

First Responder Organisations

Amendment

After clause 43, insert new clause -

"First Responder Organisations

- (1) For the purposes of developing a more effective system for identifying victims of modern slavery, ensuring timely safeguarding and consistent access to support, the Secretary of State must, within 3 months of the passing of this Act, and on an annual basis, thereafter, make provision to broaden the number of first responder organisations which are not public authorities ("non-statutory first responder organisations")—*
- (a) following regular review of—*
- (i) the number of referrals received and increasing the number of non-statutory first responder organisations according to the increase in referrals received; and*
 - (ii) the geographic and exploitation type gaps and increasing the number of non-statutory first responder organisations according to identified geographic and exploitation type need;*
- (b) through open tendering of non-statutory first responder organisations based on the needs identified in subsection (1)(a), established—*
- (i) through a transparent recruitment process; and*
 - (ii) with a focus on specialist professional expertise.*
- (2) For the purpose of addressing training gaps amongst first responder organisations, the Secretary of State must review, report on, and analyse the quantity and quality of training provided to all first responder organisations, and particularly for statutory first responder organisations.*
- (3) For the purposes of increasing capacity and efficiency amongst first responder organisations, the Secretary of State must provide resources to non-statutory first responder organisations."*

Member's explanatory statement

This new clause would require the Secretary of State to increase first responder capacity for the purposes of ensuring effective safeguarding and access to support for survivors of modern slavery by enabling more first responder organisations to make high-quality referrals to the National Referral Mechanism.

Background

First responder organisations (FROs) are specifically authorised to refer a potential survivor of human trafficking and modern slavery into the National Referral Mechanism (NRM), as individuals cannot refer themselves. In England and Wales, FROs are either 'statutory', meaning that they are public authorities with a strict duty to notify the Home Office when encountering a potential survivor of modern slavery, or 'non-statutory' meaning they are not public authorities, but independent charities and NGOs with expertise in human trafficking and modern slavery.¹

Where a non-first responder organisation or a legal adviser is supporting a survivor of modern slavery, they cannot make the NRM referral and must instead rely on an FRO to do so.² However, due to capacity issues affecting FROs, many supporting organisations are turned away by them, and many give up looking for an FRO for the survivor they are supporting.³ This impedes the effective identification of and access to support for survivors of modern slavery.

The significant evidence of a shortage in FRO capacity has led to calls to increase the number of FROs, particularly non-statutory ones.⁴ Many officers within statutory FROs are unaware that

¹ Home Office. (Last updated 7 April 2026). [National referral mechanism guidance: adult \(England and Wales\)](#)
Scotland and Northern Ireland have a different list of first responders: Home Office. (Last updated 7 April 2026). [National referral mechanism guidance: adult \(Northern Ireland and Scotland\)](#)
Modern Slavery Act 2015, s.52

² See para. 21.63 of [Modern Slavery: Statutory Guidance for England and Wales \(under s49 of the Modern Slavery Act 2015\) and Non-Statutory Guidance for Scotland and Northern Ireland](#)

³ See page 1 of [Non-Statutory First Responder Capacity: 2024 Briefing and Analysis](#), ATMG, August 2024

⁴ See: Joint Statement: [Non-statutory First Responders Capacity and Resources](#), Kalayaan, BAWSO, Medaille Trust, Migrant Help, The Salvation Army, TARA, Unseen, 14 August 2024

[Non-Statutory First Responder Capacity: 2024 Briefing and Analysis](#), ATMG, August 2024

[Written Evidence from the Helen Bamber Foundation HUM0033](#), Helen Bamber Foundation, March 2023

[January 2023 UK law changes: how are victims of modern slavery affected?](#), Hope for Justice, February 2023

Report: Achieving a Durable Solution for Trafficked Children, UNICEF

See page 19 of [Restoring Belief, Reducing Criminality](#), Unseen, January 2026

See page 8 of [Response by the Latin American Women's Rights Service \(LAWRS\)](#), October 2025

[Written evidence submitted by the Labour Exploitation Advisory Group HUM0047](#), Labour Exploitation Advisory Group, March 2023.

