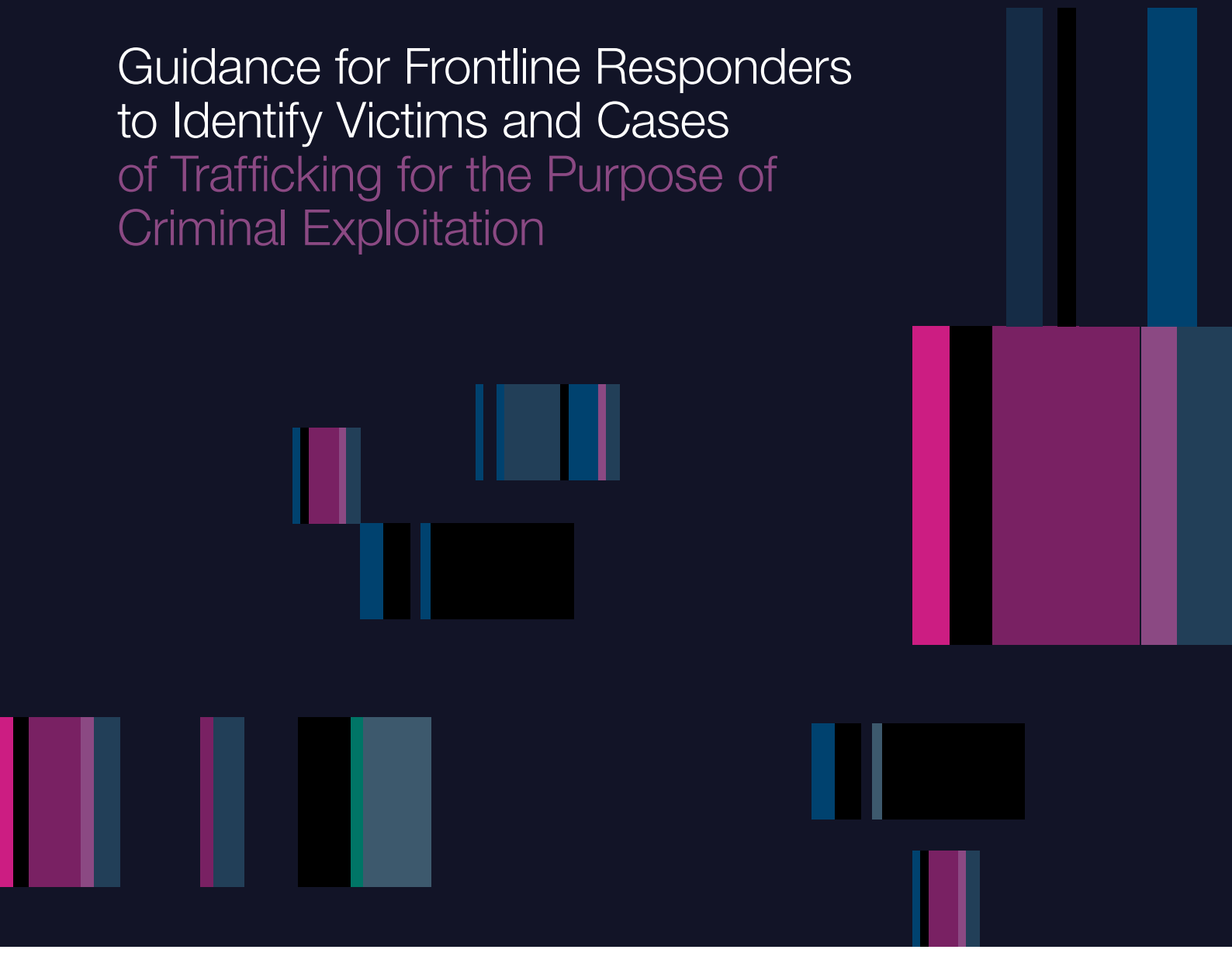
Office of the Special Representative and Co-ordinator
for Combating Trafficking in Human Beings

Survivor and Trauma-Informed Model Standard Operating Procedures (SOPs)

Guidance for Frontline Responders to Identify Victims and Cases of Trafficking for the Purpose of Criminal Exploitation



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Prologue by Sosa Henkoma

Freedom has never been a single shape to me.
For some, it is the moment they slip out of the hands that once held them down.
For others, it is the first breath taken far from an environment that bruised their spirit.
Sometimes freedom is simply the right to steer your own life without apology,
to choose your direction without fear of being pulled back.
Freedom shifts. It stretches. It belongs to each person differently.
But for me, freedom is something softer, something deeper.
It is the shedding of every label ever placed on my skin
the ones whispered, the ones shouted, the ones I tried to wear just to survive.
It is stepping out from under all those definitions
and discovering who I am when no one is naming me.
My freedom is the quiet, fierce act of being myself
without permission, without explanation, without a single box to fit into.
It is the moment I realise I am not what the world has called me
I am what I choose to become.

Over 3 thousand miles separated me from all I've ever known myself to be, my culture, family, education, and more all gone in the blink of an eye, who I once knew was left behind to survive in the new environment I had been thrusted into. It seemed my journey started as an innocent young 8-year-old boy, suffering at the hands of my stepmother; but in fact, the trauma started way earlier. No one saw the hidden scars; everyone just saw the smile plastered on my face which had been engrained into me from a young age. Instead, the labels just started piling on; social services viewed me as a "fantasizer" whilst disclosing being threatened through debt bondage aged 11; it was made out that a boy my age could not be living that type of lifestyle. The second significant label came from a parent who referred to me as "the devil walking on earth" when I was 12. By 13, the criminal justice system had categorised me as an offender. In the UK, a place many could consider safe, my reality was far different. My normal day to day consisted of running drugs for others, handed my first firearm by the mere age of 11, by 12, my birthday celebrations included a bullet-proof vest and a shotgun instead of your typical toys. By 13, I had a permanent criminal record and served time in prison for something I was forced to do.

It is often asked who teaches a child the difference between good and evil, is it the parents, the family, or the environment? But what happens when all three are the villains? I have seen evil not just in the eyes of the woman who used any weapon at hand to break my body, or in the man I once called a friend, but in the eyes of a system that shamed me for the very tactics I used to stay alive.

These labels shaped how I was treated and how my story was interpreted. They overshadowed the reality that I had been separated from my mother at two years old, subjected to ongoing harm within the home, and abandoned by my father in a foreign country. Instead of being recognised as a child in need of protection, I was repeatedly positioned as a problem to be managed. My story reflects a wider pattern; children being exploited are often criminalised rather than safeguarded. Their disclosures are doubted, their behaviours are judged without context, and their needs are overlooked. These children are not seen as victims of forced criminality, displacement or trauma but instead through the narrow lens of the labels assigned to them.

