



Modern Slavery (Operation Eagle) Policy (914/2025)

Abstract

In 2015, the Modern Slavery Act 2015 came into force. The legislation set out criminal offences, a statutory defence for certain criminal activity and law enforcement powers / legal responsibilities for designated “first responders” which includes all police forces. The Act also sets out the role, functions and duty to co-operate with the United Kingdom (U.K) Independent Anti-Slavery Commissioner.

Policy

1. Introduction

1.1 Modern Slavery offending regularly involves the inhumane treatment, abuse, violence and control of victims, often by the hand of Organised Crime Groups (OCGs). Victims can be abused for years and have a permanent, life changing impact on them. As a consequence, Modern Slavery is one of the current national strategic priorities for all law enforcement with the response to this subject clearly defined within [Article 4 \(part 3\) of the European Convention on Human Rights \(ECHR\)](#)

This details police obligations to investigate slavery and/or trafficking within our available resources.

This policy is informed by:

- [Modern Slavery Act 2015](#)
- [Independent Anti-Slavery Commissioner: strategic plan 2024 to 2026 - GOV.UK](#)
- [Modern Slavery Act: ten year review - Correspondence - Committees - UK Parliament](#)
- [Hestia 'Underground lives: Police response to victims of Modern Slavery' \(March 2019\) – super complaint](#)
- [College of Policing Authorised Professional Practice \(APP\)](#)

2. Scope

2.1 This policy provides a framework for the workforce to deal with information about Modern Slavery covering offences within the Modern Slavery Act 2015, i.e., subjecting a person to slavery, compulsory or forced labour, domestic servitude or trafficking a person with the intention of their exploitation. It also relates to any other crime committed with the intention of committing human trafficking. It additionally addresses the cross-over with other areas of crime and policing such as ‘County Drug Lines’ drug distribution,

organised immigration crime, forced criminality and sexual exploitation of children and vulnerable adults.

3. Policy Statement

3.1 Surrey and Sussex will always have risk related to Modern Slavery due to the impacts of airports at Heathrow and Gatwick, Seaports in Kent, Newhaven and Portsmouth and the proximity to London. Sussex Police recognise that Modern Slavery is serious crime which principally, but not exclusively involves OCGs who operate at a force, regional, national and global level.

This policy and Force procedures will ensure that all police work is undertaken with an underpinning requirement to identify potential victims (PVs) of Modern Slavery, to ensure robust safeguarding steps are taken and to investigate, disrupt and where possible prosecute those responsible.

Procedure

1. Obligations

1.1 Article 4 of the ECHR specifies that a person will not be subjected to slavery or forced labour.

1.2 Part 3 (C) Article 4 of the ECHR places a procedural obligation upon us to investigate credible information that comes to our notice. We are required to investigate regardless of whether a victim has made a disclosure.

1.3 The investigation should be sufficiently effective as to be capable of leading to the identification and punishment of those responsible.

1.4 The investigation should be prompt and undertaken as a matter of urgency where there is a need to remove PVs from harmful situations.

1.5 With reference to the trafficking of human beings, there is also an obligation for effective, domestic, and cross border investigation using co-operation with overseas territories.

2. Training and Awareness

2.1 To fulfil the obligations in Section 1, Sussex Police provide regular training and awareness to officers at the point of their initial training, as part of investigative training and to maximise Continuous Professional Development (CPD) opportunities.

2.2 Officers and staff will be required to complete (as a team where possible to facilitate group discussion and shared learning) any mandatory College Learn e-learning modules on Modern Slavery.

2.3 Personnel who are required to lead on investigations into Modern Slavery will be PIP2 (Professionalising Investigation Programme) accredited investigators, and where possible, will have completed a specialist Modern Slavery Investigations Course. Modern Slavery investigations will also be supervised by a Detective Inspector.

2.4 Senior personnel such as Duty Inspectors, Critical Incident Managers (CIM), Force Control Room (FCR) Inspectors and Force Gold are provided with a bespoke input to take effective command over incidents and investigations.

2.5 The above steps will also demonstrate our compliance with the NPCC National Policing Standards (NPS).

3. Internal Meeting Structure

3.1 In accordance with NPS (section 2), Sussex Police will ensure that capacity, capability and the ability to monitor, review and supervise every investigation is undertaken. They will do this by means of regular tactical group meetings at Division and Force level. Governance will be applied via the Force Exploitation Development Board, which is chaired by the Force Strategic Lead for Exploitation (Superintendent rank).

