
Ed Humpherson, Director General for Regulation

Jennifer Rubin
Chief Scientific Adviser
Home Office
(by email)

8 December 2022

Dear Jennifer,

Use of National Referral Mechanism statistics

I am writing to you about concerns raised with us by users of the Home Office's National Referral Mechanism (NRM) statistics about claims that people are "gaming" the modern slavery system:

- In her [speech at the Conservative Party Conference](#) in October 2022, the Home Secretary said that "...our modern slavery laws are being abused by people gaming the system. We've seen a 450% increase in modern slavery claims since 2014."
- A [March 2021 Home Office press release](#) stated that there has been "an alarming rise in people abusing our modern slavery system by posing as victims in order to prevent their removal and enable them stay [sic] in the country" and that "National Referral Mechanism referrals... more than doubled between 2017 and 2020 from 5,141 to 10,613".

The number of potential modern slavery victims referred to the NRM has indeed increased severalfold over recent years, rising from 2,337 in 2014 to 12,727 in 2021, according to the [latest end-of-year NRM statistics](#). The Office for National Statistics argued in its [Modern Slavery in the UK publication](#) that this may reflect changes in awareness and identification of potential victims by designated 'first responder' organisations, but greater gaming of the system is another potential contributor. However, policy officials in the department could not point to any specific evidence for this when we enquired. What is more, the proportion of referrals deemed by the Home Office to be genuine cases of modern slavery in its 'conclusive grounds decisions' has risen year by year from 58 per cent in 2016 to 91 per cent in 2021, which does not suggest in itself that gaming is a growing problem.

There may be evidence for greater gaming that the department is now able to provide, or to point us and the public to, but if not, I would be grateful if you could raise this matter with communications and policy colleagues, encouraging them to

ensure that claims in public statements are clear on whether they are sourced from published statistics or from other reliable evidence. This will avoid the risk of misleading people to believe that the statistics say something that they do not.

I am copying this letter to Jon Simmons (Head of Protection, Irregular Migration and Asylum Analysis and Migration Statistics).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ed Humpherson', with a stylized, cursive script.

Ed Humpherson
Director General for Regulation