Changing my life around "for the better" and becoming publicly recognised as a "survivor" has, in reality, placed me in the greatest danger I have ever faced, leaving exploitation is not synonymous with safety; it does not just get switched off with a positive NRM decision. I continue to experience sleepless nights, restrictions on my ability to work and travel, daily feelings of insecurity and ongoing challenges within my role as a parent. I am consistently burdened by my criminal record, that reflects actions carried out while I was being exploited. This document and many others will explore how a child should not be held criminally accountable for their actions whilst being exploited, yet my criminal record is still smeared with what I was made to do.

Foreword

Since I took office in 2023 as OSCE Special Representative and Co-ordinator, one of my top priorities has been to support participating States in understanding, preventing, and tackling emerging forms of trafficking and advocating that anti-trafficking measures are informed by experts with lived experience. Trafficking for forced criminality has grown rapidly in the past decade and presents even greater challenges for anti-trafficking stakeholders such as victim identification – and for victims and survivors when they are not promptly identified. Sosa Henkoma's story reminds us that many survivors of such exploitation who are not identified as trafficking victims and are instead prosecuted as criminals face complex challenges that often last a lifetime, such as criminal records.

The current increasing convergence of human trafficking with other crimes is a stark testament and reminder that this evolving and complex crime requires robust measures, including a shift in traditional identification and criminal justice mechanisms and more proactive, innovative solutions by all front-line agencies across the government and civil society. The pivotal foundation of such action must be to ensure victims of forced criminality are effectively identified and protected as such. This also requires that all stakeholders who may encounter trafficking victims possess the necessary knowledge and competencies to recognize vulnerabilities, understanding of victims' behaviour, and know-how at various stages of their interactions, from the initial interview with a victim to the completion of criminal proceedings.

This Model Standard Operating Procedures informed by a lived experience expert aims to equip stakeholders with the necessary information on vulnerabilities associated with this form of exploitation and indicators that can help to recognize promptly when individuals have been compelled to engage in unlawful activities and to respond accordingly.

At the same time, we will continue to work closely with national authorities, civil society organizations, and lived experience experts to apply this guidance in practice so that victims of forced criminality are not misidentified as offenders but treated with dignity and care. This will also help States dedicate their limited resources to investigate and prosecute the real criminals who are making exorbitant profits by exploiting victims.

Acknowledgement

I commend and express my heartfelt thanks to Sosa Henkoma for his inspiring leadership in turning his lived experience into collective action, advocacy, and critical guidance that informed and shaped these Model Standard Operating Procedures. His contributions not only support and advance prevention and identification of trafficking for forced criminality within and beyond the OSCE region but also mitigate and prevent harm and re-traumatization of trafficking victims during various stages of anti-trafficking interventions. May his bravery and tenacity in sharing his own experience and translating it to concrete measures to help others motivate States to implement robust, proactive measures to prevent others from suffering similar harm and to detect and protect those victims/survivors who are compelled to commit criminal acts during the course of human trafficking.

I also sincerely thank the colleagues who contributed their expertise and provided valuable contributions to this guidance document, especially Tarana Baghirova, Programme Officer, who leads the OSCE's work on this form of human trafficking.

Dr. Kari Johnstone
OSCE Special Representative and
Co-ordinator for Combating
Human Trafficking

Introduction

The recent OSCE Survey Report 2026[1] revealed that trafficking for exploitation in criminal activities (forced criminality) is a rapidly growing and still under-detected form of human trafficking across the OSCE region. The scale of human trafficking remains significant, with approximately 102,000 victims recorded between 2021 and 2024, including nearly 30,000 victims in 2024 alone. These figures are widely understood to represent only a fraction of the actual scope of the problem, reflecting both improved detection and the continued expansion of trafficking activities.

Trafficking for exploitation in criminal activities now accounts for approximately 17% of identified trafficking victims in the OSCE region. This marks a dramatic increase compared to earlier years, when it represented just over 1% of detected cases in 2018. The number of investigations has followed a similar trajectory, rising from around 10 cases in 2015 to 192 cases in 2024, indicating both heightened awareness and a rapid expansion of the phenomenon.

Victims are increasingly compelled to engage in a wide spectrum of criminal activities, including in drug production and distribution, cyber-scam operations, benefit fraud, migrant smuggling, and violent offences.

The findings of the 2026 OSCE Survey Report also highlight a systemic gap in victim identification, particularly evident in emerging forms of trafficking such as forced criminality, where victims are frequently misidentified due to the complexity of their situations and the limitations of traditional identification frameworks. This persistent gap in victim identification and protection points to the need for enhanced identification mechanisms and tools informed by experts with lived experience. Moreover, as earlier research by the OSCE[2] shows, beyond the bias shaped by the notion of the "ideal victim," the identification of forced criminality is further complicated by the fact that their conduct often falls into a grey zone between victimhood and offending. In such situations, attention tends to focus on the criminalized acts individuals are compelled to commit, rather than on the forms of exploitation underlying them. This dynamic is deeply gendered: women and girls are more likely to be identified primarily through their involvement in commercial sex industry, while men and boys are often associated with illicit activities such as cannabis cultivation and distribution of drugs or other forms of forced criminality. As a result, gender stereotypes influence not only the visibility of exploitation but also the likelihood that individuals are recognized and treated as victims rather than offenders.

In this regard, the present model standard operating procedures are developed and informed by an expert with lived experience. By embedding survivor perspectives into the development of indicators, this document aims to advance frontline practitioners' capacity to detect subtle and complex manifestations of trafficking, including forms of psychological coercion, manipulation, and non-linear routes into exploitation that are frequently overlooked by traditional models. This more nuanced understanding supports early and accurate identification, improves access to protection and assistance, and helps bridge the persistent gap between formal legal frameworks and their practical implementation.

Early victim identification and effective protection play a crucial role in increasing victims' willingness to support investigations and contribute to dismantling wider criminal networks. When victims feel safe from retaliation, stigma, or further harm, they are more likely to co-operate throughout legal proceedings.

Purpose of Guidance

This document provides a comprehensive framework and guidance to identify, protect, and support victims of trafficking for the purpose of exploitation in criminal activities. The paper examines existing and/or common definitions, establishes core operational elements, and provides a list of non-exhaustive indicators that can be cross-examined through a multitude of legal systems, institutional settings, and cultural contexts. By exploring a range of vulnerabilities that heighten the risk of human trafficking and by clarifying roles/responsibilities of relevant actors, the document promotes the continual co-ordinated, rights-based, and non-punitive responses that uphold international human rights standards.

