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A Path to Freedom and Justice: a new vision for supporting victims of modern slavery



“I wish I knew there was help out there. The Government needs to do something to reach out to people who are trapped like I was to let them know they can report and be helped.”

Survivor



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About the Modern Slavery Policy Unit

The Modern Slavery Policy Unit, a joint initiative led by an anti-slavery charity Justice and Care and a leading Westminster think tank the Centre for Social Justice (CSJ). The joint Policy Unit has a core mission - **to keep modern slavery at the top of the British political agenda and ensure the UK fights the crime.** This means better understanding of the nature and scale of modern slavery, increased investment and a sophisticated national response proportionate to the level of threat. Utilising the experience of frontline practitioners, developing creative and evidence-based ideas, fostering a new understanding about the scale of the crime and listening to the voices of survivors, the Modern Slavery Policy Unit works to catalyse the political leadership needed to achieve systemic change.

The Modern Slavery Policy Unit:

1. Advocates for policy and legislation that places victims and their recovery needs at its heart.
2. Bridges the gap between those working to disrupt this crime and support its survivors, and decision makers in Westminster, ensuring that voices from the frontline are heard and heeded.
3. Works on a cross-party basis, bringing together and equipping a strong caucus of parliamentarians to lead the fight against slavery.

About the Report

This report builds on the Unit's 2020 report *It Still Happens Here* which explored the progress that has been made in the UK's response, five years on from the Modern Slavery Act, but also identifies the key challenges faced by frontline professionals who are working to fulfil their duties under the Act. Central among the findings of that report was that despite numerous reviews and incremental changes, the UK's immediate and longer-term response to victims is not up to standard - especially because we lose vital intelligence and evidence when victims disengage or are re-trafficked.

This report explores the recovery journey of adult victims from their first identification through the National Referral Mechanism (NRM) and support provided in England and Wales under the Modern Slavery Victim Care Contract onto longer-term recovery. Children's support needs are not considered since their needs and the structures responsible for supporting children are significantly different. The report seeks to identify key principles for reform and practical solutions to the current challenges, including how to bridge gaps between the criminal justice system and support mechanisms so victims are both better safeguarded and empowered to engage with criminal investigations. Whilst the key principles of effective support are likely to be replicated across the UK the delivery mechanisms are not so this report primarily focuses on recommendations for enhancing support in England and Wales. Since the NRM decision-making process operates on a UK-wide basis, principles for reform should apply equally to all parts of the UK.

The report was compiled following extensive evidence gathering in April - August 2021. We conducted interviews with more than 20 specialist charities that provide support to victims and survivors of modern slavery, including the prime and some sub-contractors under the Home Office's Modern Slavery Victim Care Contract. We held a round table event with CSJ Alliance member charities that support other vulnerable groups. We also interviewed individual experts and lawyers. Analysis was conducted on 13 case studies from 7 charities working outside the MSVCC. We spoke to five individual survivors of different nationalities, but were unable to speak to any male survivors.

Evidence was gathered from law enforcement and statutory authorities through interviews with a number of police officers, including Modern Slavery and Organised Immigration Crime coordinators at the Regional Organised Crime Units, regional partnerships and local council officers in Wales and across five regions in England. Two online anonymous surveys, one for police officers (26 respondents) and one for regional partnerships (10 respondents) were circulated to gather further perspectives. We were unable to speak to the Single Competent Authority in the Home Office.

Acknowledgements

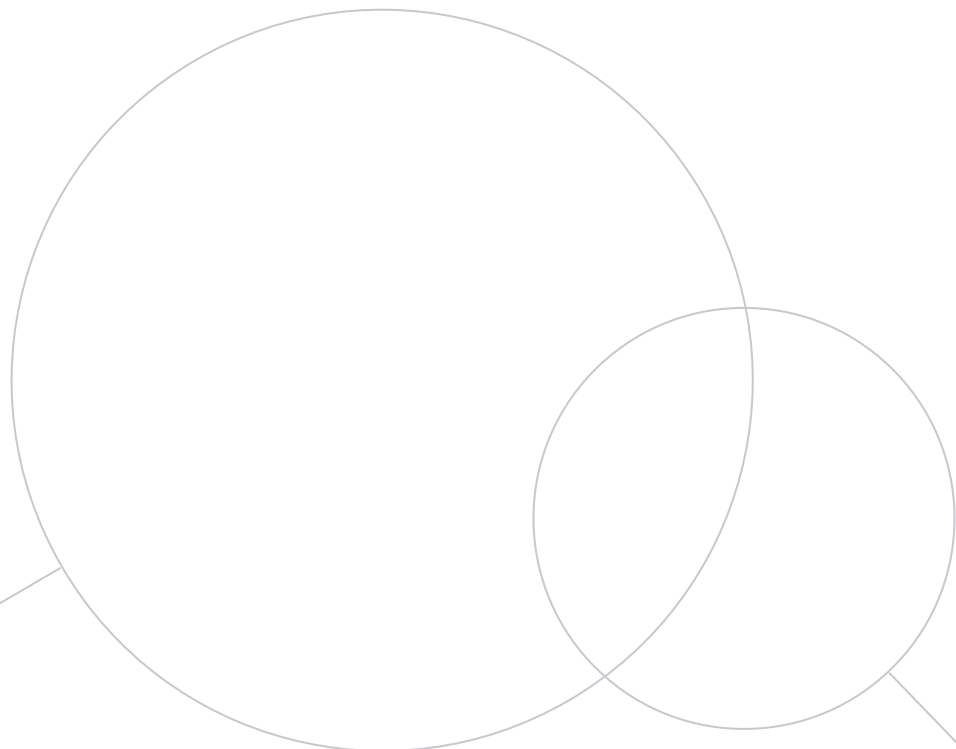
The report authors Tatiana Gren-Jardan and Louise Gleich of the Modern Slavery Policy Unit would like to thank the many people and organisations who kindly gave their time to contribute evidence during the course of this research.

First and foremost our heartfelt thanks go to the survivors who generously shared their experiences of support with us with the hope that the system can be improved for the sake of others.

We also extend our appreciation to the many frontline practitioners across the country who shared with us their experiences, achievements, challenges, concerns and the stories of their clients (full list in the appendix).

Special thanks go to Chief Constable Shaun Sawyer, the NPCC Lead on Modern Slavery, and his team for disseminating our survey to police forces across England and Wales.

The views and recommendations in this report are those of the Centre for Social Justice and Justice and Care and do not necessarily represent those of the persons and research participants mentioned above.



Foreword

Modern slavery is a terrible crime that strips away people's humanity for the sole aim of making a profit. It is hard to believe that this exploitation is happening on our own doorsteps in British communities. Just imagine the fear, degradation and physical and mental torment that victims of modern slavery endure, and then recognise it is happening here.

This country has a proud legacy of tackling the brutality of slavery. In 2015 with the Modern Slavery Act we took another significant step forward, but serious and organised criminals are still operating with impunity. Whilst at least 100,000 victims are being terribly exploited in the UK, just over 10,000 were identified and referred for support in 2020. However, astonishingly only 56 offenders were convicted for slavery offences in 2020, showing that the system is failing.

We must not allow these victims to suffer in the shadows any longer. We owe it to each and every survivor of slavery exploited on our watch to protect them from further harm, set them on a path to a safe and secure future and prevent their abusers wreaking havoc in the lives of others.

This report powerfully illustrates the challenges victims face when they escape slavery and try to rebuild their lives. With growing numbers of victims being found, the systems to identify and support them are creaking under the strain. Victims are being lost before they even enter the support system and others are being passed from pillar to post receiving varying qualities of care. Delays to decision-making leave victims stuck in the support system, unable to move on, their mental health deteriorating and recovery stagnant. When they are confirmed as victims by the Home Office, many are left with no meaningful support or a path to rebuilding their lives.

As the report highlights, we need to recognise that victim care is integral to disrupting organised criminality. By caring for victims properly we can break the cycles of re-exploitation and enable victims to provide key evidence to police. This is how we will dismantle criminal slavery networks and prevent more people from becoming victims in future. The recommendations in this report show how this can be done ranging from safe places to protect victims when they are first identified to creating long-term pathways to recovery. The need for political leadership and swift action to tackle the backlog in modern slavery decisions is clear and the case for independent, multi-disciplinary decision-making compelling. Cooperation between law enforcement and charities supporting victims is vital to creating the victim-focused criminal justice process that will help victims testify against their traffickers.

Too often modern slavery becomes entwined with concerns about immigration, as we see in the Government's new Nationality and Borders Bill. But this belies the increasing number of British victims who make up approximately a third of current referrals. At its heart slavery and the organised crime networks that facilitate it are a serious threat to the fabric of our society. Only an approach that supports victims and recognises their role in bringing the perpetrators to justice, like this report proposes, will bring an end to this exploitation that has no place in 21st Century Britain.

I congratulate the authors on the breadth and depth of their research and commend this report to the Home Secretary. The time is right for a new vision for victim support and action is urgently needed.

Rt Hon. Sir Iain Duncan Smith MP





Survivor voices

"I wish I knew there was help out there. The Government needs to do something to reach out to people who are trapped like I was to let them know they can report and be helped."

"My Navigator is my hands and head and even heart - we need more people like her to help other women. She feels me and she knows how to help."

"The [asylum] process is very long. I have a daughter at home who is not doing well mentally but I cannot do anything to help her. I feel like I am in a cage and cannot do anything."

Survivor Interview 5

"My support workers were very helpful, they were like a family to me. It was really hard as a single mom with children, but I had people who were helping and supporting me. I am so thankful to them. I know it is their job, but they did it with their heart."

"I am so happy working here with Jericho. My English wasn't good and I felt ashamed to speak. But it is getting better now as I communicate with people working in the charity shop. Every day I learn a new thing."

Survivor Interview 3

"Having a place of safety is having someone who I can trust and being in an area where no one knows me, somewhere I can start a new life and have a new start."

Survivor Interview 4



Executive Summary

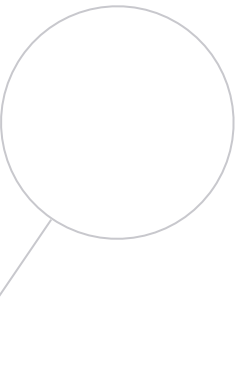
Nearly seven years after the Modern Slavery Act was passed, organised crime networks behind modern slavery are continuing to act with impunity costing the UK billions of pounds.

In *It Still Happens Here*, our report published in 2020, we estimated there could be at least 100,000 victims in the UK - 10 times the number referred to the National Referral Mechanism (NRM) for support that year.¹ This is potentially costing this country £32.9 billion a year.²

The imperative to stop slavery gangs in their tracks could not be clearer, yet prosecution rates remain low. The National Crime Agency estimates there are at least 6,000-8,000 offenders involved in modern slavery in the UK.³ But in 2020, there were only 91 prosecutions and 13 convictions for modern slavery offences as the principal offence, and only 344 prosecutions and 56 convictions for modern slavery offenders overall. Victim testimony is key to unravelling slavery networks, but too often cases are dropped due to lack of victim engagement.

As we set out in our 2020 report, good care for the exploited and abused is not a luxury extra - it unlocks progress against organised crime. Those exploited and abused on British soil, whether UK citizens or foreign nationals, deserve care and a chance to recover. They also often crave justice. Failure to support survivors increases re-trafficking rates and hinders our ability to dismantle the criminal networks responsible because their vital intelligence is lost.

The NRM, the UK's system for identifying victims of modern slavery and providing them with support, was introduced in 2009. But the landscape of modern slavery in the UK has changed considerably since then. Despite numerous reviews and incremental changes over the years the system is still not fit for purpose. The pressure on wider services such as addiction support, mental health provision, asylum systems and local authority social care and housing present additional challenges for successful victim recovery.



Too often victims of modern slavery are treated as somehow different from victims of other crimes. The provision of specialist support through the NRM is a great resource, but it is not an alternative to the services other victims of crime can access, especially those with wider and complex needs. The approach of the Nationality and Borders Bill, which incorporates modern slavery support with immigration reform, will entrench this position. It effectively creates a hierarchy of victims by putting a time limit on when victims of slavery in the immigration system can come forward to talk about their abuse and saying that victims with criminal convictions can be denied access to support. We would never do this for other victims of serious crime. It is time to reframe our response to victims of modern slavery and treat them as, first and foremost, victims of crime. This is for their benefit as they seek justice, and for the sake of relentlessly pursuing those committing these appalling crimes, who too often act with impunity.

1 *It Still Happens Here: Fighting UK Slavery in the 2020s*, Justice and Care and the Centre for Social Justice, July 2020

2 In 2018 the Home Office estimated an economic and social cost of £328,720 per modern slavery victim: *The economic and social costs of modern slavery Research Report 100 July 2018*, Home Office

3 *National Strategic Assessment of Serious and Organised Crime 2021* National Crime Agency

The challenge

Early engagement: Fear of reprisals from their traffickers and worry about deportation keep victims from trusting the authorities. Getting engagement with the victims of modern slavery right from the moment of rescue is crucial. It takes time to build trusted relationships and encourage them to engage with support services and the police.

Needs-based support: Meeting victims' needs and protecting them from re-exploitation is essential to enabling them to share their intelligence, which can lead to the break up of criminal slavery activities. Too often eligibility for services, not need, dictates what victims receive, leaving support providers and mainstream services struggling to meet victims' increasingly complex needs.

Quality and efficient NRM referrals and decision-making: Chronic and extensive delays impact significantly on victims' recovery, their mental health and their ability to move on to a safe, independent future. They also offer poor value for money by unnecessarily extending victims' time in support. Bold steps are needed to tackle the backlog to move us from a crisis point to proactive leadership in this fight.

Bridging gaps between support and criminal justice systems: Modern slavery victims are first and foremost victims of crime. Many victims see restoring justice as part of their recovery process, but there is a disconnect between victims, the support system and the criminal justice system and few get to see their traffickers behind bars. Wrap around support programmes like Justice and Care's Victim Navigator programme demonstrate that with appropriate care more victims can engage with the criminal justice system.

A window of opportunity

The 2014 Modern Slavery Strategy is under review with a refreshed strategy expected in 2022 and the Nationality and Borders Bill introduced to parliament in July 2021 will establish identification and support for victims of modern slavery in law for the first time in England and Wales. These are both significant opportunities to set a new vision, leadership and framework for victim support. The Government must seize this moment, not just because we have a moral duty to victims who have been so horribly exploited on our shores, but it is essential if we are to tackle the true criminals and bring more organised crime groups to justice.





Principles for reform and summary of recommendations

1. Renewed vision and strategic approach delivering better outcomes for victims and value for money

- The Government must develop a cross-departmental victim support strategy with implementation of the NRM Transformation Programme overseen by the Number 10 Delivery Unit.

2. Identifying and supporting victims of slavery from the earliest moment

- The Government must urgently establish places of safety at a local level to accommodate and support potential victims of modern slavery before they are referred to the NRM or receive a reasonable grounds decision.
- The First Responder role needs to be strengthened to improve identification and safeguarding of victims.
- To meet victims' complex or long term needs, access to mainstream services should be integrated with support under the Modern Slavery Victim Care Contract (MSVCC).
- The Home Office must ensure that the MSVCC is focussed on victims' outcomes in terms of recovery, reducing vulnerabilities to re-exploitation and preparing them for independence, not limited to 'needs arising from exploitation'.

3. Delivering a timely and meaningful decision that enables victims to move on safely into recovery

- The Home Office should put NRM decision-making on an independent footing and require decision-makers to have modern slavery qualifications and expertise.
- The Home Office must disband the new Immigration Enforcement Competent Authority and put those resources into tackling the backlog of all NRM cases through deployment of specialist teams and fast track protocols.
- The SCA must establish improved systems to gather more, higher quality information.
- The SCA should be relieved of the burden of support-related decisions.

4. Better protecting victims and preventing re-trafficking, either in the UK or in their home country

- The Home Office must issue guidance to support providers and police on reporting and flagging victims who go missing.
- The Home Office should require and fund support providers to prepare victims for independence through work-preparedness training and work with other departments to engage businesses in providing work opportunities and skills training for victims.
- The Home Office should amend the Nationality and Borders Bill to provide all confirmed victims with an additional 12 months of support after the NRM, including leave to remain and recourse to public funds for those with irregular immigration status.
- The Home Office should develop a Fast track Government to Government Safe Return and Reintegration scheme for potential victims who do not enter the NRM.

5. Enabling pursuit and prosecution of the traffickers

- Chief Constables and Police and Crime Commissioners must make modern slavery a strategic priority for their forces and the Home Office must guarantee the long term future and slavery-focus of the NPCC Modern Slavery and Organised Immigration Crime Unit to ensure these crimes receive sufficient attention and resources.
- All police forces should partner with specialist charities to deliver victim support through joint welfare visits and roles such as Justice and Care's Victim Navigator programme to enhance the police response to victims and facilitate participation in investigations.
- Police forces should increase the number of specialist investigation teams and victim liaison officers.



Chapter 1.

Early engagement - the golden hour

Getting engagement with the victims of modern slavery right from the moment of rescue is crucial. It could either mean a way out of exploitation and a first step towards successful and sustained recovery, or remaining trapped under the sophisticated control methods of their traffickers, fearful for their lives and the lives of their families. It takes time to build trusted relationships with victims in order to encourage them to engage with the support services and the police. Safe places are needed where victims could be taken post identification to rest, before they are faced with such an important decision as entering the NRM and cooperating with the police. Importantly, working in partnership is key to success. No organisation can do it on their own, a multi-agency approach is essential when dealing with the highly complex needs of victims.

Key principles

Building trust takes time

Over and over again we heard that time and trust are the two key ingredients to helping victims exit exploitation. Many do not see themselves as victims in the first place accepting the situation they are in as the only option. Often victims come from very poor backgrounds with a history of abuse and know no better life. They are fearful of reprisals from traffickers, fearful of the authorities and the risk of being deported, and therefore do not want to engage.⁴ According to our police survey, the top three reasons why victims refuse to engage were not seeing themselves as victims in the first place (69% of respondents), followed by fear of their exploiters (62%) and fear of the authorities (50%).⁵

“I was so petrified that my boss [trafficker] would kill me when the police broke into the house. I could not move or speak, and even found it difficult to breathe”.

Survivor interview 5

In one of the cases led by Greater Manchester Police it took more than 6 months of engaging with a potential victim and building trust for her to finally come forward. The victim was then taken to a place of safety where she could rest and have some breathing space. Her options were explained to her and she agreed to enter the NRM while continuing to engage with the police, becoming one of the key witnesses in the case.

“Many victims who are foreign nationals will be scared of being reported to immigration officers.”

Modern Slavery Coordination Unit, Greater Manchester Police

⁴ Police and anti-slavery partnerships surveys

⁵ Police survey

We also heard that traffickers are changing their modus operandi and doing everything possible to limit victims' engagement with the outside world. For example, the Changing Lives Liberty Project in Northumbria found that women in sexual exploitation, the vast majority of whom are Romanian and Albanian, have a distinct script of what they say, i.e. 'they are in control of their situation' and 'they don't need help'.⁶ In the past, these women would be engaging through the welfare visits, accepting toiletries and visits to the sexual health clinic, but now they do not accept even that level of support which presents a big barrier to building trust.

"Building trust takes time and effort, going back several times and being there for the victim. We have no time limit on support and always go at the victim's pace, which allows us to build trusted relationships over a long period of time."

Changing Lives Liberty Project

Police officers from the Yorkshire and Humber region told us that the victim's engagement often depends on the type of exploitation. Victims of forced labour are more likely to come forward than victims of sexual exploitation. This is often the case with Romanian and Hungarian women who do not see themselves as victims and refuse to engage. Police officers cannot simply close down the houses the women are found in, as this creates a further barrier with victims, but also poses a risk of them being simply moved to a new unknown location. Police officers work in partnership with specialist charities such as Palm Cove Society and Hope for Justice, and have now got a dedicated Victim Navigator from Justice and Care, who do visits and engage with victims.

"It could take a year for them to come out and get engaged with the NRM and police."

West Yorkshire and Hull Regional Organised Crime Unit

Better understanding why victims refuse to engage

When an adult potential victim is identified but does not agree to enter the NRM, an MS1 Duty to Notify form should be filed under s.52 of the Modern Slavery Act. According to the Government's annual NRM report, during 2020 there were 2,178 adults flagged via the Duty to Notify process to the Home Office, a similar figure to 2019. However, in the three first quarters of 2021, 2,344 adults had already been flagged via the Duty to Notify process showing an increasing number of adult victims who are not consenting to enter the NRM. This is equivalent to half of those who did consent and were referred to the NRM during the same period of time, a total of 4,639 adult potential victims of slavery. Anecdotal evidence suggests that this figure is likely to be much higher, firstly because there is still a low level of awareness about the Duty to Notify, and secondly because many victims do not even come to the attention of the First Responder organisations for the fear of sharing their information with the Home Office. More should be done to record and analyse the reasons why potential adult victims refuse to go to the NRM so these can be addressed. At the same time, alternative safeguarding pathways should be put in place to ensure these vulnerable victims are not being re-trafficked and further exploited.

⁶ Changing Lives Liberty Project is a three year project based on a multi-agency partnership approach designed to fight modern slavery in Northumbria and Tyne and Wear funded by the PCC

Number of Duty to Notify referrals



Source: Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, Quarter 3 2021 - July to September

Reform required

Places of Safety

The Government has been committed to improving identification and support provided to modern slavery victims in recent years, and has invested a great deal of resources to reform the National Referral Mechanism (see appendix 1). However, one thing has remained unchanged - access to support services before the NRM referral is made. The announcement of 'Places of Safety' as part of NRM reform in 2017 recognised the need to provide victims with a safe place in the early hours post rescue.⁷ However, these have not been rolled out to date. In November 2021, the Minister for Justice and Tackling Illegal Migration confirmed that the roll-out of places of safety was paused due to the pandemic, resources and operational pressures on the adult victim support providers. No timeline has been set as to a possible roll-out in future, however the Minister confirmed that the work to scope the form and operational feasibility of running a pilot project on places of safety continues.⁸

Accessing safe accommodation to take victims to after they have been rescued is seen to be a key challenge across the board. A place of safety is the first step in helping victims build trust and engage. Often, police have no option but to take them to the police station, as if they are the ones who committed a crime, or to leave them on their own in often very unsuitable B&B accommodation. As

⁷ Home Office, NRM reform, October 2017

⁸ Letter from Minister for Justice and Tackling Illegal Migration to the Nationality and Borders Bill Public Bill Committee, 2 November 2021



a result, many go missing the next day. These circumstances are not leading to breaking the barriers in engagement and establishing trust. In 2020, we found the lack of safe accommodation after rescue to be a significant gap in supporting victims.⁹ Sadly, this research has shown that the issue remains unaddressed at the national scale, with a few examples of good practice locally.

In Birmingham we were told that a key barrier to exiting exploitation is lack of clarity and certainty about what support is available on that day. This is felt more acutely with those who have no recourse to public funds, as they fear being left on the streets. A clear offer with options as to what will happen when victims leave exploitation needs to exist and be properly funded, before an NRM referral can be considered.

“The need to provide pre-NRM support can be for 1 day, 10 days, 2 weeks depending on someone’s situation and how complicated their needs are. A major gap is that there is no guarantee that someone can exit exploitation and that it will be safe. National funding for support, accommodation and safe places isn’t available, and often hotel accommodation is simply not appropriate.”

