Human Trafficking Foundation

Acting Local: The Need for Modern Slavery Coordinators in Local Authorities





ACTING LOCAL: THE NEED FOR MODERN SLAVERY COORDINATORS IN LOCAL AUTHORITIES

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The Human Trafficking Foundation would like to thank all the modern slavery coordinators who contributed to this research, it would not have been possible without them. We would also like to thank all Modern Slavery Single Points of Contact in Local Authorities across England and Wales for their continued efforts and diligence within their role.

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"Across the UK, abhorrent crimes of modern slavery occur daily, shattering lives and communities. An estimated 120,000 people live under its grip, including rising numbers of British children.

Local Authorities (LAs) play a critical role in tackling modern slavery, providing victims with housing, support and collaborating with law enforcement to bring perpetrators to justice. Under the Modern Slavery Act 2015, LAs must notify the Secretary of State about all suspected victims however, they receive no dedicated funding for modern slavery from central government. Approximately 9 out of 339 local authorities in England and Wales have specialist Modern Slavery Coordinators (MSCs), creating a damaging "postcode lottery," where a modern slavery victim's access to support depends entirely on their location - an unacceptable disparity.

Despite immense budget pressures, this report demonstrates the transformative impact of MSCs. They equip councils to identify and support victims while disrupting criminal networks. However, without consistent funding or clear local authority priority frameworks, MSCs face undefined roles, balancing strategic and operational responsibilities with limited resources. One MSC reported training thousands of staff, boosting confidence in identifying modern slavery to 99%, and reaching 1,300 people over two and a half years. MSCs' work can embed essential knowledge, improving victim identification and support while addressing systemic gaps in prevention and prosecution.

As the Independent Anti-Slavery Commissioner (IASC), I have seen how coordinated local authority efforts can break cycles of exploitation. Supported MSCs are pivotal, driving early intervention and securing justice for victims.

While modern slavery remains underreported, the presence of MSCs can change this. For example, in this report, one MSC reported a 2025% rise in locations of concern over four years, illustrating their role in prevention and protection.

This report underscores the critical role of LAs in addressing systemic gaps to combat modern slavery. The Human Trafficking Foundation and Local Government Association advocate for actionable solutions, consistent funding, clearer statutory guidance, and streamlined policies - measures vital to empowering councils, safeguarding vulnerable individuals, and disrupting criminal networks.

Modern slavery is a complex issue, but progress is within our reach. Reports like this drive change, equipping policymakers, and supporting LAs in delivering a future free from exploitation. I welcome this report's call for all local authorities to have or have access to a specialist modern slavery coordinator. Together, by making tackling modern slavery everyone's business, we can ensure our communities are places of safety, dignity, and hope."

Eleanor Lyons, Independent Anti-Slavery Commissioner

"Our experience shows an energised and expert modern slavery lead can bring partners together to support survivor identification and support, the disbanding of organised crime groups, reductions in antisocial behaviour and drive innovation in this area." – Chief Community Safety Officer for Local Authority with a Modern Slavery Coordinator "This role should be an essential starting point for every single local authority. Frequently if there is not a designated modern slavery lead not much progress can be made, as this workstream requires quite a lot of work just to embed fundaments of duties of Local Authorities and ensure that all staff understands [the council's] role under the NRM."

- Modern Slavery Coordinator

INTRODUCTION

o community is immune to modern slavery, it is a crime that occurs across the country. Modern slavery takes many forms; criminal exploitation, sexual exploitation, labour exploitation and domestic servitude. Exploitation can happen to anyone; all ages, genders and nationalities are impacted. It is estimated that there are upwards of 120,000 people living in modern slavery-like conditions at any one time in the UK.1 In 2023 alone, 3,350 children who are UK nationals were referred as a potential victim of modern slavery. Modern slavery is a nationwide issue and it happens in villages, towns, cities and rural areas across the UK. It is vital then, that local authorities play an instrumental part in responding to and preventing this crime. Their role at the heart of communities puts them in a central position to react to the growing number of people who have experienced exploitation. They are needed to reduce vulnerabilities to keep communities safe from exploitation and crime; safeguard and house victims and partner with law enforcement to bring perpetrators to justice.

