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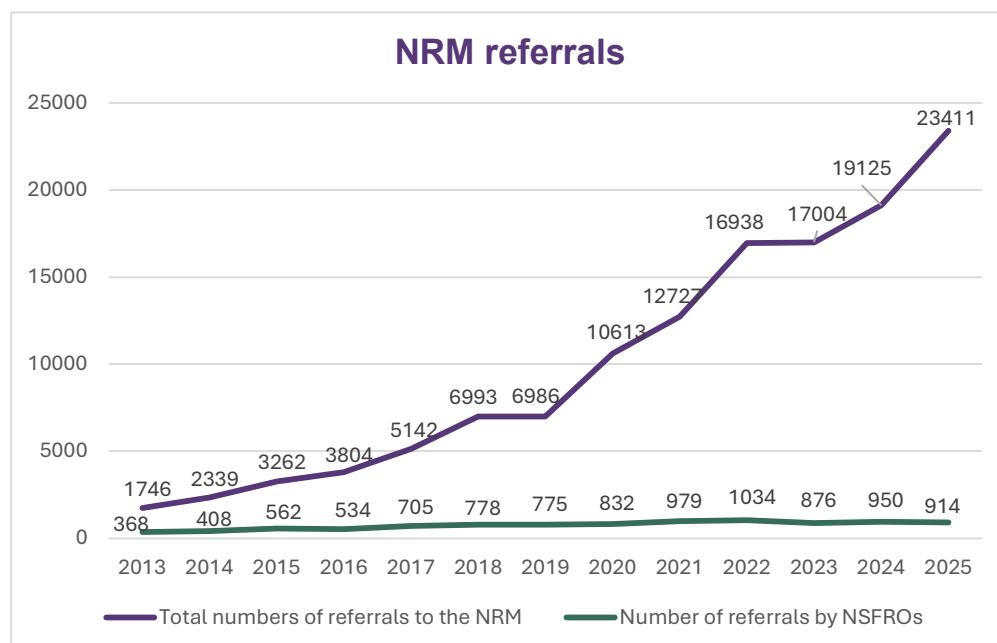
Briefing: First Responders & Ensuring Victims of Modern Slavery Can Access Support

Only specifically authorised First Responder Organisations (FROs) can refer potential victims of human trafficking and modern slavery in the National Referral Mechanism (NRM) to be identified and supported. Neither an individual, a legal representative, nor an organisation supporting a potential victim can make a referral unless they are specifically designated as an FRO. Instead, they must rely on an FRO to make the referral.

There are statutory and non-statutory FROs:

- The **statutory FROs** are:
 - police forces
 - certain parts of the Home Office:
 - UK Visas and Immigration
 - Border Force
 - Immigration Enforcement
 - National Crime Agency
 - local authorities
 - Fair Work Agency (FWA)
- **Non-statutory FROs (NSFROs)** tend to be NGOs and third sector organisations with an expertise in:
 - modern slavery and human trafficking as a whole
 - specific types of modern slavery
 - types of victims who are susceptible to modern slavery and human trafficking

The number of NRM referrals has increased year on year, and while the number of referrals made by NSFROs has also increased, it has been unable to keep up with the rise in overall referrals.



	Total numbers of referrals to the NRM	Number of referrals by NSFROs	% of referrals by NSFROs	Number of NSFROs that made referrals
2013	1746	368	21.08	11
2014	2339	408	17.44	12
2015	3262	562	17.23	13
2016	3804	534	14.04	15
2017	5142	705	13.71	11
2018	6993	778	11.13	11
2019	6986	775	11.09	12
2020	10613	832	7.84	9
2021	12727	979	7.69	10
2022	16938	1034	6.10	11
2023	17004	876	5.15	11
2024	19125	950	4.97	11
2025	23411	914	3.90	12

The number of NSFROs in the UK has not kept up with the increasing demand for references into the NRM.

In 2013, NSFROs referrals accounted for **21%** of total referrals.

In 2019, they accounted for **11%**.

In 2025, they accounted only for **4%**.

The Home Office ran a pilot from 2015 to 2017 to test proposed amendments to – in part – the NRM referral system.² However, no updates to the Home Office's policy on reviewing the need for new NSFROs have been made following the pilot's evaluation.

