

# NORFOLK ANTI-SLAVERY NETWORK STRATEGY 2025 -2028

Working together to address Modern Slavery and Human Trafficking

## FOREWORD

This is a pivotal moment in the battle against modern slavery in our county, with the publication of Norfolk's first ever multi-agency Anti-Slavery Strategy. Developed by the Norfolk Anti-Slavery Network (NASN) on behalf of Norfolk Community Safety Partnership, the strategy is the culmination of over twelve months of collective and coordinated action by partners.

Modern Slavery and Human Trafficking in Norfolk is more prevalent than many realise and is having a devastating impact on people's lives and affecting our communities, businesses, institutions, and values. Hence, safe communities, free from modern slavery and human trafficking is an absolute priority.

Tackling exploitation and supporting those affected to overcome the trauma of their experiences will be extremely challenging, but in Norfolk we have a strong Community Safety Partnership, expert groups, individual organisations, and local communities who work tirelessly to tackle this issue.

NASN's Modern Slavery Strategy 2025 builds upon our previous success and demonstrates the Community Safety Partnership's continued commitment to tackling modern slavery. Norfolk has made great progress in meeting the objectives set in the government's Modern Slavery Strategy 2014 with tangible results and successful prosecutions to those committing Modern Slavery offences.

And we plan to continue this success by working together and harnessing passion and commitment to make exploitation, trafficking and slavery, truly a thing of the past.

Yours sincerely,

Dr Gavin Thompson

Director – Policy, Commissioning and Communications, Office of Police and Crime  
Commissioner and Norfolk Anti-Slavery Network Chair

## INTRODUCTION

Modern Slavery and Human Trafficking (MSHT) is a hidden crime, where victims are concealed in plain sight<sup>1</sup> and perpetrators practice elusively to remain undetected.

Criminals target and exploit vulnerability and isolation, deprivation, homelessness, mental ill health, substance misuse, age and learning disabilities can all increase the risk of exploitation.

In 2023 the Home Office received nearly 22,000 notifications of potential victims of MSHT<sup>2</sup>, a crime that has a devastating impact on victims, their families, neighbours and wider communities.

No matter who you are or where you come from, we all deserve to live healthy, active and fulfilling lives free from exploitation and harm.

A significant problem is that victims often do not recognise or regard themselves as victims of 'modern slavery'. Professionals understanding and knowledge of modern slavery further impacts the problem. NASN must act to address this.

Eradicating MSHT is a high priority, and partners must work together locally, nationally and internationally to safeguard victims, protect vulnerable people and implement successful preventative activity.

We therefore plan over the next three years to co-ordinate the work of individual organisations across the partnership to put victims of MSHT at the heart of operations, improve victim identification, survivor support and pursue prosecution of perpetrators.

The Networks four priorities are therefore:

- Identification of victims.
- Protection and empowerment of people at risk.
- Support, equip and enable our workforces to respond as a whole-system approach to MSHT.
- Prevention through sharing a joint understanding of drivers and scale across strategic partnerships.

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<sup>1</sup> GOV.UK (2024) [Modern Slavery Training: Resource Page](#)

<sup>2</sup> GOV.UK (2024) [Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2023](#)

## DEFINING MODERN SLAVERY AND HUMAN TRAFFICKING

This strategy adopts the definition of MSHT used by the UK Crown Prosecution Service<sup>3</sup> and the United Nations...<sup>4</sup>

"Trafficking in persons shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control of another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation or the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or removal of organs."

In cases of Modern Slavery and Human Trafficking victim consent is no defence<sup>56</sup>. By law a person cannot consent to their own exploitation. A person cannot be treated as a commodity no matter how they view it themselves. Exploitation is unlawful, dehumanising and must be stopped.

## KEY POINTS OF DEFINITION

**The Act:** recruitment, transport, transfer, harbouring or receipt of persons.

**The Means:** the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability, or of the giving or receiving of payments or benefits to achieve the consent of a person having control of another person.

**The Purpose:** for sexual exploitation, forced labour, forced criminality, domestic servitude and/or organ harvesting.

An adult will need to demonstrate some aspects within all three of these elements (The Act, The Means, The Purpose) to be defined as a potential victim of MSHT.