In addition to responsibilities within the Children Act, Care Act, Housing Act and Licensing Act among others, Section 52 of the Modern Slavery Act (MSA) 2015 puts a statutory duty on local authorities in England and Wales to notify the Secretary of State about all suspected victims of modern slavery. Despite this, local authorities receive no specific funding for modern slavery from central government.

This statutory duty to notify is carried out by making a referral to the National Referral Mechanism (NRM), which is the government's framework for identifying victims of modern slavery. Only specific organisations, including local authorities, are designated 'First Responders' and able to make the referral. Victims aged 18 years and over must give consent to a referral, and without it, a local authority must complete an anonymous version of the NRM form known as a 'Duty to Notify', to fulfil their statutory duty under Sec.52 MSA. If an adult gives their consent and goes on to receive a positive initial decision within the NRM, they are entitled to additional support under a national government contract. Anyone under the age of 18 suspected to be a victim of modern slavery does not require consent and must be referred to the NRM. Child victims do not access additional support under the NRM and must be safeguarded by the local authority.

The statutory responsibilities afforded to children often means local authorities

are more equipped to provide a robust safeguarding response for under 18s in comparison to adults. For instance, out of 3,944 NRM referrals made by local authorities in 2023, only 277 were for adult victims. It might be expected that child referrals would be higher, as they do not need to consent to a referral, however only an additional 211 anonymous Duty to Notify referrals (made when an adult does not consent to an NRM referral) were made by local authorities in England and Wales during the same period.² Many local authorities are unaware of modern slavery happening locally and their statutory duties as a First Responder Organisation (FRO). Due to local authorities' wide remit of responsibilities, their obligations to modern slavery survivors often fall through the gaps between different departments.

The responsibilities of local authorities weave throughout a survivor's journey. There is no other statutory body with the ability to provide so many facets of support. However, despite this importance, out of 339 local authorities in England and Wales, there are only 9 – that we are aware of – with a designated, specialist role focusing solely on modern slavery. A number of other local authorities have a role covering multiple forms of abuse including modern slavery, or a Single Point of Contact (SPoC) for the issue, but this role is often an add-on to pre-existing responsibilities, meaning they are not able to fully focus on responding to modern slavery. In a Freedom of Information (FOI) request carried out earlier in 2024 to local authorities in England and Wales, of the 109 respondents, 44% (n. 41) have neither a modern slavery coordinator or SPoC. Furthermore, over 80% of the local authorities that do have a modern slavery lead require them to carry out these roles alongside other professional duties.

Despite pockets of great practice, there is no standardised approach to coordination of modern slavery responses within local authorities. This lack of consistency in responses across local authorities causes a 'postcode lottery' for survivors receiving support. This is at a time during which NRM referrals continue to rise, with 17,004 people being referred in 2023, the highest figure since the NRM began.³

For this briefing, the Human Trafficking Foundation worked with the 9 designated leads working solely on modern slavery and employed by various local authorities across England. Whilst the job roles have different titles, for instance 'Modern Slavery Leads', for the purpose of this briefing we shall refer to them as Modern Slavery Coordinators (MSC). Notably, the MSCs stated that they are seeing a greater push from the Home Office and Modern Slavery Victim Care Contract (MSVCC) towards local authorities to support survivors.

This is a challenging time for local authorities who are operating with restricted budgets and are reacting to increased needs within their communities. Some local authorities who employ MSCs are undergoing significant financial difficulties, but are continuing to support the role due to its the strategic and operational importance.