Modern Slavery Coordinator, Birmingham City Council

Providing emergency support and wrap-around care from the moment of rescue is an essential first step towards recovery. Places of safety, where they exist, have proven to be very effective in helping victims engage with the support services as well as the police. There are a number of benefits to having such places available locally allowing victims to be accommodated swiftly and ensuring easy access for the purpose of interviewing and engagement. It also means that victims do not have to leave the area immediately, which is often one of the reasons victims do not consent to an immediate NRM referral as this is the only place they have a connection with. Earlier this year Shiva Foundation published a report that recommended mandatory budget for local authorities to provide emergency accommodation for potential victims of slavery. Yet,¹⁰ only a few safe options exist across the country.

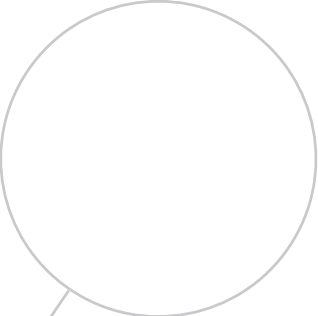
In Manchester, the place of safety which is run by the police and funded by the mayor’s office has been instrumental in securing testimony from victims and their further engagement with the investigation.

“They have a safe place to sleep which is more appropriate than a police station or hotels. Plain clothes police officers can keep them safe. It’s a nice set up and there are things for children there as well. Even if victims don’t sleep there, it’s a nice place to debrief victims away from the police station. It is much better at getting victims to feel comfortable and to engage. This then can help victims to feel safe enough to go to the NRM”.

Modern Slavery Coordination Unit, Greater Manchester Police

⁹ It Still Happens Here: Fighting UK Slavery in the 2020s, Justice and Care and the Centre for Social Justice, July 2020

¹⁰ Support and access to justice for adult victims of modern slavery Highlighting national shortcomings from a local perspective, Shiva Foundation, May 2021



The SafePlace in Birmingham, a safe house providing pre-NRM support for male victims of slavery, run by the West-Midlands Anti-Slavery Network, has seen that 95% of their clients agree to go into the NRM having been initially supported and properly informed about their options.

“After one recent case, colleagues at the National Crime Agency told us that it is very unusual for Vietnamese nationals to trust authorities and charities and to actually take up the support that is on offer. They said that from their perspective the SafePlace and the advice and support we provide encourages victims to engage with support services by providing a bespoke service to meet the needs of individuals and should be replicated nationally to encourage more victims to escape exploitation.”

West Midlands Anti-Slavery Network

In Essex, Justice and Care has partnered with another charity that provides housing for people with no recourse to public funds, to hire accommodation for victims that have been rescued by Essex Police. Potential victims can stay there on average 5 days which means that a First Responder has the time to explain the NRM entitlements, find an interpreter and get that first account without rush or stress, ensuring informed consent and good quality of the NRM referrals.

“Having the staff there 24/7 to deal with their basic needs of sleep, food, shower, phone interpreter, helps victims to feel safe. So far no one has gone missing, whereas in a hotel it is likely to be more than 50% chance of them going missing”.

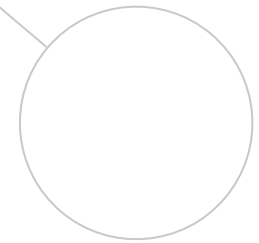
Justice and Care Victim Navigator



In Humber, the Anti-Slavery partnership brought together 4 local authorities and developed a protocol which is a written agreement between the councils (currently two out of four have provided a written agreement, the other two agreed in principle) to provide safe accommodation for potential victims of modern slavery before an NRM referral is made. For example, a potential victim was rescued by the police and as a result was made homeless, the local council then steps in to provide a safe place for them to be accommodated to ensure they are safeguarded and protected.

“We can do better to identify victims, but if we do not have the infrastructure to support victims - it is pointless. The protocol solidifies the commitments and appoints people who are responsible. There is no designated space at the moment, but the housing team has a duty to find a suitable option when a victim is rescued.” -

Humber Modern Slavery Partnership Coordinator



According to the evidence we have gathered, there is no doubt that places of safety see fewer victims going missing and more engaging with the support services available through the NRM. However, questions about cost effectiveness, availability and location, and different options for delivery remain unanswered.

Safe return to the home country

Not every potential victim, when found, wants to stay in the UK and enter the NRM. In fact, many want to go home as soon as possible as they feel deceived, frightened and do not speak the language. However, their options are limited and often rely on the good will and funding availability of some charities, police, local authorities and sometimes Embassies.

In summer 2021, the Home Office updated the Statutory Guidance on identifying and supporting victims of slavery, which says that the Government funded Voluntary Return Service is available to all non-British victims with irregular migration status at any time of their journey. Those with a positive Conclusive Grounds decision will also be able to qualify for reintegration support of up to £2,000.¹¹ We are pleased to see this development, which is in line with our previous recommendation asking for safe return and reintegration schemes to be available for survivors who are willing to return home at any stage of their recovery process, partnering with key source countries and NGOs.¹² However, this is a recent change and it is not clear how many victims have benefitted from the voluntary return to date, how it was organised and what support, if any, they received when they arrived in their home country.

Previously, both EU and non-EU victims were entitled to both the voluntary return service and reintegration support only after they received a positive Conclusive Grounds decision. We found that those victims who did not fit the Home Office's criteria were often assisted to go home by various specialist charities. In some cases, the local police or authorities had to informally accommodate these victims in local hotels before arranging and funding transport to return them to their home countries. As a result, this has led to inconsistent approaches to returning and reintegrating victims in their home country.


“We need to have a good reconnection [safe return and reintegration] service with the countries of origin to ensure that those victims who are willing to go back home can do so safely at any point of their recovery journey. We also need to help them access education and upskill them while they are being supported in the UK, so they can be agents of their own destiny whether they choose to return home or stay here.”

Miguel Neves, The Salvation Army

There is also a complete lack of data on victims who were voluntarily returned home, the reintegration assistance provided in home countries and whether risk assessments were properly carried out prior to completing the return. According to a survey carried out by the Human Trafficking Foundation and the International Organization for Migration (IOM), 83% of the

¹¹ Modern slavery: Statutory Guidance for England and Wales, Version 2.3, June 2021

¹² It Still Happens Here: Fighting UK Slavery in the 2020s, Justice and Care and the Centre for Social Justice, July 2020



respondents said that the survivors they have supported to return home tend to have specific support needs. They have also reported facing serious difficulties identifying appropriate support services in the country of origin. Worryingly, a fifth of the respondents reported that their clients had been re-trafficked following return and had re-entered a UK support service.¹³

Our research has shown that there is a clear need to establish sustainable voluntary return options for victims of modern slavery at any point of their journey that would guarantee their safety at home, support their reintegration, prevent risks of re-trafficking, as well as help maintain connection with the police investigation in the UK, if there is one. Justice and Care's pilot of the fast-track return and reintegration scheme has shown that 17 out of the 20 victims who were supported to return home during a period of 12 months remained engaged not only with victim support services in their home country but also with the police investigation in the United Kingdom. This has led to the arrest of 18 offenders and support of a further 7 live investigations.¹⁴ It is also essential to have a data collection mechanism in place to enable robust monitoring and evaluation of the voluntary returns service to work on its continuous improvement, if and when needed.

Multi-agency approach

Victims of modern slavery often have a multitude of needs that no one organisation is able to respond to. These vary from access to safe housing, physical and mental health services, safeguarding and interpretation to police protection, legal and immigration advice. A number of organisations have been advocating for developing a multi-agency approach to victim care from the moment of rescue to their full recovery.¹⁵ However, no national guidance has yet been issued to ensure a consistent approach across the country.

Meanwhile, a small number of organisations have taken matters into their own hands and developed a multi-agency response at a local or regional level. One of the most longstanding anti-slavery Multi-Agency Risk Assessment Conferences exists in Wales with the coordinator being seconded from a charity BAWSO to work with all four police forces in the region. It is victim-focussed and puts a priority on safeguarding first.

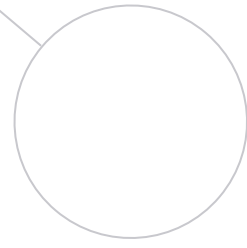
“At the Multi-Agency Risk Assessment Conferences (MARAC) all partner agencies come together and discuss every case that is referred to the MARAC process. For example, we discuss the case and look at the signs and indicators and collectively agree whether the person is a potential victim of slavery, and then look at who would be the best First Responder to complete an NRM referral. We assess the victim’s risks and ensure safeguarding is implemented, for example we will also discuss if the victim is safe and what accommodation can the local authority housing team provide. We will assess the financial situation with DWP colleagues, whereas adult services will look at whether the individual has care and support needs and if there are any capacity issues.”

Welsh anti-slavery MARAC coordinator

¹³ Findings and Recommendations for Assisted Voluntary Return and Reintegration for Survivors of Modern Slavery, HTF, IOM, March 2019

¹⁴ Justice and Care Internal Data

¹⁵ Life Beyond the Safe House, Human Trafficking Foundation 2015; Supporting Adult Survivors of Slavery to Facilitate Recovery and Reintegration and Prevent Re-exploitation, Human Trafficking Foundation et al 2017; Hope for the Future, Ashiana, Hestia, Red Cross 2019



Importantly, getting multi-agency partners around the table ensures not only a needs based approach to supporting victims, but also increases awareness, confidence and ownership across the board. This often results in better quality of the NRM referrals, timely access to emergency accommodation, adult safeguarding services and benefits when needed, as well as increasing the chances of getting victims to trust and engage with the police. Better communication between the partner agencies also means a tighter support net that reduces the risk of victims falling through the gaps.

“MARAC is absolutely invaluable for coordination and upskilling, not just on policing response but also our partners. What is invaluable is the information that the different agencies bring because of its long history. Partner agencies are comfortable sharing information that wouldn’t have happened if you just phoned them up.”

Welsh Regional Modern Slavery and Organised Immigration Crime Policing Coordinator

Similar approaches have been developed by the Passage who identify and support cases of slavery working with homeless people in London and operate a Multi-Agency Case Conference (MACC) approach (with a formal joint protocol with Westminster City Council since November 2020), as well as the West-Midlands Regional Anti-Slavery Network that launched a Slavery Adult Safeguarding Case Conference (SASCC) in March 2021. This model came about because of the anecdotal evidence about gaps in service provision, generated by third sector partners, local authorities that are still wrestling to understand where they fit, lots of narrative about challenges accessing health, accommodation, barriers faced by people with no recourse to public funds, as well as the inability to generate referrals into prosecutions.

“The idea is to identify and close gaps around service provision, to improve victim recovery, while also aiming to enhance engagement with the criminal justice process. When an adult victim is referred to us, we aim to convene a multi-agency conference within 24 hours to ensure a better safeguarding response. As the chair, I am responsible for working with partners to develop a safeguarding plan.”

West Midlands Slavery Adult Safeguarding Pathways Coordinator





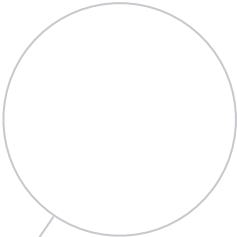
Case study

Polish adult male. Referred to the SASCC by a local authority contact as a potential victim of slavery. He was in hospital with ongoing physical health issues, and was disclosing that he had been subject to slavery in the form of labour exploitation. There were some uncertainties with regards to a referral to the NRM, any ongoing contact with the police and his long term accommodation and health needs.

A conference was convened and attended by the local authority, Public Health England, the police, a local charity and staff from the West Midlands SafePlace. Information was exchanged and a set of actions were agreed, resulting in a more joined up response. The victim has been suitably accommodated, has been referred to the NRM and received a positive reasonable grounds decision, has been helped to apply for the EU Settled Status and is receiving ongoing health support. He is also engaging with the police and supporting an investigation

Case study provided by the West Midlands Anti-Slavery Network

Strengthening the role of First Responders



One major issue that came up in every interview with stakeholders is the need for strengthening the First Responder role. We heard many times that frequently First Responders do not have full knowledge of what their duties are, what the NRM is and how to get the correct information put in for the potential victims. As a result there are huge misconceptions about what NRM should be used for and when a referral should be completed. Often the NRM referral is being completed straight away at the point of rescue and is not being explained to the victims.

“Unfortunately, many police officers and other First Responders are unaware of the NRM and the processes that come with it. Training is ongoing, but there is a definite vulnerability caused by the gap in knowledge”

West Midlands Slavery Adult Safeguarding Pathways Coordinator

“If First Responders are not sufficiently aware about the NRM and how to fill in the forms, they will fail victims. If they are not capturing the evidence they are supposed to be capturing, and if that evidence is weak that impacts the victim’s chance of getting a positive reasonable grounds decision and getting the support they need.”

The Salvation Army



The quality of NRM referrals is often poor, in some cases it only has a line or two filled in. This has a negative impact on the decision making and can lead to further delays, and also means that victims may not be able to get the support they are entitled to. The Salvation Army has confirmed to us that they get a high number of referrals that have no contact details for victims and, therefore, they cannot get hold of them to ensure they are properly assessed and taken into the support service. While there is a process to request those details, it is often hit and miss whether the details can be found and it might take a long time. It is important to ensure that the NRM forms are more prescriptive about such information as the grounds for referral, including more information about exploitation, contact details, and any information pertinent to safeguarding victims when placed in support, for example location of exploitation so that victims are not placed in an area where they have been exploited.

Many stakeholders also referred to the significant gaps in awareness and training among local authorities. Due to their nature and structure, it seems impossible to train everyone to the same level and expect all staff to understand their duties in relation to victims of slavery. The largest local authority in Europe, Birmingham City Council, appointed a modern slavery coordinator who is developing a network of modern slavery champions to ensure potential victims are better identified and supported. The emerging evidence suggests that champions and Single Points of Contact (SPOCs) in local authorities enable better fulfillment of First Responder responsibilities, but also that nominating designated and appropriately trained teams could lead to a more efficient referral process.

“The modern slavery champions approach could potentially help with issue of quality of filling in NRM forms, but the legal First Responder responsibility shouldn’t fall on that individual, it should still be on the Local Authority. There is also a strong argument to say that only certain teams within local authorities should have responsibility for completing NRM referrals, for example adult social care, housing.”

Modern Slavery Coordinator, Birmingham City Council

Local authorities are not the only ones that have a continuous need for training and awareness about the First Responder role. There is also a need for further training of police officers on the frontline, for example community safety teams, front desk, divisional DCs, both for identification and safeguarding of victims, as well as for investigative reasons. The aim of the training should go far beyond simply raising awareness of their duties, but ensure that the duties are properly understood, as well as the role of the NRM and the services it provides. Police officers in Wales highlighted the crucial role health services are playing in identifying victims and the need to upskill health care staff despite the fact that they are not officially a First Responder Organisation. Other organisations that also need more awareness raising are fire services, housing inspectors and others who are going out and engaging with people in high risk industries prone to exploitation.

Chapter 2.

Needs based care - from crisis to resilience and recovery

The Government aspires to an “end-to-end needs-based approach to supporting victims”.¹⁶ The ideal of a support system attuned to and shaped by the needs of victims is universally shared by stakeholders but significant gaps in understanding and practice mean the current system is incapable of achieving this goal. Support providers under the Modern Slavery Victim Care Contract (MSVCC) funded by the Government are struggling to meet the increasingly complex needs of victims and greater numbers of British nationals brings different challenges. At a time when specialist care needs to be more integrated with other services than ever before we are seeing victims being passed from pillar to post receiving variable quality services and statutory agencies unclear where their responsibilities lie. Greater focus on what the support is aiming to achieve in terms of outcomes for victims is needed, along with a better understanding of the needs of the current cohort of victims and how those needs can be met. Meeting victims’ needs and protecting them from re-exploitation is essential to enabling them to share their intelligence that can lead to the break up of criminal slavery activities.

Key principles

A response to crime not immigration

Modern slavery is often seen as an immigration issue rather than a serious and organised crime with its victims being viewed primarily as ‘vulnerable foreign nationals’ and not victims of crime. Not only is this an outdated perception, given the steady and continuing rise in British victims being identified (a third of all victims and 11% of adult NRM referrals in 2020) but it means the support framework lacks a strong vision for addressing the consequences of serious criminality. The provision of specialist support is a great resource but lack of understanding and integration with mainstream services has led to it being perceived as an alternative system for exploited migrants rather than a specialised resource for victims of crime alongside mainstream services. This is particularly apparent in the case of British victims where there is confusion among First Responders about whether the NRM is suitable or appropriate.

“I was told when I went into the NRM that I wouldn’t get anything, so I was told to tick that I didn’t want support because I wouldn’t get it because I can go to NHS. I was told that I didn’t need legal advice because I didn’t have an immigration issue. I didn’t know what support was on offer. It was literally like begging for help because you don’t know what is going on. The NRM is all wrong, what it offers isn’t meant for British survivors.”

Survivor Interview 2

¹⁶ New Plan for Immigration CP 412, HM Government March 2021 p.33

Recovery, independence and resilience

The foundational principle for an effective support system for victims of modern slavery should be to help victims recover from their exploitation and to protect them from being re-exploited in future. Not only is this the best outcome for victims, but preventing a cycle of re-exploitation ensures value for money from public expenditure on support services.

What is meant by ‘recovery’ from modern slavery is not easy to define. Modern slavery takes many different forms and the impact on victims varies. Complete recovery from some of its effects is not something that can, or indeed should, be expected for all victims within the period of intensive support provided by the Government. Nonetheless, the support providers we spoke to emphasised helping all victims reach a point of independence and resilience both practically and emotionally.

Support should help a victim move “from crisis to a place where they can have longer term goals and an understanding that life can be beautiful and free”, where victims are able to find and access support or services independently and can make decisions for themselves.

“Our aim is that they are able to live an independent life, able to make safe choices for their life, where they have a fulfilled life, through volunteering, learning, working, or parenting”

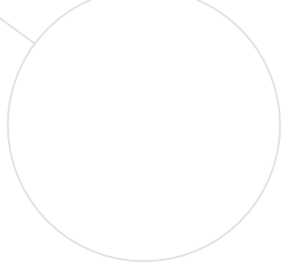
Adavu

The support system is not currently able to meet this objective. Although the MSVCC contract wants support providers to help victims develop resilience and prepare them for an independent life, statutory guidance restricts support to victims’ ‘ongoing recovery needs arising from their modern slavery experiences’.¹⁷ Support providers found this concept unclear and a barrier to preparing victims for independence and protecting them from re-exploitation.

“Focussing on ‘trafficking needs’ alone grossly underestimates the impact of intersecting needs on a person’s vulnerability to trafficking and the complex process of recovery. For example, precarious housing, learning disabilities, unattended mental health problems, debt, and threats to your family are all factors that could have led to a person being trafficked. However, in the recovery process, these pre-existing vulnerabilities are sometimes discounted as they are not considered direct ‘trafficking needs’. Coming out of trafficking will not immediately bring stability to a person’s life. In fact, it is the very opposite - the system often presents only temporary solutions. At the point of exit from the NRM, support for these needs may still be temporary or even worse totally unattended because they are not ‘trafficking needs’. To create a country that is hostile to traffickers, we need to understand how to reduce these precarious situations and ways to empower a person to safeguard themselves.”

The Snowdrop Project

17 2020 MSVCC – Volume 3 – Schedule 2.1 – Service Description V1.2 Redacted; 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 Version 2.5, Home Office November 2021



We heard that victims' needs are going unmet as support requests are often turned down by the Home Office.

“we often get [from the Home Office] ‘this is not covered’ and then we have to find alternative funding to support those needs. These are extremely traumatic times for these individuals and their dependents - we need to be more accommodating and understanding of what is needed.”

The Salvation Army

The Nationality and Borders Bill which is before parliament at the time of writing will entrench this restriction in law and provides no support for victims after they receive a positive conclusive grounds decision. This is short sighted and undermines the aim of preparing victims for independence.

Understanding victims' needs

Delivering needs-based care requires a comprehensive and up to date understanding of the needs presented by victims the system seeks to support. One of the significant reflections from all the frontline professionals we spoke to is how the cohort of modern slavery victims has changed since the NRM was created in 2009.

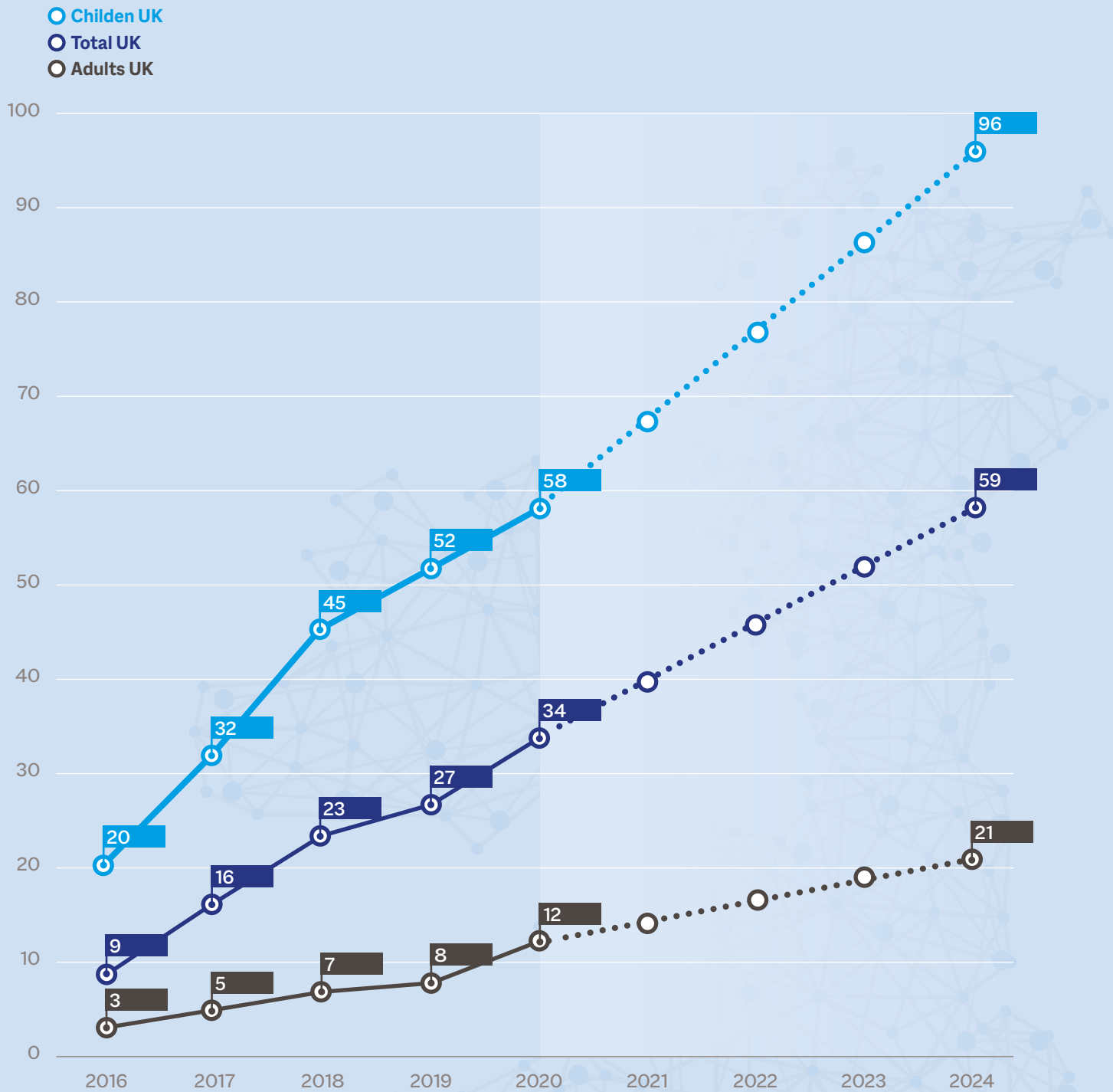
British nationals are now the second largest national group of adult referrals and the largest national group overall, with sizable year on year increases.¹⁸ But, as mentioned above, there are serious questions about whether the pathways to support for British national victims are effectively meeting the needs of this group. This is the subject of ongoing research by St. Mary's University funded by the Modern Slavery and Human Rights Policy and Evidence Centre.¹⁹



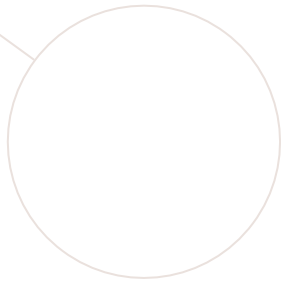
¹⁸ Independent Anti-Slavery Commissioner Annual Report 2020-2021, July 2021; Supporting Victims of Modern Slavery Year Ten Report on The Salvation Army's Victim Care and Co-ordination Contract July 2020 to June 2021, The Salvation Army

¹⁹ Improving support for British survivors of modern slavery, MSPEC announcement, September 2021

Percentage of NRM Referrals that are UK Nationals (Excl. Dual Nationality) and projected percentages for 2024 based on current rate of increase



Source: Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, End of Year Summary 2020



There are increased numbers of victims of criminal exploitation. The Salvation Army reported a 62% increase in such victims referred into their care from 2020 to 2021.²⁰ Many of these victims are also suspects in criminal proceedings and some spend time on remand where access to support is limited and is not covered by the MSVCC.

