

These briefings provide an analysis of the [publicly available UK National Referral Mechanism \(NRM\) data](#) on potential victims of modern slavery and, from this briefing onwards, the disaggregated NRM data from the UK Data Service (UKDS).¹ The NRM is the UK's official system through which victims of modern slavery are identified and supported (See the 'How NRM decision-making operates' box below).

This is the second of a series of briefings produced by IOM UK which follow each quarterly release of NRM data from the Home Office. The briefings focus on the data from the most recent quarter, but also use historical NRM data for context. They provide an analysis of key highlights, ongoing trends, and data gaps identified by IOM UK. The analysis of the disaggregated NRM data from the UKDS enables the briefings to offer additional detailed analysis to the Home Office's own statistical bulletin for each NRM data release.

This briefing focuses on Quarter 4 (Q4), 2021 (October-December) and highlights four key findings from analysis of the data (see box on right).

435 Days was the median waiting time for a Conclusive Grounds decision made in Quarter 4, 2021, while more than 200 people waited over 1,000 days for a decision.

There is no target timeframe for making a Conclusive Grounds decision (CG). The [statutory guidance for the 2015 Modern Slavery Act](#) notes, "A decision can only be made fairly and reasonably once sufficient information has been made available to the Single Competent Authority (SCA) for it to complete the decision." The guidance only stipulates that decisions should be made after the 45 day reflection period ends.

The median waiting time of 435 days for the CG decisions made in Q4, 2021 was an improvement on the median time for Q3, 2021, which was 527 days. However, as Graph 1 shows, this was the third highest median waiting time for CG decisions in the last 2 years.

HOW NRM DECISION-MAKING OPERATES

The National Referral Mechanism (NRM) has a two-stage decision-making process for identifying potential victims of modern slavery (a term that includes any form of human trafficking, slavery, servitude or forced labour). The first stage is the Reasonable Grounds (RG) decision, which should be made within 5 working days of a potential victim being referred to the NRM. The test currently in use for the RG decision is "I suspect but cannot prove" that the person is a victim of modern slavery. A positive RG entitles a person to a reflection period of at least 45 days to receive specialist support and assistance. The second stage Conclusive Grounds (CG) decision should be made no sooner than 45 days after the RG decision, and is made on the 'balance of probabilities' threshold. Both the RG and CG determinations are made by the Single Competent Authority (SCA) and Immigration Enforcement Competent Authority (IECA) which both sit within the Home Office. Further information on the NRM is available [here](#).

HIGHLIGHTS

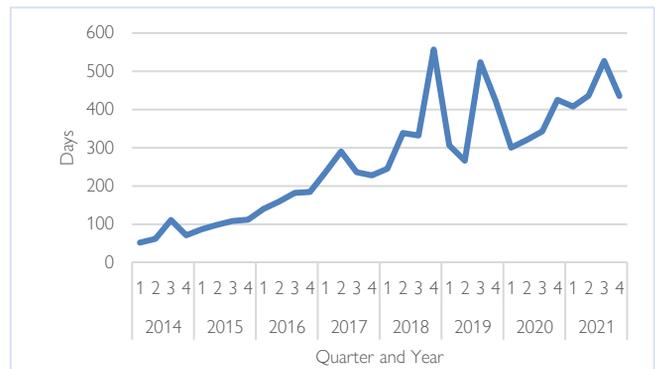
435 days was the median waiting time for a Conclusive Grounds decision made in Quarter 4, 2021, while more than 200 people waited over 1,000 days for a decision.

1158 Conclusive Grounds decisions were made in Quarter 4, 2021, a substantial increase on the previous quarter and the highest since Q1, 2019 (a record high quarter)

83% of UK children referred to the NRM in Quarter 4, 2021, were reported as having experienced criminal exploitation, compared to a rate of 28% for non-UK children.

559 referrals in Quarter 4, 2021 were flagged as a 'county lines' case, the second highest number in a quarter for which data is available.