The trafficking of children is a process that comprises elements of only of The Act and The Purpose.

A child is considered aged under 18. All potential victims of MSHT under the age of 18 must be referred to the Child Safeguarding team urgently to be managed under Child Protection procedures.

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<sup>3</sup> [UK Criminal Prosecution Service \(6th July 2022\). Modern Slavery, Human Trafficking and Smuggling](#)

<sup>4</sup> [United Nations Office of the High Commissioner for Human Rights \(UN\). \(15th Nov 2000\). Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime](#)

<sup>5</sup> [OHCHR \(2000\). Section 3, Palermo Protocol](#)

<sup>6</sup> [Modern Slavery Act 2015. Section 1](#)

# MODERN SLAVERY AND HUMAN TRAFFICKING IN NORFOLK

## Why is MSHT a priority?

MSHT has a devastating impact on victims. It is a threat to safety, damaging to the stability and resilience of communities and costly to society. A multi-agency approach is essential to understand the ever-changing nature of this hidden crime, identify and respond to victims and focus on prevention and diversion tactics, which are informed by evidence.

## Statutory requirements for Agencies and Public Authorities

The Independent Anti-Slavery Commissioner's Office, created under part 4 of the Modern Slavery Act 2015 has a UK-wide remit to encourage good practice in the prevention, detection, investigation, and prosecution of modern slavery offences. Under the Modern Slavery Act Statutory agencies<sup>7</sup> (NHS, Police, Local Authorities and Immigration Agencies) have a duty to co-operate with the Commissioner<sup>8</sup>.

Public Authorities in England and Wales, specified in section 52 of the Modern Slavery Act 2015, have a statutory Duty to Notify the Home Office when they come across potential victims of modern slavery either through referring a potential victim into the National Referral Mechanism (NRM) where they are a child or consenting adult, or by notifying the Home Office where an adult does not consent to enter the NRM using the Modern Slavery Portal.

Public Authorities include:

Police, British Transport Police Force, National Crime Agency, a county council, a county borough council, a district council, the Gangmasters Licensing Authority.

## How are these requirements being met?

Partners in Norfolk are meeting the statutory and mandatory requirements through active participation and membership to the Norfolk Anti-Slavery Network to ensure informed alignment to current policy and statutory guidance in matters concerning MSHT in the UK.

In Norfolk, the team supporting the Norfolk Community Safety Partnership and the Norfolk Anti-Slavery Network are part of the Office of the Police and Crime Commissioner for Norfolk (OPCCN). This network coordinates and supports Norfolk's partnership response to MSHT.

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<sup>7</sup> Gov.UK. (2024) 1.7 Who this guidance is for, Modern Slavery: Statutory Guidance for England and Wales (under s49 of the Modern Slavery Act 2015) and Non-Statutory Guidance for Scotland and Northern Ireland

<sup>8</sup> Independent Anti-Slavery Commissioner (2022)

## RESPONDING TO MODERN SLAVERY AND HUMAN TRAFFICKING

When an individual is identified as being a potential victim of MSHT the first priority is to safeguard. In addition, they can be referred in The National Referral Mechanism (NRM). This is a framework for identification and referral of potential victims of MSHT by a relevant competent authority ensuring they receive specialist support.

Only selected governmental and non-governmental agents can do this and they are called First Responders<sup>9</sup>.

### Who are the First Responders?

In England these are: Police forces, parts of the Home Office, UK Visas and Immigration, Border Force, Immigration Enforcement, National Crime Agency, Local Authorities, Gangmasters and Labour Abuse Authority (GLAA), Salvation Army, Migrant Help, Medaille Trust, Kalayaan, Barnardo's, Unseen, NSPCC (CTAC), BAWSO, New Pathways, Refugee Council.

MSHT is a complex crime and may involve multiple forms of exploitation. An individual could have been a victim of human trafficking and/or slavery, servitude and forced or compulsory labour, forced criminality and more.

Victims may not recognise that they are being trafficked or exploited.