3.2 It will be the responsibility of the Divisional Senior Single Point of Contact (SPOC) to lead on any Divisional or Departmental meetings and ensure there is well briefed attendance to the Force Tactical Group.

4. Partnership Arrangements

4.1 The current local partnership meetings, including Serious and Organised Crime (SOC) groups and Partnership Tactical Tasking and Co-ordination Group (TTCCG) will all have a Modern Slavery element to maintain knowledge and vigilance across the group. Relevant content from these meetings and any that the police are not part of will be brought to a single Sussex Anti-Slavery Network co-ordinated in rotation by the three top tier authorities in the county.

4.2 Information sharing will remain compliant with the Section 115 Crime and Disorder Act 1998, UK General Data Protection Regulation (UK GDPR) and as required by the Force Information Management procedures.

5. Single Points of Contact Network

5.1 West Sussex, East Sussex, Brighton & Hove and Gatwick (due to unique environment) will have both senior and practitioner points of contact for all staff requiring advice, guidance and signposting to specialist capabilities. These SPOCs will be publicised on a Force structure chart, in a prominent location on the Operation Eagle - Modern Slavery intranet site for ease of identification.

5.2 Specific, additional SPOCs will also be available on Departments such as Force Contact, Command and Control Department (FCCCD), Operations Command (OC), Specialist Crime Command (SCC), Professional Standards Department (PSD) and Public Protection to ensure wide coverage.

5.3 Where anyone undertaking the role as SPOC is deployed to a different role, the Force Strategic Lead should be notified as soon as possible.

5.4 The Force Exploitation Team and Force Tactical Lead for Modern Slavery and Human Trafficking (MSHT) will undertake 6 monthly SPOC development sessions to ensure group effectiveness.

6. National Referral Mechanism (NRM)

6.1 Sussex Police is a 'first responder organisation' for the purposes of compliance with Section 52 Modern Slavery Act 2015.

6.2 Section 52 requires the police (police are one of several first responder groups and also includes public authorities, Home Office, National Crime Agency (NCA), the Gangmasters and Labour Abuse Authority (GLAA) and certain designated 3rd sector organisations) to notify the Secretary of State (Home Office) of a person we reasonably suspect to be a PV of a Modern Slavery Act offence.

6.3 Police fulfil their obligations under Section 52 by carrying out the NRM process. This can be done using the online portal found at <https://www.modernslavery.gov.uk/start> or the completion of either an NRM or in cases where adults do not give consent, an anonymised Duty to Notify (DTN) must be submitted via the same link.

6.4 NRM referrals do not represent the transfer of investigative responsibility.

6.5 Modern Slavery will regularly involve complex coercion and control measures imposed by accomplished criminals. Best practice dictates that the NRM process that is consequently undertaken involves consultation and the use of pre-interview assessment and Achieving Best Evidence (ABE) interview for a vulnerable PV. This should be completed by an appropriately skilled officer / member of police staff (See 2.3 and 2.4 above).

6.6 Following this thorough and sensitively undertaken process, the PV will be given sufficient information in respect of the possible victim support and the likely investigative path. Only at the conclusion of this will the PV be invited to give INFORMED CONSENT to be supported by the NRM process by signing the forms.

6.7 Adults consenting will be referred by submitting the forms to an agreed single national gateway to be assessed.

6.8 Adults, who despite all information provided by skilled officers, decline support will have their details and the full circumstances of their exploitation entered within the 'Duty to Notify' section of the digital portal.

6.9 Any PV under 18 years will always be referred by NRM, irrespective of consent (but wishes should be fully recorded).

6.10 Every PV, irrespective of their wish for support will have their circumstances investigated as per Article 4 of the ECHR Part 3 (C).

6.11 A separate submission is required for every PV encountered.

6.12 Every referral must have a corresponding NICHE CRIME OCCURRENCE entered upon it for an offence specified in the Modern Slavery Act 2015 and follow the Home Office crime recording rules.

6.13 All NRM submissions, decisions and updates from the Single Competent Authority (SCA) must be uploaded onto that occurrence within the 'reports tab' and referred to in the enquiry log.

7. NRM Referrals from External First Responders

7.1 Where the SCA receives a referral from another first responder organisation, under national guidelines, they may be sent to Sussex Police for mandatory investigation. Such referrals will be recorded using the 36/06 crime classification. Crime classification changed in April 2025 and further information is available [here](#).

7.2 Where Sussex Police receive such a referral it will be allocated to an appropriately skilled investigator.

7.3 Where enquiries reveal that the person, facilitated transport or alleged exploitation indicates primacy in a different UK force area, contact should be made with that force and competent authority informed. Where necessary, the normal crime transfer procedures will be followed.