The public quarterly NRM data provides the median and mean waiting times for all the CG decisions made in the quarter. In addition, the disaggregated NRM data available from the UKDS now provides more detailed information on individual waiting times for CG decisions. This reveals the extremely long waiting times that some people referred to the NRM are experiencing.



Graph 1: Median waiting time for Conclusive Grounds decisions

¹ Home Office, Modern Slavery Research & Analysis. (2022). National Referral Mechanism and Duty to Notify Statistics, 2014-2022. [data collection]. 4th Edition. UK Data Service. SN: 8910, DOI: 10.5255/UKDA-SN-8910-4

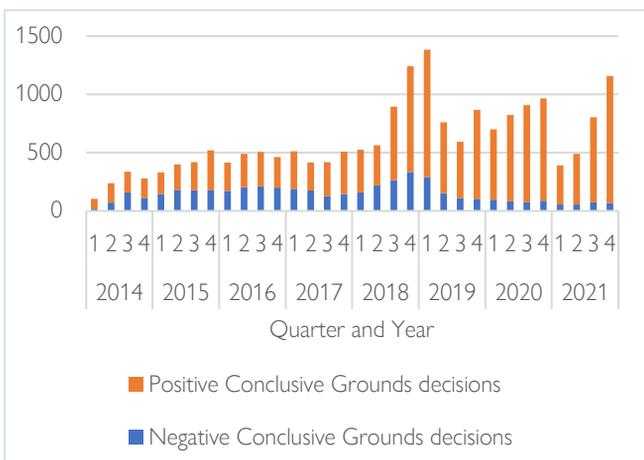
The longest waiting time for a CG decision made in this quarter was 2,698 days. This was for a woman who was conclusively identified as having been trafficked for sexual exploitation. There were 2 people who received a CG decision in the last 3 months of 2021 whose initial referral to the NRM pre-dates the introduction of the Modern Slavery Act in 2015. There were 5 people who had waited more than 2,000 days and more than 200 people who had waited over 1,000 days for the CG decision they received in Q4, 2021.

1,158 Conclusive Grounds decisions were made in Quarter 4, 2021, a substantial increase on the previous quarter and the highest since Q1, 2019 (a record high quarter)

There was a substantial increase in the number of CG decisions made in this quarter; 354 more than the previous quarter (Q3, 2021). Graph 2 below shows that there were more CG decisions made in this quarter than in any quarter since the record high of 1,385 in Q1, 2019.

One important factor in this overall trend was a significant increase in the number of CG decisions made for child referrals. The 605 CG decisions for children in this quarter was greater than the total of the previous 6 months. This increase has occurred at the same time as the commencement of a pilot for devolved decision making by local authorities for child referrals in 10 local authorities with a target for making a CG decision in 90 days. However, neither the public NRM data or the UKDS NRM data provides details of decisions under these pilots.

The Home Office’s analysis of the Q4, 2021 public NRM data also highlights the recruitment of more SCA staff to make decisions as an important factor behind the increased number of CG decisions [“The number of conclusive grounds decisions issued has been increasing over the course of 2021 as a result of the recruitment of additional decision makers by the SCA.”](#)



Graph 2: Number of CG decisions made per quarter

83% of UK children referred to the NRM in Quarter 4, 2021 were reported as having experienced criminal exploitation, compared to a rate of 28% for non-UK children

Graph 3 below shows that the percentage of UK and UK dual national children (henceforth described as ‘British’) being referred to the NRM as having experienced criminal exploitation, either exclusively or in combination with one or more types of exploitation, has never been less than 80% in any quarter since records began in Q4, 2019 (prior to this, all potential victims of ‘criminal exploitation’ were recorded in the NRM using the category of ‘labour exploitation’). In comparison, only 28% of the 565 non-British children referred to the NRM (including those recorded as unknown nationality) were reported as having experienced criminal exploitation.