A person cannot be considered to have consented to being exploited where consent was obtained through improper means or, in the case of children, where their particularly vulnerable status makes it impossible for them to consent in the first place.

A First Responder does not need to be certain that someone is a victim of MSHT.

## TRAUMA-INFORMED PRACTICE AS PART OF SYSTEMS LEADERSHIP

[Helen Bamber Foundation \(2022\) Trauma Informed Code of Conduct:](#)

- Victims of MSHT have experienced a traumatic past, professional engagement is an opportunity to secure a recovery as well as establish long-term stability.
- Some groups are more susceptible to becoming victims of modern slavery, recognising vulnerabilities and understanding the individual will help identify them as victims.
- Victims may experience post-traumatic stress disorder; practitioners have a responsibility to train in this area.
- Many potential victims have an increased risk to go missing or return to their traffickers and be re-trafficked.

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<sup>9</sup> [Gov.UK \(2024\) National referral mechanism guidance: adult \(England and Wales\)](#)

## LINKS TO OTHER PARTNERSHIPS

As acknowledged by the Government's Modern Slavery Strategy (2014) there are already coordinated works underway at a national and local level, linking MSHT prevention to addressing the risk and protective factors<sup>10</sup>. Existing arrangements include...

- Norfolk Community Safety Partnership subgroups, including the Domestic Abuse and Sexual Violence Group and the Community Relations and Prevent Strategic Group.
- The Norfolk Health and Wellbeing Board including the Norfolk Drug and Alcohol Partnership.
- Norfolk Children Safeguarding Partnership including the Vulnerable Adolescent Group.
- Children and Young People Strategic Alliance.
- Norfolk Safeguarding Adult Board.
- Local Criminal Justice Board.
- Norfolk Youth Justice Board.
- Local Organised Crime Group.

The NCSP maintains strong interworking between existing partnerships to develop the response to MSHT.

Relationships with safeguarding arrangements are maintained through the Norfolk Anti-Slavery Network Group and reciprocal membership on safeguarding groups and through the NCSP.

There are also many other non-statutory partnership groups and boards within Norfolk. The implementation and delivery of The Modern Slavery Strategy must continue to capitalise on the existing strength, resource and expertise these provide to maximise effectiveness, support existing arrangements and avoid duplication.

This strategy sits alongside and complements existing strategic partnership strategies which operate in this space and considers learning from relevant national and local thematic reviews and guidance.

Norfolk	Nationally
The Police, Crime and Community Safety Plan 2025-28 (PCC)	Independent Anti-Slavery Commissioner's Annual Report 2021-2022
The Safer Norfolk Plan (Norfolk Community Safety Partnership Strategy) 2025-28	HM Government, Modern Slavery Strategy 2014
The Serious Violence Strategy (NCSP)	HM Government, Serious Violence Strategy April 2018

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<sup>10</sup> [Gov.UK \(2014\) 3.9 Modern Slavery Strategy](#)

The Domestic Abuse Strategy (NCSP)	HM Government, Tackling violence against women and girls 2021
The Sexual Violence Strategy (NCSP)	Home Office, Tackling Domestic Abuse Plan 2022
The Vulnerable Adolescent Strategy (Norfolk Safeguarding Children Partnership)	Modern Slavery: Statutory Guidance for England and Wales (under s49 of the Modern Slavery Act 2015)
The Flourishing in Norfolk Strategy (Children and Young People Strategic Alliance)	Independent Anti- Slavery Commissioner Strategic Plan 2024-2026

