

# Support and access to justice for adult victims of modern slavery

Highlighting national shortcomings  
from a local perspective 2020



## Abstract

The purpose of this research is to highlight gaps in modern slavery victim support and access to justice for adults. First by developing a structured understanding on existing policies and legislation. Then, taking Hertfordshire as an example, understanding how national policies are implemented at a local level to determine the barriers to victims' support and access to justice and promote existing recommendations by providing evidence of local capabilities in identifying and addressing victims' needs.

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# Key Definitions and Abbreviations

**Domestic abuse:** Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality.

**Duty to Notify (DtN):** The duty certain agencies have to notify the Home Office of potential victims of modern slavery. The notification can be done through an MS1 form: notification of a potential victim of modern slavery or through the National Referral Mechanism.

**Modern slavery:** The status or condition of a person over whom any or all the powers attaching to the right of ownership are exercised (129 Convention; approved in defining Art 4 ECHR: *Siladin v France* (ECHR, 2005)). In UK legislation, modern slavery is an umbrella term to cover a number of crimes which all include two basic elements: the deception or coercion of an individual, for the purpose of exploitation.

**Human trafficking and modern slavery (HTMS):** Often interchangeably used terms, however, human trafficking implies movement of victims for the purpose of exploiting them.

**Modern Slavery Act 2015 (MSA 2015):** A Parliamentary Act designed to combat modern slavery in the UK. It consolidates previous offences relating to trafficking and slavery.

**National Referral Mechanism (NRM):** The framework for identifying victims of human trafficking and modern slavery and ensuring they receive the appropriate protection and support.

**Reasonable and Conclusive Grounds:** The decisions made by the Single Competent Authority (a team within the Home Office) on whether there are grounds to believe a person referred to them is a victim of modern slavery. When a first responder submits someone into the NRM, first it is decided if there are 'reasonable grounds' to believe that the person is a victim (the 'reasonable grounds' decision) and, if the decision is positive, an investigation will lead to a decision, on the balance of probabilities, of whether that person is a victim (the 'conclusive grounds' decision).

**Safeguarding:** The act of protecting someone from harm or damage with an appropriate measure.

**Victims/survivors:** In alignment with the wording of the Modern Slavery Act 2015, and for consistency, a victim includes someone identified as a victim of modern slavery and a person who has received support to recover from it. This document uses the term victim to mean both victims and survivors (in alignment with the Modern Slavery Act, etc.).

**Vulnerable adult:** The terminology used throughout this report to indicate someone at higher risk of exploitation due to their physical, mental, or financial state.



# Executive Summary

## **How can we draw a broader understanding of gaps identified in victim support in Hertfordshire as a consequence of national shortcomings?**

The purpose of this research is to highlight gaps in support for victims of modern slavery and access to justice for adults. First by developing a structured understanding on existing policies and legislation. Then, taking Hertfordshire as an example, understanding how national policies are implemented at a local level to determine the barriers to victims' support and access to justice.

The policy recommendations listed below have been detailed in existing literature, however this report provides a local perspective to the need for their implementation and hereby also highlights the disconnect between national policy and local-level implementation.

As new policies are created, information on how these must be implemented does not necessarily trickle down as intended. Several reasons contribute to the disconnect. First there are national barriers, such as insufficient data and lack of support for survivors who have yet to enter the NRM. Second there is a lack of understanding of the issue, its scale and local-level responsibility at the county-level. And third, as new responsibilities are added to local authority portfolios, resources are not increased which results in services stretched for capacity.