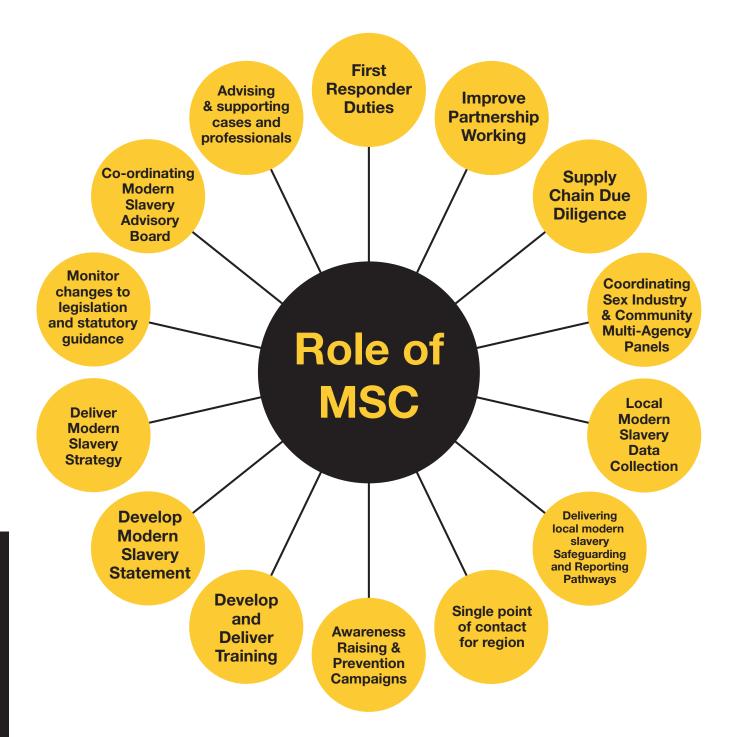
The briefing makes the case that access to the specialist, designated role of an MSC is essential to all local authorities and will drive best practice in identifying and supporting survivors and building partnerships to make communities resilient to modern slavery, thus saving money in the long run.

RECOMMENDATION:

All local authorities must have, or have regional access to, a specialist modern slavery coordinator funded by central government.

² National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2023

The roles of the nine Modern Slavery Coordinators (MSCs) within their local authorities vary, with no set remit found across the positions. MSCs reported duties that ranged from strategic planning to day-to-day operational tasks. As this is not a statutorily mandated position, the MSC roles have been initiated and developed in different ways in responding to preexisting needs, funding streams or even the nature of the council in which they are present. Reasons for why these roles came into being include proactive responses to increased cases of modern slavery and to the introduction of the MSA (2015). Some MSC roles were created in response to judicial reviews which found local authorities unable to carry out their statutory duties.



Notably, most MSC roles focused more on responses involving adults rather than children, mainly due to Children's Services having a clear remit and responsibility for responding to child victims. MSCs reported working alongside their colleagues in Children's Services, yet overall, their expertise was required in developing the council's response to adult victims.

Many different departments, from licensing to housing to procurement may come across victims of modern slavery in their work. There is no national guidance as to which teams within a local authority are first responders, it is therefore left to the discretion of the council to decide under which remit modern slavery sits.

The majority (7) of the MSCs are positioned within their respective Community Safety Teams, with the other two within Adult Services. It was acknowledged that accountability through robust governance structures was required for the role to be effective, accountable and to provide a platform to problem-solve. Due to the differing governance structures within the local authorities, the MSCs reported being accountable to varying bodies. These included Community Safety Partnership boards, Safeguarding Adults boards and county wide partnership groups.

As there is no one set cause for the initiation of the MSC roles, there is no one set funding stream that ties the positions and duties of the MSCs together and local authorities receive no specific funding for modern slavery from central government. Naturally, requirements and expectations of funders influence the role itself, and therefore it is understandable why the remit of one MSC position will not map directly onto that of another. As shown below, funding comes from multiple sources, both within and outside the local authority in which the MSC works.