# NORFOLK ANTI-SLAVERY NETWORK

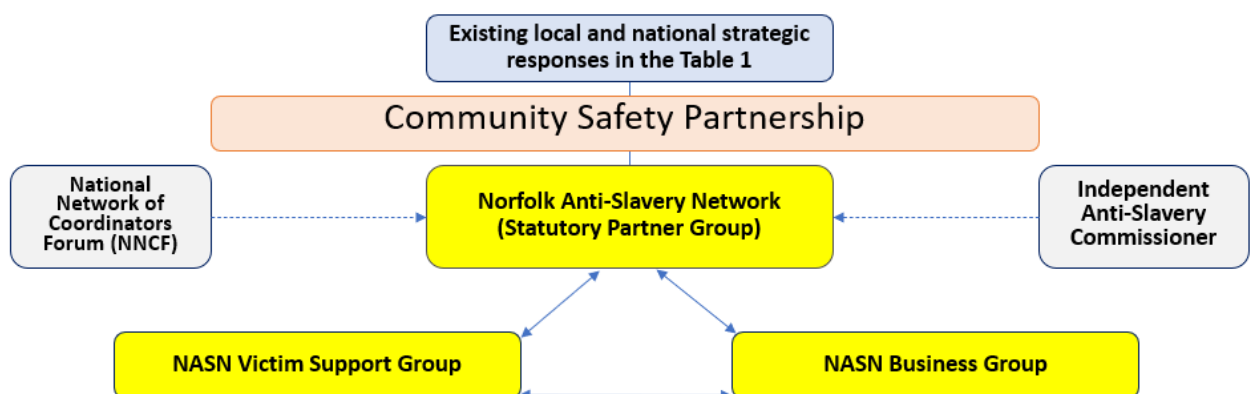
## WHAT IS THE NORFOLK ANTI-SLAVERY NETWORK?

NASN comprises representatives from key stakeholders including local authorities, public services, civil bodies, and corporate sectors.

The main group meets quarterly and consists of statutory agencies that feed into subsidiary groups; The Victim Support Group and The Business Group with the purpose of providing strategic leadership and direction on the implementation of the Modern Slavery Act 2015 Section 49 Statutory Guidance<sup>11</sup> and Section 54 Transparency in supply chains etc<sup>12</sup>.

### Our purpose:

The Norfolk Anti-Slavery Network is a strategic partnership of organisations that represent all sectors of Norfolk, public, civil and corporate committed to tackling Modern Slavery and Human Trafficking by identifying and supporting victims and challenging perpetrators through prosecution or disruption.



The Norfolk Community Safety Partnership is independently scrutinised quarterly by the NCSP Scrutiny Sub Panel, the membership of which consists of Councillors from Norfolk County Council and each of the tier two local authorities.

## Priorities and objectives of NASN

Identification of victims:

- Recognising a potential victim of MSHT as per statutory guidance (Oct 2023)
- Increase awareness of MSHT through key stakeholders, public and professionals

<sup>11</sup> Gov.UK. (2024) Modern Slavery: statutory guidance for England and Wales

<sup>12</sup> UK Legislation (2015) Section 54. Transparency in Supply Chains etc, Modern Slavery Act 2015



Protection of vulnerable people, victim support and empowerment:

- Intervene early to reduce vulnerability.
- Proactively and collectively respond to challenges to ensure a consistent standard of survivor support across Norfolk.
- Ensure the voice of the victim is heard and they are supported to recover.

Support, equip and enable our workforces to respond as a whole-system approach to MSHT:

- Supply training for partners in raising awareness, improve reporting, MSHT resilience and Prevention, response and Protection.
- Promoting supportive relationships between statutory, non-statutory, charitable and 3rd sector agencies across Norfolk.
- Facilitate the sharing of good practice between anti-slavery partnerships across the UK and avoid duplication of work wherever possible.

Focus on prevention through sharing a joint understanding of the scale of the problem across strategic partnerships:

- Identify new trends and patterns of modern slavery and human trafficking and share this intelligence with key local partners (law enforcement, statutory agencies) where appropriate.
- Ensure Norfolk partners are informed of legislation, policies, developments, initiatives and best practice relating to modern slavery and human trafficking responses.