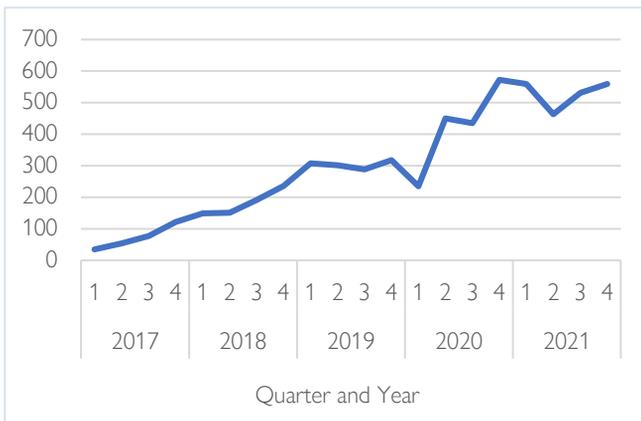
Over recent years, British children have represented an increasingly significant proportion of child referrals to the NRM. 2019 was the first year that the majority of children referred to the NRM were British, a trend which continued in 2020 and 2021. In this quarter, 59% of the children referred were British. The large number of referrals of British children as potential victims of criminal exploitation is a significant factor in the overrepresentation of British children in the NRM. British children referred to the NRM as having experienced criminal exploitation not only represents a significant proportion of child referrals but all referrals. In Q4, 2021 almost a quarter (24%) of the total NRM referrals were for a British child who was reported as being a potential victim of criminal exploitation.



Graph 3: Percentage of British children referred to the NRM per quarter who were reported as having experienced criminal exploitation

559 referrals in Q4, 2021 were flagged as a ‘county lines’ case, the second highest number in a quarter for which data is available

Graph 4 below shows the number of referrals flagged as a county lines case since 1st January 2017. The NRM data available from the UKDS shows 1 referral in 2015 and 2 referrals in 2016 which were flagged as county lines cases.



Graph 4: Number of referrals flagged as a county lines case per quarter

County lines is an issue which has received ever greater attention from the police, politicians and the media over the last few years but it is not a new problem. The National Crime Agency’s (NCA) [strategic assessment on the scale of and nature of human trafficking in the UK in 2014](#) highlighted three cases of UK nationals who were potential victims of criminal exploitation who “fit the profile of vulnerable persons used as drug runners in a ‘county lines’ enterprise.”

The growing concerns about county lines cases led to the Home Office including data on NRM referrals flagged as a county lines cases in the public NRM quarterly statistics. Q2, 2020 was the first quarterly release which included that data. The [Home Office’s bulletin for Q2, 2020](#) notes, “Since January 2020, county lines referrals are identified by a ‘flag’ on the system.”

However, prior to that, the Home Office had acknowledged a significant number of county lines cases among the NRM referrals but had not yet provided any data on the trend. For example, the [Home Office’s bulletin for Q4, 2019](#) explained, “For those exploited as minors, criminal exploitation is driven by an increase in the identification of ‘county lines’ cases.”

The cases flagged as county lines in the public NRM data are disaggregated by age category and gender. The data shows the vast majority of referrals flagged as a county lines case are for children. In Q4, 2021 81% of referrals flagged as a county lines cases were of children.

In Q4, 2021 the number of child NRM referrals flagged as a county lines cases represented 54% of all child NRM referrals involving criminal exploitation. As Graph 5 below shows, the NRM statistics suggest that significant numbers of children are potentially being exploited for other criminal purposes than county lines. More evidence is needed to better understand the specific forms of criminality for the referrals recorded as criminal exploitation but not flagged as a county lines case.



Graph 5: Total number of child NRM referrals flagged as a county lines case as a percentage of child NRM referrals where criminal exploitation was reported

ABOUT IOM

Established in 1951, the International Organization for Migration (IOM) is the leading inter-governmental organisation in the field of migration, committed to the principle that humane and orderly migration benefits migrants and society. As the UN Migration Agency, IOM works with migrants, governments and non-governmental partners in the international community to provide humane responses to the growing migration challenges of today.

The IOM Country Office in the UK (IOM UK) is one of over 150 country offices, promoting cooperation and dialogue on migration issues. (See www.unitedkingdom.iom.int for more information).

To contact IOM UK about this briefing, please email ctuk@iom.int