Organisations that support potential victims report that **many survivors are afraid of public authorities**, that they worry that statutory FROs will prioritise criminal investigations over the survivor's safety, and that these FROs might have information sharing policies with other Government bodies.³ These organisations find that their service users are **better served with referrals by NSFROs**.⁴

Referrals made by NSFROs are more likely to get positive decisions in the NRM. This suggests higher quality referrals and support to gather evidence provided to potential victims.

Between Q2 2025 and Q2 2026, **referrals made by NSFROs received a positive Reasonable Grounds decision in 81% of cases**, while the rate of positive decisions for referrals by Local Authorities was 73%, 62% for police referrals, and 47% for the other Government agencies.⁵

A recent study of negative Conclusive Grounds (CG) decisions in the NRM found that “*people referred to the NRM by a Government Agency were 1.53 times more likely to be given a negative CG decision for insufficient information compared to referrals made by NGOs and third sector organisations. The FRO responsible for making a referral is highly relevant to difficulties in the provision of information and evidence for making CG decisions.*”⁶ (emphasis added)

Higher quality referrals also make the job of NRM decisionmakers easier and faster, and thus they lead to a **more efficient use of taxpayer money** as they cut down on the need for reconsiderations.

However, many of these **organisations report a lack of capacity of NSFROs**, leading to potential victims being turned away, and in many cases, **giving up looking for an FRO**.⁷

NSFRO capacity continues to be an urgent concern, and this impedes effective identification of and access to support for survivors of modern slavery.

¹ Data extracted from each of the end-of-year summary reports of NRM data from 2013 to 2025. The reports for 2013 to 2018 are available on the NCA website, and the reports for 2019 to 2025 are taken from the Home Office's NRM statistics.

² Home Office, 2017, “An evaluation of the National Referral Mechanism pilot - Research Report 94”, available at: <https://assets.publishing.service.gov.uk/media/5a81fa8be5274a2e87dc081a/evaluation-national-referral-mechanism-pilot-horr94.pdf>

³ The Anti-Trafficking Monitoring Group, 2024, “Non-Statutory First Responder Capacity: 2024 Briefing and Analysis”, available at: <https://www.kalayaan.org.uk/wp-content/uploads/2026/09/Briefing-Non-statutory-First-Responder-capacity.pdf>

⁴ They note that NSFROs offer a comfortable and survivor-centred environment and submit higher quality referrals to the NRM. See page 2, Ibid.

⁵ Home Office, Modern Slavery Research & Analysis. (2026). National Referral Mechanism and Duty to Notify Statistics, 2014-2026. [data collection]. 22nd Edition. UK Data Service. SN: 8910, DOI: <http://doi.org/10.5255/UKDA-SN-8910-22>

⁶ Modern Slavery & Human Rights Policy & Evidence Centre, 2025, “Seeing beyond the negative”, page 18, available at: https://files.modernslaverypec.org/production/assets/downloads/MSPEC_IOM_report_FINAL-full-report.pdf?dm=1762445798

⁷ The Anti-Trafficking Monitoring Group, 2024, “Non-Statutory First Responder Capacity: 2024 Briefing and Analysis”, page 8, available at: <https://www.kalayaan.org.uk/wp-content/uploads/2026/09/Briefing-Non-statutory-First-Responder-capacity.pdf>

The sector⁸ has long called for the number of available independent NSFROs to be increased through an open tender and transparent application process,⁹ in order to deal with an increased demand for referrals and to reduce a 'post code lottery' for access to support for survivors of modern slavery and to reduce stigma in referrals.¹⁰

Geographic and Exploitation Type Gaps and High-Quality Training

High-quality, specialised, staff **training for FROs is integral to successful victim identification**, ensuring better quality decisions. Statutory and non-statutory FROs as well as non-first responder organisations have expressed that there are serious gaps in first responder training provision.¹¹ In fact, many officers within statutory FROs are unaware that they are first responders, making Home Office toolkits and information hubs alone ineffective.¹²

Notably, not all FROs are equipped to identify every exploitation type, let alone provide the information required by decision-makers to effectively identify the victim as such.¹³ Recruiting more NSFROs with the required geographic remit and expertise in the less understood exploitation types, in addition to ensuring high-quality specialist training for FROs, would help address both geographic and exploitation type needs.

