

**Organisation Name: Laburnum Health Centre**

# **Modern Slavery and Human Trafficking Guidance**

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## **Overview for all staff**

- Modern slavery and human trafficking are difficult to identify as there are no definitive symptoms, but there are many signs that could show a person is a victim of either.
- All staff must be aware of the signs of modern slavery and human trafficking; healthcare workers should remain vigilant to help to protect the health and safety of potential victims.
- A trafficked person may be effectively a prisoner, and visiting a healthcare organisation may be an opportunity to seek help; clinicians should trust their instincts and act if something does not seem right, for both adults and children.
- If staff suspect slavery or trafficking, they should gain more information and speak to the person privately, without companions present; victims may be reluctant to disclose information due to lack of trust, so reassurance and privacy are essential.
- Should staff need further support when dealing with possible victims of slavery or trafficking, they should speak to the organisation's Safeguarding Lead or their nominated deputy.

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# 1 Introduction

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## 1.1 Policy statement

This policy outlines the commitment of this organisation to recognise and appropriately report concerns regarding modern slavery and human trafficking. All staff must be aware of signs that could indicate modern slavery and know how to support those affected.

This policy should be read in conjunction with the CQC's [GP mythbuster 36: Registration and treatment of asylum seekers, refugees and other migrants](#) and the organisation's Safeguarding Handbook.



Safeguarding (adults and children) eLearning is available in the [HUB](#).

## 1.2 Status

In accordance with the [Equality Act 2010](#), we have considered how provisions within this policy might impact on different groups and individuals. This document and any procedures contained within it are non-contractual, which means they may be modified or withdrawn at any time. They apply to all employees and contractors working for the organisation.

# 2 Policy guidance

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## 2.1 Modern slavery and human trafficking explained

Understanding the associated terminology will help staff to support any patients who are subject to any type of slavery or trafficking, including but not limited to:

Common term	Definition
Modern slavery	When an individual is exploited by others for personal or commercial gain. Whether tricked, coerced or forced, they lose their freedom.
Human trafficking	The recruitment, transportation, transfer, harbouring or receipt of people through force, fraud, coercion or deception, with the aim of exploiting them for profit.
Forced labour	Any work or service that people are forced to do against their will, usually under threat of punishment. This includes sexual exploitation, sex work (both adults and children).
Bonded labour	When a person is forced to work to pay off a debt (it may be referred to as debt slavery or debt bondage)
Domestic slavery	When domestic workers, often vulnerable people, are forced to work inside a private household, performing a range of tasks.

Criminal exploitation	One of the most common forms of slavery in the UK and victims are forced into 'county lines' drug trafficking, drug production and theft, and this can including <a href="#">cuckooing</a> .
Female genital mutilation	The partial or total removal of the external female genitalia. The female genitals are deliberately cut, injured or changed for no medical reason. While it is not widely considered as a form of human trafficking, it may be an indication to consider.  For further detailed information, see the organisation's FGM Guidance Document.
Clinical disengagement	When a patient avoids contact with healthcare services, either intentionally or unintentionally, and this may be because of modern slavery. For further detailed information, see the organisation's Clinical Disengagement Policy.
Honour-based abuse	A crime or incident committed to protect or defend the 'honour' of a family or community, including forced marriage, domestic abuse, harassment, isolation, control and violence.

Detailed information on all of the above definitions can be found at both [antislavery.org](#) and [Metropolitan Police](#).

Under UK legislation and the [Modern Slavery Act 2015](#), all modern slavery offences can be punishable by a maximum sentence of life imprisonment. When victims of modern slavery have been forced into committing a crime by the perpetrators, UK legislation states that the victims may have a defence against prosecution.

