

Modern slavery - Guidance overview

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This guidance supports policing [responders](#), [investigators](#), [supervisors](#) and [senior leaders](#) to:

- identify and safeguard victims of modern slavery and human trafficking (MSHT)
- identify suspects of MSHT offences
- understand the risks associated with MSHT incidents
- investigate MSHT incidents effectively
- disrupt those posing a threat of harm
- develop appropriate governance, training and partnerships to effectively support the force response to incidents of MSHT

MSHT is an umbrella term for slavery, servitude, forced or compulsory labour and human trafficking for the purposes of exploitation. It is classed as a serious and organised crime.

MSHT is included in the [Home Office serious and organised crime strategy](#). The Home Office has also produced [Modern slavery statutory guidance for England and Wales and non-statutory guidance for Scotland and Northern Ireland](#).

Further resources are available in the [policing slavery and human trafficking group](#) on Knowledge Hub (you will need to sign in), where guidance, debriefing and lessons learned are shared among enforcement agencies.

Modern Slavery Act 2015

The following requirements from the [Modern Slavery Act 2015](#) should be taken into account when using this APP. The act:

- enables courts to make a confiscation order under the [Proceeds of Crime Act 2002](#)
- enables courts to order a person convicted of a modern slavery offence to [pay reparation to their victim or victims](#) if a confiscation order has been made (go to the [Financial strategy](#) section of this APP for more information)

- makes provision for the [forfeiture](#) or [detention of land vehicle, ship or aircraft](#)
- explains how a person commits a human trafficking crime when they arrange or [facilitate travel of a person](#) with a view to exploiting them
- criminalises certain [preparatory conduct](#) – for example, making a visa application with the aim of bringing someone to the UK as a victim of MSHT
- introduces civil orders in the form of [slavery and trafficking prevention orders](#) (STPOs) and [slavery and trafficking risk orders](#) (STROs) to restrict the activity of those who present a threat of harm
- introduces a statutory defence for [victims of trafficking or slavery forced to commit a criminal offence](#)
- ensures that the police consider [special measures for use by victims when giving evidence at court](#)
- makes provision for [independent child trafficking guardians](#), previously known as independent child trafficking advocates
- establishes a legal duty for the police and other specified public authorities to [notify the Home Office where they have reasonable grounds to believe that a person may be a victim of MSHT](#)

For more information go to [Modern Slavery Act 2015 considerations](#).

Definitions and terms

- Alpha victim: A victim who is complicit in the exploitation of others, often out of survival and not out of choice. Alpha victims may:
 - have been given elements of responsibility by the suspect
 - intimidate or influence other victims
 - report back to the suspect
 - eventually become a suspect themselves
- County lines: Illegal drugs are transported from one area to another, often across police and local authority boundaries (although not exclusively). This is usually by children or vulnerable people who are coerced by individual offenders, organised crime groups (OCGs) or gangs. The 'county line' is the mobile phone line used to take the order for drugs.
- Cuckooed address: This is where the suspect will take over a local property, normally belonging to a vulnerable person, then use it to operate their criminal activity from.

- **Debt bondage:** Victims are tricked into working for little or no money to pay off a debt. This can be done by charging victims an excessive fee for visas and other travel documents, food, accommodation, tools and transport that is hard to pay back due to inflated interest. Faced with alleged debt claims from suspects, victims feel morally bound to work until debts are paid off.
- **Disruption:** Intentional police-led activity that interferes with an offender's networks, lifestyles and routines so it is harder for them to commit crime, or results in a reduction of a threat or vulnerability identified by the national control strategy (NCS).
- **Human trafficking:** An offence defined by [section 2 of the Modern Slavery Act 2015](#). For further information, go to the Crown Prosecution Service (CPS) guidance on [Modern slavery and human trafficking: offences and defences](#).
- **Organised crime group (OCG):** A group whose purpose, or one of its purposes, is to carry out criminal activities, consisting of three or more people who act – or agree to act – together to further that purpose.
- **Organised immigration crime (OIC):** A collective term for the activities of individuals and/or criminal networks that facilitate the illegal entry or arrival to, or exit from, the UK in contravention of immigration law. OIC also includes enabling an individual to remain in the UK by illegitimate means. For further information, see the National Police Chiefs' Council (NPCC) [Modern Slavery and Organised Immigration Crime](#) (MSOIC) programme.