The central purpose of the document is to embed human rights-based, trauma-informed, and victim-centred practices in all stages of intervention in addressing forced criminality, from first point of contact and initial assessments to investigative processes, provision of services, and ongoing reintegration support. It provides an extensive, yet non-exhaustive list of indicators ranging from personal, behavioural, socioeconomic signs and indicators specific to the online landscape to support a wide range of stakeholders in effectively identifying and protecting victims of forced criminality. This guidance also offers evidence-based recommendations based on both lived experience and extensive research aimed at frontline practitioners, the criminal justice system, local communities, and policy-makers to develop sustainable protection systems, reducing harm and recognising victims of forced criminality whilst actively preventing their re-traumatisation. This document provides a framework for the development of standard operational procedures that uphold dignity and safety and promote recovery, while recognising the critical importance of multiagency and inter-agency partnership throughout all stages of intervention.

Definitions

Exploitation in criminal activities

Exploitation in criminal activities is a form of trafficking where individuals, both children and vulnerable adults, are manipulated, threatened, groomed or coerced into committing criminal acts, in turn benefitting other individuals or groups; this is often done through a variety of trafficking means including deception, debt bondage, promise of reward/protection, or through violence. Trafficking for forced criminality (or for exploitation in criminal activities) can be understood as trafficking in persons for the purpose of exploitation of victims through forcing or otherwise compelling them to commit criminal acts for economic or other gains of traffickers or exploiters.[3] UNICEF similarly highlights that forced criminal activity constitutes a form of child exploitation and abuse, rooted in power imbalance and resulting in significant physical, psychological, and developmental harm.[4]

There are many examples of victims forced into offending; they range from low level to high gravity offences. In several OSCE participating States, this type of exploitation occurs through different criminal activities. For instance, as in the United Kingdom "county lines" is defined as a "violent and exploitative form of drug distribution."[5] Both adults and children are forced into cannabis cultivation; however, Europol reports that organised crime groups deliberately target migrants and socially isolated adults for cannabis cultivation because they are easier to control and less likely to seek help[6]. While GRETA documents cases where children trafficked for criminality are forced to stay in controlled accommodation while carrying out drug distribution[7], this can also occur online. A growing body of evidence indicates that organised crime groups (OCGs) are using social media, encrypted messaging apps, and gaming platforms to recruit individuals into money laundering, fraud, cybercrimes, and drug distribution.[8]

Over the past years, criminal groups have employed trafficking modus operandi to exploit individuals in a range of financial crimes, such as benefit fraud, extortion, money laundering, identity related offences, and 'money mules.' Europol highlights that adults are frequently targeted through fake job offers, debt relief scams, or promises of quick income, while young people are approached through online grooming, peer recruitment, or coercion.[9]

UNODC documents that victims are deceived or pressured into opening bank accounts, transferring funds, or allowing their identity to be used for criminal transactions, sometimes under threat, blackmail, or economic vulnerability[10].

New and emerging patterns of forced criminality have developed alongside the global expansion of social media platforms and digital connectivity.

Deceptive offers: individuals are offered free or heavily subsided holidays, but this results in the coercion of that person to transport illicit substances across international borders.

Exploitation in cyber scamming is rapidly on the rise, and at current there are three methods on the forefront:

- The first is exploiters are laundering money that they receive through several avenues such as through legitimate business fronts.
- Next, there is 'off chain' coercion, which is where threats of physical violence, kidnapping, and torture are used to obtain someone's crypto wallet or digital key.
- Finally, cyber scamming (often referred to as "pig butchering"), is a type of fraud which works based on emotional manipulation, building trust to invest in fraudulent platforms, cryptos or pay for fake items.

Traffickers use celebrity personas, or stolen identities to flaunt lavish and successful lifestyles to hook in individuals or employ "lover-boy" technique to manipulate romantic relationships.

Victims of forced criminality

Pursuant to the UN Declaration of Basic Principles of Justice for Victims of Crime and Abuse of Power, a victim is any person who has suffered physical, mental, emotional, or economic harm, or impairment of fundamental rights because of acts or omissions that violate criminal law[11]. The Council of Europe Convention on Action against Trafficking in Human Beings defines a victim of trafficking as any person subjected to the acts, means, and purpose elements of trafficking, and emphasises that identification does not depend on the initiation of criminal proceedings.[12] The EU Anti Trafficking Directive 2011/36/EU similarly recognises any person who has been trafficked as a victim of crime, clarifying that consent is irrelevant where coercive or exploitative means are used, and that children are victims regardless of means.[13] Together, these instruments establish that victim status arises from the harm suffered – not from peration with authorities or the stage of criminal proceedings – and that trafficking victims are entitled to protection and assistance as victims from the moment of identification.

The UN's 2024 Global Trafficking in Persons Report (GLOTIP)[14] highlighted the gendered nature of trafficking for forced criminality, showing that this form of exploitation disproportionately affects males. While historically women and girls have been the primary target of trafficking perpetrators, recent data reveal a distinct pattern in criminal exploitation. According to GLOTIP in 2022, 68% of child victims and 24% of adult victims subjected to forced criminality were male. There was also a higher concentration of victims in Western and Southern Europe, at 22%.

We must recognise that exploitation results in multi-layered cases of victims, when a person has been trafficked for forced criminality is coerced into offending, particularly to commit financial or cyber-crimes this creates a secondary victim of the offence. It is important not to diminish the fact that both individuals are victims in the matter. The multitude of secondary victims can be vast in cases such as cybercrime, including online fraud where a large number of individuals can be scammed at one time; there is then the matter of lasting financial and psychological consequences due to these offences.

This directly illustrates the cycle of continuum of victimisation, whereby initial victims are systemically transformed into instruments of victimisation of others through criminal acts they were compelled to commit related to their trafficking. The survivor's actions may reflect deeply embedded coercion that had become heavily normalised within the context of sustained violence and control, particularly given their cognitive and emotional processes were still being developed.

Guiding Elements for Standard Operational Procedures

Indicators for criminal exploitation victim identification

With a global rise in criminal exploitation, there is an urgent need for clear indicators of this form of human trafficking, because victims often lack the ability or opportunity to safely disclose what is happening to them. Over time, exploitation has been specifically engineered to look like an individual's choice; perpetrators often use methods of grooming, debt bondage, threats, violence, and psychological manipulation to make a person feel and appear complicit in their own exploitation. Exploiters use this as a deterrent method, as they deeply embed individuals into cycles of crime, coercing them to believe they are part of the crime leading to the committal of further offences. Contact with professionals at this stage can often lead to the signs of exploitation being misinterpreted as deliberate criminal behaviour. Therefore, indicators have been created to help a wide network of professionals navigate the victim-offender overlap. These indicators listed in this guidance are designed to help practitioners recognise behaviour that may appear to be consensual criminal activity is often likely to be someone in survival mode because of criminal exploitation. Knowledge of nuanced elements and the recognition of the signs at an earlier stage allows practitioners to create preventative interventions, challenge harmful narratives, and avoid re-traumatisation of trafficking victims. It can also help channel resources to investigate and prosecute the real criminals responsible for wider criminal activity rather than to punish trafficking victims.