## 2.2 Signs of slavery and trafficking

Modern slavery and human trafficking are difficult to identify as there are no definitive symptoms. The Gov.uk [Identifying and supporting victims of modern slavery: guidance for health staff](#) explains there are many signs that could show a person is a victim of slavery or trafficking, including if the person:

- Is accompanied by someone who appears controlling, who insists on giving information and coming to see the health worker
- Is withdrawn and submissive, seems afraid to speak to a person in authority and the accompanying person speaks for them
- Gives vague and inconsistent explanation of where they live, their employment or schooling
- Has old or serious injuries left untreated
- Either gives vague information or is reluctant to explain how the injury occurred or to give a medical history
- Is not registered with a GP, nursery or school
- Has experienced being moved locally, regionally, nationally or internationally
- Appears to be moving location frequently
- Appearance suggests general physical neglect

- Struggles to speak English
- Has no official means of identification or suspicious looking documents

Additionally, children and young people might show the following signs:

- Has an unclear relationship with the accompanying adult
- Goes missing quickly (sometimes within 48 hours of going into care) and repeatedly from school, home and care
- Gives inconsistent information about their age

Possible health care issues may include:

- Evidence of long-term multiple injuries
- Indications of mental, physical and sexual trauma
- Sexually transmitted infections
- Pregnant, or a late booking over 24 weeks for maternity care
- Disordered eating or poor nutrition
- Evidence of self-harm
- Dental pain
- Fatigue
- Non-specific symptoms of post-traumatic stress disorder
- Symptoms of psychiatric and psychological distress
- Back pain, stomach pain, skin problems; headaches and dizzy spells

Further information is available from [Responding to the health needs of survivors of human trafficking: a systematic review](#) and the National Crime Agency [Modern slavery and human trafficking](#) guidance.

### **2.3 Maintaining an awareness**

All staff are to be mindful of the signs of modern slavery and human trafficking. Detailed guidance regarding the indicators of abuse in both adults and children is available in the organisation's Safeguarding Handbook.

Healthcare workers should be vigilant to possible modern slavery in the hope that they can improve the health and safety of trafficked persons by:

- Being aware of the possibility of human trafficking
- Recognising the signs and symptoms
- Broaching the subject sensitively
- Listening and making time for the patient
- Checking current safety position
- Giving information and referring on to other services
- Documenting and recording information accurately

Someone who has been trafficked may be a virtual prisoner. Visiting a healthcare worker may be a rare opportunity for the person to come forward and be open about their situation. In all cases, whether adult or child, clinicians are encouraged to act on their instincts if they

think that something is 'not right'. There may be a pattern of signs or symptoms that could alert the clinician such as a combination of triggers or an inconsistent story or history. It is important to remember that:

- Trafficked people may not self-identify as victims of modern slavery
- Trafficking victims can be prevented from revealing their experience to healthcare staff from fear, shame, language barriers and a lack of opportunity to do so. It can take time for a person to feel safe enough to 'open up'

There is a need to be cautious regarding age and the following rule is to be adopted:

- If a person states they are under 18, or if a person says they are an adult although there is a suspicion they are not, the patient should be treated as if they were under 18 years old

As part of annual training commitments, staff receive in-house training on the recognition, reporting and recording of all patients suspected of being victims of modern slavery or trafficking or associated safeguarding concerns. The following may be referred to:

- DHSC [e-lfh tool for health service staff on identifying and responding to Modern Slavery](#)
- [The Gangmasters and Labour Abuse Authority \(GLAA\)](#) defines methods used by traffickers to exploit their victims and includes victims' accounts.
- [The Government's Modern Slavery Awareness Booklet](#) provides detailed information for staff working within the public sector

## 2.4 Asylum seekers registration and treatment

When dealing with asylum seekers, refugees and other migrants, staff are to adhere to the CQC's [GP mythbuster 36: Registration and treatment of asylum seekers, refugees and other migrants](#) and the organisation's Patient Registration and Health Check Policy.

## 2.5 Common misunderstandings and misconceptions

Those working with potential victims should understand some of the common misconceptions about modern slavery and its victims:

- People can be victims of modern slavery even when they have apparently consented as consent can be obtained by coercion
- Coercion can also mean that victims do not take opportunities to escape. Despite this, they are still victims
- Exploitation does not need to have taken place yet for individuals to be victims, e.g., if their abusers are caught before the exploitation takes place. What matters is the purpose for which they are being held
- UK nationals can be victims of modern slavery. People can also still be victims of human trafficking even where they have only been moved within a country
- Modern slavery victims could be related to or in a relationship with their abusers, e.g., if they are being groomed

- Victims of modern slavery may say that they have a better situation than previously. Despite this, if they have been coerced by their abuser into exploitation, they are still victims of modern slavery

## 2.6 Actions to take in suspected cases

Should the clinician or member of staff have suspicions about slavery or trafficking, they are encouraged to try to find out more about the situation and speak to the person in private without anyone who accompanied them to the premises. A victim of human trafficking is unlikely to open up initially due to lack of trust. They need to be reassured that they are in a safe space allowing for them to talk. It may take several meetings before the person opens up so be prepared to make follow up appointments.