“One victim was held on remand for 6 months for offences related to cannabis production (despite an NRM being submitted) before a judge threw out the case. But on leaving custody the victim disappeared within 24 hours.”

Changing Lives Liberty Project

Greater numbers of victims are being referred for exploitation considered to be ‘historic’ whose needs may be different from someone identified directly in slavery. There have also been changes in the most common nationalities of victims with some nationalities consistently high and others decreasing or increasing.²¹ Culture and nationality can impact the legal and practical needs of victims as well as their risks of re-exploitation.²²

Many stakeholders also referred to an increased number of victims with complex care needs ranging from substance misuse and mental health issues, to long standing physical or learning disabilities. Safe houses and outreach support workers have great expertise in modern slavery but they are not trained mental health professionals or substance misuse counsellors. Some safehouses will not accept victims with very high complex needs or challenging behaviour but without safe accommodation it is almost impossible to address their other needs.

“Our specialist support is not specialist mental health support or addiction support. We have a lot of victims with very high needs who we are expected to keep in support but we cannot meet that need - they need specialist intervention. These cases have a very traumatic impact on other service users who actually regress because of this negative impact - it is just the wrong environment.”

The Salvation Army

“Safe, stable accommodation is foundational, if we can’t find someone somewhere to live we can’t meet any of their other needs effectively.”

Hope at Home



20 Supporting Victims of Modern Slavery Year Ten Report on The Salvation Army's Victim Care and Co-ordination Contract July 2020 to June 2021, The Salvation Army

21 The top 20 source countries for modern slavery victims in the UK Comparative Report, University of Nottingham Rights Lab, April 2021

22 'Improving our Response to Modern Slavery & Exploitation: Supporting Chinese Women Ruth van Dyke, Centre for the Study of Modern Slavery, St Mary's University with Caritas Bakhita House, Rahab and Tamar, 2020

23 Ibid.

Person-centred and tailored support

All the support providers we spoke to, both those who specialised in modern slavery support and those working with other vulnerable groups, agreed that a ‘needs-based approach’ should be person-centred and led by the victim themselves focussed on their priorities and plans (within the scope of available services). Support workers described the centrality of listening to each victim to understand their hopes, needs and expectations.

“It’s about every woman defining her own priorities of need. What she comes in with, we might view it and see there are far more particular needs than what she says she is coming in for but actually respect and the mutuality of how we relate to somebody has to be that we move from her perceptions of what her needs are and help her to identify what the broader and other needs might be. But that involves that also being in her time frame and at her speed.”


Women @ the well

They understood that there were limitations to the support they were able to offer victims and stressed the importance of giving victims clarity about what is available so the victim does not have false expectations or hopes.

However, there was frustration that the process requirements of the MSVCC mean it functions more as a tick-list starting from ‘here’s what you are entitled to’ rather than ‘what do you need’? Victims and support workers have to provide evidence to justify a request for certain types of support which is time-consuming and does not respond sensitively to victims experiencing trauma. This is illustrated by the Recovery Needs Assessment (RNA) process for extending support after a positive conclusive grounds decision in which every request for support goes to Home Office staff for approval. One survivor described the RNA process as “so invasive, so stressful” due to the frequent reassessments and the requirement to provide evidence of need including a significant level of personal information.

Eligibility for other services can also complicate a tailored, person-centred approach. For example, most asylum seeking victims will be accommodated in asylum (NASS) accommodation. Yet we repeatedly heard concerns from professionals and survivors about victims being placed in accommodation that is poorly maintained, unsuitable or unsafe considering the specific trauma and exploitation they have experienced, echoing many previous research reports.²³ Statutory guidance allows victims to be accommodated in a safe house for their own safety where necessary. However, there does not seem to be a process to make individualised assessments of the specific NASS accommodation placements victims are placed in. This accommodation also falls outside the remit of the new Care Quality Commission (CQC) inspection regime for the MSVCC. In practice, whether a victim is moved from a particular asylum accommodation seems dependent on the intervention of individual support workers or solicitors.

20 Far From a Home: Why Asylum Accommodation Needs Reform, British Red Cross 2021; Closed Doors Summary Report: Inequalities and injustices in appropriate and secure housing provision for female victims of trafficking who are seeking asylum, Hibiscus Initiatives 2021



Inconsistencies in the support received by victims also present wider challenges. We heard evidence suggesting that the quality of care received by victims through the MSVCC is variable. The CQC inspection process which began in January 2021 is an opportunity for strengthening quality control so that all victims receive consistently high quality, person-centred care. To be effective, though, enforcement action must be taken wherever support does not meet the required standard. The CQC does not have power to take enforcement action in respect of modern slavery providers and it is not clear what action the Home Office will take in response to inspection reports.

Reform required

Holistic support to enable long term recovery and resilience

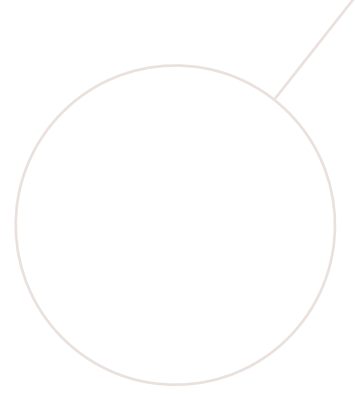
Many charities want to set victims up for an independent future with reduced risk of re-exploitation. But to do so many need support that goes beyond the confines of the MSVCC and is not limited to victims' immediate basic needs or needs directly caused by their exploitation. There are three key strands to the support being given:

- work to promote the general health and wellbeing of victims,
- specific support to develop life and vocational skills,
- ongoing tailored support to promote independence.

Wellbeing: Victims' ability to engage with other forms of support and more crucially to move towards recovery is underpinned by their confidence and wellbeing as much as by specific professional services. Support providers we spoke to highlighted the need to address these wider needs in tandem with their immediate basic needs as set out in the MSVCC and the European Convention on Action against Trafficking in Human Beings (ECAT). This is an holistic perspective which bears a similarity to the duty to promote the wellbeing of vulnerable adults in the Care Act 2014.²⁴

“Wellbeing support needs are just as important as access to legal representatives and other services”

City Hearts



Inconsistencies in the support received by victims also present wider challenges. We heard Interviews with support providers and case study analysis shows how they are promoting victims' wellbeing through a variety of activities: arts and crafts, fitness classes and leisure and social activities; one-to-one pastoral support; developing community connections and peer support; life skills coaching as basic literacy and numeracy, money management, operating domestic appliances, paying utility bills, or navigating local services. Through these activities, victims are listened to and engaged with on a human level without any demands or trying to 'move their case forward'. As a result victims often make greater progress in their recovery. Developing community and relationships outside professional support workers are an integral part of building an independent life. Opportunities to develop peer support from other victims who are further along in their recovery journey can also encourage and build confidence. Social isolation can be a big barrier for victims' recovery.

“A Vietnamese woman went missing from support and left a note saying ‘I felt lonely’”.

Justice and Care Victim Navigator

Most of these wellbeing activities are funded outside the MSVCC through subcontractor charities' own charitable funds, partnerships with local businesses and community organisations, and some victims have support from other charities outside the MSVCC.

Palm Cove Society told us about a partnership they have with Leeds United Football Club whose charitable foundation provides weekly fitness sessions for Palm Cove residents.

At Caritas Bakhita House, a non-MSVCC safe house, we heard about the role of the daily 'communal dinner' where each resident takes turns to cook for the other residents and staff and how this strengthens individuals' confidence and self esteem as well as building relationships. We also heard how residents had taken on leading community social and wellbeing activities since the usual art groups and fitness classes run by volunteers had had to stop during the covid pandemic.

City Hearts has a Health and Wellbeing programme with designated staff focused on reducing social isolation, helping victims feel valued and relaxed and reducing their stress. The support from Health and Wellbeing staff can be as simple as a walk or a coffee with a victim or taking their children to a playground. Pre-Covid the team also ran weekly drop-in sessions for their clients (separate sessions for men and women) which provide an informal environment where people can build relationships for peer support and take part in therapeutic activities such as games and crafts and have lunch together. During the pandemic drop-ins have been replaced according to rules in place at the time by 'wellbeing packs', internet enabled devices, one-to-one walks, and more recently small group outdoor activities such as trips to the beach.

The Salvation Army's Survivor Support Fund provides additional funds to survivors in the Modern Slavery Victim Care Contract and also helps to make the transition to independent living a little easier when people move on. The fund provides financial support for things like therapeutic leisure activities, clothing, maternity supplies, travel costs to appointments not covered by the MSVCC, education and training courses.²⁵

²⁵ Supporting Victims of Modern Slavery Year Ten report on The Salvation Army's Victim Care and Co-ordination Contract July 2020 to June 2021, The Salvation Army



Life and vocational skills: Building victims' vocational skills and supporting them to access safe and decent work is essential to creating resilience against future exploitation as well as enhancing victims' self-esteem and sense of wellbeing.

“I want to work. I don't want to be on benefits. I have a feeling I have to give this money back”

Survivor Interview 5

Research has highlighted the benefits of work for modern slavery victims but also that they face practical, legal and personal barriers to accessing it.²⁶

“There are so many positive implications of being in work, even just volunteering. For example, single mothers who don't have a community for them to have a few hours per week in a place they have chosen, where they are valued and their contribution is appreciated makes a difference. Some survivors are in the NRM or asylum system for too long, they want to use their skills in a positive way. It improves self worth and self esteem.”

Jericho Foundation

“Teaching them about their labour rights is important, what a good job should be, a contract, etc. They need to know what ‘a good job’ looks like”.

Palm Cove Society

Victims' vocational needs are not specifically included in the needs assessment for support under the MSVCC but can now be considered in the development of a victim's journey plan if among their 'personal goals and aspirations'. There are a number of work access programmes used by modern slavery victims, but availability of different opportunities varies across the country. Support workers and survivors spoke about English language courses (a prerequisite for many other training or employment opportunities) as well as work-preparation programmes (for example those offered by the Sophie Hayes Foundation), vocational training courses related to the interests or skills of victims such as catering or beauty therapy, and further and higher education. Voluntary opportunities and short term work placements or supported work programmes such as those offered by Staffline, the Bright Future programme and the Jericho Foundation's Equiano Project give victims the opportunity to gain experience and skills and also to experience what decent work should look like - modelling things like respect in the workplace, appropriate communication, employment rights and so on.

²⁶ Access to Work for Survivors of Slavery to Enable Independence and Sustainable Freedom, March 2021, Anti-Slavery International, ATLEU, Anti-Trafficking Monitoring Group, Co-op, FLEX, Kalayaan, Sophie Hayes Foundation, Survivor Alliance; The benefits and the barriers to accessing employment: Considerations for survivors of modern slavery, May 2021, Rights Lab University of Nottingham

Although not all victims are ready or able to work due to their experience of trauma or skill levels, frontline professionals highlighted the frustrations felt by many who would like to work but are unable to due to their immigration status.

“Independent living is difficult to achieve because there are a lot of limitations. They cannot work, or study, or get married - the options are restricted because of their immigration status or other limitations”

Unseen

“Those who spend a long time in the system, they become frustrated because we are not able to get them what they really need. For example, they cannot work and want to.”

Migrant Help

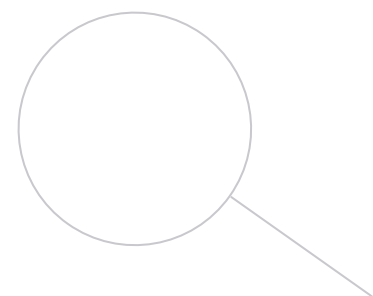
For some this impacts their recovery and leads them back into exploitation following the NRM - others will decide not to engage with support at all and remain in situations of exploitation.

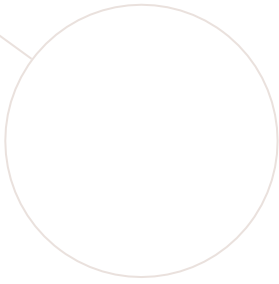
Greater emphasis on developing meaningful and sustainable independence and resilience for victims is key to increasing the effectiveness of the support system. Recovery for the individual can never be achieved if exploitation becomes a recurring cycle. At a more strategic level, a system of support that leaves victims vulnerable to re-exploitation and in need of repeated care does not offer value for money.

Case study

An integral part of Ella's support has been referring the client to the Luminary Bakery. Luminary Bakery is a social enterprise offering educational and employment opportunities for women who have experienced social and economic abuse or disadvantage. Luminary Bakery had been an important stepping-stone in the client's recovery and reintegration, improving her confidence and helping her set up her own bakery business. In this vein, as the client moved through Ella's service a key source of support has been helping her with her business. Ella's referred the client to an incubator, acquired free art classes by contacting local colleges, and assisted her in applying for charity grants to help with her financial concerns and pay for baking equipment.

Case study provided by Ella's





Ongoing support towards independence: Recovery, as all stakeholders emphasised, is not a linear process and looks different for each victim with some needing longer support than others. Planning with victims for their longer term future early in their engagement with support is key to successful transition out of crisis and into independence.

“It is important to talk to the person about their plans, start working with them as to what their plans are, give the power and control to them, to make decisions about their future.”

Justice and Care Victim Navigator

The RNA process has given case workers more time to work with a victim to prepare for their next steps after the NRM. But we heard from support workers that many victims still leave the NRM very vulnerable. Many still need advice and practical assistance to establish an independent life with some needs not being identified or addressed during the NRM period.

“The women in our Move On project have had positive CGs and run out of RNAs. Some also have leave to remain. Support workers would love to keep working with these women [under the MSVCC] as there are things to be done for them but they can’t.”

Medaille Trust

“There is a huge gap in support after the NRM before an asylum decision is made, a mismatch in the timelines of the processes”

Housing for Women

There are a range of charities offering ongoing support after the end of the MSVCC funded service. These deal with a wide range of needs from advocacy to access housing, benefits or health care, to practical help like finding furniture, or support to integrate into the community building relationships, getting their children into school or gaining work experience. Community initiatives in particular, can offer a way for survivors to develop an informal support network and move beyond dependence on professional support workers. These varied programmes illustrate how victims’ needs and vulnerabilities go beyond the ‘needs arising from exploitation’ which can be met by the RNA process.

The Snowdrop Project has developed an innovative tool for assessing the needs and risks of their clients who come to them after the NRM. This tool allows support workers to assess a victim’s needs across a range of eight areas from accommodation, health and legal issues to relationships and finances. In each area the support worker considers different factors and assesses



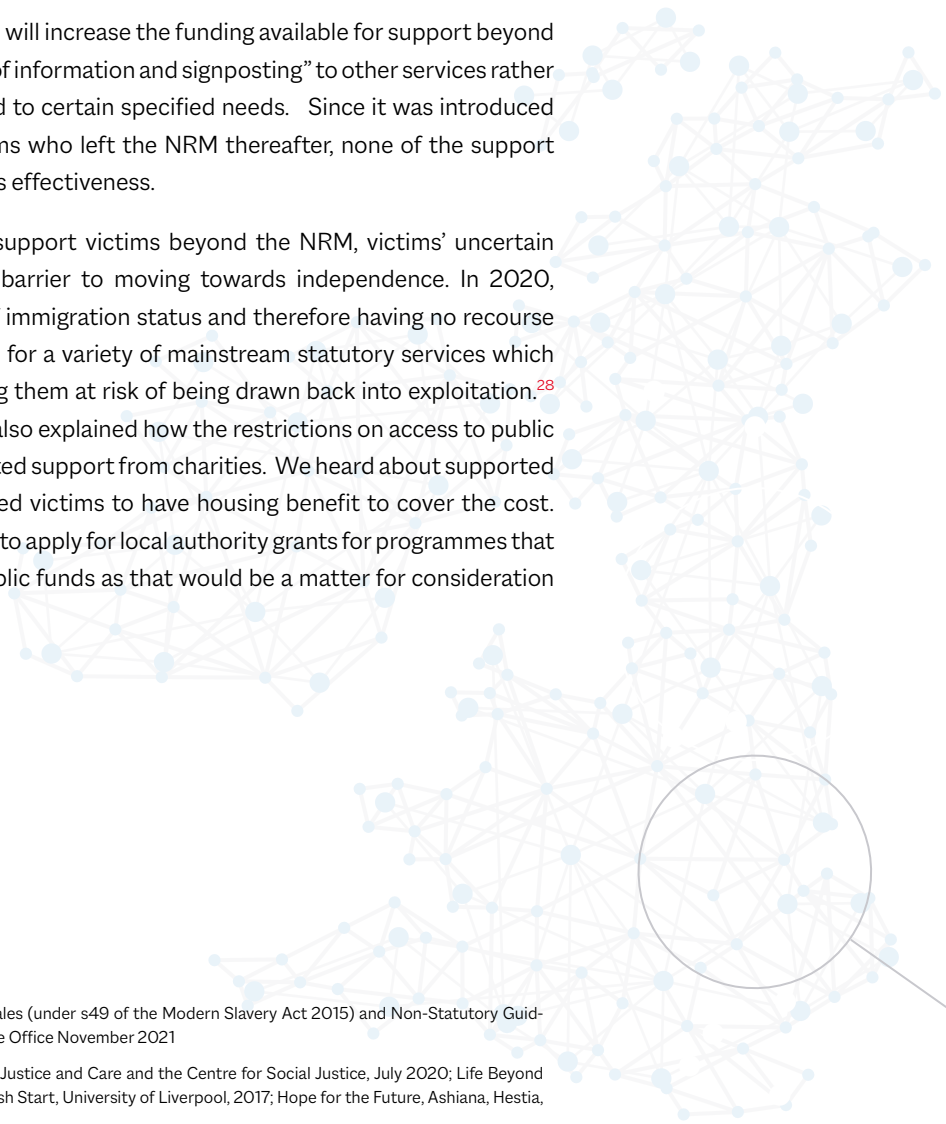
the complexity of the victims' needs, ultimately calculating an overall level of need from requiring safeguarding interventions to living independently. Crucially the tool takes account of the impact that multiple needs can have on a victim's overall level of vulnerability so if multiple 'medium' level needs are recorded the overall result will be a high level of need.

We also heard how even after a period of independence events in a victim's ongoing recovery after the NRM can create a new need for support. Experiences such as being granted asylum and given notice to leave asylum (NASS) accommodation, being moved to new accommodation or being called to give evidence at trial create instability and challenges that a survivor may not have dealt with before.

Supported accommodation such as Ella's offers safe accommodation alongside casework support for those who need more intensive support. Others offer outreach type support of different kinds covering casework, advocacy, support with criminal justice processes or drop-in and community groups.

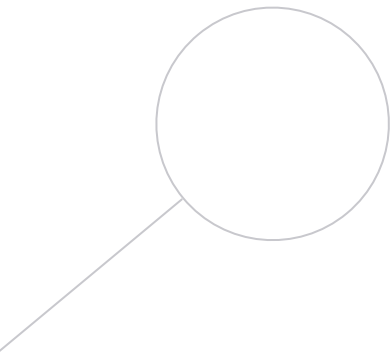
The new Reach In service under the MSVCC will increase the funding available for support beyond the NRM although it is limited to "provision of information and signposting" to other services rather than direct assistance.²⁷ It is also restricted to certain specified needs. Since it was introduced in January 2021 and available only to victims who left the NRM thereafter, none of the support providers we spoke to could comment on its effectiveness.

No matter the willingness of charities to support victims beyond the NRM, victims' uncertain immigration status presents a significant barrier to moving towards independence. In 2020, echoing earlier research, we found a lack of immigration status and therefore having no recourse to public funds means victims are ineligible for a variety of mainstream statutory services which may be necessary for their recovery, putting them at risk of being drawn back into exploitation.²⁸ Stakeholders interviewed for this research also explained how the restrictions on access to public funds due to immigration status also restricted support from charities. We heard about supported accommodation where some places required victims to have housing benefit to cover the cost. One NGO told us they had been advised not to apply for local authority grants for programmes that will support people with no recourse to public funds as that would be a matter for consideration in awarding funding.



27 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 Version 2.5, Home Office November 2021

28 It Still Happens Here: Fighting UK Slavery in the 2020s, Justice and Care and the Centre for Social Justice, July 2020; Life Beyond the Safe House, Human Trafficking Foundation, 2015; Fresh Start, University of Liverpool, 2017; Hope for the Future, Ashiana, Hestia, Red Cross, 2019



Time and time again when asked what would make a significant difference in promoting victims' resilience and long term recovery we were told that they need secure immigration status with the right to work or access benefits and housing, along with access to appropriate mental health services. This has been frequently highlighted in previous research recommending both ongoing support and a period of leave to remain to be made available for all victims after a positive conclusive grounds decision.²⁹

“If the positive CG could carry some form of stability and safety - entitlement to leave to remain, benefits, the right to work - so people are not then tempted to go and look for other forms of income which could lead to exploitation.”

Jericho Foundation

“The main thing is stability and this cannot be achieved when constantly waiting for decisions - be that NRM or asylum. There needs to be a minimum of 12 months where they are not bothered at all by the Home Office and can actually focus on recovery.”

Anti-Slavery Partnerships Survey Respondent

“Before I was stressed and waiting for a letter from the Home Office. Sharing the house with people who you don't know. Getting the visa was like freedom for me. You forget about your past. You leave it all behind.”

Survivor Interview 3

“Our work with survivors of trafficking has shown that continued uncertainty has a significant negative impact on their mental health. It is only once granted leave to remain in the UK, with the sense of safety and security that this brings, that survivors are truly able to benefit from therapeutic care and begin to recover from the trauma they have experienced.”

Helen Bamber Foundation

The intention to put into law the support available for victims during the NRM process through the Nationality and Borders Bill is a positive step but the Bill falls short of enabling victims to move on into a safe independent future. The narrow focus on needs directly resulting from slavery and the absence of support and limited leave to remain after a positive conclusive grounds decision is a missed opportunity. Care for the exploited and abused is not a luxury extra - it unlocks progress against organised crime by enabling victims to act as witnesses.

