding decision making, the lack of access to the NRM should they not be able to provide sufficient evidence surrounding their experiences, and the possible impact on a potential victim's immigration status. These participants felt strongly that potential victims should be given all the information possible to have a realistic understanding of NRM support and to make an informed decision, but recognised that these consequences may impact the decision to not pursue an NRM referral.

"If it's someone who is undocumented, I will be much more cautious and I will be very clear about the potential consequences."

Participant 1



Lack of Understanding of the NRM

Research by Findlay (2024) highlighted the concern that potential victims can proceed through the entire NRM process without ever knowing what it is, finding poor understanding of the NRM system and an overall lack of informed consent. This concern was supported through this research, with 27 participants (48%) highlighting the challenge that potential victims face in understanding the NRM, reporting this as a factor which influences the decision to consent to a referral. The lack of understanding was attributed to a range of factors which will be broken down further in this section. Participants felt that even for those who do consent to an NRM referral, these challenges often result in the lack of informed consent, with 68% of participants interviewed for this project raising the issue of informed consent.

The Impact of Trauma on Comprehension and Understanding

Supporting the existing understanding of the impacts of trauma on cognition and understanding (Silveira et al. 2020), 30% of the participants who raised the concern of potential victim understanding highlighted the impact that trauma can have on potential victim comprehension and retention of information surrounding the NRM. Participants reported that potential victims are often in their most vulnerable state when they are offered a referral into the NRM, and as a result are not in the physical or emotional position to understand the information they are presented with or to effectively articulate the support they need. Similarly, 26% of participants reported the overall complexity of the system contributes to the lack of understanding of the NRM. Participants reported that despite having an explanation of the NRM provided, the combination of the significant amount of information presented, the complexity of the multi-stage decision making process and evidence required, and the vulnerable position that many potential victims are in at the time they are encountered, results in potential victims being unable to understand or retain the purpose and process of the NRM. It was therefore felt that many potential victims are unlikely to consent to a referral into the NRM if they do not understand the system itself.

"I genuinely feel like people don't retain any of it. If I ask at the end of the interview, 'Okay. Do you remember? Can you say in your own words what the process is like?'. They would just like have no idea."

Participant 19

Misinformation

30% of participants reported that the lack of understanding of the NRM can be the result of misinformation and poor communication. Participants highlighted examples of potential victims refusing consent due to hearing reports that a referral would have a negative impact on their asylum process. In addition, participants spoke of potential victims had heard the negative experiences of peers who had previously left the NRM due to a lack of support, the impact of court proceedings, and the delay on life due to timescales.

"[Potential victims had] heard from people, other asylum seekers not to go into the NRM because they will stall your asylum claim or it could mean your asylum claim gets turned down if you go into the NRM".

Participant 22

Furthermore, participants highlighted instances of poor and fraudulent advice given to potential victims from immigration solicitors. One participant discussed a case in which an immigration solicitor, who was charging £2000-3000 for completing the potential victims asylum claim, had advised the potential victim that they could not apply for asylum and also have an NRM referral, and so the potential victim refused referral into the NRM on the advice of their solicitor.

Terminology Barriers

Finally, the lack of understanding of the NRM was also attributed to the barrier created through terminology surrounding the NRM, as raised by 26% of participants. Participants felt that the name of the "National Referral Mechanism" can be a barrier, as even professionals struggle to remember the terminology. It was reported that the NRM is a term that is too harsh and "clunky" and adds to the level of fear that potential victims may be experiencing at this point of contact. In addition, participants discussed the use of the terms "modern slavery, "human trafficking" and "exploitation", highlighting the challenge of these terms resonating with potential victim's experiences. This was particularly prevalent for foreign nationals, where 30% of participants raised the issue of potential victims not understanding or relating to these concepts due to cultural differences and terms not translating into other languages.

"People shut down immediately because they don't resonate with the term Modern Slavery. They might not even know what it means because it doesn't directly translate in a lot of languages."