Staff should not be concerned about challenging cultural beliefs and should not let these stand in the way of making informed assessments about the safety of a child, young person or adult.

When the identifying party believes the potential victim may be either a child or adult at risk, they should inform the Local Authority Social Services as soon as possible. Local Authority Social Services can determine whether a safeguarding enquiry under [Section 42 of the Care Act 2014](#) is required and what further action is necessary.

The organisation's Safeguarding Handbook should be considered for further guidance. Additionally, advice may be sought from the Safeguarding Lead. In all cases, staff should:

- Be trauma-informed in their approach, be sensitive to the possible indications of trauma, e.g., hyper vigilance, mistrust, anxiety, numbing and a dissociative state and respond non-judgementally and reassuringly
- Not rush the consultation. The victim may have some cognitive impairment as a consequence of the abuse and may find it difficult to remember details or make decisions
- Be sensitive to possible fear of contact with statutory agencies – the victim may have been told that they will be deported
- Avoid calling authorities such as the police or immigration services unless they have the informed consent of the patient or when the threat of danger to the patient or others is such that they need to do so
- Not raise the slavery or trafficking concerns with anyone accompanying the child or adult
- Ensure the healthcare needs of the individual are addressed, treatment is provided and referrals made where necessary

## 3 National Referral Mechanism (NRM)

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The [National Referral Mechanism](#) (NRM) is a framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support. Only first responder organisations can refer via this mechanism (see section 4 of the linked guidance). Staff at this organisation should discuss any concerns with the organisation's Safeguarding Lead in the first instance, who then may contact a designated first responder organisation. For details of additional support organisations, refer to [Annex A](#).

## Annex A – Support organisations

Name of organisation	What do they do?	Contact details	Notes
<b>Police</b>		See notes	999 if it is felt that there is an immediate risk of harm, or 101 if not.  <a href="#">Online contact form</a>
<b>Barnardo's</b>	<a href="#">Barnardo's National Counter-Trafficking Service</a>	0800 043 4303 (24 hrs)  <a href="#">Online reporting form</a>	For under 18s  <a href="#">Home Office page about the Independent Child Trafficking Guardians</a>
<b>Citizens Advice</b>	Citizens Advice is a major UK voluntary sector organisation that provides free, confidential and independent advice to help people to overcome their problems.	Various supporting contact numbers <a href="#">here</a>	
<b>Forced Marriage Unit (FMU)</b>	Help and support for anyone trying to stop a forced marriage or help for those trying to leave a marriage they have been forced into.	020 7008 0151 (Mon - Fri 0900 to 1700)  020 7008 5000 (Out of hours)	<b>Email:</b> <a href="mailto:fmu@fcdo.gov.uk">fmu@fcdo.gov.uk</a>  <b>Web:</b> <a href="https://www.gov.uk/stop-forced-marriage">https://www.gov.uk/stop-forced-marriage</a>
<b>Migrant Help</b>	This charity provides support to all other adult male and female victims of trafficking.	Various contact numbers <a href="#">here</a>  <a href="http://www.migranthehelpuk.org">www.migranthehelpuk.org</a>	Migrant Help is a named First Responder for the National Referral Mechanism and can provide advice, guidance and additional information for partner agencies.

<b>National Crime Agency</b>	Report to the NCA via the National Referral Mechanism	0370 496 7622 (24 hrs)	Further information including reporting see <a href="#">here</a>
<b>NSPCC</b>	<a href="#">NSPCC Child Trafficking Advice Centre</a>	0808 800 5000 <a href="#">Online reporting form</a>	For under 18s
<b>Salvation Army</b>	Reporting modern day slavery	0800 818 3733 (24 hrs)	Staff who suspect that a patient may have been trafficked can contact the 24-hour confidential helpline.
<b>Unseen</b>	Unseen is a UK charity that provides safehouses and support in the community for survivors of trafficking and modern slavery.	08000 121 700 (24 hrs) <a href="#">Online reporting form</a>	<a href="https://www.unseenuk.org">https://www.unseenuk.org</a>