



# Written Evidence from Resolve

*Identification of Victims of Modern Slavery Consultation*

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## About Resolve

Resolve is the UK's leading community safety organisation. For 30 years, we have worked closely with HM Government and the Civil Service to shape national policy and best practice around anti-social behaviour (ASB) and related community safety issues — including drug dealing, knife crime, vandalism, intimidation, harassment, and neighbour disputes.

Drawing on our sector-leading expertise, we support Local Authorities, Housing Providers, and Police Forces across the UK, helping practitioners respond to ASB and community safety challenges confidently and effectively. Our vision is of communities that are safe, empowered, and supportive environments where all residents can thrive.

## Policy at Resolve

Resolve contributes to government consultations on issues affecting ASB and community safety. We also undertake independent research and publish policy papers, available at:

<https://www.resolveuk.org.uk/our-services/be-heard>

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# 1 Introduction

Modern slavery is a complex and pervasive issue that intersects with multiple areas of the community. Increasingly, its manifestations overlap with ASB-related concerns. Exploitation often involves forced criminal acts, such as begging or drug dealing, which may be categorised as ASB or contribute to environments that facilitate such behaviours. In our recent YouGov survey, we found that public spaces in particular, were vulnerable to ASB. Over a quarter of those surveyed (27%) said they felt unsafe where they live, and 15% admitted ASB has made them not want to visit the shops. Indeed, the drivers behind this ASB are not modern slavery alone; crime that persists as a result of modern slavery is a significant issue, representing a huge concern in regards to nuisance and organised begging in particular. When victims are driven to desperation, often coerced and controlled, this inevitably causes cascading effects that leave many of our communities feeling unsafe.

## 1.1

Modern slavery legislation is frequently invoked in ASB cases, for instance The Modern Slavery Act 2015 s 45 covers incidents where a person is being forced to beg by another. Conversely, ASB tools and powers are used to disrupt exploitative practices. Issues that cross both areas include problems such as organised begging in communities, that create and sustain ASB through desperation of the modern slavery victim. This response draws on the lived experience of practitioners working directly with vulnerable residents and communities, with a particular focus on ASB frameworks, housing enforcement, and local partnership structures.

## Consultation Questions Addressed

This submission responds to the following sections of the consultation, as outlined in the Home Office questionnaire:

- Q 5a-c Terminology and Framing — The usefulness of the term “modern slavery” in enabling frontline practitioners to identify potential victims, and consideration of alternative terminology in housing and community safety contexts.
- Q6a-c Indicators and Statutory Guidance — The adequacy of current indicators in the *Modern Slavery Statutory Guidance* (2021), and whether additional indicators are needed to support identification within housing and ASB casework.
- Q7a-c Understanding Different Forms of Exploitation — How practitioners understand and distinguish forms of exploitation (sexual, labour, criminal, domestic servitude, organ trafficking), and what would support improved recognition and response.
- Q8a–b Legal Definitions and Scope — Whether existing legislation and the *Slavery and Human Trafficking (Definition of Victim) Regulations 2022* adequately capture all relevant forms of exploitation encountered by local authorities and registered providers.
- Q13 a-e Formal Identification and Decision-Making - Finally, the response touches on how the Reasonable Grounds and Conclusive Grounds processes function in practice, including communication gaps and feedback loops between the Single Competent Authority and local safeguarding structures.

## Summary of Approach

In responding to these questions, we have highlighted the importance of:

- Recognising the very real impact that modern slavery has on anti-social behaviour, including organised nuisance begging.
- Strengthening awareness and training within housing and ASB teams to recognise potential indicators of exploitation;
- Considering embedding modern slavery practice within existing ASB and safeguarding frameworks;
- Clarifying referral pathways and accountability between statutory and non-statutory First Responders;
- Improving data sharing and feedback between the Home Office's Competent Authorities, police, and local safeguarding partnerships.
- Making clear what makes a modern slavery victim, and what rights they are entitled to
- Considering a holistic view when it comes to modern slavery victims

## 2 Definition and Scope of Victims

Modern slavery is often hidden within neighbourhood-level incidents. Victims may be misidentified as perpetrators, particularly in cases involving:

- Cuckooing, where criminal groups take over a vulnerable resident's home for illicit activity.
- Individuals coerced into drug cultivation, street-level offending, or sex work, reported as causing nuisance or crime.
- Exploited workers housed in overcrowded or substandard accommodation, flagged to ASB or environmental health teams.

It is welcome that some of these cases will now be recognised as the exploitation that they are, as will now be the case with the introduction of the Crime and Policing Bill. This goes a long way in recognising that often people are coerced in these situations, in particular when it comes under the remit and unfortunate reality of modern slavery.

### 2.1

There has been a debate for some time on the evidential threshold for modern slavery as defined by the Modern Slavery Act 2015. Legal definitions of modern slavery can be difficult to apply, and in particular, difficult to prove legally, and in actual practice. In one case we have heard, a victim was forced into illegal work under threat, housed in poor conditions, and had family members threatened abroad. Despite these circumstances, the initial assessment did not meet the strict legal definition of modern slavery. The court later ruled that a more holistic view should have been taken.

### 2.2

Moreover, many victims do not self-identify as such, further complicating detection and support. This is for many reasons, some of which being a lack of education around the topic. This is conducive with the experience of ASB, with education and information lacking on who or what an ASB victim looks like. It is therefore suggested that this is likely the same problem with modern slavery.

### **3 Decision-Making and the National Referral Mechanism (NRM)**

Following consultation with colleagues at the Gangmasters Labour and Abuse authority (GLAA) we found that there are many instances where the NRM protects people in a truly vulnerable situation. The Initial identification is extremely important, much like ASB, timely and proactive intervention is key to safeguarding the worst consequences of modern slavery. Extended decision-making timescales further compound these challenges, especially when victims remain in the community under ongoing exploitation.