Participant 11

The Questionable Benefit of the NRM

Raised by 50% of participants, the issue of whether or not the NRM is beneficial for every potential victim was identified as another key factor influencing potential victim decision making. The questionable benefit of the NRM was raised both as a factor influencing the internal decision making from a potential victim, but also as a factor which many professionals consider when assessing if the NRM is the right avenue for providing support to a potential victim.

Of the 28 participants who discussed the benefit of the NRM, only 1 participant reported that the NRM is universally beneficial for all potential victims. Whilst other participants recognised that the NRM can be beneficial, this was always caveated that this is only the case if support is provided as intended, with participants acknowledging that many survivors do not receive the support they need, undermining the purpose and benefits of the NRM. The following section therefore addresses key concerns raised by participants surrounding the questionable benefits of the NRM.

British Nationals

Across the 27 participants who felt that the NRM is not always beneficial, 10 participants discussed the difference that nationality makes when assessing whether the NRM is the best outcome for a potential victim, highlighting the specific lack of benefit for British nationals. Despite British nationals making up the largest nationality represented across potential victims in the NRM, participants reported that the NRM is not designed for or effectively prepared to support British victims of modern slavery. Participants felt that British potential victims often choose not to pursue a referral into the NRM as they can receive access to services, such as housing, substance misuse support, and financial assistance, through their Local Authority and a range of other agencies, meaning that there is seen to be no essential benefit from an NRM referral for British nationals. The lack of benefit for British Nationals was also recognised by [Murphy et al \(2022\)](#), who found that 50% of practitioners interviewed did not see the benefit of referring British nationals into the NRM.



The Lack of a Tangible Benefit

30% of participants reported that the NRM has no tangible benefit for a potential victim beyond official recognition by the government as a survivor. Participants felt that aside from the offer of support and some financial assistance, there is little benefit to a potential victim. Participants highlighted the lack of impact that the NRM has on immigration status, the lack of safe moves on options post-NRM, and the ability of potential victims to access support from organisations outside of the NRM. In addition, participants felt that instead of being victim focused, the NRM is a tool used by the government to track statistics, and by the police as a means of pursuing exploiters. As a result, participants reported that potential victims often refuse consent to referral into the NRM on the recognition that there is often nothing to be gained from a referral into the NRM. However, it was unclear from the qualitative data whether potential victims reached this conclusion on their own or were influenced by the advice of the supporting FR.

“But in my honest opinion, I don’t know what else to say other than it may help because you just got a bit of paper to say the Home Office have said ‘I am a potential victim of modern slavery’, but sometimes it’s not worth the paper it’s written on.”

Participant 17

The Delay to Life

The questionable benefit of the NRM was also attributed to the delay to life caused by NRM timescales, with 25% of participants highlighting the influence that timescales can have on a potential victim’s refusal to consent. Whilst recognising increases in the speed of decision making surrounding the Reasonable Grounds decision, participants highlighted the reluctance of potential victims to provide consent to the NRM when made aware of the timescales surrounding decision making. Supporting reports that the time spent in the NRM can feel like time spent in limbo or emotional torture (Anti-Trafficking Monitoring Group 2023; Findlay 2024), participants highlighted that potential victims do not want to place their entire life on hold for a number of years. As a result, participants reported increasing instances of foreign nationals weighing up entering the NRM or pursuing asylum based on humanitarian grounds, reporting that potential victims often based their decision on whichever route would be quickest.

“It’s a conversation going on, so people are choosing which one is a lesser devil? Which one will give me a quicker route to my freedom in that way.”

Doctoral Research Participant 11

Better Off in Exploitation

Finally, 25% of participants reported potential victims refusing to provide consent to an NRM referral as they believed that they would be better off in exploitation. Participants highlighted the need for many potential victims to work, with a referral into the NRM preventing any potential victim without immigration status from the ability to engage in employment. As a result, whilst many potential victims realise they are being exploited, participants reported potential victims perceive exploitation to be a better option than the alternative of entering the NRM without the ability to work to pay off debts or to send financial remittances to family members overseas. In these instances, the benefit of the NRM was said to be outweighed by the benefit of income, albeit in exploitative circumstances.