The importance of these indicators' links with the necessity of shaping both safeguarding victims and legal responses to this form of exploitation; they become the foundation that enables protection, diversion from the criminal justice system, and access to specialist support. Without fully comprehending these signs of criminal exploitation, individuals will continue to be punished for their own exploitation, which in turn reinforces cycles of harm going against the basic principles of international law and creates further security challenges, de-facto encouraging traffickers to replicate the model repeatedly[15]. These indicators must not be used merely as observational tools but serve an essential safeguard against clear systemic injustice.

Personal and Physical Indicators

- Missing episodes (where someone goes missing)
- Unexplained bodily injuries
- Found with drugs inside body cavities (also known as plugging, banking, "fridge," which all mean "where things have been concealed for transporting usually inserted into the rectum or vagina")[16]
- Increased use of drugs or alcohol
- Start wearing specific colours tied to a gang or organised crime group
- Found with large quantities of drugs or weapons
- Sudden changes in appearance or hygiene

Psychological and Behavioural Indicators

- Behavioural changes (isolation, aggression, overconfidence)
- Fear
- Hypervigilance, constantly checking surroundings
- Rehearsed/Scripted explanations
- Minimising risk or normalising exploitation
- Rapid mood swings
- Withdrawal of allegations of exploitation or criminal cases
- Self harm (history of self-harm or suspicion/visible signs of self-harm, behaviour indicative or inclination toward self-harm) or significant changes in emotional wellbeing
- Becoming withdrawn and secretive
- Early signs of glamourising lifestyle behaviour (movies, music, culture, social media)

Social Indicators

- Unexplained absences and lateness from, or disengagement with, school, college, training, or work
- Relationships with controlling individuals or groups (could be older individuals, known or unknown)
- Befriending strangers online
- Sudden change in social status (children and young people becoming more popular and protected by older peers)
- Being present in known hotspots for criminality
- Found in deprivileged position (as blue-collar workers or forced labour) in locations where illegal goods are produced (e.g., drugs or illegal tobacco factories) or illegal activities are conducted (e.g., scam compartments)

- Found in transportation hubs (e.g., airports) with illicit goods in their luggage, provided by another person
- Found serving as a driver or a seaman transporting irregular migrants by land or sea, with no or minimum professional driver/seaman training and experience

Economic/Financial Indicators

- Unexplained sudden material gain
- Being asked to hold money or items for others or transfer money via own bank account for a percentage
- Being pressured to open bank accounts or hand over bank cards
- Multiple bank accounts (children and young people)
- Were proposed to earn good money if they have bank accounts, with no further details provided
- Were proposed high-paying online jobs with no experience
- Were proposed well-paid jobs in pharmaceutical industry, IT company, call centre, as a tour guide or as a driver or seaman (e.g., for touristic yachts), with no experience, education or documents required
- Were proposed to work as recruiters for models, content-managers or distributors of a model-generated content
- Receiving large amounts into their accounts or in person
- Receiving virtual gifts or delivered goods
- Being involved in debt repayments with the inability to explain
- Engagement with online fraudulent schemes (betting, trading, money mule, drug transportation)
- Use of cryptocurrency and digital wallets with no prior experience or knowledge, therefore beyond normal ability or behaviour

Indicators Specific to the Online Landscape

- Multiple social media accounts
- Sudden increase in encrypted messaging apps
- Being added to large group chats with unknown individuals
- Receiving instructions, threats or tasks via online platforms
- Use of location sharing features with unknown individuals
- Burner accounts (temporary or anonymous social media profile created to browse, post, or interact without revealing the user's real identity)
- Chronic overuse of electronic devices
- Being pressured into sending personal information such as ID photos or bank details
- Worried about being away from technological devices
- Engagement with online fraudulent schemes (also listed under financial, but still an online specific pattern)
- Sudden changes in online behaviour (changing username, deleting old accounts, and wiping chat histories)

Risks associated with criminal exploitation

- Loss of developmental milestones (general, school/education, physical and mental)
- Reduced future opportunities
- Physical injuries, including risk of serious violence and death
- Emotional and psychological trauma
- Sexual violence, including sexual assault, rape, internally inserting drugs, sextortion, revenge, or punishment
- Debt bondage
- Neglect of self/basic needs
- Inhumane living conditions
- Tiredness and sleep deprivation (both psychological and physical)
- Unable to engage in academic or physical work
- Arrested and/or charged with criminal acts, criminal records, prison sentences
- Strained relationships
- Strange relationships (including new love interests)
- Long-term health consequences
- Identity distortion
- Emotional, physical, and financial dependency
- Community retaliation
- Exposure to extremist or violent content
- Intergenerational harm (that disrupts the social, emotional, economic, and relational foundations on which families rely)
- Increased vulnerability to further exploitation
- Secondary victims, sometimes of serious crime

Vulnerabilities

Vulnerabilities in criminal exploitation are the personal, situational, and structural factors that make an individual at greater risk of grooming, coercion, and control. They create openings that traffickers actively look for and manipulate. Understanding these vulnerabilities is essential because it shifts the focus from blaming the victim to recognising the conditions that made the exploitation possible. It enables practitioners to identify risks earlier, tailor interventions more effectively, and challenge harmful narratives that frame exploited individuals as offenders rather than victims. Ultimately, recognising vulnerabilities is a core safeguard; it helps prevent exploitation, supports recovery, and ensures responses are rooted in protection rather than punishment.

