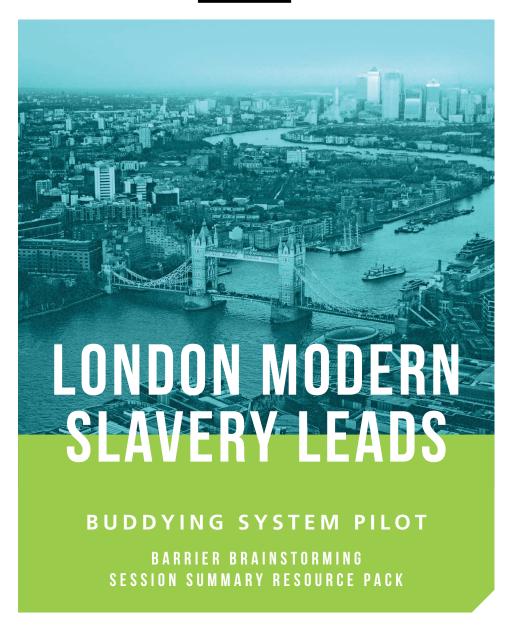
Human Trafficking

Foundation



#### INTRODUCTION

Under the Modern Slavery Act 2015, local authorities in England and Wales have key duties to identify victims of modern slavery. As First Responders, they refer potential victims to the National Referral Mechanism (NRM), the framework for identifying and supporting victims of modern slavery and human trafficking. Local authorities often face challenges such as limited resources, gaps in knowledge or training, and the complexity of coordinating multi-agency responses. Addressing these challenges is critical to fulfilling their obligations under the Modern Slavery Act and responding effectively to this crime.

The London Modern Slavery Leads (LMSL) Buddying System Pilot, coordinated by the Human Trafficking Foundation, aims to empower local authorities to strengthen their response to modern slavery by pairing London Boroughs with others that share similar challenges, goals, and who are located close to each other. The buddying system is all about collaboration over isolation; a space to share ideas and problem solve together.

During the pilot launch event, a collaborative session was held where attendees discussed the barriers they face in responding to modern slavery in their local areas. They explored the challenges, why they happen, what impact they have, and how we can start to address them. This resource summarises those discussions and is designed for local authorities who are working to improve their response to modern slavery.

Challenges have been grouped into key themes; the themes that emerged highlight how many Boroughs are facing similar struggles but also how much potential there is to learn from one another. Funding and resources remain significant challenges, and this pilot can't fix those but offers sustainable solutions with existing resources.

We hope this resource helps you feel less alone in the challenges you're facing and ultimately, be better equipped to effectively respond to modern slavery in your local authority.

## **MULTI-AGENCY WORKING**

Challenge	Why it Happens	Impact	Practical Solutions
Limited engagement from key partners (e.g. police, NHS)	These agencies may not see modern slavery as a priority. Their roles in relation to modern slavery are often unclear, and staff may not understand how they contribute to survivor identification or safeguarding. There's also limited accountability for non-participation.	Without full engagement, crucial information about cases is missed, and responses become fragmented. Survivors may go unidentified or unsupported and cases unprosecuted.	<ul> <li>Help colleagues to recognise their roles and responsibilities in responding to modern slavery</li> <li>Advocate to make participation in panels and partnerships (e.g. safeguarding panels, modern slavery working groups) an explicit part of job descriptions and performance expectations</li> </ul>
Poor collaboration across internal council departments (safeguarding, housing, procurement, licensing etc)	As councils are large organisations, departments often work in silo, with differing priorities and little shared understanding of modern slavery. Staff may fear overstepping or feel illequipped to act. Capacity is a recurring barrier.	When collaboration relies on one or two passionate individuals, a singular department can feel overwhelmed and responses fall apart when they leave. Intelligence is also missed, and survivors risk getting an incorrect response if they come into contact with a different part of the council that is not as well informed on how to respond to modern slavery. Continuity, learning, and survivor support decline.	<ul> <li>Establish cross-department working groups with clear roles. These could involve task and finish groups to establish best practice such as transparency supply chain statements.</li> <li>Secure senior leadership buy-in to embed work across departments and prevent dependency on individuals.</li> <li>Regularly highlight and communicate successful case outcomes that resulted from cross-department cooperation.</li> </ul>
Barriers with adult social care	Adult Social Care teams are sometimes not fully engaged in modern slavery work. There may be unclear responsibilities for adults who don't meet Care Act thresholds, or a lack of clarity about which service should lead. Transitional safeguarding between child and adult services is sometimes poorly responded to.	Survivors may be turned away or bounced between services. This is especially true for young adults, people with no recourse to public funds, or those with complex trauma who don't meet care eligibility. Safeguarding risks escalate and staff may become frustrated.	<ul> <li>Develop joint safeguarding protocols and transitional safeguarding pathways.</li> <li>Clearly define Adult Social Care's responsibilities and develop a referral pathway for NRM referrals and support.</li> <li>Provide tailored training on modern slavery, including Care Act implications and trauma-informed approaches.</li> </ul>