Exploitation types

Victims of MSHT are exploited using [grooming tactics](#), force, coercion, control, deception, threats or other intimidating behaviour. For more information go to [types of modern slavery and human trafficking](#).

Children and vulnerable adults can still be victims of MSHT even if these forms of exploitation are not used, as their vulnerability can be exploited without the use of other tactics. The main types of MSHT, all of which are applicable to children and adult victims, are:

- slavery, servitude and forced or compulsory labour
- sexual exploitation
- criminal exploitation
- organ removal

Victims may be subject to more than one type of exploitation. For further information, go to the [Identifying and engaging with victims of MSHT section](#) of this APP. [Vulnerability-related risks guidelines](#) provide guidance on the signs and indicators of vulnerability-related risks.

Where MSHT victims may be encountered

Victims of MSHT can be encountered anywhere. This includes:

- where they live and sleep
- at work locations
- while being transported to and from work
- during police contact

Additionally, child victims of MSHT may be found during missing or truancy episodes, at schools or at railway stations.

Victims can also be encountered where an activity that enables the crime to be committed takes place, such as:

- banks for the opening of account
- job centres where national insurance (NI) registration interviews occur
- employment agencies where they are registered for work

Victims may also be found at hospitals, such as accident and emergency departments. Victims of labour exploitation may, for example, have injuries due to the lack of proper personal protection equipment. Victims of criminal exploitation may present with unexplained physical injuries.

Living and sleeping accommodation

Addresses where MSHT victims live and sleep can vary. For example, victims of labour exploitation can be found living in poor-quality [houses in multiple occupation](#) (HMOs) or where there are many people living in cramped sleeping quarters at the same time. MSHT victims may work in shifts. When they are working, other residents may be sleeping, which may give the appearance of fewer people living at the address. This is known as 'hot bedding'. Other examples are homeless shelters and travellers' sites. Victims of sexual exploitation may live where they work, so they may be isolated from other people. Children may reside in a care setting.

Work locations

Work locations may or may not be obvious. In relation to labour exploitation, the victim will typically be working in low-paid, unskilled, high-turnover or seasonal work. The victim may be working for a legitimate business. Work locations include:

- farms
- factories
- sweatshops
- construction sites
- restaurants
- cleaning companies
- car washes
- fishing fleets
- care homes and domiciliary care settings
- nail bars
- leafleting or charity bag collection
- recycling sites
- food processing
- hotels and hospitality
- warehouses
- delivery driving

In relation to sexual exploitation, victims may be encountered:

- at brothels
- at private residences
- at nightclubs
- at strip clubs
- at escort agencies
- at massage parlours
- in red light districts
- at hotels
- online – for example, recruitment agencies, adult pornographic sites, child abuse sites, adult service websites

Locations where victims of criminal exploitation may be found include:

- cannabis farms
- a cuckooed address
- on the streets – for example, when begging, dealing drugs or rough sleeping
- transport hubs, such as railway stations or bus terminals
- retail shops – for example, to carry out shoplifting
- in a town or region they have no connection to – for example, through county lines
- online at home

Domestic servitude is possibly the most hidden form of MSHT, occurring in private premises.

Victims may be encountered during visits to addresses, such as domestic abuse incidents, reports of concern for welfare, missing from home enquiries or any other reason.

Transporting victims

Victims of MSHT might be encountered while they are being transported to and from their place of work. This includes, for example, travelling on public transport, in vehicles when sexual exploitation victims are being transported between addresses, or to visit a customer to perform a requested service. They may also be encountered when the vehicle they are travelling in is stopped by the police or is involved in a road traffic collision.

Police contact

Victims of MSHT might be encountered on initial contact with the police – for example, via calls, visits to the police station or contact with operational officers carrying out their duties. They may also be identified in custody as a result of criminal activity. An individual may not disclose they are a victim of MSHT. Policing responders should use **professional curiosity** to help identify victims and understand the circumstances that brought about the encounter.