# Recommendations

## The national government should:

**Recommendation 1:** Increase the transparency of NRM data for victim support coordination

**Recommendation 2:** The national government should provide legal aid to a potential victim as soon as they are identified

**Recommendation 3:** Forbid detention of HTMS victims

## Local governments should:

**Recommendation 4:** Provide HTMS awareness training to local authorities

**Recommendation 5:** Local authorities should use existing support infrastructures to ensure HTMS victims are cared for

**Recommendation 6:** County-wide coordination of housing support to balance regional disparities in available accommodation, broadening the scope of action under the Homelessness Reduction Act 2017

## Local and national policies on housing support for victims should:

**Recommendation 7:** County Councils should secure a mandatory budget to provide immediate emergency housing to potential victims of abuse

**Recommendation 8:** Implement needs-based assessment processes throughout a victim's journey to allow for diverse needs to be identified and address properly

## Local areas should build on existing models to:

**Recommendation 9:** Assign a caseworker to every potential modern slavery victim

**Recommendation 10:** Coordinated efforts to encourage and enable prosecutions of HTMS perpetrators

# Methodology

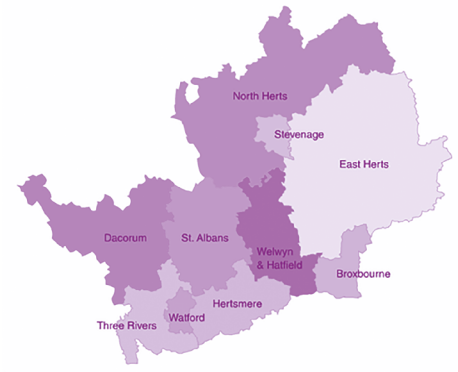
**This report focuses on adult victims because the support available for children is different to the one available to adult victims of HTMS. Focusing on one versus the other allowed for a deeper dive into the current policies and implementing support structures to identify potential gaps.**

For this report, research focused on national legislation, policy reviews and data published by the UK Government on identified victims of modern slavery. In addition, phone interviews with frontline staff and local safeguarding leads in Hertfordshire provided qualitative data to appreciate disparities between national provisions and local implementation. Phone interviews were also conducted with housing staff from local districts and with police. A standard questionnaire<sup>1</sup> was delivered during these interviews. The questionnaire was comprised of closed and open-ended questions to avoid any bias and allow the interviewee to detail the situation from their perspective. Questions were standard and asked to all interviewees. However, the relevance of certain questions over others depended on the interviewee's role and organisation. For instance, some questions were specifically targeted at first responders to assess their understanding of the National Referral Mechanism (NRM). Fifteen individual interviews were conducted.

## Local framework

In order to understand how national policies are implemented locally, it is important to look into local capacity and understanding of roles and responsibilities for all relevant stakeholders. Given its proximity to London and its high density of population, Hertfordshire was seen as a relevant county to focus on for the purpose of this research. Hertfordshire is a county situated immediately

north of London and is part of the East of England region. It is comprised of ten local authority districts that sit beneath an



overarching county council. The latest estimated population (mid-2018) of the county is 1,184,365, with Dacorum being the most populated district, closely followed by East Hertfordshire. According to the Indices of Deprivation (IoD)<sup>2</sup>, Hertfordshire ranks 135 out of 151 upper tier local authorities in England with rank one accounting for the most deprived. It is also a two-tier authority, with services to Hertfordshire residents split between county, and then district/borough councils that operate separately. For instance, safeguarding and police sit at county level while other areas, such as housing and licensing sit at district level. This is relevant information as we found that this two-tier authority system added administrative complexities in the coordination of support for modern slavery victims. It fragments the responsibility towards the victim between the different county and district level authorities.

Hertfordshire also has a very proactive Modern Slavery Partnership (HMSP), which made data collection on modern slavery victim support in the area easier. It also was a useful resource to understand how national policies were implemented locally with regards to HTMS.

The Hertfordshire Modern Slavery Partnership brings together more than 100 statutory and non-statutory partners from across the county to tackle human trafficking and modern slavery in all its forms. This multi-agency group is made up of representatives from Hertfordshire County Council, the Police and Crime Commissioner's Office for Hertfordshire, Shiva Foundation, Hertfordshire Constabulary, District & Borough Councils, NHS Trusts, charities, government agencies and more.