“The majority of people we see owe some type of money. They’ve borrowed money from somebody before and now they’re paying it back. So, they need to do the work to pay the debt off. They can’t exit the exploitation because if they do that, then they won’t be earning the money to pay their debts off.”

Participant 13



Lack of Appropriate Identification

Whilst not a factor just relating to consent given by a potential victim, 27% of participants highlighted the impact that poor identification can have on the entry of potential victims into the NRM. Alongside poor identification within detention centres and asylum interviews, the lack of appropriate identification was attributed to professional disbelief, a lack of training, and lacking capacity of FRs.

Disbelief, Professional Bias, and the Criminalisation of Victims

27% of participants discussed the impact of professional disbelief, bias, and the criminalisation of potential victims has on their identification and potential engagement within the NRM. Participants highlighted the changes in professional attitudes towards potential victims, emphasising how the rhetoric of abuse to the modern slavery system has trickled down into those working directly in the field. Participants felt that professionals with a preconceived bias have a detrimental impact on other FRs who come into contact with potential victims and their ability to identify genuine potential victims or offer the NRM as an option.

“Everyone’s listening to that, and everyone’s going to then ‘Oh if my sergeant’s not interested, I’m not interested’, and then you know the knock-on effect to victims is huge.”

Participant 8

First Responder Training

Lack of appropriate identification was also related to the lack of FR training, with 21% of participants reporting that poor training results in FRs who do not fully understand the NRM or their role as a FR. This was said to result in potential victims experiencing a ‘patchwork experience’ of professionals, which contributes to a potential victims own poor understanding of the NRM and subsequent decision making.

“But when you’ve got that person, that OIC [officer in charge], who’s the front facing person for that victim, and can see the lack of confidence there, it does really impact your victim engagement as well...They’re gonna think this person doesn’t know what they’re talking about, and nine times out of ten they’re right, aren’t they?”

Participant 9

The Impact of Recent Policy and Legislation

Within existing literature it is clear that the conflation of immigration and modern slavery reduces the likelihood of migrants being identified as victims of human trafficking ([Lee 2005](#); [Ham et al. 2013](#); [O'Connell Davidson 2016](#); [Hadjimatheou and Lynch 2017](#); [Lemke 2017](#); [Bell 2018](#); [Serughetti 2018](#); [Broad and Turnbull 2019](#); [Hadjimatheou and Lynch 2020](#); [Hynes 2022](#); [Waite et al. 2023](#)). With the 2022 Nationality and Borders Act and the 2023 Illegal Migration Act formally bringing modern slavery into immigration legislation, significant concerns were raised related to the impact that these legislative changes would have on the identification of potential victims and their willingness to engage in NRM support ([Garbers et al. 2022](#); [Human Trafficking Foundation 2022](#); [Modern Slavery and Human Rights Policy and Evidence Centre 2023](#); [Stachowska 2023](#); [Labour Exploitation Advisory Group 2024](#)). As a result, this research explored the influence that these legislative and other policy changes, such as increased evidence thresholds in the statutory guidance ([Home Office 2023b](#)), have had on the decision of potential victims to enter the NRM.



33 participants discussed the impact of recent policy and legislation on the identification of potential victims and their willingness to consent to a referral into the NRM. Of the 33 participants who spoke of the potential impact, 27 reported a definite or potential impact, whilst six reported no impact. To consider the positionality of participants discussing the potential impact of recent policy and legislation, of the 27 participants who reported an impact on potential victim willingness to engage with the NRM, 21 participants worked for an NGO. In comparison, of the six participants reporting no impact, four participants worked for an enforcement agency.