Initial analysis suggests that it would cost central government $\pounds 57,533$ per year to fund the salary of an individual MSC.⁴ This cost is inclusive of employer national insurance contributions (rate as of April 2025) and an employer pension contribution of 16%.^{[5] [6]} It does not include additional expenditure on overheads, nor does it factor in operational budget, which currently ranges between $\pounds 0 - \pounds 10,000$ a year for each MSC.

The MSCs in place are making significant contributions to their local authorities' responses to modern slavery, with a greater operational budget they would be able to expand this work and their efforts. Importantly, the costs listed above do not factor in the added economic benefits and social value of the role found in improved processes, streamlined workloads, support of other agencies (including law enforcement) and a positive impact on survivors of modern slavery and the wider community.

⁴ This is based on the average salary of six of the current MSCs

⁵ Unison - Local Government Pension Scheme

⁶ Please note that due to the nature of the <u>Local Government Pension Scheme</u>, exact pension contribution costs will vary depending on local authority.

The presence of an MSC improves local authorities' ability to identify potential victims of modern slavery. MSCs demonstrated through internal data that since the introduction of their roles, the number of NRM referrals themselves and the number of registered concerns (be it concerns around locations, perpetrators or potential victims) have increased. In one instance an MSC reported a 2025% increase in registered locations of concerns across a four-year period. In another, an MSC reported that in the first year of the position being in place there was a 629% increase in reporting from the first quarter to the fourth.

One explanation for this increase in identification and referrals is the operational involvement of the coordinators themselves. Whilst these roles are often designed to be strategic positions, it is common for MSCs to take on operational tasks to support colleagues who are unaware of their responsibilities as a First Responder. While the involvement of MSCs in individual cases is undoubtedly helpful, more significant systemic changes have proven to be crucial in improving local authorities' response to their duties as set out in the MSA (2015). Multiple MSCs demonstrated that the establishment of modern slavery pathways streamlined processes to allow survivor support to be delivered more effectively and efficiently. Clearly signposted pathways and guidance allow staff within the local authority to follow best practice and feel more confident to raise concerns. Which in turn, helps ensure victims are identified and are able to receive appropriate support.

Out of 218 local authorities that made NRM referrals for adults in 2023, the 9 with a designated modern slavery position made up 18% of all adult NRM referrals.⁷

"From the perspective of the Care Act, Section 42, it ensures that we are clear on roles and responsibilities such that the local authority team will be involved with those people who have care and support needs, but there is also a pathway for those that don't, meaning that victims are less likely to 'fall through the gaps' of services"

 Local Authority Staff Member who works with a MSC

Identification Case Study:

A local NGO was supporting a potential victim of modern slavery, who despite indicators of exploitation, was not deemed by police to warrant a referral to the NRM. It was said that the individual did not present modern slavery concerns, due to the perception that they were free to leave the exploitative situation.

The NGO highlighted the case to the local authority's MSC, who was able to review the information. Following careful consideration, it became clear that numerous vulnerabilities of the potential victim, as well as evidence of abuse of power by the perpetrators, had not been thoroughly considered and regarded as a control factor. The MSC's expertise and experience enabled them to understand and identify the complexities within the case that another statutory First Responder missed.

The local authority carried out an interview with the individual and made the NRM referral. They were given a positive reasonable grounds decision by the Single Competent Authority and the individual was able to enter support that would otherwise have not been available to them.

"Despite training, my officers are still unsure of NRM practices and so I am always reassured by my team being accompanied by [the MSC's] to provide expert knowledge and support."

 Chief Inspector of Police Force working Alongside an MSC

PARTNERSHIPS

"The council's modern slavery lead is very proactive and is very good at working closely with the police. She is extremely passionate and goes the extra mile."

- Police Force working alongside a MSC

Partnership working within communities is crucial to identify and protect survivors of modern slavery.⁸ Effective partnerships enable organisations to draw on the strength and resources of one another. MSCs noted that partnership working, and multi-agency approaches relieve the pressure that can fall on organisations when working independently.