²⁹ It Still Happens Here: Fighting UK Slavery in the 2020s, Justice and Care and the Centre for Social Justice, July 2020; Hope for the Future, Ashiana, Hestia, Red Cross, 2019; Access to Legal Advice and Representation for Survivors of Modern Slavery, Research Summary, Dr Samantha Currie and Dr Matthew Young, University of Liverpool, Modern Slavery and Human Rights Policy and Evidence Centre, May 2021; Supporting Adult Survivors of Slavery to Facilitate Recovery and Reintegration and Prevent Re-exploitation, Human Trafficking Foundation et al 2017; Victims of Modern Slavery, House of Commons Work and Pensions Committee 2017

Focus on victim outcomes and reduce bureaucracy

Charities responsible for delivering the MSVCC told us that the contract is not set up to measure victim outcomes. This may be why there has been limited attention paid to what happens to victims after they leave the NRM, despite concerns being expressed about this previously.³⁰ Key Performance Indicators (KPIs) focus on assessing the performance of the prime and subcontractor charities such as the speed of delivering services rather than the impact of those services on victims' recovery.

“It feels like we are trying to meet KPIs that don’t make sense, we need to focus on ‘what is the purpose’ (of the NRM) and bringing people to a point of resilience, no longer vulnerable to exploitation.”

Unseen

Ella's told us that they assess the progress of their clients using the Assessment of Survivor Outcomes tool developed by International Justice Mission which considers victims' progress towards rehabilitation across six domains: Safety, Legal Protection, Mental Wellbeing, Economic Empowerment and Education, Social Support, Physical Wellbeing.³¹ A research project funded by the Modern Slavery and Human Rights Policy and Evidence Centre will be looking over the next year at how to assess survivor outcomes and produce a Modern Slavery Core Outcome Set.³² These could form the basis of a tool for measuring outcomes for victims receiving support under the MSVCC.

By intentionally measuring outcomes for victims rather than delivery of services the dedication and expertise of support workers can be redirected to focus on the purpose of the support - bringing victims out of modern slavery and helping them towards independence and recovery. It would also offer a salutary check on the cost-effectiveness of the service as part of the UK's overall modern slavery strategy. Care will be needed to ensure that outcomes do not become simply another check-list of services delivered but instead assess the impact on the victim and their future. It should also include less tangible impacts such as hope, personal confidence, social networks and independence and be based on victims' own perspectives.

The current focus on eligibility rather than outcomes has created an excessively centralised and bureaucratic process for evidencing and approving support requests which has little to do with promoting victims' recovery. Empowering and equipping support providers to make support decisions within the scope of the contract without excessive evidence or case by case approval from the SCA (whose staff do not have social care training or qualifications) would increase efficiency freeing up the time of both support workers and SCA staff. It would also ensure decisions about support are made in a trauma-informed manner with a focus on outcomes rather than process.

30 Reducing Modern Slavery, Committee of Public Accounts, April 2018

31 Assessment of Survivor Outcomes tool, International Justice Mission

32 Modern Slavery Core Outcome Set, MSPEC announcement, September 2021



Collaboration, integration and partnership

As the cohort of victims has grown and changed, the need for integration between support offered under the MSVCC and through mainstream services has grown but the quality of collaboration varies.

“Better cooperation between organisations providing care, particularly when survivors are placed back into communities would help recovery.”

Partnerships Survey Respondent

Some support providers have found challenges with getting access for victims to mainstream services. There appears to be confusion among some services about the function of the MSVCC support with some professionals in statutory services stepping back or refusing to provide support to a victim such as addiction services or social care, because they have support from the MSVCC. Local authorities highlighted the financial challenges they face with increasing demand for services to address other issues of community safety such as violence against women or knife crime as well as modern slavery.

“Everybody thinks the NRM is a solution for everything – housing, mental health, disability – and then their own services don’t have to fund this service”.

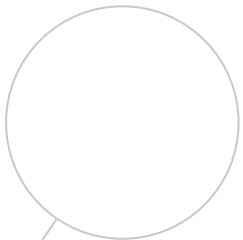
The Salvation Army

“As soon as social services see the person has a case worker from the safe house, the local authority steps back and doesn’t offer help. Sometimes they don’t understand what modern slavery is, or don’t understand the role of the NRM case worker or don’t understand limits of what NRM support worker can offer. Other times it could be that social services say they don’t have the resources.”

Medaille Trust

Despite these reports, we heard examples of collaboration with local authorities and other statutory services which show how effective cooperation can be in providing support appropriate to a victim’s needs. These ranged from formal local partnerships and networks or relationships with local services which have developed independently.

Designated modern slavery coordinator roles within local authorities not only help the authorities to increase staff awareness of their responsibilities to modern slavery victims but also provide a contact point for MSVCC support providers to facilitate access to local authority services for victims. Coordinators in Birmingham and Brighton and Hove for example are acting as a bridge to bring support workers together with local authority adult social care or safeguarding teams and also intervening to review and challenge refusals.





Multi-agency case conference models that have been developed for pre-NRM safeguarding also in some cases continue to coordinate support for victims after an NRM referral. We heard for example that where victims remain in or return to the local area during or after the NRM they can be referred back into the Welsh MARAC where needs for further support arise.

Regional and local modern slavery partnerships involving NGOs, statutory services and law enforcement also facilitate collaboration in supporting victims in the locality. In our survey with 10 regional partnerships, more than half reported having a multi-agency victim support pathway in operation in their area. Members of several local partnerships spoke about how these partnerships have contributed to building relationships between different groups which has in turn improved the support available to victims. However, some partnerships spoke about how a lack of engagement from MSVCC subcontractors limited their ability to help support victims within the NRM and on exit, perhaps due to capacity or distance. An emphasis on partnership-working in the new MSVCC is likely to encourage greater participation in such collaborations. But support providers cannot forge these partnerships alone - local authorities need to have the same instruction and impetus.

“Organisations have to be willing to work in partnership - not just pay lip service. It is down to building trust and really working together. Who you know does make a difference.”

Adavu

Individual relationships between support providers and statutory agencies or other local partners also help to facilitate the provision of care. Palm Cove Society described the strong relationships they have built over a number of years with the local drug and alcohol service, local GP surgery, pharmacies and local authority housing departments which in many cases help to smooth access to those services for their clients.

“We are trying to have as many links as possible locally to ensure quick access to services” -

Palm Cove Society



We heard several examples where victims' access to specialist outside services was increased through support providers hosting those professionals in their sites, often through a 'drop-in' format. We were told that victims dealing with trauma or unstable lives often find it hard to keep appointments, but that standard services are often withdrawn if appointments are missed. Co-locating services or support providers hosting staff from specialist agencies on a drop-in basis makes it easier for victims to engage with those services.

“Predominantly our service is based on domestic abuse, but we have other services that co-locate in our centres to make it a holistic support place for women experiencing any type of trauma. Probation colleagues see women going through the probation system here.... We have rape and sexual abuse support services based from our centres, we have our team, we have other providers and mentors that help people get back into work, we have food banks and baby banks, everything from a practical level, it's really a holistic place. Everything is available in one place. It isn't stigmatising people for their particular issue. It is trying to remove some of those barriers for people accessing support.”

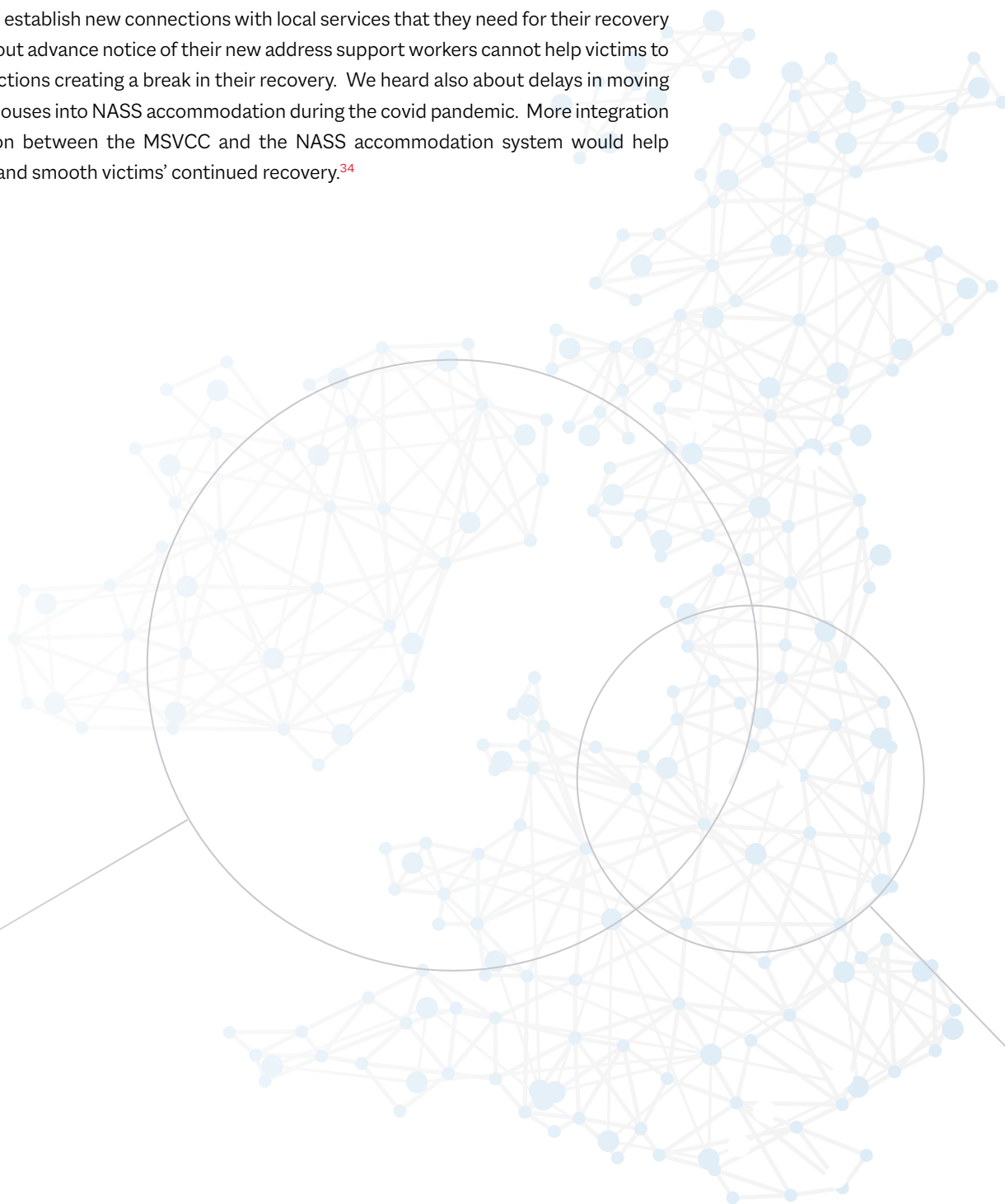
My CWA (Cheshire Without Abuse)

Beyond collaboration and partnership between agencies, improved integration of the support available would benefit victims' recovery. When it comes to setting a victim on a path towards long term independence and recovery, stable housing is fundamental. If victims are eligible for accommodation that will take them beyond the end of the NRM process such as local authority accommodation or asylum (NASS) accommodation, maintaining or accessing that accommodation as soon as possible can be helpful for their ongoing recovery. However, their need for immediate safety and security must also be met.

Frontline professionals were concerned that British victims are not generally able to access safe house accommodation but a lack of priority, or unsuitable local accommodation puts victims at continued risk. Even if British national victims are taken into safe house accommodation, if they are moved out of the local area, they can be at risk of losing their rights to social housing which depend on a 'local connection'. The frontline staff were frustrated there is no simple process for moving British national victims into local authority housing in a different locality which would enable them to keep those rights and offer them a longer term solution. More integration of MSVCC support with mainstream services including priority access to social housing for victims of modern slavery without a 'local connection', as has been recommended previously, would smooth this process and offer victims immediate safety and sustainable access to accommodation.³³

³³ It Still Happens Here: Fighting UK Slavery in the 2020s, Justice and Care and the Centre for Social Justice, July 2020; Day 46, Human Trafficking Foundation, 2016; Hope for the Future, Ashiana, Hestia, Red Cross, 2019; Supporting Adult Survivors of Slavery to Facilitate Recovery and Reintegration and Prevent Re-exploitation, Human Trafficking Foundation et al 2017

Two different problems arise when it comes to victims who are seeking asylum. Firstly, as mentioned, there needs to be a more personalised assessment of the suitability of specific NASS accommodation for a victim of slavery. Secondly, support workers told us that a victim entering NASS accommodation might not know their exact new address until the day of moving (which highlights the limited opportunity for assessing its suitability). They can be moved anywhere in the country so need to establish new connections with local services that they need for their recovery such as GPs. Without advance notice of their new address support workers cannot help victims to make those connections creating a break in their recovery. We heard also about delays in moving victims from safe houses into NASS accommodation during the covid pandemic. More integration and communication between the MSVCC and the NASS accommodation system would help bridge these gaps and smooth victims' continued recovery.³⁴



34 Hope for the Future, Ashiana, Hestia, Red Cross, 2019

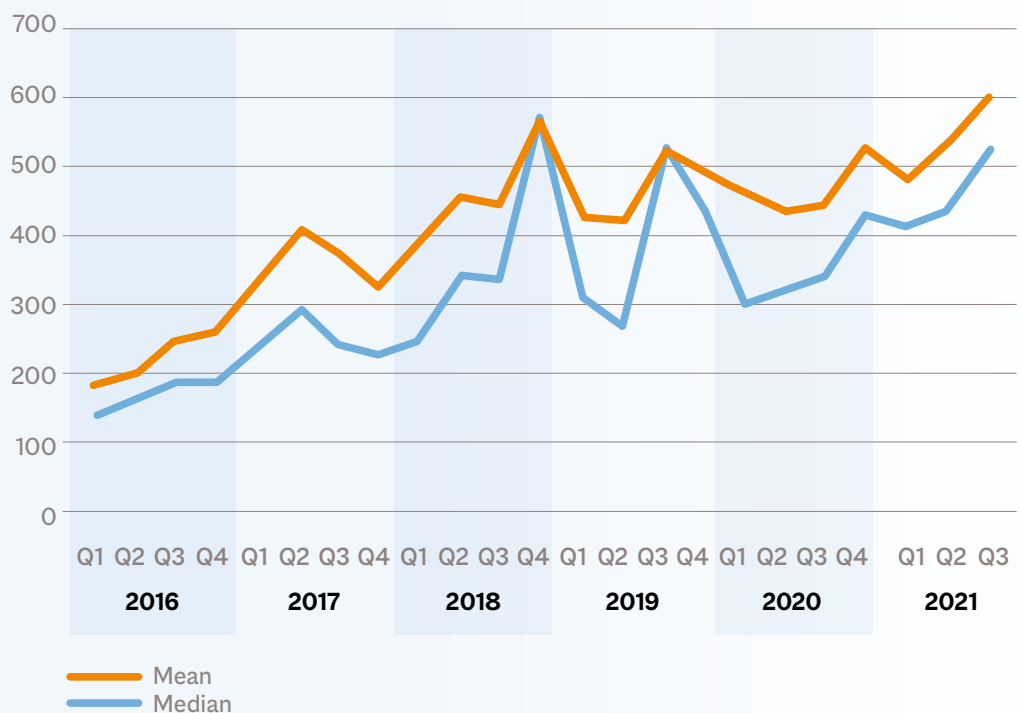
Chapter 3.

Quality and efficiency of NRM referrals and decision-making

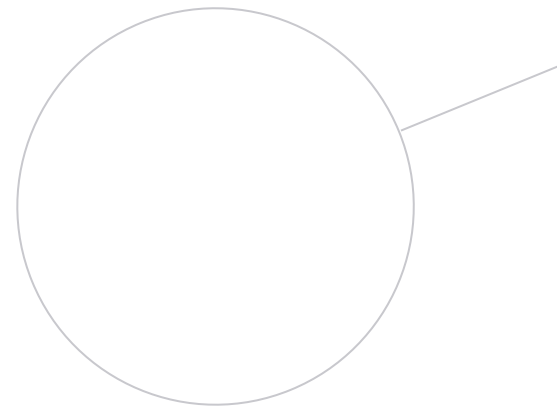
For better or worse the decision-making process of the National Referral Mechanism is central to victims' recovery. NRM decisions are the 'gateway' to accessing support services across the UK. The accuracy and timeliness of those decisions also impacts victims' recovery and their ability to move into a safe, independent future. The NRM has suffered from extensive delays for many years and despite additional staff there is little sign that the backlog will be cleared. There remains a lack of confidence among many stakeholders in the decision-making process. Unfortunately, we were unable to speak to the Home Office's Single Competent Authority which is responsible for making NRM decisions to gain their perspective.

The NRM decision-making process is not a mere administrative task. Identifying victims and enabling them to access support and to engage positively with law enforcement is foundational to the fight against slavery. Bold steps are needed to tackle the backlog to move us from crisis point to proactive leadership in the fight against slavery. Decision-making must be disentangled from immigration processes. Independent, highly-qualified staff, improved information systems and a reduction in bureaucracy will produce more accurate and faster decisions. This will avoid a future build up of cases as well as being better for victims and ensuring value for money.

Average number of days taken to make conclusive grounds decisions, by quarter



Source: Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, Quarter 3 2021 - July to September



Key principles

Timely and quality decisions to enable victims to move on and ensure value for money

Good quality decisions made in a timely and efficient manner with sensitivity to the vulnerabilities of victims are essential to safeguard victims and help them move forward in recovery.

Since 2017, victims have been waiting for a conclusive grounds decision on average for over 300 days, with waits of over 400 days in each of the first three quarters of 2021 reaching 500 days in quarter 3.^{35 36} We heard of victims regularly staying with support providers for two years and some for five years awaiting a decision. At the end of 2020 there were 235 Reasonable Grounds and 17,734 Conclusive Grounds decisions pending.³⁷ Delayed or inaccurate decision-making has a detrimental impact on victims' recovery.

“People go from being a victim of trafficking to being a victim of the NRM system because their future again hangs on someone else’s decisions”

Hope at Home

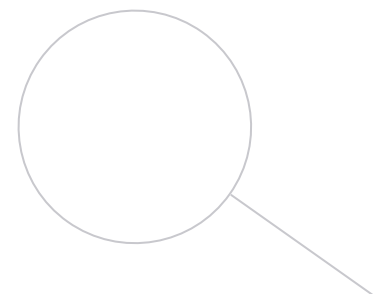
The uncertainty of not knowing what will happen, living for extended periods with the possibility that the decision could arrive ‘any day now’ is extremely harmful for victims’ mental health, slowing recovery and causing additional anxiety. Without regular updates or any sense of what is happening, victims can lose trust in the authorities including even support providers.

“Delays in the NRM and asylum system - shatters people. It is nearly impossible to find mental wellbeing when you have no idea what is going to happen. It prolongs the feeling that you are invalid.”

Ella’s

“Not knowing if decision will be yes or no is like a nightmare”

Survivor interview 4



35 Modern Slavery: National Referral Mechanism and Duty to Notify Statistics UK, End of Year 2020 - 1 January to 31 December; and Quarter 3 2021 - July to September

36 These are the median average wait times described in the NRM Statistics as “a more accurate reflection of the situation faced by potential victims in terms of how long they were waiting for a conclusive grounds decision.” Mean average wait times are higher at 400-500 days indicating some individuals are waiting a very long time indeed.

37 Independent Anti-Slavery Commissioner Annual Report 2020-2021, July 2021



Case study

A man who had been trafficked to the UK for domestic servitude as a child was identified as a potential victim of modern slavery by The Passage, a homeless charity in London, when he was sleeping rough in a park. Although he was referred to the NRM 4 days after entering The Passage Modern Slavery Service he experienced delays in all decisions. It took 18 days to receive a reasonable grounds decision, and 14 months to receive a conclusive grounds decision. It took 7 more months to have leave to remain. During this time, he remained in the safe house going through Recovery Needs Assessment (RNA) after RNA. The delay to have leave to remain and therefore have access to housing and employment caused him utter distress and anxiety as he felt trapped with no move-on plan.

Case study provided by The Passage

Victims without secure immigration status cannot work whilst waiting for a decision nor make firm plans for the future as asylum and discretionary leave decisions are dependent on the NRM decision. Delays then mean victims' lives and recovery stagnate whilst they wait.

“One of my clients said ‘I am in a cage, I cannot move on’”

Migrant Help

We also heard that long delays create a risk that victims become dependent on support providers and even institutionalised which is the opposite of the ideal outcome of the recovery period. Practically too, it becomes difficult to help victims make plans for their next steps without any sense of when that decision may come.

“There is always a chance that clients get too used to being with us ...we don't want them to become over reliant on us or institutionalised and we work with them to build their independence to ensure this does not happen.”

Palm Cove Society

Some stakeholders we spoke to questioned the need for such a complex decision making process saying that no other victims of crime are required to 'prove' they are a victim to access support. For some victims a positive decision gives them a sense of being believed that has a positive impact on their recovery and for individuals who receive a negative decision the opposite is true. However, the lack of any entitlement to services or immigration status as a result of a positive conclusive decision makes it more of a psychological benefit than anything else. When asked about the decision-making process many stakeholders and victims defaulted to talking about the asylum process since for victims without immigration status it is their asylum claim that has the most impact on their future and recovery.

“For many clients the positive CG is a proof that they were believed and means a lot to them, but often the question is what next? We then discuss how we will continue to support them during the next stage of their journey.”

Palm Cove Society

Police officers also highlighted that delays to decision-making have a significant impact in cases where the potential victim is a criminal suspect and has raised the statutory defence under section 45 of the Modern Slavery Act. This impacts other victims as well as delaying prosecution of offenders (if deemed appropriate). Police officers in the Met told us about one victim whose suspected exploiter has raised the statutory defence. The first victim suffers from PTSD and has found the two year delay in the case very distressing. Other officers expressed concern that potential suspects may be supported for extended periods alongside other victims to whom they may pose a risk.

“If the Home Office don’t make timely decisions, we risk leaving offenders in the NRM with access to victims and support systems”

East Midlands ROCU (Nottinghamshire Police)

Confidence in the quality of NRM decision-making is impacted by the high proportion of negative NRM decisions which are overturned after a reconsideration request. In 2020, 80.8% of reasonable grounds decisions and 75.1% of conclusive grounds decisions that were reconsidered, subsequently received a positive decision.³⁸ Whether due to a lack of expertise on the part of decision-makers or a lack of quality information, it is clear that improving the accuracy of initial decision-making would both increase the overall efficiency of the NRM process and spare victims the damaging impact of a negative decision.



³⁸ Data released in response to Freedom of Information request 64090 23 June 2021



Case study

On turning seventeen Rachel, a young Nigerian woman, was ordered by her abusive stepfather to drop out of school and prostitute herself. Rachel fled to the UK on a student visa but ended up moving in with her stepfather's brother, who took away her passport, regularly humiliated her and forced her back into prostitution. Rachel managed to escape but then her student visa ran out. Terrified of being sent back to her stepfather in Nigeria and desperate to remain in the UK, she paid £3,000 to scammers who promised to regularise her immigration status. These scammers took all of Rachel's money yet the Home Office still rejected her application for leave to remain. Rachel then spent years afraid to go to the police for help. She was ultimately detained by Immigration Enforcement and held at Yarl's Wood Immigration Removal Centre.