### **TRAINING & CONFIDENCE**

Challenge	Why it Happens	Impact	Practical Solutions
Modern slavery seen as 'add-on' work	Staff often feel overwhelmed and modern slavery may not be seen as core to their role due to low number of cases or lack of data. Shifting priorities mean it's frequently sidelined.	Exploitation is missed, staff lack confidence, and cases are not escalated appropriately. Survivors remain invisible and can't access support, communities remain unsafe.	<ul> <li>Make modern slavery training mandatory for all new staff and refresh it regularly.</li> <li>Position modern slavery training as safeguarding core business, not a specialist niche.</li> </ul>
Professionals lack confidence with the NRM	Professionals report that the National Referral Mechanism (NRM) can feel complex, bureaucratic, and the benefits unclear.	Staff hesitate to refer or make inadequate referrals, meaning victims miss out on essential protection and support.	<ul> <li>Build local modern slavery Single Point of Contacts (SPOC) within each department where staff can seek advice and peer support.</li> <li>Share positive outcomes from referrals to build trust in the process.</li> <li>Use reflective case reviews to identify learning opportunities.</li> </ul>
Low curiosity or lack of awareness about exploitation	Professionals may have limited exposure to exploitation indicators or training hasn't been engaging or contextual. Busy roles limit time for deeper learning.	Signs of modern slavery and trafficking go unnoticed. Survivors may interact with services repeatedly without identification.	<ul> <li>Deliver engaging, scenario-based training, informed by people with lived experience.</li> <li>Create opportunities for informal peer learning and reflection.</li> </ul>
Lack of understanding of transitional safeguarding	Services for children and adults are poorly aligned. Many professionals are unsure how to support 17–25 year olds effectively.	Young people leaving care or vulnerable youth at risk of exploitation are left unsupported during a critical period.	<ul> <li>Adult social care and children's social care co develop local guidance and protocols for transitional safeguarding.</li> <li>Ensure exploitation is explicitly included in those frameworks, with joint working between children's and adult services.</li> </ul>

### **GOVERNANCE & LEADERSHIP**

Challenge	Why it Happens	Impact	Practical Solutions
No clear local strategy or framework	National approaches are inconsistent, and local areas often lack time or funding to create modern slavery strategies.	Staff are unclear on their responsibilities, leading to inconsistent or reactive responses. Survivors fall through gaps, and accountability is lacking.	<ul> <li>Co-develop a local strategy with frontline staff and multi-agency partners that reflects real-world practice and local needs.</li> <li>Align it with national goals and focus on what's actionable locally.</li> </ul>
No dedicated SPOC (Single Point of Contact)	SPOC roles are often unfunded and dependent on enthusiastic individuals. They can be deprioritised when teams restructure or individuals leave.	Work lacks structure, and knowledge isn't retained or passed on. The response becomes fragmented and reactive.	<ul> <li>Where possible, formalise SPOC roles with protected time.</li> <li>Embed the SPOC into wider networks like the London Modern Slavery Leads Network (LMSL) for peer learning and support.</li> <li>Document processes to safeguard knowledge.</li> <li>Require them to recruit a replacement SPOC before the person leaves the role</li> </ul>