7.4 Where enquiries reveal that every element of exploitation or associated, facilitated journey occurred entirely outside England and Wales and a UK national is not involved, Sussex no longer has to record a crime and will instead create an admin NICHE for our records only.

8. Referral from the National Helpline

8.1 The Modern Slavery National Helpline is a charity-run facility creating intelligence from a variety of sources. The helpline is widely advertised.

8.2 Helpline reports are not NRM referrals and would normally be regarded as inbound items of intelligence. They should be used to complete a 3 x 5 x 2 Niche intelligence log and be allocated to the most appropriate SCC Intelligence Unit for development. Where helpline intelligence has a time critical element, the Force Control Room will be contacted using 101 or 999 according to urgency.

8.3 Where a helpline report contains sufficient information to amount to a credible allegation of Modern Slavery, it should be used to create a STORM log and NICHE occurrence and allocated as 7.2.

9. Victim Safeguarding

9.1 The principle that underpins activity is to protect and manage the PV and to prevent possible re-trafficking when organised crime networks may seek to re-capture and continue to exploit victims.

9.2 The Home Office award a national safeguarding contract for ADULT PVs which currently sits with The Salvation Army (TSA) and their network of sub-contractors.

9.3 In all circumstances where ADULT PVs require such support, TSA should be called via (redacted text)

9.4 TSA would normally support PVs who have received POSITIVE REASONABLE GROUNDS (+RG) from the competent authority.

9.5 TSA and other 3rd sector organisations however, MAY be able to support and accommodate a PV who has not yet received reasonable grounds subject to certain circumstances. If in doubt, contact your SPOC for options.

9.6 Access to and contact with so-supported victims will be by prior arrangement only via a call to (redacted text).

9.7 The personal circumstances of some PVs are such that TSA is not needed to arrange accommodation.

9.8 Irrespective of the support provided, it is important that adult safeguarding teams in the local authority are made aware of the PV's circumstances and care support provider to maximise support.

9.9 Justice and Care Victim Navigator

For specialist Modern Slavery and Human Trafficking victim support and investigation advice contact Sussex Police partner Justice and Care to gain access to a Victim Navigator. This can be done via the Sussex Police Force Exploitation Team at (redacted text)

9.10 Child Safeguarding and Reducing Adultification

Neither TSA nor other 3rd sector organisations have a responsibility to safeguard PVs known to be or thought to be under 18 years old.

9.11 Police Protection Powers provided under Section 46 Children Act 1989 and Safeguarding protocols under Section 47 Children Act 1989 and Section 20 Children Act 1989 will apply.

9.12 Considerable thought must be applied to joint risk assessment strategy meetings for children who are subsequently provided with an emergency placement. The profiles of some potential child victims of Slavery / Trafficking are particularly vulnerable to loss and potential re-trafficking. It should not be assumed that a lost child has absconded or left of their own volition.

9.13 All Modern Slavery investigations must consider the impact of the adultification of children (e.g. where a child is perceived to be older than they are based on physical attributes, appearance and behaviours. This may be more likely to happen with Black and/or Global Majority / Racially Minoritised children due to unconscious bias and/or racist practice. This was highlighted in section 6.3 of the National Audit on Group-Based Child Sexual Exploitation and Abuse (Casey Review, published June 2025). (To access referenced webpage the links are held in the hyperlinks document located at Links/Appendices).

10. Investigation and Financial

10.1 As in section 1 above, investigation into Modern Slavery must be effective, timely, and undertaken by appropriately skilled staff overseen by a Detective Inspector.

10.2 Skilled staff will be considered as such if they have completed the specialist Modern Slavery Investigation Course, or where a PIP2 Detective is working collaboratively with a qualified colleague or being directed by a Detective Inspector. In all cases, regular consultation with their SPOC or investigative lead is essential.

10.3 There can be a wide range of reasons why an officer may encounter reluctance for victims to disclose. Consultation and research must be undertaken to provide the officer

with enough information about the PV's culture, background, and potential control measures such as language and cultural beliefs. This will enable them to pre-plan engagement and therefore maximise the chance of meaningful disclosure. It should be noted that, like other victims of serious crime, the effect of trauma may well require extended periods of care and the assistance of specialist support before disclosure is possible.

10.4 Where encountered, some PVs of Modern Slavery may have issues in relation to their immigration status, the initial investigative steps of Modern Slavery should be the focus. This is specifically highlighted in the His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) report "Stolen Freedom" Page 45. HMICFRS 2017.