Identifying and engaging with victims of MSHT

Suspects target or create vulnerabilities to enable them to offend against the victim. It is essential that MSHT victims are recognised so that their needs can be met and the most appropriate actions can be taken.

For further information, go to:

- [Modern slavery statutory guidance for England and Wales and non-statutory guidance for Scotland and Northern Ireland](#)
- [Vulnerability-related risks guidelines – communication](#)

Victims may not want to disclose information or give their account of events for a number of reasons, such as mistrust of the police or fear of the suspect. Meeting their immediate welfare and health needs, as well as displaying a desire to listen, will help to build a trusting relationship. This will encourage the disclosure of information. It will also aid early understanding of safeguarding needs and the identification of evidential opportunities. [Vulnerability-related risk guidelines](#) provide guidance on communication skills to establish trust quickly and should be read alongside this APP.

Victims may show a range of complexities and behaviours, such as:

- fear
- reluctance to leave their situation due to [control methods](#)
- guilt and/or shame
- distrust of, or hostility towards, the police and/or partners
- unwilling involvement in crime
- being an [alpha victim](#)
- any form of trauma from exploitation, which can result from a sustained period of violence or cruelty
- withdrawn behaviour
- signs of self-harm
- disorientation
- inability or unwillingness to give an account of events – for example, if the suspect is present, they may be scared of the consequences of engaging with the police
- defence of the people exploiting them due to the dependency created by the exploiters
- not seeing themselves as victims

Alpha victims

Some suspects may present as victims but are actually alpha victims. Steps should be taken during the investigation to establish their participation in any offending. Alpha victims will still require support as a victim and continued assessment of their vulnerability. Early identification and management of alpha victims – for example, separating them from other victims, is essential so that other victims may be more willing to speak. The status of the victim should be continually assessed as part of the ongoing investigation.

Control methods

Suspects use control methods to engage or coerce vulnerable individuals into exploitative work or committing crime. This can also occur online. Suspects may use any of the examples listed, or any combination of them, to control victims.

Abuse

- Abducting or kidnapping victims.
- Committing verbal, physical, sexual and/or psychological abuse against the victim, their family or someone they know, in private or in public.
- Using threats and intimidation.
- Withdrawing or controlling basic provisions – for example, food, accommodation, sanitation or mobility.
- Withdrawing or removing the victim's freedoms or human rights.
- Increasing workload, resulting in no rest time or social activity.

Creating dependency

- Providing vulnerable victims with alcohol and/or drugs.
- Being the only source of food and accommodation.
- Retaining victim identification and legal documentation. Common examples include passports or birth certificates.
- Creating an imbalance of power in a perceived relationship between the suspect and victim.

Deception

- Presenting a false scenario in which the potential victim is convinced that they can improve the quality of their life and the lives of their family.
- Recruiting for non-existent jobs and education placements.

- Misrepresenting the job and work conditions – for example, women going abroad and believing they will be employed as domestic workers but being forced into sex work on arrival.
- Offering refuge with the intent to exploit.

Emotional control

- Threatening to harm or intimidate the victim, the victim's family or someone they know in the UK or in the victim's home country, unless they comply with the suspect's demands.
- Making victims believe they are colluding in illegal activities with suspects and are complicit in the offence.
- Instilling in victims a fear of possible deportation.
- Reinforcing to victims that they will not be believed if they approach UK authorities to make a report, creating fear and suspicion.
- Making victims feel attached to the family of the suspect or an OCG and 'adopting' them as a member of the family or OCG.
- Developing **inappropriate friendships** or intimate relationships with victims.
- Some suspects may:
 - marry women from abroad and transport them to the UK with a view to exploitation
 - perform spiritual practices to coerce victims into exploitation

Financial control

- Creating a debt bondage.
- Controlling access to victims' bank accounts.
- Managing wages so that victims are not sure what they are being paid and what fees are being deducted.
- Not keeping the victim informed about employees' rights and minimum wages.
- Reassuring victims that they will be paid a lump sum wage in the future that never occurs.
- Forcing victims to fraudulently access benefits.