Further Resources for Non-Statutory First Responder Organisations

The capacity issues faced by FROs also highlight their lack of resources to make enough referrals to keep up with the increased number of survivors needing referrals. Accordingly, there have been many calls for further allocation of resources for NSFROs to enable survivors to access identification and support through the NRM.¹⁴

RECOMMENDATIONS

- **Support amendment NC25:** The Home Office must review and formally consider **recruiting more NSFROs** to help keep up with demand and ensure that survivors can access support.
- **Support amendment NC26:** The Home Office must **review and report on the training and guidance provided to FROs** to ensure that all FROs are able to correctly identify and refer potential victims of trafficking and modern slavery.
- **Support amendment NC27:** The Home Office must review the **resourcing of NSFROs** and consider increasing support to ensure effective and efficient NSFROs capacity.

For more information, please contact Sophie Levack, Immigration Lawyer & Policy Officer at Kalayaan: sophie@kalayaan.org.uk

⁸ See Recommendation 2 'Increase the number of organisations which currently have the status of First Responders' page. 77, "Wrong kind of victim? One year on: an analysis of UK measures to protect trafficked persons", ATMG, June 2010, available at: <https://www.ecpat.org.uk/Handlers/Download.ashx?IDMF=9b1a0aa4-8645-4d61-ade8-e5e7257ddc98>

⁹ Kalayaan, BAWSO, Medaille Trust, Migrant Help, The Salvation Army, TARA, Unseen, 2024, "Joint Statement: Non-statutory First Responders Capacity and Resources", available at: <https://www.kalayaan.org.uk/library/joint-statement-non-statutory-first-responder-capacity-and-resources/>

¹⁰ See pages 19 and 30 of "Decade of Dignity: A Strategic Vision for Eradicating Modern Slavery in the UK", April 2026. Contributors: Anti-Slavery International, Action for Children, Alliance for Youth Justice, Anti-Trafficking Monitoring Group (ATMG), Anti-Trafficking and Labour Exploitation Unit (ATLEU), Catch22, ECPAT UK, Focus on Labour Exploitation, Hestia, Hope for Justice, Human Trafficking Foundation, Justice & Care, NWG Network, The Anti-Slavery Collective, The Children's Society, The Salvation Army, The Snowdrop Project, Unseen. Signatories: AFRUCA Safeguarding Children, BASNET (UK BME Anti Slavery Network), Caritas Bakhita House, Ella's, Helen Bamber Foundation, Hope at Home, Latin American Women's Rights Service, Palm Cove Society, Shpresa Programme, Sophie Hayes Foundation, The Medaille Trust, The Passage, available at: <https://www.antislavery.org/wp-content/uploads/2026/04/Decade-of-Dignity-Report-April-2026.pdf>

¹¹ Home Office, Updated 2026, "Identification of victims of modern slavery call for evidence: findings", available at: <https://www.gov.uk/government/calls-for-evidence/identification-of-victims-of-modern-slavery/outcome/identification-of-victims-of-modern-slavery-call-for-evidence-summary-of-responses#summary-and-methodology:-text=Participants%20across%20workshops%20suggested%20there%20were%20significant%20gaps%20in%20training%20provision>

¹² Written Evidence submitted by The Snowdrop Project (HUM0031), March 2023, paras. 12.3 and 12.4, available at: <https://committees.parliament.uk/writtenevidence/119334/pdf/>

¹³ The 4th highest recorded exploitation type for the period 2020-2024 was 'not specified or unknown' (UKDS NRM). See page 23 of "Seeing beyond the negative", 2025: "Many people are being referred to the NRM by first responders who appear not to have been able to recognise the type of exploitation the person may have experienced as consistent within those expansive categories." Available at: https://files.modernslaverypec.org/production/assets/downloads/MSPEC_IOM_report_FINAL-full-report.pdf?dm=1762445798

¹⁴ Kalayaan, BAWSO, Medaille Trust, Migrant Help, The Salvation Army, TARA, Unseen, 2024, "Joint Statement: Non-statutory First Responders Capacity and Resources", available at: <https://www.kalayaan.org.uk/library/joint-statement-non-statutory-first-responder-capacity-and-resources/>