Structural

- Poverty, deprivation, and limited access to resources
- Social and economic inequality that restricts opportunities
- Under resourced or overstretched safeguarding systems
- Weak or inconsistent protection from statutory services
- Community environments with high crime, violence, or exploitation activity
- Lack of safe spaces, youth provision, or positive community infrastructure
- Marginalised or minority communities

Situational

- Previous criminal history or contact with the justice system
- Migratory status (undocumented, separated from family)
- Family conflict, neglect, domestic abuse, or parental substance misuse
- Being in institutional care, experiencing placement instability, or going missing
- Care leavers who “age out” of child protection systems
- Disengagement from education, exclusion, or poor attendance
- Unemployment or insecure/low-paid work
- Lack of basic social support, including health insurance, child, housing, disability, retirement or other allowances as relevant
- Social isolation or limited support networks
- Fleeing conflict, natural disasters, or other crises
- Impacted by emergencies (e.g., children spending more time online during the lockdown)
- Financial pressures, debt, or responsibility to provide for family, especially with multiple dependents
- Recent bereavement, relationship breakdown, or other destabilising life events (e.g., health emergency in the family)

Personal

- Young age, especially adolescence (developmental risk for grooming)
- Gender-related risks (e.g., boys overlooked as victims; girls facing sexualised coercion)
- Language barriers
- Disabilities, including learning difficulties, neurodivergence, or communication needs
- Mental health challenges that reduce resilience or increase dependency
- Substance abuse
- History of trauma, abuse, or exposure to violence
- Low self-esteem, unmet emotional needs, or desire for belonging
- Impulsivity or risk taking linked to developmental stage or unmet needs[17]

Roles and Responsibilities

While preventing and responding to criminal exploitation will always require a structured and co-ordinated approach, it is important that roles and responsibilities are clearly defined and consistently upheld. Within the wide range of stakeholders with responsibilities, there are both statutory and non-statutory partners. Statutory partners are those who hold legal duties to identify risk and permission for sharing information, then take the appropriate safeguarding measures. The non-statutory partners often provide essential specialist support as they have a wider scope and awareness of the community and the ability to report, which can lead to earlier interventions.

No single service holds full responsibility, particularly in transnational situations. It is a partnership of shared responsibility that is needed, allowing interventions to be clear and co-ordinated instead of fragmented. It is imperative that all individuals involved remember that we all have the same mission, the goal is to put an end to criminal exploitation, and the immediate priority is to stop the network and decision-maker, not the sole perpetrator. The collective duty is essential for building a structurally sound system, which can prevent criminal exploitation, whilst supporting victims and holding perpetrators accountable. All those involved need to be trauma-informed and actively use interventions and advocacy in which victims are not re-traumatised when seeking support.

It is important to note that embedding lived experience consultants throughout all aspects of society, government, and businesses creates a strengthened system and everyone's insights can help to adapt policy, decrease risk of exploitation, and promote awareness.

Roles

Government responsibility		
Area of responsibility	**Who it includes**	**Primary responsibilities**
National Government	Cabinet Office National Anti-Trafficking Co-ordinator and relevant ministry or departments	Sets national policy and proposes legislative guidance, manages the National Referral Mechanism (NRM), funds victim services, national helplines, prevention measures and enforcement initiatives, and leads and co-ordinates cross- government strategy. Embeds lived experience consultants to strengthen all work being undertaken: everyone's insights can help to adapt policy, decrease risk of exploitation, and promote awareness. Advises and guides the work of local government structures.
Local Government	Social Services and Child Protection Authorities	Acts as a frontline agency with statutory duties to identify victims including child victims, assess needs and risks, serve as a case manager, secure safe accommodation, and coordinate immediate safeguarding responses,services andlong-term assistance.
Ministry for Education or equivalent	Schools, Colleges	Develops safeguarding policy and statutory guidance for the education sector; ensures children and youth, as well as parents are informed of the risks of trafficking for exploitation in criminal activities and know where to seek advice and help; ensures providers are trained to recognise grooming, coercion, and multitude of indicators of criminal exploitation and know proper referral pathways; can identify potential victims and refer to care.
Ministries of Health & Social Services/Care or equivalents	National Social Welfare Agency and Child Protection Authorities	Develops Standard Operating Procedures for identification, assessment of needs, case management, and assistance to victims of trafficking, including children, to be used by health and social welfare services. Produces clinical guidance on trauma and exploitation. Ensures healthcare professionals can identify, document, report concerns, and contribute effectively to multi agency identification, medical assistance and safeguarding.
	Hospital and Public Health Services	

Criminal justice system		
Area of responsibility	**Who it includes**	**Primary responsibilities**
Police	Local police forces (including precinct, patrol and community police), specialist anti-trafficking, exploitation and county lines units, cyber police, youth police units, should consult with other specialized law enforcement such as counter-narcotics- or anti-fraud-related law enforcement	Prioritise the investigation of traffickers and exploiters rather than criminalising victims for offences linked to their exploitation. Ensuring to check for trafficking-related indicators in adjacent crimes, like smuggling of migrants or goods, online scamming, production and distribution of drugs and pornographic materials, financial crimes, production of counterfeit goods, and benefit fraud. Gathering intelligence ethically and safeguarding victims throughout operations, minimising risk and preventing re-traumatisation, and co-ordinating with specialist agencies to ensure safety and support.
Prosecution Service	Prosecutors, specialist trafficking leads	Assess evidence of coercion, grooming, or trafficking when an individual's actions are a direct outcome of exploitation. When there are indicators of human trafficking, or criminal exploitation, practitioners should work towards dismissing cases or diverting away from criminal proceedings, recognising the individual as a victim in need of protection and refer to care.
Courts & Probation	Judiciary, Court staff, Probation Service, Youth Justice practitioners, Lawyers, Bar, Free legal aid	Recognise and treat exploited individuals as vulnerable potential witnesses and ensure all court processes are trauma informed. Justice agencies working together collaboratively to recognize and identify trafficking victims among individuals in detention or suspects being prosecuted, support rehabilitation, and deliver a holistic approach to safeguarding throughout custody and within the community. Continual monitoring of individuals post release to prevent them being re-trafficked and strengthening long-term safety. Practitioners to use a tailored approach, co-creating support plans to rebuild stability, autonomy, and trust, and support with criminal record relief process.
Financial intelligence unit (FIU)	Financial intelligence and investigation officers	Detect, analyse, and investigate/disclose suspicious financial transactions and activities related to money laundering, fraud, scams, drugs, and cybercrime to relevant law enforcement agencies. Ensuring reporting entities (financial institutions) are aware of and use red-flag indicators related to human trafficking.
Border/migration authorities	National Border and immigration services	As frontline agencies identify potential victims and traffickers through screening and document checks at border check points and during immigration process (including in detention), assess risks among migrants and travellers, and detect suspicious travel patterns; refer victims to protection services rather than treating them as offenders, while also supporting law enforcement through intelligence gathering and investigations.
Labour inspection services and labour law enforcement authorities	Labour inspectors, agencies responsible for enforcing labour laws, regulating recruitment agencies and temporary work	Monitor workplaces to ensure legality of work and detect signs of human trafficking among workers. Refer potential victims to protection services, ensuring they are treated as victims rather than offenders, and work alongside law enforcement to support investigations and prosecutions.