[Identification of victims of modern slavery call for evidence: summary of responses](#), Home Office, Updated 24 February 2026

[Open letter to Home Secretary on modern slavery protections](#), Hestia, 25 November 2025

they are first responders, making Home Office toolkits and information hubs alone ineffective.⁵ The sector⁶ has long called for the number of available independent non-statutory FROs to be increased through an open tender and transparent application process,⁷ in order to deal with an increased demand for referrals and to reduce a 'post code lottery' for access to support for survivors of modern slavery and to reduce stigma in referrals.⁸

Geographic and Exploitation Type Gaps and High-Quality Training

High-quality, specialised, staff training for FROs is integral to successful victim identification, ensuring better quality decisions. Statutory and non-statutory FROs as well as non-first responder organisations have expressed that there are serious gaps in first responder training provision.⁹ Notably, not all FROs are equipped to identify every exploitation type, let alone provide the information required by decision-makers to effectively identify the victim as such.¹⁰ Recruiting more non-statutory FROs with the required geographic remit and expertise in the less-understood exploitation types, in addition to ensuring high-quality specialist training for FROs, would help address both geographic and exploitation type needs.

Further Resources for Non-Statutory First Responder Organisations

The capacity issues faced by FROs also highlight their lack of resources to make enough referrals to keep up with the increased number of survivors needing referrals. Accordingly, there have been many calls for further allocation of resources for non-statutory FROs to enable survivors to access identification and support through the NRM.¹¹

⁵ See paras. 12.3 and 12.4 of [Written Evidence submitted by The Snowdrop Project \(HUM0031\)](#), March 2023

⁶ See Recommendation 2 'Increase the number of organisations which currently have the status of First Responders' page. 77, [Wrong kind of victim? One year on: an analysis of UK measures to protect trafficked persons](#), ATMG, June 2010

⁷ See [Joint Statement: Non-statutory First Responders Capacity and Resources](#), Kalayaan, BAWSO, Medaille Trust, Migrant Help, The Salvation Army, TARA, Unseen, 14 August 2024.

⁸ See pages 19 and 30 of [Decade of Dignity: A Strategic Vision for Eradicating Modern Slavery in the UK](#), April 2026. Contributors: Anti-Slavery International, Action for Children, Alliance for Youth Justice, Anti-Trafficking Monitoring Group (ATMG), Anti-Trafficking and Labour Exploitation Unit (ATLEU), Catch22, ECPAT UK, Focus on Labour Exploitation, Hestia, Hope for Justice, Human Trafficking Foundation, Justice & Care, NWG Network, The Anti-Slavery Collective, The Children's Society, The Salvation Army, The Snowdrop Project, Unseen. Signatories: AFRUCA Safeguarding Children, BASNET (UK BME Anti Slavery Network), Caritas Bakhita House, Ella's, Helen Bamber Foundation, Hope at Home, Latin American Women's Rights Service, Palm Cove Society, Shpresa Programme, Sophie Hayes Foundation, The Medaille Trust, The Passage

⁹ [Identification of victims of modern slavery call for evidence: findings](#), Home Office, Updated 24 February 2026.

¹⁰ The 4th highest recorded exploitation type for the period 2020-2024 was 'not specified or unknown' (UKDS NRM). See page 23 of [Seeing beyond the negative](#), November 2025: 'Many people are being referred to the NRM by first responders who appear not to have been able to recognise the type of exploitation the person may have experienced as consistent within those expansive categories.'

¹¹ See: Joint Statement: [Non-statutory First Responders Capacity and Resources](#), Kalayaan, BAWSO, Medaille Trust, Migrant Help, The Salvation Army, TARA, Unseen, 14 August 2024

Non-Statutory First Responder Capacity: 2024 Briefing and Analysis, ATMG, August 2024
January 2023 UK law changes: how are victims of modern slavery affected?, Hope for Justice, February 2023.
See page 19 of *Restoring Belief, Reducing Criminality*, Unseen, January 2026
See page 8 of *Response by the Latin American Women's Rights Service (LAWRS)*, October 2025
Written evidence submitted by the Labour Exploitation Advisory Group HUM0047, Labour Exploitation Advisory Group, March 2023