Of the six participants reporting that recent policy and legislation has had no impact on the decision of potential victims to not enter the NRM, five participants believed that it is too much of a stretch to believe that potential victims would even be aware of recent legislation changes. These participants reported that legislation has been complex for professionals to understand and so would be too challenging for potential victims, with language barriers preventing potential victims from having any awareness of the UK asylum system. Additionally, two participants reported that if anything, potential victims should see the NRM as being more beneficial as a result of recent legislation, reporting that the NRM can be used as a system to allow foreign nationals to remain in the UK whilst their case is considered.

"It's just methodology. It's ways of staying within the country. And potentially using the NRM process is a good get out clause."

Participant 2

The remainder of this section will explore key impacts raised across the 26 participants who reported that recent policy and legislation has had an impact on potential victim willingness to enter the NRM. Exploring the most prevalent four factors raised by participants, a full breakdown of reported impacts is displayed in the following table.

Table 5: Key Impacts Resulting from Recent Policy Changes

Factor Identified	No. Participants
Hostile Environment	8
Deportation Policies	7
Evidence Threshold Changes	5
Targeted Nationalities	4
Professional Attitudes	4
Inadmissibility Policy	4
Lack of Trust in Government	4
Changes to the Police	2

Hostile Environment

30% of participants reporting an impact discussed the awareness of potential victims surrounding the increasingly hostile environment and rhetoric surrounding the illegality of migrants who have arrived via irregular means. Participants reported that potential victims are aware that they may not be believed by authorities, as a direct result of legislation and media publications, but also through exploiters as a further attempt to keep victims trapped within exploitation. As a result, participants reported that potential victims do not want to engage in an NRM referral due to the fear of disbelief and the lack of trust in the Governments response to supporting victims.

"Like the damage is almost, it's reputational as well. So even if there was a like a change in legislation now which just magically resolved all of these issues. The horse has bolted to some degree, in that people have heard this, they know that there's a hostile environment, they've heard that they won't be believed."

Participant 16

Deportation Policies

27% of participants highlighted the impact of deportation policies, such as those within the Illegal Migration Act and subsequent Safety of Rwanda Act, on the willingness of potential victims to enter the NRM. With a number of participants supporting survivors who received 'Notice of Intention to Remove' to Rwanda letters in 2024, participants discussed the lack of protection that the NRM provides against deportation policies. Consequently, participants felt that there is a disincentive for potential victims to consent to a referral based on the fear of identification by the Home Office which may result in their deportation.

"Once the fear came in that they may be deported, things were happening, you know, then the people stopped. That's where we've seen the changes. And then it was like, you know, they were really worried and thought 'no, no, no, I don't want to'."

Participant 10



Threshold Changes

19% of participants reporting an impact stressed the effect that changes to the Reasonable Grounds evidence threshold in the Modern Slavery Statutory Guidance ([Home Office 2023b](#)) has had on the number of potential victims entering the NRM. Whilst not a factor influencing consent, participants raised the threshold changes as a potential reason for higher DtN reports. Participants discussed the challenge of obtaining evidence for an NRM referral, with participants suggesting that the lack of available evidence will result in NRM referrals not being completed for a potential victim regardless of whether they are believed to be a potential victim.

"Sometimes the only advice they can give is actually not to go to the NRM, because they can see that there is not sufficient evidence for first responder organisations, that there is not sufficient evidence to just take the case through, so what's the point of going to the NRM if the decision is going to be negative?"

Doctoral Research Participant 16

Targeted Nationalities

Finally, 15% of participants raised concerns about particular nationalities being targeted through Home Office policy. Discussing specific return agreements with Albania and Vietnam which categorised them a safe country, participants highlighted the impact that these policies may have had on potential victims coming forward to identify.

"There was a time when the Home Office basically categorically said no to every single Albanian national's NRM referral. That was generally a policy. I wondered during that time what would that do to the other potential victims? Surely, why would you ever engage with something if you've got no chance to begin with? Because obviously that goes around in communities. People talk to each other and they're aware of what's going on."

Participant 19

Support Options Outside of the NRM

With increasing numbers of potential victims not accessing support through the Modern Slavery Victim Care Contract, this research also investigated what support is available to a potential victim if they do not enter the NRM. 24 participants (43%) discussed victim support outside of the NRM, with the different service types identified by participants highlighted in the following table.