Businesses/non-profit/community		
Area of responsibility	**Who it includes**	**Primary responsibilities**
Non-Governmental Organizations (NGOs)	Charities, CIC, SIC	Identifying potential victims and referring to care and NRM. Operating safe houses and shelter accommodation. Providing long-term reintegration support, with a plan of restoring victims basic needs, emotional wellbeing and sense of security whilst also offering legal advice, advocacy, and language translation. Delivering outreach and specialist services. Provide holistic support and put in place clear and supported transitions to decrease risk of re-traumatisation.
Businesses	Companies, supply chain partners, procurement teams	Ensuring supply chain transparency, whilst complying with national and international legislation. Identifying, escalating, and reporting concerns linked to exploitation at any stage of procurement, production, or service delivery to prevent forced labour.
	Technology companies/ social media platforms	Tech companies play an increasingly important role in preventing and tackling forced criminality by using advanced technologies like artificial intelligence to detect suspicious behaviour and financial transactions, dismantle criminal networks, and identify potential victims. They are essential in ensuring user safety features, enabling reporting systems, and flagging harmful interactions, and share intelligence and support investigations. At the same time, financial services and crypto companies must follow and report financial flows and detect suspicious transactions and activities linked to human trafficking.
	Financial institutions including crypto and blockchain technology companies	
Community Groups	Faith-based organizations, sports clubs, youth centres, neighbourhood groups	Acting as informal community monitors, through noticing early signs of exploitation or "cuckooing" ("criminals take control over the home of another person to use it for criminal activity")[18] Being a safe, trusted space for individuals to speak openly and safely, signpost everyone to safeguarding and support services, especially those who can properly meet their needs.

Responsibilities during intervention phases

Health and social care responsibility		
Area of responsibility	**Who it includes**	**Primary responsibilities**
Identification	Medical staff, Accident & Emergency teams, general doctors/practitioners, paramedics	Recognising less obvious indicators such as untreated and/or repeated injuries, malnutrition, exhaustion, heightened anxiety, or fear of authority, alongside the ability to document concerns accurately.
Patient-Centred Care	Doctors, nurses, clinical staff	Providing medical treatment without pressuring the victim to engage with police and creating a safe, non judgemental environment that prioritises wellbeing and trust; becoming a safeguarding principle rather than a single action.
Safeguarding	Health professionals, safeguarding leads, social care practitioners	Clinicians acting as "eyes and ears" within clinical settings, making referrals to social services for children and vulnerable adults and for the formal identification as a victim of trafficking; sharing information appropriately while respecting confidentiality. Recognising indicators when aiding vulnerable families and individuals, including children; reporting to law enforcement in case of immediate danger and the need to withdraw a presumed victim from a trafficking situation.
Mental Health Support	Mental health teams, psychologists, trauma specialists working with adults and children	Providing trauma-informed therapeutic support that addresses the impact of coercion, fear, and psychological manipulation. Practitioners helping victims rebuild a sense of autonomy and emotional stability, develop safety strategies, and recognising recovery as a gradual and victim-led process.

Education		
Area of responsibility	**Who it includes**	**Primary responsibilities**
Early Intervention	Schools, colleges, universities, pastoral teams, safeguarding leads	Identifying students at risk of exploitation; making timely referrals through the right safeguarding channels, staying consistent throughout the entire process and ensuring it is done through a trauma-informed, child-centred approach. Recognising indicators early and keeping up to date with specialist training.
Curriculum & Prevention Education	Teachers, curriculum leads, PSHE rdinators	Designing and delivering specialist curriculum on online safety, grooming tactics, healthy relationships, emotional intelligence, and how to recognise exploitative dynamics and vulnerabilities as this equips students with the knowledge and confidence to protect themselves and their peers. This includes helping children understand how offenders operate, how manipulation and coercion can feel in real time, and how to spot early warning signs in both online and offline contexts.
Safe and Supportive Environment	All education staff, designated safeguarding leads (DSLs), student support services	Providing a trusted space where children can share concerns without fear of punishment or criminalisation is essential, ensuring the safeguarding responses prioritise protection over discipline. It is imperative to have strong links with local partnerships to collaborate with, forming a protective network. More specifically, collaborating with mentoring organizations, community groups, and services led by people with lived experience to offer children additional layers of support, advocacy, and relational safety.
Mental Health Support	Mental health teams, psychologists, trauma specialists working with adults and children	Providing trauma-informed therapeutic support that addresses the impact of coercion, fear, and psychological manipulation. Practitioners helping victims rebuild a sense of autonomy and emotional stability, develop safety strategies, and recognising recovery as a gradual and victim-led process.

Importance of lived experience embedded into systemic change

Lived experience is not an optional add on, it is a critical safeguard against bias, blind spots, harmful assumptions, and systemic harm. The insight that is brought by those with lived experience cannot be replicated through training or policy alone. Lived experience disrupts stereotypes about profiling, what choice and compliance look like through the lens of coercion. Both previous and current systems still have gaps that re-traumatise individuals and often fail to fully meet their needs; someone with lived experience can show where policy and practice is falling short, adding invaluable support.

Recommendations for Policy and Practice

Effective policies and practices to tackle trafficking for exploitation in criminal activities must focus on a combination of robust measures that are geared towards preventing this form of exploitation, identifying and protecting victims and at-risk populations, and ensuring accountability for perpetrators. The recommendations proposed in this guidance document aim at enhancing the capacities of a range of stakeholders in ensuring the policies and strategies are victim-centred and trauma-informed, strengthening both agency competencies and approaches to victim protection and safeguarding and improving legal frameworks to ensure victims are not prosecuted for criminal activities of their traffickers and finally equipping practitioners across criminal justice proceedings with knowledge and tools to conduct effective prosecution of criminals.

Recommendation 1: Ensuring trauma-informed, victim-centred practice

Organizations should adopt a trauma-informed approach that recognises that trauma has a significant impact on an individual's ability to converse about their experience, blocking or altering memories and sense of time, effecting the way they trust, and how they engage and share disclosures with both people and organizations. Professionals need to recognise that an individual's behaviour, choices, and relationships/friendships may be based on coercion, unmet needs, strategies to survive, and fear. Additionally, it is essential for practitioners to be aware of how an individual's trauma responses, such as dissociation or attachment patterns, may affect their behaviour and needs.

Key Points[20]**:**

- **No expectation of immediate or linear disclosure:** a disclosure may not come immediately and it may not all occur at once or happen in chronological order; trauma can cause fragmentation in memories and fear can suppress the truth of an individual's experience.