#### **3.1**

We also note that devolving decision-making to local agencies, despite the benefit of multi-agency working, may increase the burden that is already placed on local agencies. In consultation with external stakeholders, it was found that the centralised system, while not perfect, delivers outcomes for vulnerable victims. With the introduction of various legislation that seeks to strengthen and, at the same time, burden local agencies with powers and duties, it is advised that this proposal not be implemented in order to avoid capacity issues. This is in case of creating a potential risk of a threat of misidentification, slow response time, and a rigid operational attitude.

#### **3.2**

We recognise that the models for identification are not mutually exclusive, and stress that devolution and multi-agency working is vital, as modern slavery is often an issue that transcends many agencies. Therefore, a hybrid model could work best in ensuring a balance between local decision-making, along with broader expertise and accountability.

## **4 Barriers and Proposed Improvements**

There are several systemic barriers that hinder effective victim identification, these include: Role ambiguity, ASB and housing professionals are not formally recognised within the modern slavery framework, despite frequent contact with victims. Resource constraints; Community safety teams face increasing caseloads and limited capacity for complex safeguarding. Victim mistrust, which includes fear of eviction, enforcement, or immigration repercussions, discourages disclosure. Operational silos, modern slavery is often viewed narrowly as a criminal or immigration issue, rather than a safeguarding concern.

### **4.1 Understanding Different Forms of Exploitation**

Practitioners consistently report that recognising different forms of exploitation within community safety and housing contexts remains highly complex. Frontline ASB and housing teams often encounter behaviours that sit at the intersection of criminality, vulnerability, and exploitation. These include instances of organised begging, county lines involvement, forced labour, and coercive control within multi-occupancy housing.

### **4.2**

While modern slavery and human trafficking are well understood conceptually, many practitioners indicate that the practical indicators of these crimes can be subtle, masked by other presenting issues such as anti-social behaviour or tenancy breaches. This underscores the need for clearer, housing-relevant guidance and cross-agency training to improve early identification and referral.

### **4.3 Local Practitioner Insights**

There is evidence to suggest an element of organised begging taking place within cities across the UK. This activity has involved members of the Roma community, and indicators of coordination include the use of identical signage across multiple individuals with precisely the same wording. While not a daily occurrence, activity is often observed intermittently and appears to follow patterns that suggest organised control or coercion.

### **4.4**

Many front-line officers have engaged with a number of the individuals involved, but they have consistently declined to provide personal details and frequently disperse before Police attendance can be secured. This has made it difficult to gather consistent intelligence or initiate formal safeguarding or enforcement processes. To improve intelligence-gathering and develop a more joined-up response, some practitioners intend to deploy City Safe Hub staff to undertake joint patrols with Police during periods of reported activity. These patrols will help identify potential links between individuals and addresses, supporting a more structured understanding of any exploitative networks.

## 4.5

Other practitioners have highlighted that identifying victims within such cases is particularly complex. As with other forms of modern slavery, victims can be fearful of reprisals or may not recognise that they are being exploited. This leads to significant under-reporting. It was reported that many are members of the Roma community, where language barriers and a deep-seated distrust of statutory authorities present additional challenges. These barriers make it difficult to establish trust, gather intelligence, and ensure that individuals receive the safeguarding interventions they need.

### Summary

These insights demonstrate that apparent low-level ASB activity—such as begging or street nuisance, can mask the insidious problems of serious exploitation and coercion. Identifying such cases requires strong partnership working, cultural competence, and sustained engagement rather than one-off enforcement. Embedding modern slavery awareness into more professional areas, including ASB and community safety frameworks, will help practitioners identify victims earlier and respond more effectively. Modern slavery should, therefore, be understood in a holistic sense.

### Recommendations

- Consider integrating modern slavery into ASB and safeguarding policy frameworks, recognising the overlap between exploitation, coercion, and vulnerability.
- Ensure training and supervision reinforce a victim-centred ethos, avoiding enforcement-led responses where exploitation is suspected.

## 5 Conclusion

Modern slavery is not confined to the margins. Recognising this reality and equipping frontline staff with the tools, authority, and support to act is essential. We believe, in our initial consultations, that devolving decision-making to local agencies, despite the benefit of multi-agency working, may increase the burden that is already placed on local agencies. In consultation with external stakeholders, the centralised system, while not without its disadvantages, does deliver outcomes for vulnerable victims. With the introduction of various legislation that seeks to strengthen and, at the same time, burden local agencies with powers and duties, it is advised that this is not implemented, in order to avoid capacity issues. Otherwise, we may risk the threat of misidentification, slow responses, and a rigid operational attitude.

### 5.1

We recognise that the definition of modern slavery has a very high test for prosecution. Without considering a holistic view of the victim, we risk low prosecution rates and ineffectively dealing with the problem. As stated in the House of Lords, Modern Slavery Act 2015 Committee, it was made aware that the prosecution rate for modern slavery offences is only about 1.8%; the committee recognised that the prosecution volume was too low, making it clear that this does not reflect the reality of offending. We need to look at modern slavery as a holistic issue that very often intersects and interplays with other vulnerabilities and profound issues.

### 5.2

Lastly, we advise, just as we do for ASB, that there should be an educational campaign on who a modern slavery victim is. This should include how they can access support and how modern slavery affects not only the individual but also the community. We hope it is clear from this response that modern slavery victims are often not informed about their victim status and misidentify themselves, slowing the identification process where quick and timely intervention is key. In order to ensure the safety of communities, prevent organised begging that damages public confidence, and ensure the safety and dignity of victims, we must ensure that this definition is clear.