10.5 Whilst the police have a clear duty to notify the Home Office of those we believe to have entered or remained in the UK unlawfully, immigration matters should be considered in parallel with Modern Slavery. It is imperative to note that full consideration and adjustments need to be offered to people who require language interpretation.

10.6 Victims being taken through the NRM may be able to receive discretionary leave to remain in the UK. It is vitally important however, that the expertise and the functions that Immigration Enforcement Officers can provide are not overlooked, particularly in relation to early operational planning, access to and updates of numerous Home Office IT systems that are not readily available to police, and their specialist, document examination capabilities.

10.7 Section 45 of the Modern Slavery Act 2015 relates to the statutory defence for a person who is believed to have committed a crime whilst being controlled by others in Modern Slavery situations. Sussex Police must pro-actively consider whether offences (other than those excluded in the Modern Slavery Act Schedule 4) are relevant to Section 45 and therefore require investigation as paragraph 1 accordingly.

10.8 Modern Slavery criminality has amongst the greatest levels of financial profits globally and is entirely based on wealth creation; as such it is essential that investigators proactively link with Financial Investigator / Financial Intelligence Officer (FI / FIO) capabilities.

10.9 In recognising the complex and potentially international financial networks operated by Modern Slavery Organised Crime Groups (OCGs), NCA operate a joint money laundering intelligence task force (JMLIT) using their gateway provided by Section 7 Crime and Courts Act 2013. Where appropriate, Sussex Police will use the JMLIT portal to facilitate Modern Slavery financial research (Note this is ONLY available for Modern Slavery, Counter corruption, Counter terrorism and money laundering). The first port of call for this facility will be contact with the NCA at Spring Gardens or the FIs within the South East Regional Organised Crime Unit (SEROCU) who are regular, successful users of the tactic.

10.10 Where Sussex investigators identify members of an OCG who have an identified, but potentially peripheral role in Modern Slavery offending, they will actively consider Section 45 Serious Crime Act 2015 (participating in the criminal activities of an OCG).

11. Intelligence

11.1 We will proactively encourage officers and staff in all Departments to be vigilant of how and where PVs of Modern Slavery might be identified and submit intelligence via the NICHE RMS system. This will include information within new incidents and that encountered during potentially unconnected, existing operations. Created intelligence, as a default will be considered for sharing to an agreed minimum list of agencies including, but not limited to the SEROCU threat desk (redacted text) and the Modern Slavery and Human Trafficking Unit (MSHTU) of the NCA (redacted text)

11.2 To facilitate this, a comprehensive list of agencies and their contact details will be provided to all intelligence processing assistants (IPA).

11.3 Where relevant intelligence is identified as being held by organisations in partnership arrangements, we will seek direct dissemination, manually submit intelligence or encourage the use of a partnership intelligence submission form where it is used.

11.4 The handling and development of intelligence will follow the same guidelines as other areas of serious crime. Where there is the potential intelligence relating to overseas entities, Sussex will make full use of intelligence functions provided by the International Crime Co-ordination Centre (ICCC).

12. Missing / Vulnerability

12.1 Modern Slavery victims, particularly those encountered by law enforcement agencies often require safeguarding and management to minimise or hopefully remove the risk of harm or re-trafficking.

12.2 Whether it be 3rd sector contractors for adults or children's service for those under 18 years, we have learned that the risk of loss of those in certain profiles is high.

12.3 To address this, it is imperative that missing / vulnerability teams, case officers, Modern Slavery SPOCs and social services can meaningfully assess (strategy discussion) and record the risk of loss and put plans in place to mitigate that risk.

12.4 Where officers respond to, or are asked to investigate missing episodes, care must be taken not to draw an automatic conclusion that the person has left of their own volition. It may easily be the case that they have been instructed to leave with punitive consequences to themselves or others for not doing so.

13. International

13.1 Where an investigation appears to impact on other national jurisdictions, Sussex police will proactively collaborate using assistance of the ICCC.

13.2 The Home Office Visas and Immigration (UKVI) have International Liaison Officers stationed in embassies across the world. They make up the Risk and Liaison Overseas Network (RALON). It is possible for enquiries in relation to overseas nominals and VISA applications to be made via RALON. The first port of call should be via the Home Office embedded liaison officer in SEROCU.

13.3 The NCA also have International liaison Officers (ILOs) (formerly known as SLOs) based throughout the world. ILOs are yet a further channel for law enforcement and other enquiries to be conducted overseas. There may be specific tactical advantages to using this bilateral channel which can be clarified during first contact.