After the failure of her first lawyer to get her into the NRM, Rachel's second lawyer managed to get her out of Yarl's Wood to an initial accommodation centre in Wakefield, then a room in Barking and finally a house in Ilford. Yet, all this accommodation was in very poor condition, usually infested with vermin, without proper bathroom facilities and run by rude and neglectful staff, and so totally unsuitable for a victim of modern slavery. During this period Rachel was unable to work and the small asylum support payments she did receive were stored on a card that could only be used in certain shops, excluding her local African supermarket where she wanted to buy food.

Whilst in Ilford, Rachel's third lawyer applied for reconsideration of her negative NRM decision and she eventually received both a positive reasonable grounds and positive conclusive grounds decision recognising her as a victim of modern slavery. This was a massive relief. Rachel says that she felt a sense of finally being believed and recognised. Following her positive conclusive grounds decision, Rachel was granted a year's discretionary leave to remain. She now no longer worries when she sees a police officer on the street, wondering 'are they coming for me?' and is free to move around, meet people and make connections.

We have changed Rachel's name to protect her identity. Case study provided by Street Talk.




Reform required

Targeted interventions to deal with the backlog

Long delays in decision-making reach back at least as far as 2016 and in fact the 2014 Home Office Review of the NRM also highlighted issues with the timescales for decision-making. When it was created in 2019 the SCA inherited a sizeable backlog in cases but as the number of referrals have continued to increase, despite the recent recruitment of extra staff, delays continue to lengthen. This creates a cumulative problem for the system which in turn negatively affects victims of slavery as we have described.

It is time for a targeted intervention specifically to address the long delayed cases. Dedicated, experienced staff should be deployed to handle these long delayed cases to identify the causes of delay and proactively respond to them. Specific fast track protocols are needed to enable decision-makers to progress these long delayed cases once they have identified the reason for delay. They should be empowered to gather the additional information necessary and also have strict timeframes and guidance for making decisions in situations where it is unlikely any more information will be forthcoming. Similar fast-track protocols should be deployed for reviews of negative decisions by MAAPs in these delayed cases. There needs to be a balance struck between allowing victims time to build trust and disclose what has happened to them when they are comfortable, and the harm caused to victims by extensive delays.

Several support providers that we spoke to felt that the NRM decision making process could be more effective if it had specific and transparent protocols for handling challenging cases from the outset to avoid such delays. These include cases where new information is unlikely to be available for a variety of reasons. We heard about cases involving historic exploitation or where exploitation occurred entirely overseas and no new information is likely to be produced, and yet victims have still had to wait for a decision for two years. Delays caused by these challenges not only impact the individual with the difficult case, but all victims whose own cases are delayed as a result.



The [SCA] were trying to get the answers to some questions that it was not possible to prove such as a claim that 'I was brought to the UK aged 7 by suchandsuch'. There are a lot of cases where the evidence could not be corroborated. ... But we cannot have a situation where decisions are taking years and years."

The Salvation Army

Reducing the backlog and developing protocols to process complex cases would be a more effective deployment of resources than the new second competent authority the Immigration Enforcement Competent Authority (IECA) created in November 2021. Ploughing resources into a new decision-making body to speed up decision-making for only a segment of victims (foreign national offenders, people in detention or in the community facing deportation or where someone's asylum claim has been deemed inadmissible) will do nothing to address the systemic delays which keep victims in the support system for longer than they need to be harming their mental health and recovery and causing an unnecessary drain on the public purse.



Gathering of more high quality information

Accurate and efficient decision-making relies on having access to the relevant information. The poor quality of some initial NRM referral forms was highlighted by both police and NGO stakeholders as referred to in chapter 1. The poor quality of initial information presents a challenge for SCA decision-makers and almost certainly contributes to delays or poor quality decision-making. In the New Plan for Immigration the Government proposed amending the test for the Reasonable Grounds stage decision to require “objective factors but falling short of conclusive proof”.³⁹ Depending what is meant by ‘objective factors’, given the current patchy quality it is unlikely many NRM forms will contain enough information to pass this more stringent test. This will likely increase delays in decision-making at the Reasonable Grounds stage as the SCA tries to gather more information and will delay victims’ access to support. Rather than amending the test, it would be more effective to increase the quality of NRM referral forms and evidence gathering at both Reasonable and Conclusive Grounds stages.

Quality assurance of NRM forms at the point of referral can increase the quantity and quality of information submitted to decision-makers. The Metropolitan Police, Greater Manchester Police and West Midlands Police have all developed protocols so all NRM referrals submitted by the force go through a designated officer or team with specialist expertise.


No matter how good the initial NRM form is, trauma and fear affect many victims’ first accounts. Further information is needed for accurate decision-making at the conclusive grounds stage. First Responders should act as a contact point for the Single Competent Authority (SCA) and offer additional input for conclusive grounds decisions. However, many First Responders are not aware of their responsibilities beyond referral and may not be equipped to provide more information. In the case of police referrals, the referral is often made by a frontline or community officer after which the case is passed on to specialist colleagues for investigation who would be better placed to provide new information on the case.

Evidence uncovered by police in the course of criminal investigations can add valuable information beyond that available on an initial NRM referral form. Police officers felt that greater cooperation between the SCA and the police would be beneficial. In particular they recommended having named decision-makers in each case that they could contact and more direct channels for sharing information with a more collaborative approach. At present they were often unsure whether information sent to the general SCA inbox had been received and considered. Common responses in our surveys with both Regional Partnerships and Police Officers recommended continued contact between First Responder and SCA to improve NRM decision-making.

***“There are not enough requests from the SCA to ask for my evidence on the case[...]. Contact with the SCA is hit and miss. If we find one case worker who has been great, we will contact them even if not the case worker on the case. Otherwise it is the generic email address and the SCA colleagues are not quick at responding.*”**

Modern Slavery and Child Criminal Exploitation Team, London Metropolitan Police

39 New Plan for Immigration CP 412, HM Government March 2021 p33



“It is very one-sided communication. The SCA get in touch when they need some information, we don’t hear back when Police contact them”

Police officer

“We don’t seem to be able to pick up the phone to a dedicated caseworker, whereas we will have a dedicated CPS lawyer attached to a case - we can speak to them to tease out the nuances that can’t be put in written documents. If SCA is only working via written documents they will miss things”

East Midlands ROCU (Nottinghamshire Police)

Support workers are well placed to gather a range of information and to understand the complexities and any apparent inconsistencies in victims’ narratives. This information and expertise is essential to accurate decision-making. Increasing the input from support workers would deepen the evidence available for quality decision-making as current practice seems to vary. It was encouraging to hear from Palm Cove Society that they have received more requests for input from the SCA since summer 2021, but this had not previously been the norm. In July 2021 the Medaille Trust launched the Victim Voices project in which support workers are trained to carry out Achieving Best Evidence ‘ABE’ police standard video interviews with clients. The aim is for the interview tapes to be submitted to the SCA to inform decision-making as well as potentially contributing to a criminal investigation. Evaluation of the use of such interviews to inform decision-making will be immensely valuable.

The involvement of the SCA in Welsh MARAC meetings is an example of how a strong collaborative approach between the SCA and other agencies, including police and support providers, supports decision-making. We were told that if new information arises at a later stage it can be fed into the NRM process by the SCA member present at the MARAC meeting or if any information is lacking SCA staff can bring it to the attention of the various agencies attending.

Where a victim has a good legal representative, their solicitor will submit additional information to the SCA to aid decision-making. We heard from expert lawyers that victims without legal representation may be disadvantaged in the process but more worryingly that victims with poor quality representation could be further disadvantaged as in such cases the SCA expects the lawyer to be effective. We heard from support workers and victims themselves who had initially had a negative decision due to poor quality or even fraudulent and bogus legal representatives. Lawyers also told us that where health matters are raised, increasingly the SCA requires formal legal evidence about a victim’s health – a medico-legal report as would be required for an asylum claim – rather than a GP letter. It is unclear what the position would be for a victim without a lawyer. The rules about when legal aid is available for the NRM are complex and the proposed extension to pre-NRM legal aid advice is currently limited to people receiving legal aid in immigration-related cases.⁴⁰ Access to legal representation for the whole NRM process, including through legal aid would help ensure consistency of treatment of all cases through the NRM.

⁴⁰ Nationality and Borders Bill clauses 65 and 66 (as the Bill stood at First Reading in the House of Lords on 9 December 2021)

Multi-disciplinary decision makers

The quality of decision-making is largely driven by the qualifications and expertise of the staff making the decision. None of the professionals we spoke to had a clear understanding of the qualifications or training of SCA staff and felt that NRM decisions should be taken by experts in modern slavery, echoing previous recommendations.⁴¹ Several police officers highlighted the recent court judgment that for the purpose of deciding if a person accused of criminal offences should have access to the statutory defence for victims under the Modern Slavery Act the SCA decision-maker is not considered an ‘expert witness’ as to whether the individual is a victim or not.⁴² There are clearly complexities arising from the specifics of this case and the different purpose of the decision for the NRM or for a defence to criminal charges. However, this judgment certainly seems to have dented the reputation of SCA decisions in the eyes of some professionals.

There is a perception among stakeholders interviewed for this research that the ‘enforcement’ and ‘immigration’ cultures of the Home Office influence decision-making for what should be primarily a safeguarding function. The introduction of the Immigration Enforcement Competent Authority (IECA) in November 2021 to decide cases for foreign national offenders and where the person is facing deportation or removal from the UK reinforces these concerns. The creation of the IECA means victims will once again receive different treatment on the basis of their immigration status creating two tiers of victims and reversing the change made with the creation of the SCA in 2019.

“There is significant risk that those victims of modern slavery whose cases are assessed by Immigration Enforcement will have their cases judged by considerations about their immigration status rather than their rights to protection as victims of serious crime.... I am extremely concerned that by introducing the IECA and returning to a dual system approach, we are taking a step backwards in our response to modern slavery with considerable implications for victims.”


Independent Anti-Slavery Commissioner⁴³



⁴¹ ‘Proposal for a Revised National Referral Mechanism (NRM) For Adults’ Anti-Trafficking Monitoring Group September 2014; ‘A Game of Chance? Long-term support for survivors of modern slavery’ St Mary’s University, 2017;

⁴² R v Breani [2021] EWCA Crim 731

⁴³ Letter to the Home Secretary on the IECA 11 November 2021, Independent Anti-Slavery Commissioner



There is a very real possibility of inconsistency in decision-making between the SCA and the new IECA. More concerning though is the risk that the fact a victim is on a path to deportation will influence decisions which should be based solely on indicators and evidence of modern slavery. Siting this body within Immigration Enforcement (IE) which has the aim of ensuring compliance with immigration law, heightens this risk. At the time of writing no information is available about the staffing of the IECA, whether decision-makers will be drawn from existing IE staff or SCA staff nor the training and qualifications of the decision-makers.

This absorption of modern slavery decision-making into immigration policy undermines efforts to target organised crime gangs responsible for modern slavery. Victims handled in this way will be highly unlikely to engage with the police in respect of the networks who have exploited them. The IECA should be disbanded and resources deployed to tackle the backlog and address complex cases and develop a multi-disciplinary framework.

Many stakeholders we spoke to felt that SCA decision-makers needed greater knowledge and understanding of the experience of victims and the impact of trauma on the narratives given by vulnerable people. One of the MSVCC subcontractors suggested that SCA staff might benefit from time shadowing support workers.

All the professionals we spoke to felt that the variety of experience and knowledge in multi-disciplinary teams would improve decision-making. A multi-agency approach has been recommended previously by a variety of reports but not fully adopted.⁴⁴ Home Office trials of an alternative NRM referral and decision-making process found that the “range of skills and experience of panel members was seen to be very important for good decision making” but highlighted the burden of voluntary participation rather than a formal multi-disciplinary structure.⁴⁵

The Home Office has since created Multi-Agency Assurance Panels (MAAP) to review negative conclusive grounds decisions made up of independent experts from a range of relevant professions. One MAAP member we spoke to emphasised the benefit of the different perspectives and opinions brought by the panel members from various backgrounds. Stakeholders we spoke to questioned the efficiency of these panels being advisory only. The Home Office is currently trialling a localised multi-agency approach to decision-making for children.⁴⁶ The results of these pilots should also be used to inform developments in decision-making for adults.

44 A Review of the National Referral Mechanism Multi-agency Assurance Panels, Anti-Trafficking Monitoring Group, 2021; Supporting Adult Survivors of Slavery to Facilitate Recovery and Reintegration and Prevent Re-exploitation, Human Trafficking Foundation et al, 2017 March 2017; Proposal for a Revised National Referral Mechanism (NRM) For Adults, Anti-Trafficking Monitoring Group, 2014; Review of the National Referral Mechanism for Victims of Human Trafficking, Home Office, 2014

45 An evaluation of the National Referral Mechanism pilot, Nicola Ellis, Christine Cooper and Stephen Roe, Home Office, October 2017

46 Devolving child decision-making pilot programme: general guidance, Home Office, Updated 8 November 2021

Transparency, accountability and communication

Confidence in NRM decisions and efficiency of decision-making could be increased with better communication and greater transparency and accountability.

We heard that victims often only receive two letters about their case from the Home Office, one with the Reasonable Grounds decision and one with the Conclusive Grounds decision and no updates in between. Often those letters give victims a misleading impression about how quickly that decision will be made which exacerbates their frustrations.

They receive a letter saying the decision will be made in 45 days, after 45 days the clients complain ‘where is the decision?’ I have to tell them from the very beginning that it never takes 45 days.”

Migrant Help

We heard that previous MSVCCs included KPIs for support workers to chase SCA decisions recognising the impact of delays on victims. Those KPIs have since been dropped, having proved ineffective. Many stakeholders felt it was the SCA itself that needed a stronger accountability mechanism for keeping to decision-making timescales.

Even when a decision is made there can be delays in the victim receiving the official notification. This can cause problems for support providers who have the information via the NRM online portal and have to prepare the victim to exit the service but the victim has not yet received the letter from the Home Office informing them of the decision. We heard that when one victim receives a decision before another who has been in the safe house longer this can also be frustrating for victims in the absence of clear communication on their own case. More frequent and more realistic communication with victims about timescales, along with performance targets to keep to those timescales could at the very least ease the negative impact of the uncertainty on victims’ mental health.

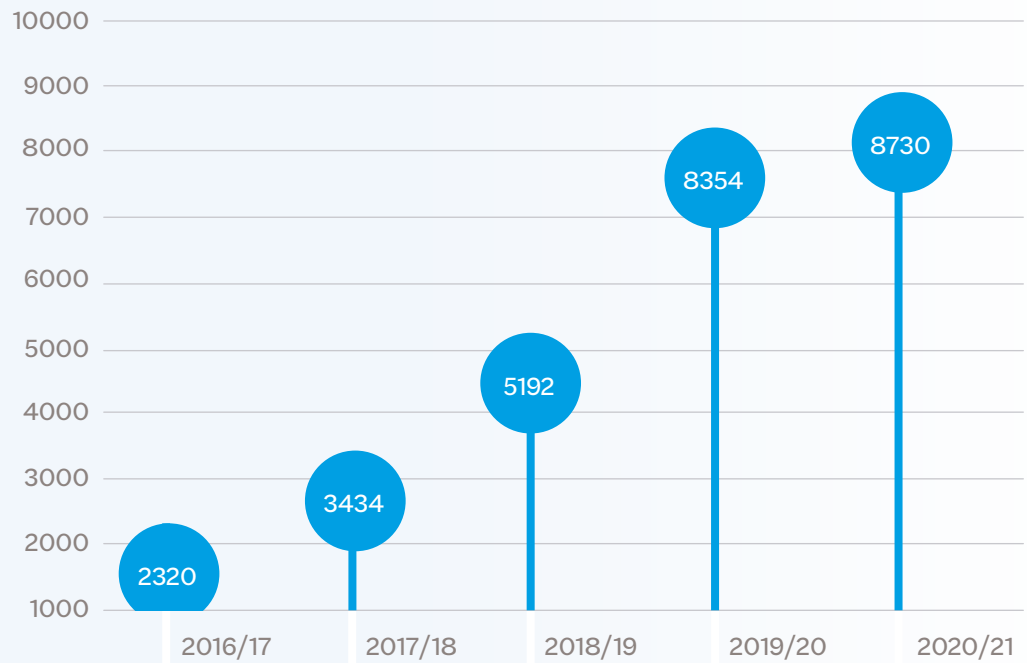
Stakeholders across both criminal justice and victim support sectors told us they had little understanding of the decision-making process or the reason for delays. From their experience support providers believed that cases were not simply being addressed in order of referral, although were unclear about how the SCA prioritised cases or how much time would be allocated to a case. Many had the impression that cases were not continually active, but waited for long periods before being picked up by a decision-maker. We heard that the best decisions in the immigration system often come when there is a focussed and engaged decision-maker. Having designated case-owners responsible for proactively monitoring and gathering relevant information on cases from the moment of referral would help to identify early those cases where more material is needed, where decisions can be taken or where there are challenges for decision-making. It would also provide a clear channel for support providers, police, victims’ lawyers and other professionals to share relevant information with decision-makers.

Chapter 4.

Bridging gaps with the criminal justice process

Victims of modern slavery are victims of crime, often perpetrated by serious and organised crime groups. Many victims see restoring justice as part of their recovery process. However, not many get to see their traffickers behind bars. The UK has made progress in identifying and supporting potential victims of modern slavery with numbers increasing year on year showing better awareness and recognition of the crime. Yet, the number of perpetrators sentenced for modern slavery crimes under the Modern Slavery Act remains woefully low. In 2020 there were 344 offenders prosecuted and just 56 convictions for modern slavery crimes, and only 13 of those convictions were for modern slavery as the principal offence.⁴⁷ This is a tiny proportion of the 6,000-8,000 modern slavery offenders the National Crime Agency estimates are operating in the UK.⁴⁸ Our previous research identified key challenges in bringing perpetrators to justice, such as the complex and international nature of the crime, lack of resources and specialist investigative capacity, low awareness among prosecutors and judges, but most importantly lack of victims' engagement with the police investigation.⁴⁹ We therefore decided to take a closer look at the disconnect between victims, the support system and the criminal justice system in an attempt to identify possible solutions to bridge the existing gap.

Police recorded crime for modern slavery in England and Wales (2016-2021)

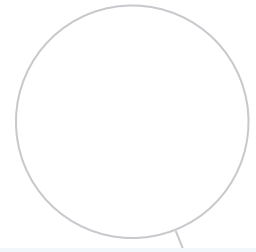


Source: Home Office Police recorded crime and outcomes open data tables October 2021

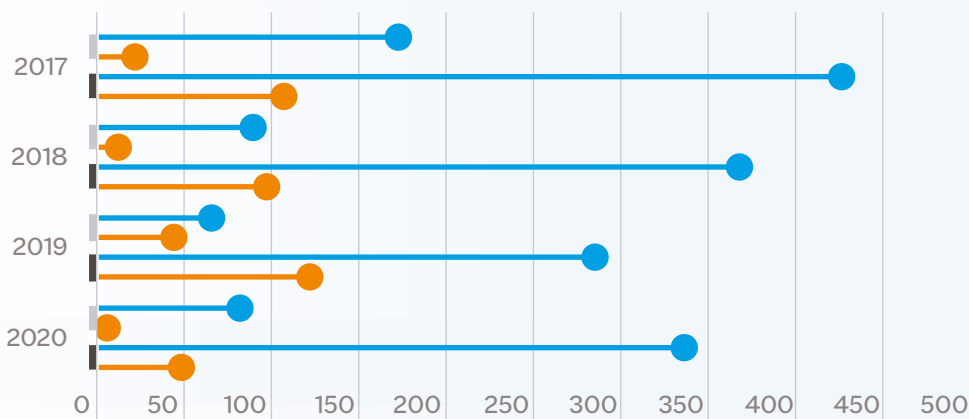
47 Independent Anti-Slavery Commissioner Annual Report 2020-2021, July 2021

48 National Strategic Assessment of Serious and Organised Crime 2021, National Crime Agency, May 2021

49 It Still Happens Here: Fighting UK Slavery in the 2020s, Justice and Care and the Centre for Social Justice, July 2020



- █ **Defendants prosecuted** for modern slavery offences on a principal offence basis
- █ **Defendants prosecuted and convicted** for modern slavery offences on an all offence basis, England and Wales
- Prosecutions
- Convictions



Source: Independent Anti-Slavery Commissioner Annual Report 2020-2021

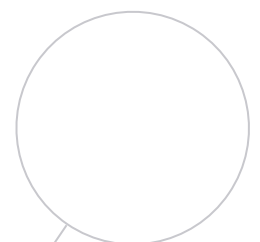
Key principles


Leadership and a strategic response

The response to modern slavery remains patchy and inconsistent across the country. In order to disrupt this crime that has already become entrenched in our society, we need to deploy a much more coordinated and strategic response. The postcode lottery of leadership, awareness and action needs to end. Our 'It Still Happens Here' report published in 2020 identified that lack of local and regional leadership leads to inconsistent responses resulting in a number of gaps that allow criminals to run amok in our communities. We made a number of recommendations calling for more leadership from Police and Crime Commissioners, Mayors and Deputy Mayors, and Chief Constables to address those gaps. We recommended developing regional anti-slavery strategies underpinned by data and intelligence to tackle the crime accordingly addressing the specific characteristics of the crime in that area and linked to the support services necessary to enable victims' recovery. Good practice needs to be transformed into business-as-usual. A robust strategic response and leadership are absolutely vital to secure buy-in, commitment and resources from all partners to ensure an all-out assault on perpetrators and a needs-based approach to victims.

Better communication and sharing of information

Better communication and sharing of information between the police, support services and victims has been one of the leading themes in most of the interviews with stakeholders and survey analysis. Despite years of working together, there still remain significant gaps in how information is being shared, partly due to the lack of communication mechanisms, but also due to a lack of trust. Undoubtedly, in some areas progress has been made led by multi-agency working that has paved the way for open and transparent communication and trust.





Firstly, as outlined in the previous chapter there seems to be a gap in communication between police forces, in particular between the Officer in Charge (OIC) of an investigation, and the Single Competent Authority, which needs to be urgently addressed.

“From a police perspective there never seems to be any outreach to police from SCA following an NRM referral going in. We would like to see two way engagement. Police have the information that could be vital and help speed up the NRM decision making process”

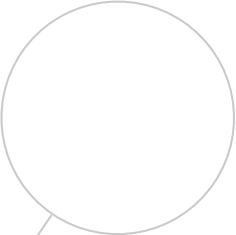
East Midlands ROCU (Northamptonshire Police)

Secondly, there is a gap in communication between the police and support providers who are looking after victims once they are referred to the NRM. More often than not, when a positive reasonable grounds decision is received, a victim is whisked away and housed in another part of the country without the police officer knowing where they are being taken to. This poses challenges to the investigation, as contact with the key witness is lost and often hard to re-establish. Also, some police officers see a safeguarding risk in potential victims being picked up by taxi drivers subcontracted by the Salvation Army where volunteer drivers have not been available to transport them to a safe-house.

“Taxi drivers picking up victims is a problem for a number of reasons. Firstly, keeping the location of a safe place secure. Secondly, it is a safeguarding risk because the driver is a stranger and the victim is on their own, often not able to communicate. Moreover, it can trigger anxiety and traumatic memories for victims where taxis have been involved in their exploitation.”