Table 6: Support Available Outside of the NRM

Type of Support	No. Participants Reported
Asylum Support and Immigration Advice	10
Unspecified Support	10
Specialist Modern Slavery Support	8
Housing	7
Multi-Agency/Wrap Around Support	5
Social Care	5
Employment and Finance	5
Sexual Health	4
Physical Health	4
Police	2
Mental Health	2
Substance Misuse	1

“The NRM is by far not the biggest outcome for cases. We’re much more likely to refer somebody for other support than we are to refer them into the NRM for all the reasons that we’ve spoken about today.”

Participant 11

Asylum Support and Immigration Advice

Reported by 42% of participants discussing support options, asylum support and immigration advice services were most commonly raised by participants as support services used outside of the NRM. Services reported by participants included those which enabled potential victims to access legal aid and immigration solicitors, and those which provided more holistic support surrounding housing, education and general casework support.

Unspecified Support

Unspecified support refers to instances where participants discussed their process of referring potential victims to other agencies for support without specifically naming the organisation or the type of support they provide, observed across 42% of participants. Participants recognised that ongoing support is dependant on local availability but emphasised the frequency in which potential victims are already engaged in multiple types of support through their Local Authority and NGOs.

"I will say that people who engage with us are like in the sphere of quite a lot of different services. very few times I've ever spoken to someone who didn't have like a couple of case workers of some sorts."

Participant 19

Specialist Modern Slavery Support

33% of participants discussed specialist modern slavery support provided by NGOs as options for support which fall outside of the scope of the NRM. These services included NGOs which provide safe house and refuge accommodation, and NGOs which provide casework and befriending support, both in the pre-NRM space as potential victims contemplate a referral into the NRM and separate to the NRM process.



Multi-Agency Wrap Around Support

The provision of wrap around support resulting from multi-agency working was reported by five participants. Of those, three participants were representatives of local authorities who have created multi-agency panels within a framework for providing support to potential victims. In these cases, participants reported that on identification of a potential victim, the multi-agency panel will identify all support needs and provide wrap-around support to try and meet those needs, prior to an NRM referral being discussed with a potential victim. However, it was recognised that the provision of wrap around support prior to discussion of the NRM can lead to potential victims not consenting to a referral. With all their immediate needs being met, participants reported that potential victims do not believe an NRM referral would be of any additional benefit.

"I've kind of built up that work and we've commissioned them in some ways and a lot of that purposely was to direct people outside [the NRM]. That sounds underhand but I just feel in a position being made to or legislation that makes workers do that, I think there's something really wrong."

Participant 17

No Further Support Given

Whilst 24 participants discussed the range of support available for potential victims who do not consent to a referral into the NRM, 10 participants reported instances of no further support given to potential victims. The lack of support was attributed to potential victims choosing to disengage, for example in cases of potential victim leaving a police station without the desire to engage in support. However, in these cases, participants still reported signposting the potential victim to other charities should they wish to engage with support at a later time.



Recommendations to Tackle Barriers Identified

14 participants interviewed within the primary data collection made recommendations for ways to tackle barriers and improve engagement with the NRM. Highlighting only the most prevalent recommendations in this section, a full breakdown of recommendations can be found in appendix B.

First Responder Training

The most frequent recommendation for improving engagement with potential victims, as reported by 45% of participants, related to training. Emphasising the need for consistent and mandatory training for all FRs, participants reported that training would improve FRs ability to identify the signs of exploitation and understand the process of the NRM, in turn impacting the quality of support provided on encountering a potential victim and their ability to comprehensively describe the NRM. In addition, participants raised the need for cultural competence training to help tackle barriers to engagement that result from differences in the cultural understanding of slavery and exploitation.