13.4 It is VERY IMPORTANT that colleagues do not attempt to make the same or similar enquiries using different international channels without having notified and discussed the reasons with those organisations. Duplicated enquiries can cause significant problems.

14. Slavery and Trafficking Orders (STO)

14.1 Slavery and Trafficking Prevention Orders (STPO) and Risk Orders are articulated within Part 2 of the Modern Slavery Act 2015 are designed to address the offending risks posed by identified suspects.

14.2 Prevention Orders can be sought against those with previous Modern Slavery Act or similar disposals (here or overseas) whereas Risk Orders require no previous disposal.

14.3 Refer to the Home Office 2017 guidance or the Anti-Slavery Commissioner 2022 guidance for the use and application of Orders.

14.4 Sussex Police will proactively consider the use of Civil Orders under Part 2 Modern Slavery Act 2015 as a way of minimising the risk of Modern Slavery offending during investigations and protecting PVs and as a disruption tactic against OCGs.

14.5 Part 2 of the Modern Slavery Act 2015 orders are civil, with a criminal breach, as such all applications will be made via the Sussex Police Solicitors.

14.6 Prior to application, the relevant scenario should be discussed with one of the Force Modern Slavery SPOCs in order that required disclosure of intelligence and evidence are balanced against the benefits. This MUST include consultation with the relevant intelligence manager who owns the intelligence and will assist with disclosure matters additionally, the financial gatekeeper for the Division is consulted and approves the application costs.

14.7 Once done, Sussex Police personnel must contact the SEROCU Orders Officer in the National County Lines Coordination Centre (NCLCC) for specialist advice about how to progress the STO within a County Lines context. This can be done via email (redacted text) and copying in the Sussex Police Exploitation Team (redacted text) for a central record of STO applications. The NCLCC Orders Officer can help Sussex Police personnel set out the intelligence case and application. Once this has been completed the Sussex Police personnel must forward the Slavery and Trafficking Risk Order (STRO) application to the Force Solicitors for progression. STPO applications must be forwarded to the Crown Prosecution Service (CPS) for progression, so it can be shared with the court and defence which will allow them time to review it and respond accordingly. Non-County Line connected STO applications must be sent to the (redacted text) for further support and guidance via email (redacted text).

14.8 Where an order is sought at sentencing, it is imperative that the CPS and the court are fully aware of the Senior Investigating Officer's (SIO's) plans for an order to be considered.

15. Reception Centres

15.1 Where activity in response to Modern Slavery intelligence is planned, and is anticipated to encounter numerous PVs, it may be prudent to consider the use of a multi-

agency reception centre to assist with the engagement, assessment, care, and management of any PVs.

15.2 Reception centre planning is normally greatly enhanced by consulting both Force SPOCs and the tactical advisors in the Modern Slavery / Human Trafficking Unit of the NCA (redacted text). Force planning officers and 3rd sector specialists such as TSA (redacted text) should be consulted for logistical support.

15.3 During the use of a reception centre, it is expected that PVs will be taken through some initial screening, but care must be taken to prevent screening questions exceeding their objective and that the national best practice of ABE interviews are not undermined.

15.4 It is essential to consider that some victims may have been exploited in extreme circumstances and/or for significant periods, in some cases years. Those encountered may have numerous and complex, medical, and psychological needs that require attending to over some time before any attempts to obtain a victim disclosure is sought.

15.5 In recognition of the complex and traumatic experiences of some victims, it is important for officers to consult and undertake pre-engagement and pre-interview assessments.

16. Crime Recording

16.1 It is important that we record accurate data in the records we hold about protected characteristics. This data is critical to delivering outstanding public service because it deepens our understanding of what our communities demand from us, what response we currently give and where we need to improve. Protected characteristics can be defined as age, gender, gender reassignment, being married or in a civil partnership, being pregnant or on maternity leave, disability, race (including colour), nationality, ethnic or national origin, religion or belief and sexual orientation. Accurate crime recording also goes some way towards increasing trust and confidence in policing.

Mandatory Flags

Some crime data is flagged by the Home Office. There are Hate Crime, Metal Theft, Domestic Abuse, Online Crime, Child Sexual Abuse, Child Sexual Exploitation, Alcohol, Corrosive Based Substances and Honour Based Abuse. There is detail which supports each of these important flags at Counting rules for recorded crime. For more information refer to the Crime and Incident Disposal, Recording and Auditing Policy (757).

Team: Local Policing Service Improvement and Engagement