Norfolk Anti-Slavery Network (Statutory Group) Partner Agencies:

- Office of Police and Crime Commissioner Norfolk
- Norfolk Constabulary
- East of England Ambulance Service
- Norfolk Fire Service
- HMP Prisons and Probation Service
- Integrated Care Board
- Primary Care Network
- NHS Acute Trusts
- Gangmaster Labour and Abuse Authority (GLAA)
- Eastern Region Serious Organised Crime
- Immigration and Border Force
- Norfolk Adult Safeguarding Board
- Norfolk Children's Services
- Trading Standards
- Department of Work and Pensions
- St Giles Trust

- Salvation Army
- Migrant Help
- Local Authority Single Point of Contact for Seven District Councils representing Housing, Environment, Community Safety and Food.
- Norfolk Safeguarding Children Partnership
- Norfolk County Council People from Abroad
- Home Office (SCA)

## **STRATEGIC OVERVIEW**

The NASN will continue to deliver its strategy using an evidence-led approach, with activities to deliver on the priorities. This will build on the significant activities delivered locally and nationally through 2025 - 2028 by the partnership.

The development of the first Norfolk Anti-Slavery Strategy was created in partnership with statutory, non-statutory and corporate members of the Norfolk Anti-Slavery Network representing organisations across Norfolk. Consultation guided the formation of the Strategy and shaped future governance and structure of the Norfolk Anti-Slavery Network.

Contributors also participated in the Management of Risk in Law Enforcement (MoRiLE) 2024 discussing the challenges Norfolk faces and feedback on how we can make our partnership approach to Modern Slavery consistent, innovative and unyielding.

## **IMPLEMENTATION**

- Organisations to publish their annual statement setting out the steps they take to prevent modern slavery in their business and their supply chains. This is a requirement under section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015.
- Current and relevant web presence which supports all key stakeholders including professionals and businesses on information regarding MSHT.
- Provision of countywide resources and expertise for local stakeholders and councils.
- Presentations and training delivered to safeguarding and strategic leaders in the county, first responders, businesses the housing sector and all criminal justice agencies.
- Creation of referral pathways for children and adults affected by MSHT.
- Establishment of a Victim Support Services group and Business Group to explore resources and opportunities for joint-working.

**Using Data:** We use the latest data to direct resource allocation and prioritise our actions. We share data with our partners and facilitate an information sharing platform between Public, Civil and Commercial partners. We do this through many activities, not least being regular engagement with other partnerships. This helps to remain informed and ahead of

current trends and analysis in areas that crossover with modern slavery and human trafficking working in collaboration with national partnership groups sharing best practice, such as the National Network Coordinators' Forum which is a professional network, existing to contribute to the continual improvement of the UK's practical response to MSHT. It aims to provide support and facilitate collaboration with the coordinators of regional networks and anti-slavery partnerships, who themselves provide support to frontline workers from both statutory and non-statutory sectors, with the view of improving victim identification, survivor support and prosecution of perpetrators.

## GOVERNANCE

The Norfolk Community Safety Partnership provides governance, oversight and direction to the Norfolk Anti-Slavery Network to ensure a whole-system partnership response to the strategic priorities. See Partnership Structure Diagram for governance detail. In addition, a wider network of partnerships helps NASN achieve effective governance, best practice and accountability.

## MONITORING AND EVALUATION

All seven local authority areas will be responsible for setting their own individual action plan in response to their locality's specific needs using [Council Guide to Tackling Modern Slavery](#) and will be encouraged to update and report on their own area-specific challenges and progress to the Norfolk Anti-Slavery network on a quarterly basis. Each local authority area should aim to self-assess and set local actions in line with NASN strategic objectives.

**If you are concerned about the welfare of an adult or child in Norfolk you can report to your local safeguarding team by calling 0344 800 8020 or [report online](#).**

## WHO TO CONTACT TO REPORT MODERN SLAVERY AND HUMAN TRAFFICKING

- In an emergency call the Norfolk police on 999 or use 101 for non-urgent calls including advice.
- Contact the Modern Slavery Helpline (Unseen) for confidential advice and reporting, available all hours, every day on 08000 121 700 or [report online](#).
- Salvation Army for confidential advice, available all hours, every day on 0800 808 3733
- Crimestoppers for confidential reporting on 0800 555 111 [or online](#)
- [Unseen](#) is a UK Charity providing safehouses and support in the community for survivors of trafficking and modern slavery. They also run the UK Modern Slavery & Exploitation Helpline and work with individuals, communities, business, governments, other charities and statutory agencies.