Notably improved partnerships can be seen internally, between different departments within the local authority, as well as the MSCs describing imporved working relationships between local authorities and external stakeholders.

Often council systems and processes can act as a stumbling block for those not familiar with them. The existence of the MSC role can support external partners to communicate with relevant teams and navigate processes to better support survivors. In some instances. MSCs have done this by proactively creating multiagency groups to address issues within local modern slavery responses. These include monthly task and finish groups, which bring together council leaders and external agencies, to more focused groups such as panels to improve the response to transitional safeguarding for child victims of modern slavery as they turn 18.

The MSCs gave examples of training and increased communication and overall improved joint working with statutory agencies such as the Gangmasters and Labour Abuse Authority (GLAA) and local police forces. Agencies, when working in partnership, can share data and evidence which support criminal investigations and safeguard survivors. MSCs then not only improve the local authority's response to modern slavery, but also lead to better policing and improve broader responses in the region and nationally. One MSC reported building a close partnership with their local police force, which resulted in a multiagency meeting which presents an opportunity for information sharing, proactive action and an improved response to tackling modern slavery.

Improved partnerships have also laid the groundwork for focusing on preventing modern slavery. Data collected among local partners has driven preventative and disruptive activities, including targeted campaigns which focus on awareness raising of exploitation types prevalent in the region. By alerting residents to their rights, along with red flags that could suggest unscrupulous job offers, MSCs have played a vital role in making communities safer. MSCs have also been able to convene regional conferences to address modern slavery. Events and campaigns such as these raise awareness of modern slavery which leads to the need for addressing and responding to modern slavery effectively being recognised, and ultimately results in increased prevention and better identification and support for survivors.

"Since (The Modern Slavery Coordinator) took the lead role there have been an array of training processes and increased external collaboration. New initiatives, forums and groups that can improve dove tail of support services, coupled with the internal work (The Modern Slavery Coordinator) must be doing to unplug and unblock pathways reducing challenges and less gatekeeping faced enabling eligible victims to be appropriately considered against council duties".

 Third Sector Employee working in area with a MSC

Partnership Working Case Study:

Following training by the MSC on spotting the signs of modern slavery, the council's Rough Sleeping Team came across three men who were homeless after escaping labour exploitation. The MSC assisted the team to arrange immediate appropriate accommodation for the three men and continued to provide advice to the team and other professionals involved for the next two weeks.

The MSC worked with the team to arrange for the three men to receive specialist support from partner agencies. Two of the men consented to referral to the NRM, one declined consent and a DTN was completed. After building trust, one of the men disclosed the address where he had been exploited and shared that there were other people staying there. In response, the MSC arranged a multi-agency visit to the property, which involved the council's Housing Enforcement team, the police and the GLAA and set up a reception centre with various NGO support agencies present. Two potential victims were recovered from the address and taken to the reception centre where they were made aware of their worker's rights, given advice on their situation and advised how to seek help.

This was the first time there had been a multi-agency warrant and reception centre convened for a modern slavery case and happened because the MSC was in post. The MSC ensured the relevant agencies were involved and aware of how to respond and coordinated the partnership response. This case also led to the Rough Sleeping team feeling more confident in identifying modern slavery and they have responded to further cases since.

Supporting Police Investigations Case Study:

Following a referral to the local authority an individual was identified as a trafficker, exploiting multiple women across a city. In order to ensure a smooth operation, the MSC helped coordinate multiple agencies, including the police, to develop a joint action plan and a joint agency visit.

Once potential victims were identified, they were not initially able to provide formal disclosures at the time, which meant the police were unable to take forward important testimonies as part of their investigation. However, the MSC ensured safeguarding options were presented to the potential victims, who received positive reasonable grounds decisions and entered the NRM.