Methods for Reaching Potential Victims

23% of participants recommended methods for reaching potential victims to improve engagement with the NRM. Participants recommended better advertisement of the NRM, including information on what support and accommodation is available through the NRM, and the publication and promotion of information on the prosecutions of exploiters. Participants also discussed the need to have more resources and information available in other languages which can be sent out to potential victims ahead of an NRM interview, or given to them in person. It was felt that this could assist the power and agency given to a potential victim, alleviate some of the fear of the unknowns of entering the NRM, and enable them to make a more informed decision on entering the NRM.

“If you start publicising things like prosecution, and like advertising that, then people will feel, ‘oh OK, that person was a victim of this and they were believed, and they went through the criminal justice process and now their perpetrator has been brought to justice’. Without having any of those things, there’s no precedent almost for why they should come forward.”

Participant 16

Holistic Treatment of Potential Victims

Finally, the need for holistic and trauma informed treatment of potential victims was reported by 18% of participants. Participants reported that in order to improve potential victim engagement, interviews should be conducted in a trauma informed space as opposed to standard interview rooms, a greater focus should be placed on building trust and being gentle in the approach to potential victims, and that potential victims should have the ability to take time to decide to consent to an NRM referral.



Conclusion

This research identified a number of factors which may influence the decision of potential victims to not consent to an NRM referral. Whilst confirming a number of established challenges to potential victim engagement, such as the fear of authorities and immigration repercussions, challenge of self-identification and fear of repercussions, this research provided insight into a broader range of factors which influence potential victim decision making. Key findings highlighted the impact that the inconsistent description and resulting lack of understanding of the NRM can have on potential victim consent, and identified questions regarding the benefit of the NRM and whether a referral into the NRM is the best outcome for the potential victim.

Findings also suggest that recent policy and legislation has had an impact on the engagement of potential victims within the NRM, with 48% of participants reporting a negative impact on potential victims willingness to consent to the NRM as a result of the expanding hostile environment, deportation policies, and evidence threshold changes.

Whilst providing insight into factors influencing potential victim decision making, it must be acknowledged that this research is limited in application. Due to the challenge of accessing potential victims who have not entered the NRM, these findings only represent the understanding of influencing factors from the perspective of professionals, and so are at risk of stereotyping and generalising potential victim experiences.

Furthermore, findings confirmed that DtN reports are increasing at a higher rate than the growth rate of referrals into the NRM, suggesting that there are more potential victims being encountered who actively do not wish to pursue a referral into the NRM. Furthermore, findings suggest that the number of potential victims encountered who do not enter the NRM is under-reported, with non-statutory FRs reporting intentional non-completion of DtN reports due to the lack of statutory responsibility and lack of benefit for potential victims. As a result, the research concludes that there is cause for concern surrounding the true scale of potential victims encountered who choose not to receive support.

Despite the increasing number of potential victims encountered who are choosing not to enter the NRM for support, this research found that there is a range of support available for potential victims who choose not to enter the NRM. Whilst recognising the challenges that potential victims may have in obtaining support depending on their locality, participants reported that the NRM is not the main outcome for many potential victims that they encounter due to the amount of other support available.

Recommendations

Taking into account the complexity surrounding many of the factors influencing the decision of a potential victim to not enter the NRM for support, this report makes the following recommendations:

- 1. Ensure that the NRM provides the services and benefits** promoted through a comprehensive review of the experiences of those within it. This review should aim to reform the NRM to ensure that potential victims are able to experience the full benefit of a referral, regardless of nationality, and should rebuild confidence that a referral into the NRM is in the best interest of a potential victim.
- 2. Ensure that all First Responders receive standardised training** to ensure that potential victims receive a consistent and comprehensive explanation of the NRM. This explanation must include all information regarding the benefits and potential consequences of an NRM referral to ensure a potential victim is able to make a fully informed decision.
- 3. The UK Government must recommit to providing pre-NRM safe spaces** to ensure a trauma-informed approach when engaging with potential victims. This will offer immediate support and safety for individuals escaping situations of exploitation and give the necessary time needed to consider their decision about entering the NRM.
- 4. The UK Government must do more to de-couple modern slavery with immigration.** Whilst the Labour government has recently transferred the remit of modern slavery to the Safeguarding Minister, more must be done to challenge the encroaching hostile environment and protect potential victims of modern slavery from immigration detention and deportation.
- 5. Duty to Notify (DtN) reporting must be made mandatory across all First Responder Organisations** to aid a more comprehensive identification of potential victims of modern slavery in the UK. This must be supported by clear guidance and training on the purpose of DtN data and the specific information required in DtN reports.
- 6. The UK Government must reassess the use of Duty to Notify data,** and how data can be better recorded and accessed in order to improve professional practice and facilitate the prevention of modern slavery and human trafficking.
- 7. Further survivor-led research should be conducted** which speaks directly with survivors and potential victims to explore their experiences first hand and build on the findings of this research with professionals and First Responders.