Isolation

- Preventing victims from leaving their accommodation.
- Forcing victims to work and live in the same accommodation.
- Allowing very limited or no contact at all with victims' families, other victims, work colleagues, the local community or those in the locality of the same nationality.

- Frequently changing the victim's work and living location.
- Removing any aspect of social activity or rest time, so that victims spend their days either working or sleeping.
- Denying or controlling victims' access to a telephone, mobile or the internet.

Vulnerability factors

Suspects target or create vulnerabilities in victims, such as:

- homelessness
- uncertain or insecure immigration status
- unaccompanied asylum-seeking or migrant children
- poverty or financial difficulties
- debt bondage
- alcohol and/or drug dependency
- poor education or exclusion from the education setting
- mental health or learning difficulties
- **neurodivergence**
- disability
- limited employment opportunities
- troubled or unstable family background – this includes children in care settings
- victim is a child or young person
- language barriers
- criminal convictions
- being a victim of certain crimes – for example, a domestic abuse victim

For further information on unaccompanied asylum-seeking or migrant children, go to:

- **[Operation Innerste process guidance](#)**
- **[Care of unaccompanied migrant children and child victims of modern slavery – Statutory guidance for local authorities](#)**
- **[Refugee Council](#)**

Signs of MSHT

The relationship between the victim and suspect can be built up over time and through repeated encounters, continuing until the victim is removed from their exploitative environment. The exploitation could be subtle at first and not recognised by the victim. The victim may be slowly controlled by the suspect, physically and psychologically. The victim may not be able to remove themselves from this situation for a number of reasons, such as previous traumas they have experienced, being a child or an inability to see a way out of it.

Victims may be subject to more than one type of exploitation, so they may display several signs of MSHT, which are detailed below and based on practitioner experience. Not all signs need to be present for a person to be a potential victim.

Restricted freedom

- Closely monitored, directed or controlled by dominant members of an OCG or suspect. Allows others to speak for them when addressed directly.
- Physically unable to, or feel they cannot, leave their situation due to the control methods used.
- False identity or travel documents and/or not in possession of their passports or other travel or identity documents.
- Afraid of revealing their immigration status.
- Limited or no access to medical care.
- Limited or no contact with their families or with people outside their immediate environment.
- Unknown to local authorities and service providers – for example, health, education and housing.
- History with unexplained changes of address or moving location.
- Depend on the suspect for work, transportation, accommodation, food and clothing.
- Discouraged from involvement in education or learning English and working outside the home.

Behaviour

- Recite stories that suspects have forced them to learn when approached by authorities, leading to interviews with errors and a lack of credibility.
- Display challenging physical, verbal behaviour or **hypervigilance**.
- Frequently missing or absent from school.
- Increased use of online chat rooms or dating sites.
- Show signs of depression, psychosis, suicidal behaviour and/or anxiety.
- Fearful or mistrustful of authorities, including the police, as victims may have been convinced by the suspect that authorities are not to be trusted.

- Unfamiliar with freedom or lifestyle choices – for example, hours worked or living conditions.
- Poor understanding of English in written or spoken format.
- Reluctant to give details of accommodation.
- Appear to take the side of the suspect.
- Not know their home or work address.
- Convictions for minor offences from different locations across the UK, which can be linked to the exploitation.
- Participate in the activities of OCGs.
- Produce, carry and/or sell illicit drugs.
- Travel with an OCG with only a few accompanying adults.
- Travel alone to a town or city they have no connection with.
- Unable to negotiate working conditions.
- Never leaving the work premises without the suspect and being subject to security measures designed to keep them on work premises.
- Unfamiliar with their rights – for example, in relation to a spousal visa.

In particular, victims of sexual exploitation may:

- be required to wear certain clothing or pretend to be a different nationality as a result of demands from the offender
- be pregnant and/or visiting pregnancy advisory services
- move from one brothel to the next, or work or live in various locations

Finances

- Little or no access to their earnings or cash of their own.
- Had the fees for their transport to the country of destination paid for by facilitators, whom they must pay back by working or providing services.
- Charged excessively for accommodation, food and travel directly from their wages.
- Appear to have had their identities hijacked and used in state benefit or other types of fraud without their knowledge.
- Financially exploited – for example, diversion of benefits and carer allowance.
- Not have labour contracts or payslips.
- In low-paid, low-skilled and undesirable work. They may lack basic training and professional licences.