Modern Slavery Coordination Unit, Greater Manchester Police

Thirdly, there is a need for better sharing of information between the First Responder organisations, the SCA, The Salvation Army and subcontractors. Lastly, but most importantly is the communication between the police and victims. Police investigations often take a long time and by the time a case gets to court it could be a matter of several years. Police officers often struggle to keep in touch with the victim and update them on the progress of the case. This ultimately leads not only to the victim’s frustration and disappointment, but also disengagement with the investigation. A number of police officers who are working with a Victim Navigator⁵⁰ side by side have highlighted the important role of the Navigator, who acts as a bridge between the police and victims, but most importantly continues to provide vital support to victims for the entire duration of the investigation leading to higher rates of engagement with the police.



⁵⁰ Victim Navigator is an innovative programme led by Justice and Care that sees expert staff embedded within the police forces to help support slavery victims when they are rescued.



Focus on victims and partnership working

Victims of modern slavery are the ones who have been preyed upon and subject to abuse and exploitation. They should be central to any support system, as well as the criminal justice system. Our evidence has shown that victims need to be properly supported from the moment of rescue to the day justice is served in court in order to ensure better outcomes in terms of victim recovery and successful prosecutions.

The majority of the police officers interviewed for this report stated how vital the victim's engagement is in getting a successful prosecution. Yet many victims choose not to engage with the police for fear of authorities, fear of reprisals from their traffickers and simply not seeing themselves as victims.

“When I came to England I didn’t speak a word of English. I didn’t know where to go and what to do. I had no passport, no money. I couldn’t go to the police, I had the child at home and a debt to pay.”

Survivor Interview 5


“One of the hardest things is that a lot of the time victims don’t realise they are victims. The biggest barrier is helping them to understand they have been a victim of crime and have been exploited. For example, we rescued 8 victims from a car wash brought over from Romania, all kept in a shipping container in crowded, poor conditions. They were only getting £6 per day after deductions. One victim was so ill she had to be urgently taken to hospital for 10 days. When asked, this girl said she was upset about what had happened to her, but she hadn’t really realised that she wasn’t getting the money that had been promised. She did not know she was a victim of modern slavery crime.”

Modern Slavery and Child Criminal Exploitation Team, London Metropolitan Police

Police officers recognise that often they do not have the time, resources and skills to wrap the support around the victim to help them feel safe and start building trust. It is not a rare scenario that victims who are identified by the police are housed in a hotel until the Salvation Army is able to move them into a safe house. At times this means they are placed in the same area they are fleeing or have been subject to exploitation. Some disappear overnight.

“Police officers are not trained to help with welfare matters like benefits, immigration, housing, etc. It leads to a much better outcome for victims to have trained people to help with ancillary needs, while the police officers focus on the investigation.”

Modern Slavery, Human Trafficking & Organised Immigration Crime Lead, Warwickshire



Moreover, modern slavery investigations often take years to reach courts. By then the support that the victim is entitled to through the NRM is likely to have finished. Victims are also eager to move on with their life, creating a family, getting a job or going into education either in the UK or many go back to their home country. While this is certainly good for victims and their recovery, it means that they are more likely to disengage from the criminal justice process, especially if the Officer in Charge of the investigation is not keeping regular contact with the victim during the entire investigation.

“There is a massive gap between the end of the NRM process and the court case. It is very stressful for victims. This could also be the time when the victim is vulnerable to being approached by suspects leading to stress, anxiety and fear. It feels that we put them through NRM and drop out the other side which adds to the challenge of keeping in contact with victims and keeping track of them. Victims need support to get to court.”

Police officer

The pandemic put a further strain on the court system which was already too slow for victims of serious crimes. The Crown Court backlog has increased by 48% since the onset of the pandemic reaching nearly 61,000 cases at the end of June 2021. In its latest report looking into the backlog of criminal cases in court, the National Audit Office warned that keeping rape and sexual assault victims, witnesses and defendants waiting for more than a year for their cases to be heard increases the risk of those cases collapsing if people stop supporting the case.⁵¹ A similar situation happens with the cases of modern slavery. In order to ensure continuous support from victims to the criminal justice case, they need to be helped and supported throughout this difficult and lengthy journey.

The court process itself can be very traumatising for victims. According to Victim Support the charity that provides support and advice to victims of crime going through the court system, the courtroom can become a further site of trauma for victims, in particular victims of domestic abuse and sexual violence, when they may come into contact with perpetrators and may be cross-examined by perpetrators, which causes distress and anxiety for victims.⁵² An additional layer of complexity is added when victims do not speak or have poor knowledge of English, which is often the case with victims of slavery. Interpretation services in court may not be available due to limited resources, and some interpreters may struggle with the technical language in courts. As a result of these language barriers, victims may feel unable to give evidence or attend the court, and so disengage with the justice process.⁵³

Taking into account the length and the complexity of the criminal justice process, it is imperative that victims receive additional support from specialist charities focused on their needs. In those cases where police officers are able to prioritise victims' safety and wellbeing, often in partnership with specialist charities, victims are more likely to give their consent to engagement at an early stage and continue supporting police until the case gets to court.

⁵¹ Reducing the backlog in criminal courts, National Audit Office, October 2021

⁵² Policy Statement on Domestic Abuse, Victim Support 2017

⁵³ Language barriers in the criminal justice system: Initial research findings relating to victims and witnesses, Victim Support 2021

“In London we have fantastic support from various charities such as Bakhita House, Justice and Care, Rahab, Tamar, Medaille Trust. They help us look after the victims, while we focus on the investigation.”

Modern Slavery and Child Criminal Exploitation Team, London Metropolitan Police





Professionalism and mandatory training

Despite the many years of investment into training by the Government through the Modern Slavery Police Transformation Unit and more recently the Modern Slavery Organised Immigration Crime Unit (MSOICU), as well as numerous training programmes run by individual charities, there is still a continuous need for training and upskilling of police officers, starting from early engagement with victims, making an NRM referral and ensuring informed consent, as well as developing specialist investigative capabilities. Where additional resources and training have been put in place, the first fruitful results are beginning to appear. Yet the need is far greater than the supply.

Unfortunately, we have also heard about lack of professionalism in policing when dealing with victims of modern slavery. While some police forces are victim-focused and are undoubtedly leading the way, the picture is still patchy. A lack of understanding of the complex nature of the crime, existing stereotypes about modern slavery victims, as well as lack of knowledge about the impact of trauma on victims' ability to engage and disclose to the police result in victims being failed. Cases of criminal exploitation are often the most complex where the engagement with a potential victim starts from a position of disbelief.

Case study

The client is female, an adult, from Edo State in Nigeria. She was exploited both in Nigeria and the UK. The exploitation began when the client was 13 years old (in 2004) and lasted for approximately 13 years, 12 and a half of these years spent in the UK as a domestic worker for an 'aunty' and family. The largest barrier to the client's recovery has been her engagement with the criminal justice system. Throughout the client's over 3 years of communication with the police, they have demonstrated a profound lack of understanding and sensitivity towards the trafficking experience and trauma in general. The case has been closed four times, citing insufficient evidence for a referral to the Crown Prosecution Service. This is despite the consistency of the client's testimony, her positive conclusive grounds NRM decision and her identified medical conditions. The police failed to obtain a statement from the first woman to whom the client confided, nor did they seek evidence of an employment contract or official records of the client (i.e. schooling, as the client was a minor during the exploitation).

Case study provided by Ella's

In 2019, a super complaint was put forward by a charity Hestia about the police response to victims of modern slavery, which raised a number of concerns about how police identify, deal with and support victims, and how modern slavery crimes are investigated. It concluded that failures to identify and support victims properly by the police led to investigations being closed, prosecutions dropped, and as a result traffickers walking away scot free.⁵⁴ The HMICFRS investigation concluded that despite some good progress in police response since their initial inspection in 2017 in some forces and by specialist units, there was still much inconsistency across the country, and that more had to be done to support victims better and investigate slavery crimes effectively.⁵⁵

In 2020, through our own research we found that inconsistent responses to modern slavery across England and Wales are mainly driven by the lack of leadership. Modern slavery is still not viewed as business as usual and is often not on the priority list for Chief Constables and Police and Crime Commissioners.⁵⁶ To date this still remains the case.

Reform required

Police officers and support providers have one goal in common which is to protect the victim who suffered abuse and exploitation. The analysis of our police survey has shown that the top three things that need to be put in place to enable and encourage victims to engage with the police are: 1) A specialist support worker; 2) Stable accommodation and financial support; 3) Protection for wider family.⁵⁷ Some of these are easier to be put in place than others, yet vital in order to help facilitate the victim's journey through the criminal justice system should they wish to cooperate with the police. More evidence is coming to light that by providing longer-term needs-based support to victims from the moment of rescue to the day a trafficker is convicted sends more traffickers behind bars. Dismantling criminal networks should become equally a common goal, as this is the only way to prevent more victims falling prey to unscrupulous perpetrators and to stop modern slavery happening in the first place.

Increased cooperation between charities and police

The relationship between charities providing support to victims of modern slavery and police has evolved significantly in recent years. Many have built trust and confidence, often due to multi-agency partnership working that helped break initial engagement barriers. A number of charities are now working closely with the police to ensure victims are appropriately looked after from the moment of identification. The police's own evidence shows that "two key aspects of ensuring a successful investigation are having individuals with specialist training/ experience and an understanding of how close working with the Crown Prosecution Service (CPS) and partners, including NGOs and charities, can have a significant impact on the outcome."⁵⁸




54 Undergrounds lives: Police response to victims of modern slavery, Hestia, March 2019

55 The Hidden Victims: Report on Hestia's super-complaint on the police response to victims of modern slavery, HMICFRS, College of Policing, Independent Office for Police Conduct May 2021

56 It Still Happens Here: Fighting UK Slavery in the 2020s, Justice and Care and the Centre for Social Justice, July 2020

57 Ibid.

58 Guidance on improving Modern Slavery Outcomes, NPCC MSOIC Unit, April 2021



We were told that often the challenge is the pace at which an investigation needs to go alongside the needs of the victim who might not be going at the same pace. The pressure on police is the key 48 hours to find out who suspects are and arrest them which is often reliant on what the victim is willing to disclose. Having a trained specialist support worker or an advocate to look after victims when they are identified was recognised to be one of the most effective ways of helping victims engage and continue to support police investigation.⁵⁹

“Victims of modern slavery need the same kind of wrap around support as for victims of domestic abuse and sexual offences. Having established Sexual Assault Referral Centres (SARCs) and Independent Domestic Violence Advocates (IDVAs) and Independent Sexual Violence Advocates (ISVAs) for victims of those offences, I can’t believe that we don’t have the same wrap around support for MS victims.”

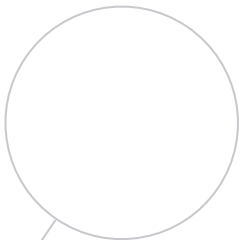
East Midlands ROCU (Nottinghamshire Police)

Police officers who we spoke with highlighted the value of partnerships with charities and the need for those to become stronger and more consistent across the country. Some police forces always engage with charities when they go on welfare visits and even include in joint rescue operations. For example, West Yorkshire Police work closely with Palm Cove Society, Hope for Justice and Justice and Care; Northumbria Police work collaboratively with the Changing Lives Liberty Project to help establish initial engagement with victims. In Derbyshire, police work closely with the Red Cross to accommodate identified victims of slavery before they are referred to the NRM providing emergency short-term accommodation, advice and support through the ‘Your Space’ programme. In Wales, all four police forces work closely with the MARAC coordinator seconded from the charity BAWSO.

Some charities have gone an extra mile to help victims break the fear of the authorities and mistrust of the police to bridge the gap in their engagement with the police. For example, Caritas Bakhita House works closely with the police and has a spare room where police interviews can take place in a safe and comfortable environment for victims. They also invite police officers to come into the safe house in plain clothes to speak to the victims and explain that they are there to protect them.

“Many victims come to us without any prior contact with the police. For these victims we need to build a bridge to try to get women to trust the police before police are even involved. It is a big bridge to build! Those who come through the police are easier because they already have contact with police, but we have to work hard to keep them engaged.”

Caritas Bakhita house



The Medaille Trust have developed a new programme called ‘Victim Voices’ that aims to fill the gap for victims who have a barrier in engaging with police by training the case workers to do Achieving Best Evidence (ABE) interviews. This will enable victims to share their traumatic experiences with people

⁵⁹ 62% of the respondents to our police survey chose “specialist support worker” as their number one option.

whom they trust in a place where they feel comfortable. Once the victim has given their consent and has had the interview, it could be used for the following purposes: 1) To support the NRM decision making process by sharing the information with the SCA; 2) Capturing vital intelligence in regards to the suspects, their details, phone numbers, locations at an early stage to be shared with the police; 3) Used as a full evidential interview for the police investigation at any stage without having the need to re-traumatise victims.

“When we feel the client is ready, we will start explaining the possibility of doing an ABE interview. Some will want to talk straight away, others will need some months. If a victim feels ready to give an interview, we will ask them how they want it to be used. It is possible for someone to later consent to sharing it with police after first saying it should only go to the SCA.”

The Medaille Trust

Hope for Justice’s Independent Modern Slavery Advocates (IMSA) provide holistic, socio-legal advocacy and support to victims who are referred to them through NGOs and other partners. As well as helping victims access their legal rights and entitlements, IMSAs support victims through the criminal justice process by ensuring that they have knowledge and understanding of what is involved in supporting a police investigation, so they can make informed choices about their involvement. IMSAs will also advocate for investigations to be re-opened where needed and challenge non-prosecutions. Where cases go to trial, IMSAs ensure that victims are supported throughout the court case, attending trial and facilitating engagement with other existing services such as the witness service. Hope for Justice told us that 100% of the victims they worked with and who were called to give evidence as part of a criminal trial have been able to attend court, demonstrating the significant impact of having support and legal advocacy. IMSAs also offer understanding, advocacy and support and ensure access to legal advice to victims that have been wrongly convicted of an offence they were compelled to do as a result of their experience of exploitation, including evidence to support any ongoing appeal and/or discontinuation of a case.

Justice and Care developed an innovative Victim Navigator programme that sees specialist workers embedded at the heart of the police teams with unparalleled access to data and intelligence.⁶⁰ Police officers who have a Victim Navigator embedded within their police team reiterated a number of times the positive impact the role has on victims’ continuous engagement with the police leading to more successful criminal justice outcomes.

“Once victims have been referred to NRM and taken to another part of the country, police officers don’t perhaps keep in contact with victims as much as needed. This is where Victim Navigator has been invaluable bridging that gap and enable police to continue with investigation”

Modern Slavery and Child Exploitation Team, London Metropolitan Police

⁶⁰ ‘Victim Navigator’ programme was designed in consultation with national police leaders with the aim to fill a specific and important gap in existing service provision by forming a trusted bridge between the police and victims of modern slavery; and by flexibly and independently brokering support from external specialist services according to individual victims’ needs.



“Victim Navigator has a central role in keeping the investigation going. After the initial response by the police, the Navigator is able to support victims to access support services, health and education. The Navigator provides longer term and wider support as well as updating on case, which police officers cannot do.”

Modern Slavery Coordination Unit, Greater Manchester Police

Established in September 2018, and now covering 5 police forces in England and Wales (London Metropolitan Police, Essex Police, Surrey Police, Greater Manchester Police, West Yorkshire Police), and Police Scotland and UK Border Force at Glasgow Airport, significant evidence has been built to show how tailored need-based long-term support for victims of slavery helps police bring more traffickers to justice. Of over 200 victims supported by the Navigators, 89% chose to support a police investigation leading to 120 suspects being arrested, 24 prosecutions supported and 2 convictions served (many cases have only just received court dates in Autumn 2021 due to the length of time it takes for a police investigation and backlogs in the court system).⁶¹ The programme continues to expand with two additional regional Navigators supporting police forces in the East Midlands region and two national Navigator roles supporting cross-border investigations.

In March 2021, the Government committed to considering testing a new approach which would involve embedding specialist workers within police forces to support victims and law enforcement officers on investigations as part of their wider commitment to strengthening the criminal justice system response to modern slavery.⁶² This commitment is welcome. In October 2021, the Home Office launched a grant scheme for law enforcement bodies to fund support for victims of modern slavery in the criminal justice system until end of March 2022.⁶³ Plans or funding thereafter have not been made public.

A unique feature of the Navigators is being with the victims and supporting them through the entire duration of the criminal justice process. They continue acting as a bridge between the victim and the police even if the victim has left the NRM support provision or has returned home, making sure that the victim is protected and kept up-to-date with the course of the investigation. In addition to communication and advocacy, support includes booking accommodation and travel for victims to attend the court hearing, often even providing food as many do not have money of their own. Emotional support is vital to



⁶¹ Victim Navigator Interim Evaluation, Justice and Care, July 2021

⁶² New Plan for Immigration CP 412, HM Government, March 2021

⁶³ Supporting victims of slavery in the Criminal Justice System, Contract summary, Home Office, October 2021

help victims go through the entire process which is frequently delayed and causes additional stress and harm.

“Delays are really hard on the victims, especially the individual who was summoned, then delayed, then re-summoned, delayed - multiple times. We maintain regular contact, talk to them, explain what is happening, checking up regularly on them and making sure they are using their coping mechanism and looking after themselves (eating enough, sleeping, talking to family/support networks etc). We also make sure they have credit so they can chat to family to receive additional support.”




Justice and Care Victim Navigator

Similarly, Caritas Bakhita House keeps their door open for their clients who need the support once their case reaches the courts. Some victims stay at the safe house during the whole criminal justice process, some come back when they need to for support with the court proceedings. Those victims who choose to return home are connected with a charity in their country of origin that helps maintain contact with the victim and their engagement. Caritas Bakhita House support workers explain the process in advance to help manage victims' expectations and, if victims want, accompany them to court. Court dates often get moved and the process is more geared towards the defendant not the victim, which can be detrimental to victims' emotional and mental health, as well as their trust and confidence in the process.

“Court can really empower a victim. It is the final step of closure. But equally it can go the other way, it can destroy them. They have the worry going up to it, especially if the court date is then cancelled. The key is to always be truthful about the process and what might happen. That's why it is critically important for the support workers to know and understand how the criminal justice process works.”

Caritas Bakhita House

Both Justice and Care Navigators and Caritas Bakhita House raised their concern that court proceedings are defendant focused, rather than victim focused which causes multiple challenges and frustrations for victims of crime. Victims of modern slavery, who are vulnerable, do not know or understand the criminal justice system; they often do not have sufficient language skills and require additional support to help navigate it.



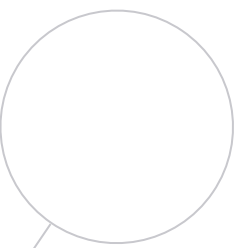
“The criminal justice system would fall apart without witness testimony and their bravery, yet the same system fails to consider their welfare at every turn. The system favours the defendant and in many ways allows them to re-exploit those they have abused. For example, if a victim doesn’t want to attend they can be summoned, but the defendant can frustrate the process in countless ways.”

Justice and Care Victim Navigator

Another important, seemingly easy, solution is to improve engagement and communication between MSVCC support workers and investigating officers to facilitate safeguarding and victim involvement in the criminal justice process. Firstly, it is necessary to break down the existing barriers and hostility towards the police and help equip support workers with knowledge and understanding of how the police investigation works and how they could better support the police in doing their job. Equally, it is important for police officers to understand vulnerabilities of victims and a trauma informed approach to engaging with victims. Developing tools to help share intelligence with the police, especially if the victim is not willing to engage directly, is another way of bridging the gap. For example, the Modern Slavery and Child Exploitation Team at the London Metropolitan Police have developed pathways for intelligence sharing between the police and partners to help better identify and support victims, as well as share the intelligence safely.

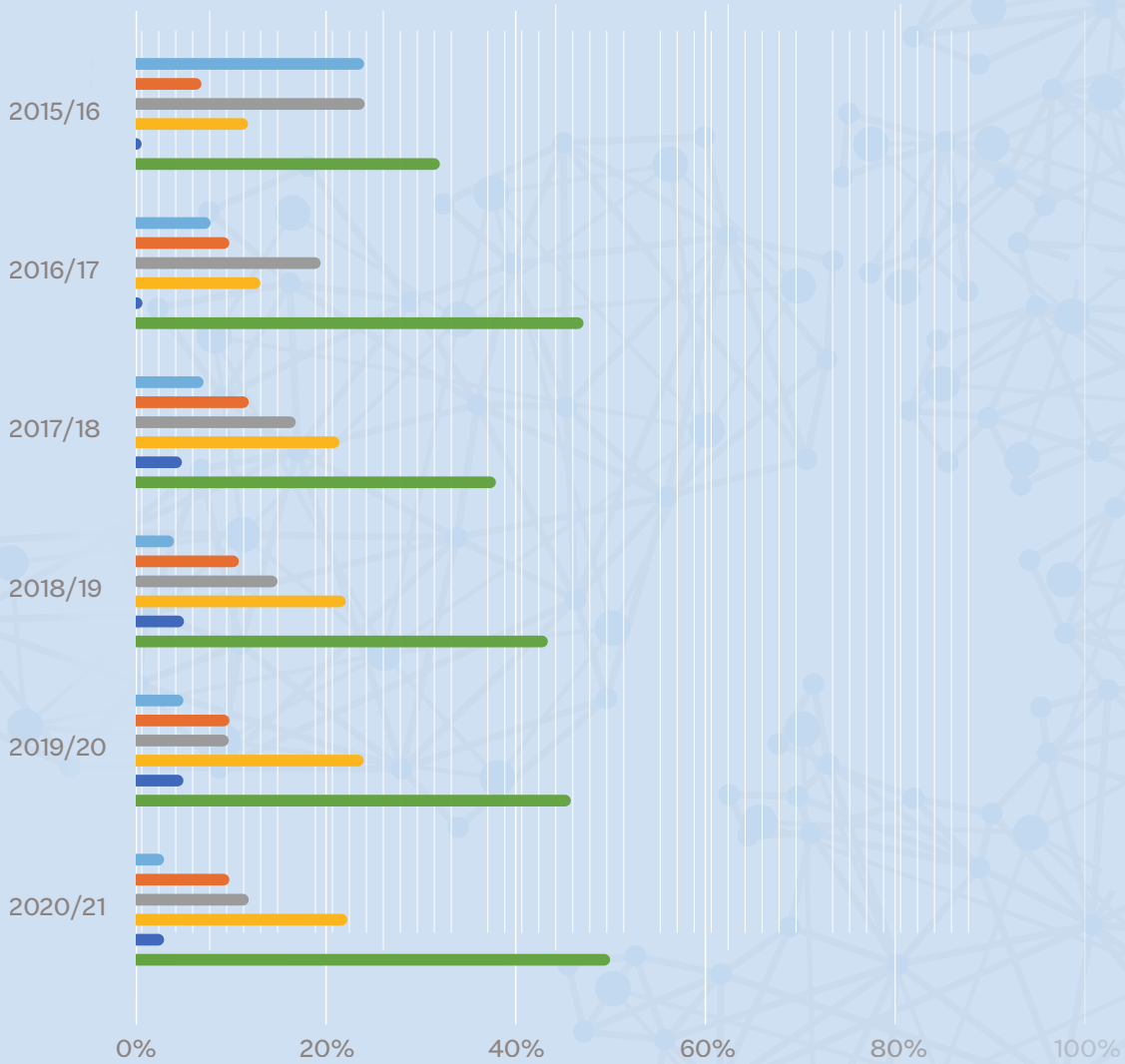
A small thing that could simplify communication is giving The Salvation Army and subcontractors access to the initial NRM form, which is currently available only upon request. The information put in on the initial referral, especially by the police, could be important for protection of victims, assisting provision of support and prevention of re-traumatisation. This would also help inform the support worker if the victim gave consent to working with the police when the NRM form was filled in, so that the support worker could get hold of the Officer in Charge to facilitate engagement. Vice versa, police should be given the details of where the victim has been placed and contact details for the support provider.