- **Choice, control, and emotional safety prioritised:** with exploitation, individuals endure a wide range of negative experiences such as neglect, powerlessness, psychological/physical trauma, manipulation, and normalisation. Professionals need to go at a pace that feels safe and comfortable for the individual as emotional safety needs to take priority over procedural efficiency.

- **Awareness of fear of authority and power imbalance:** professionals need to have a level of understanding that there are often barriers in place such as uniform, badges, types of language used, and even buildings; it is the responsibility of the practitioner to adjust to suit the needs of the individual. Practitioners should meet with compassion and curiosity instead of judgment and hostility, ensuring they are always present and aware of any triggers or dysregulation of the individual they are working with.

Recommendation 2:
Strengthening safeguarding support, child protection, and social services through increased capacity

To effectively support children and vulnerable adults, safeguarding, child protection, and social welfare authorities need time, capacity, and competence training to meaningfully engage. Chronic high caseloads across safeguarding services and organizations places a significant strain on the service, limiting the overall quality of assessments, risk management, building relationships, and increasing risk of harm. Increasing human and financial capacities is a critical section of structural reform that is needed to strengthen systems, support early intervention, and ensure that the practitioner has the space to act in a victim-centred and trauma-informed approach. The importance of this not only has a positive effect on vulnerable individuals and communities, but also on staff wellbeing and retention. It is also important to note that due to mandates across different regions, cases may increase but this should consistently be reviewed.

Key Points[21]**:**

- **Enable early identification and intervention:** having manageable caseloads allows professionals to identify risks at an earlier stage, putting preventative measures in place and reducing the level of harm vulnerable individuals can face.
- **Practice standards:** emphasise the importance of safe staffing levels and effective supervision, capped caseloads, and ethical decision-making while systemic failures prevent practitioners from being able to do so.
- **Serious case reviews and safeguarding enquiries:** both new serious case reviews and historical ones have consistently identified unmanageable caseloads and time constraints as contributing factors of poor outcomes.
- **Supports informed decision-making, case management, and multiagency working:** when there is a realistic and safe workload, it will give space to practitioners to have time to meaningfully engage in more accurate needs and risk assessments, establishment of rehabilitation plans, their implementation, monitoring and adjustment, information sharing, and reflective supervision.

Recommendation 3:
Conducting mandatory youth criminal justice training for statutory legal professionals

Children who have been exploited, neglected or harmed and subsequently become involved in the criminal justice system have distinct developmental, psychological, and safeguarding needs that are fundamentally different from an adult. Children are also protected by a separate body of law, guidance, and international standards and their rights mean they should be treated as children instead of offenders. Often, a lawyer or a free legal aid professional is not required to have specialist training before working with children and therefore are not able to keep them safe from harm, treat them as victims instead of criminals, and direct them into the correct safeguarded routes such as a referral to the National Referral Mechanism.

Key Points:

- **Mandate specialist youth justice training for lawyers and ensure pro-bono legal system:** legal professionals working in a sector where they may represent children and young people should be required to complete in-depth specialist training on youth justice law, human trafficking (particularly forced criminality), child development, trauma, neurodiversity, safeguarding, and effective participation. This training improves the quality and consistency of legal advice, representation, and decision-making, by ensuring legal professionals are equipped to identify vulnerability, exploitation, unmet welfare needs, and to advocate for child appropriate outcomes.
- **Reduce criminalisation and custodial outcomes:** training focused on diversion, proportionality, and child first principles can support earlier use of out of court disposals and drastically reduce reliance on punitive responses that are harmful and ineffective for children.
- **Compliance with child first approach and human right obligations:** policy reform and frequent, in-depth training help alignment with domestic and international standards, including the UN Convention on the Rights of the Child and the Child First Youth Justice framework.

Recommendation 4: Professional curiosity as a safeguarding standard

By "professional" it is meant everyone who comes into contact with a potential victim of forced criminality. Professional curiosity needs to be implemented at the heart of everyday practice. Professionals need to be supported and expected to actively query inconsistencies, contextual risks, indicators of harm, coercion, and exploitation. There should not be a sole reliance on disclosures; multi-agency curiosity and communication need to be the standard. It recognises that individuals experiencing harm or exploitation may be unable, or unsafe, to disclose, and apparent co-operation from these individuals or caregivers in cases when the potential victim is a child may mask ongoing risk.

Key Points[22]**:**

- **Professional curiosity embedded in supervision, training, and decision-making:** Curiosity should be explicitly embedded within supervision frameworks, workforce training, and organizational decision-making processes. Reflective supervision should routinely allow practitioners to explore what is known, what is unknown, and what may be overlooked, encouraging them to test hypotheses, examine contradictions, and consider alternative explanations for behaviour or circumstances. Training should reinforce curiosity as a safeguarding skill, not a personality trait, and support practitioners to apply it consistently across all cases.

- **Challenge of assumptions and "respectful uncertainty":** Practitioners should be supported to maintain a stance of respectful uncertainty valuing relationships and lived experience, while avoiding fixed assumptions or premature conclusions. This includes challenging assumptions based on prior assessments, family narratives, cultural stereotypes, or professional familiarity.

- **Recognition of disguised compliance and rehearsed narratives:** At the policy level, safeguarding practice must show active recognition of indicators of disguised compliance, including partial engagement, rehearsed explanations, or improvements that do not align with lived experiences or observed behaviour. Practitioners should be encouraged to explore whether compliance reflects genuine change or is being used to deflect professional attention, reduce scrutiny, or maintain control.

Recommendation 5: Clear safeguarding, information-sharing, and escalation processes

Human trafficking concerns should be treated as safeguarding matters, with set escalation routes, lawful information-sharing, and timely referral to statutory agencies, including use of the National Referral Mechanism (NRM). There needs to be extensive training for all professionals involved in working with vulnerable individuals, with frequent updates in training – at least once online and once a year in person.

Key Points[23]**:**

- **Explicit guidance on safeguarding when it overrides consent:** policies need to be updated to have specific and clarified safeguarding responsibilities of what overrides consent, such as risk of significant harm, coercion, control or exploitation. Professionals need to have a thorough understanding that lack of consent does not equate to lack of risk; practitioners need to review the bigger picture of fear, threats, absence of understanding, trauma, and dependency.

- **Lawful, confident information-sharing in line with GDPR and safeguarding/social protection law:** professionals must have an in-depth understanding of information-sharing in line with GDPR and safeguarding/social protection law, ensuring this is through a person-centred approach to support victims' autonomy. Guidance needs to distinguish between data protection barriers and permissive safeguarding powers, which in turn reinforces what information is necessary to share to protect individuals from harm.

- **Clear internal and external escalation pathways in every organization:** each organization needs to have clearly documented internal escalation routes and external referral pathways. The escalation processes need to be simple, widely publicised and actively reinforced through supervision and leadership.