- In receipt of unexpected amounts of money, gift vouchers or gaming credits.

Appearances

- Very few items of clothing or luggage.
- Signs of physical neglect – for example, malnourishment, poor health and poor personal hygiene.
- Signs of injuries typical of certain jobs or control measures, or directly the result of assault.
- Signs of substance dependence – for example, alcohol and/or drugs.
- Not dress adequately for the work they do – for example, lacking protective equipment or warm clothing.
- Suspicious or unexplained scars that could relate to organ removal.
- For children, trying to look older than they are as a result of demands from the offender.
- Wearing clothes or footwear of high value or in possession of other high value items.

Accommodation

- Have a pattern of street homelessness.
- Eat apart from the suspect and eat leftovers.
- Live or travel in a group, sometimes with other women or men who do not speak the same language and/or with people who are not relatives whom they do not know or have any obvious relationship.
- Live in overcrowded, unhygienic, degraded and unsuitable places, such as HMOs, agricultural or industrial buildings, outbuildings or adapted accommodation.

Accounts of exploitation

- Disclose experience of exploitation, being forced into sex work, criminality, begging, labour exploitation and/or domestic servitude, organ, human tissue or blood harvesting.
- Include details of exploitation and abuse in their country of origin and on their journey to the UK.
- Disclose details of being bought and sold.
- Involved in survival offending – for example, pickpocketing, shoplifting.
- Not give an account that is linear or chronological.
- Suspect controls the victim's:
 - passport, visa and other documents
 - finances
 - valuable belongings, often wedding gold

- movements during medical appointments
 - decisions around pregnancy – either encouraged or discouraged and, in some cases, forced or attempted termination of pregnancy
 - phone access
 - clothing
 - food
 - relationships – for example, threats of leaving a marriage bringing dishonour to the family
 - movement outside the home and accompanied if going outside
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- Be punished if they do not collect or steal enough.
 - Required to do all household chores for multiple family members.
 - Used as a carer for older, younger or disabled family members.
 - Experience physical and/or sexual abuse as punishment and control.
 - Experience verbal abuse, including name calling to demean.
 - Threatened with deportation.
 - May be in [receipt of gifts](#) or in possession of expensive items.

Child victims of exploitation

A child is any person below 18 years of age. [Child exploitation](#) is child abuse. When engaging with a child victim of exploitation, child protection procedures and [Investigating child abuse and safeguarding children APP](#) should be followed. Child victims may be encountered in a variety of situations and are often subject to multiple types of exploitation. Child exploitation does not always involve physical contact. It can also occur through the use of technology. Child exploitation offending under the [Modern Slavery Act 2015](#) occurs where a child is a victim of one, or more, of the following.

- Slavery, servitude, or forced or compulsory labour and where the child is trafficked with a view to exploiting them.
- Sexual exploitation – for example, they are trafficked with a view to them being exploited as either:
 - a victim of an offence in section 1(1)(a) of the [Protection of Children Act 1978](#) (indecent photographs of children), under sections 2(1) and 3(3)(a)(1) of the Modern Slavery Act 2015
 - a victim of an offence in Part 1 of the [Sexual Offences Act 2003](#), under sections 2(1) and 3(3)(a)(2) of the Modern Slavery Act 2015

- Criminal exploitation – for example, they are trafficked with a view to them being forced to commit a criminal offence, such as begging or shoplifting, in the cultivation of drugs, and county lines drug dealing due to their exploitation.

Child exploitation can also be encountered in the following situations:

- **county lines** where children will often be found travelling in private cars, taxis, trains and buses to locations, or being found in areas they have no obvious connections with
- public places and/or cuckooed addresses
- their placement in care homes
- missing from care or missing from home enquiries
- being in a **private fostering arrangement**, which is when a child under 16 years of age (under 18 if the child is disabled) is cared for by a person who is not their parent or a close relative

Tags

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