More specialist police officers and investigative capacity to respond to modern slavery crimes




Modern slavery is a widespread crime existing in every part of the UK. Yet, it is a relatively new crime which often causes confusion and misunderstanding among police officers as to how to respond to the crime accordingly. Despite the growing awareness and numerous training resources, many police officers on the ground do not encounter this crime regularly, and when they do, they are confused and unsure how to proceed. Many Officers in Charge would not have come across modern slavery cases before, and therefore lack the expertise as well as confidence in how to investigate the crime. Tactical advisors, specialist investigative training and resources have been made available by the National Crime Agency and MSOICU, yet there is still a gap in specialist investigative capacity and a patchy picture across the UK. As a result, the outcomes of modern slavery crimes remain unsatisfactory with only a small percentage being charged, and majority of the cases facing evidential difficulties.

Modern Slavery crime outcomes



- Charged/summonsed
- Evidential difficulties suspect identified; victim does not support further action
- Evidential difficulties suspect identified; victim supports action
- Evidential difficulties suspect not identified; victim does not support further action
- Responsibility for further investigation transferred to another body
- Other

Source: Home Office Police recorded crime and outcomes open data tables October 2021



Modern slavery investigations are often complex, resource-intensive and require specialist techniques that are deployed for investigating serious and organised crime. These are not always available at the divisional level where many modern slavery crimes end up being investigated due to the 'Level 1' grading often applied to these offences.

“At divisional level there would be a victim and immediate offender but often colleagues are not able to take the case further because they don’t have the time or resources to investigate the case. Specialist teams can develop the case to try to take out the controllers higher up the criminal network and are more likely to dismantle the network rather than just take out one lower level offender”.

Police officer

“As we are a central unit, we deal with things differently than colleagues at borough level. There is still a lot of learning to be done by officers at the borough level, both uniform and CID. They are often newer in police service and not familiar with modern slavery crime. Central unit has specialist skills, trained to recognise victims and their vulnerability and do best to support victims in partnership with charities. Modern slavery is our day to day work, but we aren’t always first on scene. We are doing some work to help borough colleagues be better at recognising indicators, treating sex workers with respect, being nonjudgmental towards victims.”

Modern Slavery and Child Criminal Exploitation Team, London Metropolitan Police

Information from the MSOICU provided to the Independent Anti-Slavery Commissioner indicates that “nearly half of all forces in England and Wales are believed to have a specialist investigative capability for modern slavery or wider exploitation offences and other forces are currently working on implementing a specialist investigative capability. Many forces have focused resources such as investigation, triage and intelligence towards exploitation offences (such as child sexual exploitation and abuse, child criminal exploitation, county lines and adult sexual exploitation). In some examples these units started as a dedicated modern slavery team but have since evolved into exploitation-focused teams. There is a large crossover with these types of offences, in terms of supporting victims and understanding their vulnerabilities, the complexities that can arise during investigation and the knowledge and tactics needed to investigate exploitation offences effectively. There are therefore efficiencies, especially for smaller forces, in combining resources to investigate all exploitation offences.”⁶⁴

Our research has shown that there is significant value in having specialist investigative units that could take on the modern slavery investigation. For example, specialist knowledge and expertise on modern slavery, understanding the complexity of the crime and victims' vulnerability, ability to pick up trends and understand the changing nature of the crime and how criminals operate. Police officers confirmed that being on a dedicated team also opens access to more resources, such as data and intelligence analysts, as well as financial investigation tools. According to MSOICU, existing

64 Independent Anti-Slavery Commissioner annual report 2020-2021, June 2021



data indicates that the conviction rate is likely to be much higher when a modern slavery crime is investigated by a dedicated investigation team, for example modern slavery and/or exploitation team, or serious and organised crime team. However, the vast majority of investigations are not undertaken by such teams.⁶⁵

HMICFRS found evidence that the police officers involved in specialist teams and investigative advisory roles often demonstrated a high degree of expertise and a commitment to tackling modern slavery crime. It also showed the positive effect that these teams have had on the response to modern slavery crimes leading to better outcomes than in cases that were investigated by non-specialist teams.⁶⁶ Often modern slavery crimes that are investigated are not local, but national and even international, requiring relationships with partner agencies and police forces across the country and internationally. Sharing intelligence and information with other specialist policing teams around the country could bring additional value. According to HMICFRS, police forces with specialist modern slavery and human trafficking teams were showing more proactive international collaboration resulting in Joint Investigation Teams with countries of origin.⁶⁷ But most importantly, specialist units bring benefits to victims of crime, because they understand the underlying vulnerabilities and barriers to engagement that victims have.

In addition to having specialist investigative capacity, we also heard about the benefits the specialist Victim Liaison Officers (VLOs) are having, in particular in establishing initial contact with the victim and gathering early intelligence. The Victim Liaison Officer training carried out as part of the MSOICU programme saw more than 300 officers trained in the year of 2020/2021. The aim of the specialised training is to help police officers to build trust with victims to facilitate positive engagement with the criminal justice process, using a victim centred approach. A trained VLO should have enough expertise to allow them to separate victims from perpetrators and gain intelligence to widen the case to a national scale.⁶⁸

“Our VLOs get called out, for example, when colleagues visit a brothel that may have potential victims of trafficking in. The role of the VLO is to explain to a potential victim that they are not in trouble, put them at ease and ask whether there is anything they need. Then the VLO would accompany the victim to a safe place, provide food and clothes, get interpreters on board and try to build rapport. The role of the VLO is not to carry out the investigation, we are there to support the victim, but know how an investigation works. We can take the first account. If we had more VLOs across the country we would get so much more victim engagement.”

Modern Slavery Coordination Unit, Greater Manchester Police


In Northamptonshire, VLOs are trained to focus both on evidence gathering and victim support with enhanced understanding of the NRM process. The aim is to ensure that these officers are equipped to respond within hours to ensure evidence is properly captured and victims are being informed about their support options properly.

⁶⁵ Guidance on improving Modern Slavery Outcomes, NPCC MSOIC Unit, April 2021

⁶⁶ Stolen Freedom: the policing response to modern slavery and human trafficking, HMICFRS 2017

⁶⁷ Ibid.

⁶⁸ Modern Slavery and Organised Immigration Programme Annual Report 2020/2021, June 2021



“We currently have trained Victim Liaison Officers- 14 detectives across different teams to help engage with and support victims after the initial report. However it would be great to expand this and provide VLO type training to uniformed colleagues so there is the same capability/resource available through the night as well.”

East Midlands ROCU (Northamptonshire Police)

There is significant evidence to suggest that specialist police officer roles and investigative capacity lead to better outcomes for victims and the criminal justice process. While progress has been made across the country, the picture is still patchy leading to victims being often failed and traffickers continuing to operate with impunity. More resources need to be made available to all police forces to enhance their capacity and capability to respond to modern slavery crime with a special focus on victims and their safeguarding.

Police protocols on information sharing to help safeguard victims

Victims of modern slavery are vulnerable to going missing and re-entering exploitation including some who initially enter the NRM. We heard from several police forces who use vulnerability markers on the Police National Computer (PNC) to flag victims who go missing. Statutory Guidance also requires SCA staff to notify the police where a victim in the NRM goes missing in order for a missing person marker to be added to the PNC. There is no similar instruction for support providers under the MSVCC, yet these are likely to be the first to discover that the victim has gone missing.

There is also a balance to be struck between safeguarding vulnerable people and recognising that as officers from Greater Manchester Police highlighted “victims are not obligated to engage”. Officers from the Metropolitan Police and Warwickshire Police stressed the nuanced difference between victims who have ‘gone missing’ and those who have chosen to disengage but the reality is that many who have made such a choice continue to be exploited. There appears to be a lack of clarity about how and when it is decided that a victim has disengaged from support services rather than gone missing and which circumstances would trigger a missing report by support providers to the police.

We heard from police officers about victims who had declined to engage with the NRM and had disappeared only to be re-identified later by other officers in another part of the country.

“We had an adult male who said ‘thank you for what you offered me’ - but he didn’t want support, he wanted to go and work for little money on farms; we couldn’t do anything as he had made a clear informed decision. We flagged him as vulnerable on PNC and later he was picked up by another force.”

Modern Slavery, Human Trafficking & Organised Immigration Crime Lead, Warwickshire Police

Another weakness of the PNC is that it does not include any specific identifiers to denote that the missing person is a potential victim of modern slavery; instead free text forms are used to record this information which can lead to inconsistency in the information provided. Some police forces also use the Police National Database (PND) as well as local databases to record intelligence and information relating to suspected victims but expressed concern that the PND was not particularly effective or easy to use.

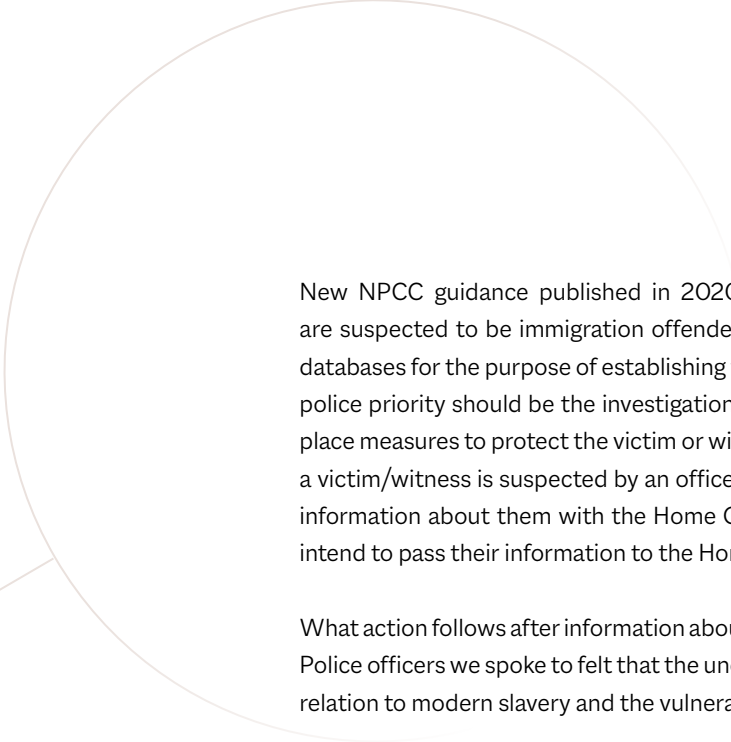
If victims simply move to another part of the country rather than going missing, we heard that there is no system for police officers to inform the force in the new area and they often do not know who to contact especially if there is no dedicated modern slavery unit. This creates a further potential risk as the officers in the new area are unaware of the potential need to safeguard that victim. Clearer guidance and communication channels are needed to help forces connect with others when a victim moves in order to protect victims better.

National databases like the PNC and the PND and other channels for information-sharing between police forces could help police to safeguard victims when they move around the country whether by choice or through continued exploitation but they do not seem to be as effective as they might be. Clearer guidance and protocols about contact between forces, the use of the PNC and PND including vulnerability markers would increase consistency and help the police better fulfil their role to safeguard victims. This might include a specific PNC qualifier indicating a missing person is a potential victim of modern slavery.

One aspect of information-sharing which has potential risks for safeguarding victims is when it comes to immigration. As mentioned in chapter 1, many modern slavery victims are fearful of the authorities and those with irregular immigration status are especially worried about deportation. This leaves many reluctant to come forward and seek help or report their exploitation to the police. An investigation by HMICFRS found that although there is no evidence that police intend to treat victims as immigration offenders, evidence does suggest that fear of this contributes to victims' unwillingness to engage with the police.⁶⁹ However, information-sharing continues to take place.



⁷⁰ The Hidden Victims: Report on Hestia's super-complaint on the police response to victims of modern slavery, HMICFRS, College of Policing, Independent Office for Police Conduct May 2021



New NPCC guidance published in 2020 on information sharing where victims or witnesses are suspected to be immigration offenders states that “Officers will not routinely search police databases for the purpose of establishing the immigration status of a victim/witness” and that the police priority should be the investigation of the allegation reported by the victim and putting in place measures to protect the victim or witness from harm.⁷⁰ However, it still envisages that “when a victim/witness is suspected by an officer of being an immigration offender, the police will share information about them with the Home Office” and says the police should tell victims that they intend to pass their information to the Home Office.

What action follows after information about victims is shared by police is down to the Home Office. Police officers we spoke to felt that the understanding and practice of Immigration Enforcement in relation to modern slavery and the vulnerability of victims had improved in recent years.

“We do a lot of work with local immigration enforcement officers - their approach is the same as ours, safeguarding vulnerable people first, dealing with offences second”

Modern Slavery, Human Trafficking & Organised Immigration Crime Lead, Warwickshire Police

“Having a multi-agency team with Immigration Enforcement involved really helps. Immigration Enforcement staff are more aware now of exploitation, they are asking more questions about the victim’s circumstances. We will sometimes send Victim Liaison Officers down to the immigration reporting centre to try to assist engagement with potential victims.”


Modern Slavery Coordination Unit, Greater Manchester Police

But police also emphasised that if a person they believe to be a victim does not want to engage with the police or the NRM but has irregular immigration status then the options are limited and engagement with immigration officials can lead to victims opening up about what has happened to them.

“Immigration status is never at the forefront. Challenges lie when we encounter a victim who police think may be a victim, but they won’t engage and have irregular immigration status.... What do we do? We see immigration as a third tier of safeguarding. If the victims don’t want to engage with police, or with the [NGO] Victim Navigator, I have known a lot of potential victims who will disclose to immigration because they see it as the last option.”


Modern Slavery and Child Criminal Exploitation Team, London Metropolitan Police

70 Information sharing with the Home Office where a victim or witness of crime is a suspected immigration offender, NPCC 2020



Whilst it might enable some victims to access support - disclosure in the shadow of potential removal does not prioritise the safety or the trauma victims have experienced. An approach where the police were not obliged to pass information to immigration authorities even when victims do not enter the NRM would enable them to focus on safeguarding and building trust with victims empowering them to speak about crimes committed against them.

Beyond the direct involvement of Immigration Enforcement some police officers were also concerned about the possible immigration consequences of data recorded on the PNC about victims who go missing. We were told that if a victim is recorded on the PNC as having been involved in prostitution or other criminal activity even as a victim, this would be flagged through a Border Force check of the PNC. If the victim had left the country and was seeking to return they would be potentially refused entry.



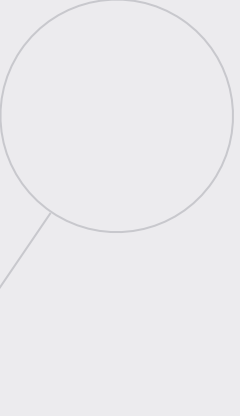


Principles for reform and recommendations

As we set out in 2020, good care for the exploited and abused is not a luxury extra - it unlocks progress against organised crime. Those exploited and abused on British soil, whether UK citizens or foreign nationals, deserve care and a chance to recover. They also often crave justice. Failure to support survivors increases re-trafficking rates and hinders our ability to dismantle the criminal networks managing the abuse because their vital evidence and intelligence is lost. It is time to invest for their benefit and ours.

To achieve the much needed transformation of the way we identify, engage with and look after victims of slavery, we have set out the following key principles for reform underpinned by our recommendations:

- 1. Renewed vision and strategic approach delivering better outcomes for victims and value for money**
- 2. Identifying and supporting victims of slavery from the earliest moment**
- 3. Delivering a timely and meaningful decision that enables victims to move-on safely into recovery**
- 4. Better protecting victims and preventing re-trafficking, either in the UK or in their home country**
- 5. Enabling pursuit and prosecution of the traffickers**



The Government is currently refreshing its overarching Modern Slavery Strategy and the NRM Transformation programme has been ongoing for some time. Legislation to put the NRM and victim support on a statutory footing (something we recommended in 2020) is before parliament in the Nationality and Borders Bill and a Victims Bill is also anticipated. The time is right for a new vision and strategic approach to supporting modern slavery victims. We believe these principles and recommendations should inform this process. Our hope is that these principles and recommendations will inform and influence new and forthcoming legislation, in particular the Nationality and Borders Bill and Victims Bill, and the policy that will underpin it, as well as the ongoing NRM Transformation programme and the review of the HMG Modern Slavery Strategy led by the Home Office.

Principle 1:

Renewed vision and strategic approach delivering better outcomes for victims and value for money

The number and needs of victims of modern slavery have changed since the NRM and MSVCC were first created. Piecemeal reform has made incremental improvements but we need new strategic vision and leadership to ensure the support delivers positive outcomes for victims and value for money. Future changes need to be part of a coherent victims' strategy.

Recommendations:

- 1. The Government must develop a cross-departmental victim support strategy with clear aims and objectives for the NRM and MSVCC** and set out how these will be delivered on a cross-departmental, multi-agency basis. This should be a central part of the new Modern Slavery Strategy due for completion in Spring 2022. Reform of the NRM, MSVCC and the wider support system should flow from this strategy.
- 2. The Government must create a cross-departmental task force to implement the victim support strategy and oversee the ongoing NRM Transformation Programme.** This will enable integration of support with mainstream services through the responsibilities and expertise of all departments to respond to victims' complex needs as victims of crime. The task force should have the introduction of Places of Safety and tackling the NRM backlog as its immediate priority (see recommendations 4 and 10 below). The task force should report to the Number 10 Delivery Unit.
- 3. The Home Office must commission research into the backgrounds, vulnerabilities, needs and risks of re-exploitation of victims of modern slavery to inform development of the victim support strategy.** It should also establish ongoing data collection and analysis to keep this up to date to inform development and delivery of support.



Principle 2:

Identifying and supporting victims of slavery from the earliest moment

Getting engagement with victims right from the earliest moment is crucial to enabling them to trust the authorities, to receive support and to engage with criminal investigations. An effective needs-based support journey needs to safeguard people in crisis and help them towards recovery and resilience.

- 4. The Government must urgently establish places of safety** to accommodate and support potential victims of modern slavery regardless of immigration status before they are referred to the NRM or receive a reasonable grounds decision. This should be done at a **local level through ring-fenced money given to local authorities or PCCs from the Department for Levelling Up, Housing and Communities (DLUHC)** like that recently provided for domestic abuse services and should include victims who have no recourse to public funds.
- 5. Local authorities should set up MARAC type processes to respond to every victim** at identification and to monitor victims' care needs before, during and beyond NRM referral. MSVCC subcontractors should be involved in these multi-agency case conferences and conferences across the country should be linked so information and oversight can be transferred when a victim moves to another area.
- 6. The First Responder role must be strengthened:**
 - a. The Home Office must introduce mandatory training to ensure that First Responders are aware of their duties under the Modern Slavery Act.** This training should be equivalent to Tier 2 of the Skills for Care Training Framework. **It should also specifically cover the obligation to submit information under the Duty to Notify** process (previously the MS1 form), the information to be submitted and when the notification should be submitted – including all occasions when indicators of modern slavery are present but a potential victim denies exploitation.
 - b. Local authorities and other First Responder Organisations must designate and upskill specified modern slavery champions** within relevant teams to act as First Responders, completing NRM forms and following up on cases.
- 7. To meet victims' complex or long term needs, access to mainstream services should be integrated with MSVCC support:**
 - a. DLUHC, Department of Health and Social Care and the Home Office should take action to increase understanding and compliance by statutory agencies with their responsibilities** to modern slavery victims to ensure access to housing, adult social care, mental health services, addiction services and health and social care acknowledging the particular vulnerability of modern slavery survivors.



- b. All local authorities should create Single Points Of Contact for modern slavery to coordinate the local authority’s response to modern slavery** and facilitate transparency, information-sharing and cooperation with local MSVCC support providers and other NGOs.
 - c. The Housing Act 1996 needs to be amended so that victims eligible for local authority housing are exempt from local connection conditions and have priority access** like victims of domestic abuse. Victims should be supported to enter mainstream housing services as soon as appropriate to their recovery (including before a conclusive grounds decision if appropriate), maintaining specialist MSVCC support through and after the transition.
 - d. Individualised assessments must be made by The Salvation Army of the specific NASS accommodation placements allocated to victims to assess safety and suitability considering their individual vulnerabilities to determine if the victim should receive MSVCC accommodation, and by NASS providers in making the allocation.** Following the assessment victims should be given at least 1 day’s notice of the specific address and supported to connect with local services before being moved. The Home Office must provide training and guidance to NASS providers, landlords and staff about the needs and ECAT entitlements of modern slavery victims and the Slavery and Trafficking Care Standards.
 - e. Statutory guidance and the new victims’ strategy should mandate the establishment of local or regional partnerships by statutory agencies with membership from all relevant local statutory agencies, MSVCC subcontractors and other NGOs** to facilitate a joined up approach to supporting victims. **Local authorities, police forces and/or Police and Crime Commissioners should provide funds or staff to act as coordinators of local partnerships.** This will also enable greater ownership and commitment to tackling modern slavery locally.
- 8. The Home Office must ensure that the MSVCC is focussed on victims’ outcomes in terms of recovery, reducing vulnerabilities to re-exploitation and preparing them for independence. It should not be limited to crisis intervention and ‘needs arising from exploitation’.**
- a. The ‘needs arising from exploitation’ criteria has to be removed** from the Nationality and Borders Bill clauses on modern slavery support and from the MSA Statutory Guidance and MSVCC needs assessments for support during both the recovery and move on periods. To reduce vulnerability to re-exploitation and promote victims’ physical, psychological and social recovery other needs and support for vulnerabilities should be addressed including in particular victims’ overall wellbeing.



- b. Victim outcomes (objective and subjective) must be clearly defined and measured as KPIs in the MSVCC** taking account of outcomes on exit and for confirmed victims up to 1 year following.
- c. Support providers under the MSVCC must require staff to have qualifications or undertake standardised accredited training** equivalent to Tier 3 in the Skills for Care Training framework.
- d. The Home Office must ensure timely publication of CQC inspection reports on support providers** to ensure transparency in standards of care and **give the CQC enforcement powers to take action where support under the MSVCC fails to meet the required standard.**



Principle 3:

Delivering a timely and meaningful decision that enables victims to move on safely into recovery

Tackling the backlog in NRM decisions must be a priority to enable timely decisions in future. Quality staff, information and systems will enhance efficiency, whilst bureaucracy is the enemy of quality, efficient decision-making. Efficient decision-making will not only lead to better outcomes for victims, but also produce value for money.

9. The Home Office should put NRM decision-making on an independent footing and require decision-makers to have modern slavery qualifications and expertise.

- a. There are two possible models for independent decision-making that should be considered taking into account learning from previous and ongoing pilot schemes: (i) creating a multi-disciplinary arms-length body with full time expert staff (operating nationally or through regional hubs) or (ii) local multi-agency hubs bringing together local statutory stakeholders (similar to the current pilots for children).
- b. In both models staff making NRM decisions should be drawn from multi-disciplinary backgrounds and be required to have expertise and qualifications in modern slavery, trauma and working with vulnerable people at the level of Tier 3 in the Skills for Care Training framework. In the short term before independent decision-making is established, these expertise and qualifications should be included in the person specification for new Competent Authority staff and mandatory external training at professional Tier 3 standard provided to existing staff.