As time passed and the potential victims received support they felt more comfortable speaking with the police. The MSC helped build the rapport and the potential victims felt able to engage with law enforcement. Due to the MSC's work to support and safeguard the individuals, whilst maintaining close contact with the police, the police we able to build and provide a case against the suspect.

WORKING WITH SUPPORT PROVIDERS

Effective support requires a productive relationship between local authorities and support providers operating within the MSVCC. Individuals' support needs will regularly lie across both a local authority and MSVCC support providers. For instance, not everyone receiving support under the MSVCC are living in safehouse accommodation. In September 2023, 87% (6,837) of adult survivors were receiving outreach support, some of whom would be eligible for accommodation through their local authority.⁹

Productive co-working between the local authority and support provider is essential to ensure that support is as effective as it can be. Multiple MSCs reported regular meetings with MSVCC providers, in which challenges and good practice can be shared. Included among the benefits reported from these relationships are: successful referrals to Adult Social Care, the provision of reciprocal training from Adult Social Care for MSVCC staff, and an increased understanding of the issues MSVCC advocates are facing when working with the local authority.

Specialist MSCs can hold and jointly manage the relationship between a local authority and the local support provider through the MSVCC. When interaction is needed with different departments across the local authority, the MSC can provide support, make connections and ease communication between relevant parties.

TRAINING

Currently, there is no requirement to have mandatory training in place for local authorities, or any FRO, on how to exercise their first responder duties. This is despite the Modern Slavery Statutory Guidance setting out the definition of a First Responder as someone who has been trained to discharge those functions.¹⁰ Therefore, the existence and delivery of training is at the discretion of each local authority. Training that does exist is often in need of updating, for example e-learning for FROs compiled by central government has not been updated since 2021. The task of designing and delivering training on the local authority's duties as First Responders can be challenging and overwhelming unless the expert knowledge already exists within the council.

The lack of mandatory training often means that statutory FROs, such as local authorities, fail to properly carry out their role. There are also instances where, without training, local authorities are not aware they are a First Responder Organisation. Evidence has shown that many first responders are unaware of their duties or the existence of the NRM¹¹, in some cases reports have been shared of first responders not knowing that modern slavery occurs in their area.

Training is a clear priority for the MSCs. Almost all MSCs stated that the development and delivery of training was a crucial aspect of their roles. By implementing modern slavery training in local authorities where it previously did not exist, or was minimal, MSCs have been able to greatly improve the knowledge of the indicators of modern slavery and what should be

⁹ Human Trafficking Foundation. The Key Issue: Housing for Survivors of Modern Slavery.

¹⁰ Modern Slavery: Statutory Guidance for England and Wales v. 3.11

¹¹ Human Trafficking Foundation & British Institute of International and Comparative Law. Identification of Adults with Lived Experience of Modern Slavery in the UK.

done when local authority staff encounter potential victims. Thousands of local authority staff members have been trained by MSCs. In many cases these training sessions have become embedded within Local Authorities and can in part explain the increased ability of these local authorities to identify and support survivors of modern slavery.

One MSC trained over 1,300 people in two and a half years. Of those training attendees who gave feedback, before the training only 45% of people agreed or strongly agreed that they could identify modern slavery. After the training this rose to 99%. In the same sample, before training, 32% agreed or strongly agreed they understood the MSA (2015) and the NRM; after training this rose to 98%. Other MSCs offered similar evidence to the effectiveness of their training, one demonstrated that 91% of those who provided feedback on their training felt an increased confidence in reporting modern slavery incidents through correct channels.

These training sessions provide opportunities for MSCs to interact with colleagues across their local authority and often external agencies as well. One interaction led to the creation of NRM pocket cards to be carried by professionals across the area so they knew how to respond if they came across modern slavery. It also ensures a sustainable response to modern slavery, where responding to cases is a shared responsibility across an organisation. One MSC reported that they often have professionals disclose during training that they've encountered instances that, following training, they now recognise as indicators of modern slavery. Prior to the training they were unsure of how to address or report the issue but feel more confident in doing so following training

organised and led by the MSC. This suggests that investing in the creation and maintenance of an MSC role within the Local Authority, is an investment in upskilling the wider organisation.