### **DATA & EVIDENCE**

Challenge	Why it Happens	Impact	Practical Solutions
Poor data recording and sharing	Systems are not aligned, and staff often fear breaching data protection laws. There's limited training on how to record and use data effectively. The National Referral Mechanism (NRM) data published by the Home Office does not present local data and therefore does not show the full picture.	Modern slavery becomes invisible in local datasets, which limits funding, planning, and recognition of the issue.	<ul> <li>Develop clear Information Sharing Agreements (ISAs) with partners.</li> <li>Provide training on data protection and its relevance to safeguarding.</li> <li>Identify a team or lead responsible for championing data collection.</li> </ul>
Lack of evidence of the impact of modern slavery	Outcomes are difficult to measure in complex cases. Survivors may disengage or outcomes are not formally tracked.	It becomes difficult to make the case for additional resources or to demonstrate what's working.	<ul> <li>Incorporate survivor voice and lived experience panels into evaluation of how services are run.</li> <li>Share outcomes with partners and leadership to secure buy-in.</li> </ul>

# PREVENTION, DISRUPTION & COUNCIL SUPPLY CHAINS

Challenge	Why it Happens	Impact	Practical Solutions
Limited focus on perpetrator disruption or prosecutions	Focus tends to be on survivor support. Councils may lack knowledge or confidence about how to contribute to disruption efforts. Information is not always passed to the police.	Perpetrators operate with impunity. Patterns of abuse go unchallenged. Opportunities for safeguarding are missed.	<ul> <li>Encourage staff to flag patterns or concerns to Community Safety, Trading Standards, or Police.</li> <li>Invite law enforcement to safeguarding panels to encourage closer working.</li> </ul>
Modern slavery risks in council supply chains	Councils often lack dedicated procurement capacity to assess modern slavery risk. Modern slavery statements may be generic or outdated.	Councils may inadvertently be compliant in exploitative practices (e.g. in construction, cleaning, social care, waste management). Legal and reputational risks arise.	<ul> <li>Review and update modern slavery statements annually.</li> <li>Build supplier risk assessments and due diligence into procurement processes.</li> <li>Train procurement and commissioning staff on modern slavery risks and supplier red flags.</li> </ul>

#### **SURVIVOR VOICE & INVOLVEMENT**

Challenge	Why it Happens	Impact	Practical Solutions
Systems not designed with survivors in mind	The National Referral Mechanism (NRM) and wider support services can feel slow and unclear to survivors. Processes are rarely trauma-informed.	Survivors may disengage, become re-traumatised, or be lost to follow-up. Support staff also feel helpless or frustrated.	<ul> <li>Involve survivors in local authority training sessions, especially for teams like housing, adult social care, and safeguarding.</li> <li>Consult survivors when designing or reviewing local pathways and services (e.g., NRPF support, housing allocation).</li> <li>Include trauma-informed principles in all survivor-facing services.</li> </ul>
Outcomes don't reflect staff efforts	Not enough focus is put on long-term support after an NRM referral is made. There's little clarity on what happens after referral, or how decisions are made.	Staff experience burnout, demoralisation, and lose faith in the system. Survivors are left in limbo, feeling unsupported.	<ul> <li>Share positive case outcomes internally to recognise good practice</li> <li>Advocate for survivor involvement in local strategic boards or service reviews.</li> <li>Create feedback loops (anonymous if needed) where survivors can safely share their views on service delivery.</li> </ul>