10. The Home Office must disband the new Immigration Enforcement Competent Authority and put those resources into tackling the backlog of all NRM cases:

- a. **The Single Competent Authority (SCA) should create teams of senior trained decision-makers equipped with fast track protocols to review and progress cases that have been delayed for more than six months after a reasonable grounds decision to clear the backlog and avoid a recurrence.** Additional staff should be recruited for these teams and should have expertise in modern slavery and accredited qualifications at Tier 3 of the Skills for Care Framework. The delayed cases teams should identify the reason for delay, identify where additional information can or cannot be sought, and gather that data from relevant parties within deadlines set by the protocols. Fast track protocols should set out deadlines for information gathering, making decisions on the basis of the information available and expedited processes for review of any negative decisions by the MAAPs. The protocols should be made publicly available to aid transparency and victims should be informed when they are being implemented.
- b. **The fast track protocols should be applied in future for all cases delayed by six months or more.**

11. Realistic decision-making timescales must be set and adhered to for the future.

- a. The Competent Authorities need to develop processes to identify at reasonable grounds stage cases that are likely to present challenges for decision-making and implement protocols for evidence-gathering and/or fast-track decision-making** when it becomes clear additional information will not be forthcoming.
- b. MAAP decisions on negative conclusive grounds decisions sent for review should be final and binding instead of advisory only.** This will speed up the process and increase efficiency.
- c. The Competent Authorities should be required to meet NRM decision-making time scales as a KPI** with meaningful consequences for missing target time frames.
- d. Victims must receive regular updates about the progress of their case** and predicted times for decision-making should be adhered to.

12. The Competent Authorities must improve channels for evidence gathering and communication with stakeholders whilst protecting victims' data by:

- a. Assigning each case a designated named case owner and encouraging direct communication from stakeholders to case owners;**
- b. Upgrading the online NRM portal** so First Responders, Police investigators, and support providers can view the referral form, submit additional information and see the status of the case directly into the portal;
- c. Creating a firewall to protect immigration and other data collected for the purpose of the NRM** and so it is not available for use by immigration enforcement during or after NRM;
- d. Keeping NRM decisions entirely separate from asylum or other immigration processes** - relevant information should only be shared with the victim's consent.

13. The Competent Authorities must establish quality control mechanisms to ensure better quality information is submitted on NRM referral forms.

- a. The Modern Slavery Portal's online NRM form must be modified to include more mandatory fields** and more prompts to require information to be submitted at an early stage.
- b. Early stage quality control reviews of every NRM form** should be undertaken by the designated case owner and where necessary more information requested from the First Responder within the first 24 hours of receipt.
- c. The Modern Slavery Portal form for Duty to Notify reports should be updated to include reasons given by the victim or suspected by the First Responder for the victim declining to enter the NRM.** The Home Office must collate and analyse this data to inform their strategic response, training and approach to engaging with victims.

14. The Home Office should relieve the Competent Authorities of the burden of Recovery Needs Assessments and support decisions. Support providers should be empowered to make decisions on victim care instead.

Decision-makers need to be freed up to focus on NRM decisions. The MSVCC should set out clear parameters for support with support providers given responsibility and flexibility to determine and provide support based on needs assessments without referral to the Competent Authority for approval. This will increase efficiency and ensure decisions are made by staff with social care expertise which Competent Authority staff do not have. Quality control of support decisions will be ensured through standardised accredited training recommended above. Only rare and complex cases should be reviewed by Competent Authority staff, and those staff must have social care qualifications.



Principle 4:

Better protecting victims and preventing re-trafficking, either in the UK or in their home country

If we want to end modern slavery we need more than an emergency response, we must break the cycles of re-trafficking. Victims of modern slavery need to be empowered to be agents of their own future, whether they stay in the UK or choose to go home.

15. The Home Office must issue guidance to MSVCC support providers and police on reporting and flagging victims who go missing.

- a. Statutory guidance should set a protocol for MSVCC support workers setting out in what circumstances they should report a potential victim to the police as 'missing'.
- b. National police protocols should be devised for consistent use of vulnerability markers on the Police National Computer, local and national databases for potential victims who go missing. Consideration should be given to developing a specific modern slavery identifier for the PNC.

16. The Home Office should require and fund MSVCC contractors/subcontractors to prepare victims for independence through work-readiness training and experience (vocational training, workers' rights education and supported work placements) **and establishing peer and community support networks.** This will enable victims to earn money and/or gain skills and support networks to enable them to find decent work and avoid re-exploitation whether in the UK or after returning to another country.

17. The Home Office should work with the Department for Business, Energy & Industrial Strategy, the Department for Work and Pensions and the Department for Education to engage businesses in providing work opportunities and skills training for victims.

18. The Home Office should amend the Nationality and Borders Bill to provide all confirmed victims with a positive conclusive grounds decision an additional 12 months of support after the NRM including leave to remain and recourse to public funds for those with irregular immigration status (as recommended in our It Still Happens Here report). This would enable victims to move into independence safely, earning money and developing skills in preparation for a future in this country or after they return home. Victims awaiting asylum claims will be able to continue their recovery protected from re-exploitation while awaiting a decision. **In developing this support the Home Office should:**

- a. **Consider development of community schemes to provide confirmed victims with accommodation and community networks through individual trained hosts or something similar to the community sponsorship programme under the refugee resettlement scheme.** This would provide victims moving on from the NRM a supportive community network and safe accommodation as they continue their recovery during the 12 months following a positive conclusive grounds decision.

b. **Expand the Reach In service** to provide intentional, proactive support from outreach workers according to the victim's need, for the full 12 months after a positive conclusive grounds decision to prepare and support victims into independent living in the UK or their home country.

19. **The Home Office should develop a Fast track Government to Government Safe Return and Reintegration scheme for potential victims who do not enter the NRM and** a data collection mechanism should be established to **monitor and evaluate the existing voluntary returns service.** There should be analysis of victims' access to support, assistance and protection from re-exploitation following their return.



Principle 5:

Enabling pursuit and prosecution of the traffickers

Police have a role to safeguard victims as well as pursue offenders and this needs to be prioritised. The criminal justice system needs to take greater account of victims' needs and vulnerabilities as participants in the court process.

20. All Chief Constables and Police and Crime Commissioners must make modern slavery a strategic priority for their forces to ensure these crimes receive sufficient attention and resources. Not only is dismantling the criminal networks behind modern slavery the best protection for victims, it also addresses other forms of criminality because organised crime networks engage in slavery alongside many other forms of criminality including lower level crimes which do not attract the high sentences available under the Modern Slavery Act.

21. The Home Office must guarantee the long term future of the NPCC Modern Slavery and Organised Immigration Crime Unit and ensure that modern slavery is the Unit's priority. The Unit must continue to build on progress made to ensure support and coordination across all police forces and other law enforcement partners in order to deliver a consistent response to protecting victims and targeting offenders across the country.

22. Specialist investigation and victim engagement training for police officers should be increased, as we recommended in our 2020 It Still Happens Here report:

- a. All police forces must designate and train specialist modern slavery investigation teams to drive better quality of investigations, increasing successful prosecutions and protecting future victims.
- b. Basic training for all detectives should cover the Modern Slavery Act to ensure that all newly trained detectives are equipped with basic skills to investigate modern slavery crime.
- c. More forces should create Victim Liaison Officer roles where officers are trained in modern slavery and available 24/7 to support victims from the moment of identification.

23. All police forces should partner with specialist charities to deliver victim support.

- a. Police should establish joint operations/welfare visits and channels for information sharing with relevant NGOs in their area.
- b. Police forces should adopt roles like Justice and Care's Victim Navigators to provide victims with support through the life of a criminal case including through the court process and assist police to take a victim-focussed approach.
- c. MSVCC support workers and police officers should work together to facilitate safeguarding of victims and empower victims to engage with criminal investigations.

24. Police forces should not routinely share information with Immigration Enforcement even where victims do not consent to enter the NRM. Protocols and guidance should clarify that information will only be shared in exceptional circumstances. Partnership working with Immigration Enforcement should prioritise identification of vulnerable people.







Appendix 1:

History of the National Referral Mechanism in the UK

The UK's victim identification and support system - the National Referral Mechanism (NRM) was set up more than 10 years ago following the ratification of the Council of Europe Convention on Action against Trafficking in Human Beings (ECAT).⁷¹ The number of potential victims identified and referred to the NRM for support has been growing exponentially, except for the last year due to the impact of the Covid-19 pandemic on victim identification. A total of 10,613 potential victims were identified and referred to the NRM in 2020, similar to the 10,616 potential victims identified in 2019, which was a 52% increase from 2018. Of the total number of potential victims referred in 2020, 47% were children - most of them British children exploited for criminal, sexual and labour purposes. The UK has been topping the list of the countries of origin for victims since 2017, and the number of British nationals now accounts for 1/3 of all cases referred to the NRM.⁷²

The NRM process identifies victims of modern slavery through a three stage process:

1. Referral by a designated First Responder (police forces, various parts of the Home Office including Border Force and UKVI, Local Authorities, the GLAA, the NCA, Health and Social Care Trusts in Northern Ireland, and various specialist NGOs)
2. Reasonable Grounds decision: whether the decision maker suspects but cannot prove that the individual being considered is a victim of modern slavery,
3. Conclusive Grounds decision: following a positive Reasonable Grounds decision, whether, on the balance of probabilities, there are sufficient grounds to decide that the individual being considered is a victim of modern slavery.

The NRM decision-making process is a UK-wide system with decisions made by the Single Competent Authority within the Home Office. In November 2021 a second competent authority was established within Immigration Enforcement (the IECA) to make decisions for a small cohort of victims including those in immigration detention or otherwise subject to removal action and foreign national offenders.

In addition to formally identifying victims, the NRM acts as a gateway for potential victims to receive assistance and support according to the UK's obligations under ECAT. Assistance and support for victims in England and Wales is delivered through the Home Office's £281m 2020-2028 Modern Slavery Victim Care Contract (MSVCC) currently held by The Salvation Army.⁷³ Support is devolved in Scotland and Northern Ireland and delivered according to contracts of the Scottish Government with Migrant Help and TARA (£3m total over three years)⁷⁴ and the Northern Ireland Executive with Migrant Help and Belfast and Lisburn Women's Aid in Northern Ireland.⁷⁵

For many years the NRM has been deemed to be outdated and unfit for purpose, which is a testimony to the constantly changing trends and nature of slavery. It has undergone a number of reviews and reforms seeking to address the growing volume and complexity of cases.

⁷¹ Council of Europe Convention on Action against Trafficking in Human Beings (ECAT)

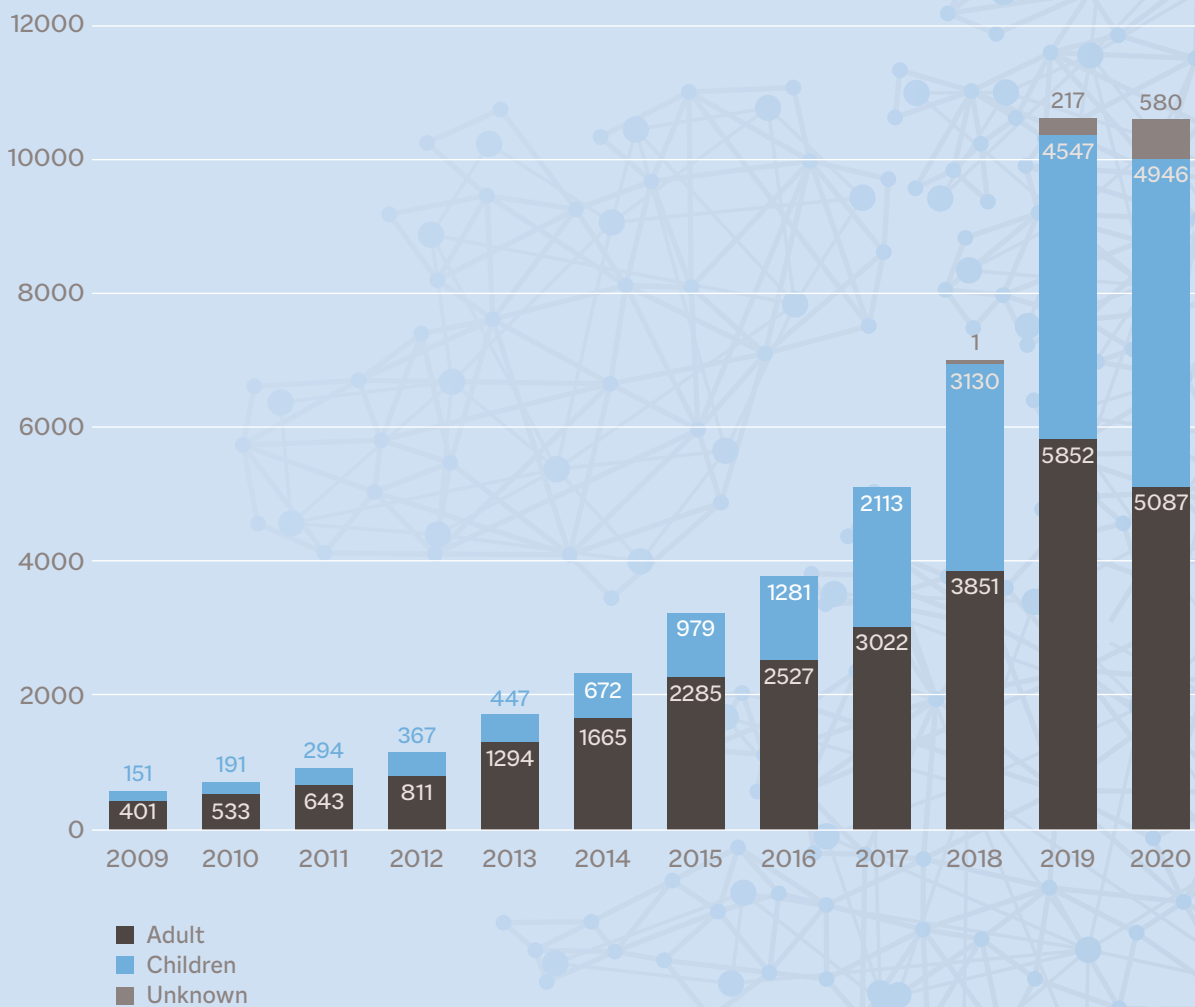
⁷² NRM modern slavery statistics, End of the Year summary, 2020

⁷³ 2020 Modern Slavery Victim Care Contract, April 2021

⁷⁴ www.migranthehelpuk.org/news/funding-increase-to-support-victims-of-trafficking-in-scotland

⁷⁵ UK Annual Report on Modern Slavery, Home Office, October 2020

Potential Victims Referred to the NRM (2009-2020, Annually)



Source: Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, End of Year Summary 2020

Timeline

Key

- Summary
- Recommendations

November 2014 Review of the National Referral Mechanism for Victims of Trafficking

The NRM Review was commissioned by the Home Office. It focused on six key areas: identification of victims; how they access support; the levels of support they receive; decision making; governance of the NRM; collection and sharing of data. It found many areas of good practice across the country. However it also found that the NRM was a disjointed system where awareness of human trafficking was often low and of the NRM processes even lower.

The NRM Review recommended **providing support based on an assessment of the individual needs of the victim**. It also recommended reviewing the timescales of entry and exit from the support, audit and inspection of the support provision and providing support following conclusive identification.

October 2017 National Referral Mechanism Pilot

Following the 2014 NRM review, a pilot NRM was run in two areas - West Yorkshire and South West from August 2015 to March 2017. The pilot tested a new approach in identification of victims through Slavery Safeguarding Leads, new case management system and multi-agency decision making at the regional level.

The evaluation in October 2017 found the role of the Slavery Safeguarding Leads was viewed positively with increased levels of awareness among staff and faster decision making at the reasonable grounds stage. Making conclusive grounds decisions via multidisciplinary panels was perceived to be transparent and credible due to the range of views heard in panels and the consensual nature of decision making. Despite these findings, neither was deemed to be sustainable beyond the life of the pilot due to resourcing and additional responsibilities.

April 2017 Work and Pensions Select Committee modern slavery inquiry

The inquiry into the support provided to victims of modern slavery made a number of recommendations within its remit. It concluded that there was a lack of awareness, training and coordination in frontline services leading to an 'inexcusable lack of support' for victims of modern slavery

It recommended a review of the NRM to ensure some minimum safeguards for victims were in place. It also recommended that all confirmed victims of modern slavery be given a personal plan which details their road to recovery and at least one year's leave to remain with recourse to benefits and services.



October 2017
Announcement of NRM reform

The NRM reform introduced a number of measures that were designed to improve identification and support for victims of modern slavery.

Those included:

- A new Single Competent Authority under the auspices of the Home Office taking lead for decision making
- An independent panel of experts to review negative conclusive grounds decisions
- Digitisation of the NRM, including a new online referral form and a new case management system
- Extending move-on periods for victims with a positive conclusive grounds decision from 14 to 45 days
- 'Drop-in' services for up to 6 months after leaving the NRM support to aid transition
- Local authority pilots to develop best practice in transitioning victims to local services and community.

July 2018 - 2019
Home Affairs Select Committee Modern Slavery inquiry

A wide-ranging inquiry looking into what progress has been made since the Act came into force and what remains to be done. Important written and oral evidence was submitted and heard by the Committee, including on identification and support for victims of slavery, and gaps within the NRM. However, due to the General Election held on 12 December 2019 the inquiry was closed before a final report was published.

Summer 2020
Transformation Programme

Following the completion of the NRM reform, The Home Office has embarked on a new NRM Transformation programme aiming to embed an end-to-end needs-based approach to victim support and develop alternative models for decision making and support for adult victims.



Appendix 2:

Research Participants

Non-statutory stakeholders

- Adavu
- ATLEU
- Caritas Bakhita House
- Changing Lives Liberty Project
- City Hearts
- Ella's
- Fortalice
- Helen Bamber Foundation
- Hope at Home
- Hope for Justice
- Housing for Women
- Jericho Foundation
- Justice and Care Victim Navigators
- Manchester Action on Street Health
- Maria Thomas, Solicitor at Duncan Lewis
- Medaille Trust
- Migrant Help
- Mustard Tree
- My CWA
- One25
- Palm Cove Society
- Refugee Education UK
- Sally Montier, Independent Expert Witness
- Shiva Foundation
- Snowdrop Project
- Street Talk
- Tamar
- The Passage
- The Salvation Army
- Unseen
- Women@thewell

Statutory stakeholders and regional partnerships

Midlands

- Birmingham City Council, Modern Slavery Coordinator
- East Midlands Regional Organised Crime Unit
- Lincolnshire County Council
- Lincolnshire Police and Crime Commissioner's Office
- Northamptonshire Police
- Nottinghamshire Police
- Warwickshire Police
- West Midlands Anti-Slavery Network
- West Midlands Anti-Slavery Network Safe Place
- West Midlands Slavery Adult Safeguarding Pathways Coordinator
- West Midlands Police

North East and North West England

- Greater Manchester Police, Modern Slavery Coordination Unit
- Humber Modern Slavery Partnership
- North Yorkshire Police
- South Yorkshire Police
- West Yorkshire Police
- Yorkshire and Humber ROCU Coordinator

London and South East England

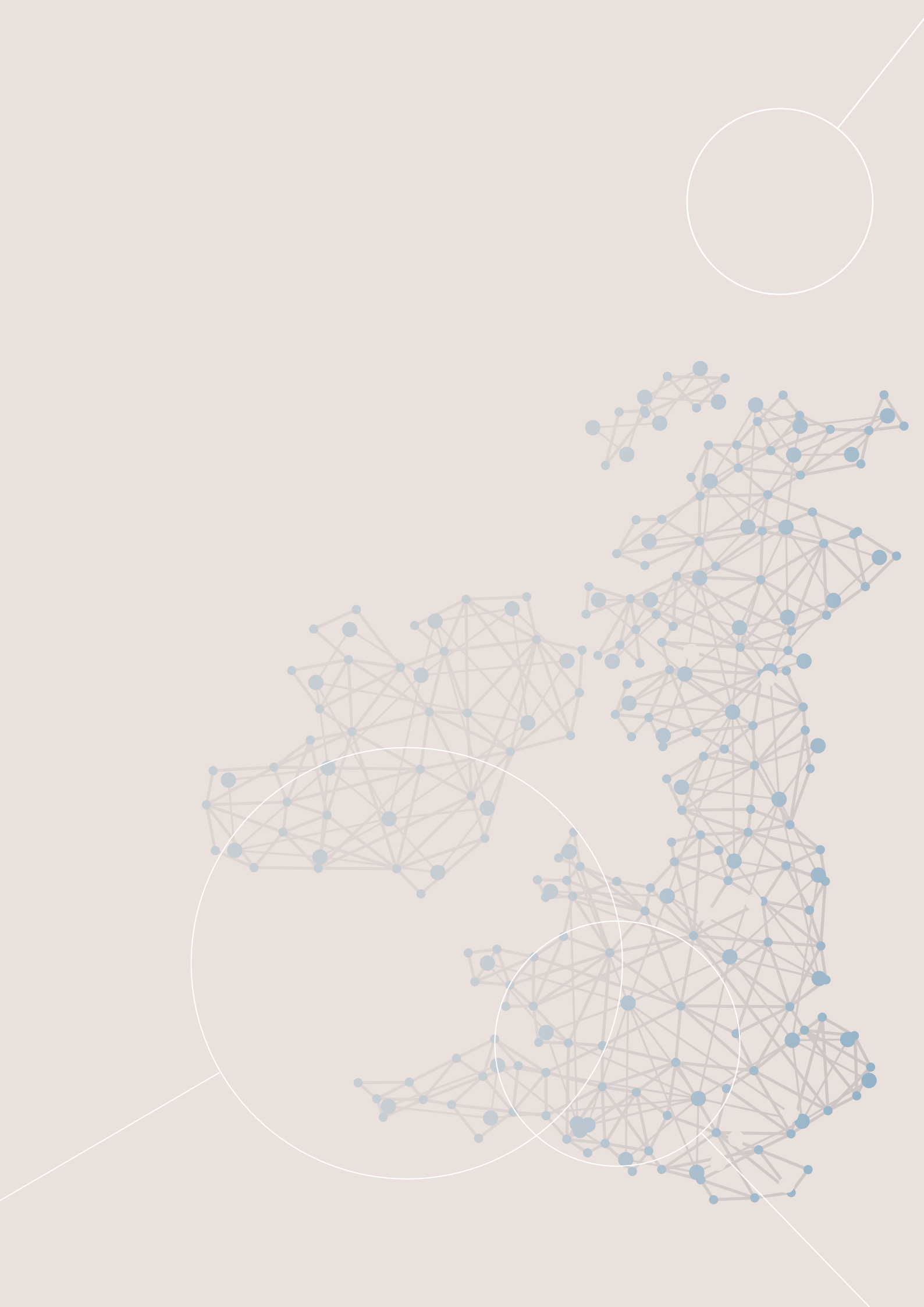
- Brighton and Hove Council
- Modern Slavery and Human Trafficking Team, Kent Police
- Modern Slavery and Child Criminal Exploitation Team, London Metropolitan Police
- Royal Borough of Kensington and Chelsea

Wales

- Dyfed Powys Police
- Gwent Police
- Welsh Modern Slavery MARAC Coordinator
- Welsh Regional Modern Slavery and Organised Immigration Crime Policing Coordinator

“Having a place of safety is having someone who I can trust and being in an area where no one knows me, somewhere I can start a new life and have a new start.”

Survivor



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