Recommendation 6: Multi-agency and contextual safeguarding

The organization should actively collaborate with other agencies and bodies, to ensure holistic support when addressing contextual risks linked to trafficking. Multi-agency and safeguarding responses require all sectors to comprehend that exploitation does not occur in isolation, and its outcomes influence many, if not all, areas of human life; therefore, a single service is not able to meet their needs entirely or keep an individual safe. Identification of trafficking risks will trigger ongoing risk assessments and safety planning, recognising the high risk of re-exploitation.

Key Points[24]**:**

- **Engagement with police, local authorities, NGOs, health, and housing:** Police need to contribute intelligence to other agencies regarding issues in the area, information about perpetrators, emerging trends or ongoing cases that have relevance. Local authorities are at the forefront of care planning; there needs to be co-ordination of statutory duties and continual risk management; oversight of partner agency referrals and holding agencies accountable when they are delayed or insufficient.

- **Consideration of locations, networks, workplaces, and peer groups:** professionals should understand and collaborate with individuals to find out areas that are not safe, provide safe travel, family dynamics, and local area issues. Also, they should seek to find positive protective factors such as friends, relatives or a particular professional.

- **Clear roles within multi-agency arrangements:** this prevents duplication of work for professionals, whilst also avoiding re-traumatisation of victims as they are not having to tell their story repeatedly. Each agency involved in this partnership needs to have and understand their specific roles/responsibilities and their level of decision-making powers and continually contribute to risk assessments and safety and rehabilitation plans.

- **Continuous risk assessments:** exploiters continually adapt; there are shifts in networks and individuals go through different stages of recovery and will have different needs each stage.

- **Individualised safety and rehabilitation/recovery planning:** a person-centred approach is a necessity here; each individual needs a tailored approach basing it around their own identity, trauma, history, and current risk level. These plans need to be regularly reviewed and updated.

- **Awareness of post-NRM vulnerabilities:** exiting the NRM process may leave an individual at heightened vulnerability; there needs to be continual holistic support from all agencies as individuals become at risk of isolation, homelessness or insecure housing, poverty, immigration uncertainty, and limited access to education or employment. In turn, these factors can quickly result in the individual becoming re-trafficked. Basic life skills training is necessary to help reintegration back into society and education around exploitation to prevent re-trafficking. Targeted professional training and economic empowerment would also provide for victims' recovery and help sustain the positive outcomes of other support provided via the NRM.

- **One defined point of contact:** a single and consistent point of contact will reduce the emotional burden the individual is facing when having to repeatedly disclose or talk about their experience.

Recommendation 7:
Skilled Workforce, Supervision and Staff Wellbeing

Staff should receive regular training, reflective supervision, and wellbeing support to ensure safe, ethical, and effective responses to trafficking concerns. Working with trafficking victims requires specialist knowledge and, as it constantly evolves over time, knowledge needs to keep expanding. Proactive measures must also be put into place to support practitioners' emotional wellbeing, preventing burnout and vicarious trauma.

Key Points[25]:

- **Mandatory trafficking and safeguarding training:** all roles in an organization need to have in-depth training in trafficking and exploitation. Core trainings need to include awareness, indicators, stages of reporting exploitation, coercive control, a trauma-informed approach, and understanding of what exploitation looks like. This means that all staff can assess and identify concerns, reducing the chance of missed opportunities and re-traumatising individuals.

- **Reflective supervision to support curiosity and decision-making:** consistent and structured reflective supervision (singular and group) that encourages critical thinking for all practitioners involved is necessary, giving a safe space to explore not only cases but what they bring up for that practitioner; having therapeutic support available can provide safety in these settings.

- **Recognition and mitigation of vicarious trauma:** staff wellbeing can be significantly impacted by the trauma they are surrounded by and taking onboard; it is therefore imperative that policies are implemented to take proactive measures in identifying signs of vicarious trauma early and giving frontline staff consistent access to external psychological support. Workloads need to be based on case complexity and safety; there needs to be a realistic cap on caseloads agreed nationwide.

- **Code of conduct:** staff of the supporting organizations, including frontline responders, should be sensitized to the risks of human trafficking in different contexts to avoid unintentionally contributing to endangering the organization's beneficiaries or colleagues. An organization should elaborate as early as possible a policy on human trafficking, SOPs, and the code of conduct to be followed by its staff.

Recommendation 8:
Governance, accountability, and continuous learning

Senior leaders and safeguarding leads will maintain oversight of trafficking responses through audit, learning reviews, and policy updates informed by evidence and lived experience. All styles of practice need to reflect a trauma-informed approach. Policy needs to align with both national and international standards. There needs to be clear structured oversight, and every practitioner should know to whom to escalate.

Key Points[26]:

- **Executive ownership of safeguarding risks:** there should be clear guidance of accountability at every level and specific organizational expectations; when professionals fall short of their duty this needs to be reviewed and intervened.

- **Learning from incidents and near misses:** having an approach of open discussion and a place to learn from mistakes allows practitioners to grow and do better in the future; it strengthens their learning whilst also addressing root causes of problems. Having this openness allows for a reduction in harm.

- **Ethical engagement with survivor-led organizations:** survivors of exploitation need to be at the forefront of not only frontline work, but also in cultivating policy. It is imperative then when survivor-led organizations are brought in they are compensated fairly and have been thoroughly supported.

Recommendation 10: Legal safeguarding against punishment of victims

The punishment of victims of trafficking (for crimes that are caused or directly linked to having been trafficked) constitutes a serious denial of justice. States are obliged not to impose penalties for crimes committed by trafficking victims as a consequence, or in the course, of their having been trafficked.[27]

States should enact legislation that effectively guarantees the protection of the rights of victims or potential victims of trafficking. This duty includes ensuring that such individuals are not detained, prosecuted, or punished for criminal acts connected to their being trafficked or as a consequence of having been trafficked. The non-punishment principle is an obligation designed to safeguard and benefit trafficking victims (and focus States' resources on pursuing criminal accountability for the traffickers instead), and it must be firmly protected under the law and consistently implemented in practice.

The non-punishment of trafficking victims should be enshrined in States' laws. This also means the laws and policies on the non-punishment principle should provide a flexible, non-exhaustive list of offenses commonly associated with human trafficking, for which victims will not face punishment (including prosecution). Specific guidance should be widely shared with prosecutors, judges, and law enforcement, beyond those specialized in trafficking investigations to include those responsible for drug enforcement and financial and cyber-crimes. They should also be made available to victims' advocates, pro-bono lawyers, and NGOs, and incorporated into relevant training programs for law enforcement, prosecutors, and judges.

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