The ability to bring about development of training and resources can often improve responses of other agencies across the region as well as the local authority. One MSC reported creating specialist training for staff within their NHS trust to recognise and improve responses in a healthcare setting by medical personnel. This training was tailored to suit the working patterns of the professionals and was made available 'on-demand'. As a result of this training healthcare workers were the highest referrers of incidents to that MSC in 2023.

"I have found that I am 'pushing against an open door', and there seems to be a real appetite amongst [local authority] staff and partners to know more about modern slavery and human trafficking, and how improvements can be made to improve our knowledge and working practices to protect vulnerable people from exploitation."

- Modern Slavery Coordinator

CAPACITY:

The main challenge reported by current MSCs is a lack of capacity due to being the sole person responsible for the development and implementation of modern slavery strategies in local authorities, who have several thousand employees. Many MSCs stated that there is often nobody who can deputise for them when they are on leave. Often leaving the MSC to feel highly responsible (despite not being in a particularly senior position) and, at times, isolated.

MSCs stated that without additional support they are often unable to address all issues they want to. Modern slavery is a constantly evolving crime, MSCs carry the responsibility to stay updated on the ever-morphing trends and to feedback into the local authority. Fortunately, MSCs have stated that partnership working allows them to do this; information can be picked up and disseminated by relevant parties. However, despite this external support, MSCs often find themselves stretched too thinly as they are expected to respond on all issues pertaining to modern slavery. Due to the extensive nature of this crime, the role can become reactive as opposed to proactive. Some MSCs reported that although their role is meant to be strategic, focusing on the development of an overall strategy for their local authority, their knowledge and position often leads them to becoming involved in operational duties, such as carrying out NRM referrals. The aim is that as MSCs deliver training across their local authority, the capacity of staff to carry out these NRM referrals will grow, meaning there will be less onus on MSCs to fulfil these operational duties.

RESOURCES:

MSCs report that data access can at times prove difficult within local authorities and with external partners such as police forces. The lack of data can prohibit the MSCs functioning within their role. Time spent making data requests and the delays that follow prevent MSCs reacting to issues as guickly as they would wish. Access to data is also essential to show the benefits of the role, or for accessing funding. As modern slavery is already an underreported crime, adding obstacles to data access risks it appearing even less prevalent. This will in turn make it appear less of a pressing issue for local authorities when faced with budgetary decisions.

As local authorities receive no specific funding for modern slavery from central government, resources need to be found within the local authority's existing budget to prioritise this crime. Lack of resources was a common issue reported by MSCs. Several reported that their role, at present, is funded on a temporary basis, with one role being funded only on a yearly basis, meaning that the challenge of securing funding for the role is time consuming and often remains a priority up until the end of the financial year. This puts a great deal of uncertainty on the role and role holder and makes it hard to plan and deliver a long-term modern slavery strategy. The lack of financial security ieopardises the sustainability of services and projects and puts the MSC in a precarious position, not knowing if they will have a job long-term. There have been at least two instances where the lack of sustainable funding has led to the roles of MSCs being removed entirely.

CONCLUSION

The position of local authorities in our communities makes them an essential part of responding to modern slavery in the UK. This is recognised in the statutory obligations put on them by legislation such as the Modern Slavery Act (2015). Despite these vital duties, local authorities are not being given the requisite support to be able to respond effectively to modern slavery, which puts individuals and communities at risk.

The work of MSCs across the country has demonstrated the impact that a dedicated role can have in the coordination of local efforts. It is evident that this single role improves the response of staff within the wider local authority, strengthens joint working and the approach taken by external partners, and enables improved support and identification of survivors. It is therefore recommended that central government make funding available so that all local authorities can have, or have access to, a specialist modern slavery coordinator.