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Appendix

Appendix A: Full List of Coded Influencing Factors

	Influencing Factors	No. of Participants	No. of References
Internal Factors	Lack of Understanding of the NRM	27	54
	- Lack of Informed Consent	15	20
	- Misinformation and Poor Communication	8	10
	- Impact of Trauma on Comprehension	8	9
	- Terminology	7	9
	- Complexity of the System	7	8
	- General Lack of Understanding	7	7
	Fear of Immigration Repercussions	27	45
	Fear of Authorities	21	31
	Nationality	17	28
	Better off in Exploitation	14	21
	Timeframes and Delay to Life	14	17
	Self-Identification	13	32
	Repercussions from Exploiters	12	21
	No Reason Provided	8	14
	Lack of Trust	8	12
	Mental Health	7	12
	Relocation within the NRM	6	11
	Attachment to Exploiter	4	6
	Child Specific Factors	3	7
	Self-Sufficiency of potential victims	2	3

	Influencing Factors	No. of Participants	No. of References
External Factors	The Description of the NRM – Professional Description	17	58
	- Use of a Set Resource or Script	8	10
	- Purposefully Discusses Consequences	5	8
	- Challenge of Interpretation	5	7
	- Difficulty of Explaining the NRM	5	5
	- Virtual Interviews	4	9
	- Location of Interview	2	5
	Disbelief and Criminalisation of Victims	20	31
	Lack of Appropriate Identification	20	25
	First Responder Ethical Dilemma	13	20
	First Responder Training	12	17
	First Responder Capacity	10	15
	Lack of Evidence	8	13
	Lack of & Poor Legal Advice Pre-NRM	6	9
	Lack of Holistic Approach	4	6
	Lack of Eligibility in Detention	2	5
Mixed Factors	Impact of Recent Policy and Legislation	33	58
	- No Impact	6	7
	- Hostile Environment	8	8
	- Deportation Policies	7	9
	- Evidence Threshold Changes	5	6
	- Targeted Nationalities	4	6
	- Professional Attitudes	4	5
	- Inadmissibility Policy	4	5
	- Lack of Trust in Government	4	4
	- Changes to the Police	2	5
	The Questionable Benefit of the NRM	28	48
	- NRM is Universally Beneficial	1	1
	- NRM may have Benefit for some	5	6
	- No Benefit for British Nationals	10	11
	- No Tangible Benefit	8	12
	- Not in Best Interests of potential victims	8	10
	- Delay on Life	5	5
	- Lack of Support Available	4	6
	- Replicates Exploitation	2	4
	Difficulty Contacting potential victims	4	6

Appendix B: Full List of Participant Recommendations

Recommendation	No. Participants Reporting
Training	10
- Training for Professionals	6
- Public Awareness	3
- Understanding of Cultural Differences	2
- International Education on Exploitation	1
Methods for Reaching potential victims	5
Overhaul of the NRM	5
Holistic Treatment of potential victims	4
Clarity in NRM description and impacts	3
Survivor First Responders	2
Legislation Change	2
Access to Employment	1
Increased Prosecutions	1
Local Authority Modern Slavery Leads	1
Improved Data Recording	1



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