<sup>1</sup> Questionnaire template included for reference under Annex

<sup>2</sup> The English Indices of Deprivation FAQs (2019), Ministry of Housing, Communities & Local Government. The IoD is a set of relative measures of deprivation for small and local level areas in England, based on seven different domains, or facets, of deprivation.

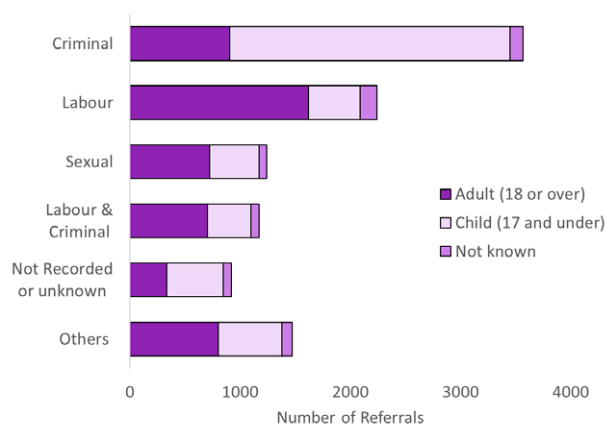
# Introduction

**Modern slavery is a crime as identified in the Modern Slavery Act 2015 (MSA 2015) and reflects the exploitation of people based around use of coercion, threats, or abuse of positions of vulnerability.**

A significant aspect of modern slavery is the violation of human rights. People who become victims of modern slavery may be subject to labour exploitation, sexual exploitation, criminal exploitation, domestic servitude and in some cases subject to forced organ donation. The most common form of exploitation within the United Kingdom is labour exploitation. In 2018, 46% of people referred into the UK NRM as potential victims, were being exploited for their labour.

What modern slavery is and how it occurs are largely misunderstood. A common perception is to think this crime only affects foreign nationals in the UK; the reality is that a significant number of British nationals are reported as being victims each year<sup>3,4</sup>. Many believe this is something that only affects women and girls; British men are also being trafficked within the UK for exploitative labour. Of the potential victims referred in 2019, one-third (3,391) were female; two-thirds (7,224) were male<sup>5</sup>. Such data challenges stereotypes on victim profiles. They are not necessarily trafficked from a foreign country and they are not always women.

British young people and children are being trafficked by organised crime groups and gangs who groom them, developing relationships, often plying them with gifts, alcohol and drugs, before forcing them into prostitution or to sell drugs in towns across the country (i.e. “county lines”)<sup>6</sup>.



Number of NRM referrals, by exploitation type and age group in 2020

Lack of public awareness has consequences on potential cases identified. Similarly, lack of awareness and training amongst public officials enhance the crime’s hidden nature and decreases the rate at which cases are identified and brought to trial. More awareness is needed to put this issue on the forefront of the public agenda, and to coordinate an effective response<sup>7</sup>.

From March 2018 to March 2019, the police in England and Wales recorded 5,059 modern slavery offences, a 49% increase on the previous year<sup>8</sup>. This rise was understood as positive as it was a consequence of effective awareness raising. In short, the more we know about the issue, the better we can identify and support victims.

The United Kingdom Parliament voted to enact the Modern Slavery Act 2015 to address this issue, notably by compiling existing legal frameworks and requiring companies to take part in addressing the issue within their business operations and supply chains. It also created the duty to notify and brought in the defense clause for victims.

3 National Referral Mechanism Statistics UK, End of Year Summary, page 4 – Referrals by Nationality, Home Office (2019)

4 Antislavery.org

5 National Referral Mechanism Statistics UK, End of Year Summary, page 3, Home Office (2019)

6 Human Trafficking Supporter Briefing (April 2019) – Care UK

7 Dame Sara Joanne Thornton, DBE, the current UK’s Independent Anti-Slavery Commissioner during the Human Trafficking Foundation conference on COVID 19 (Spring 2020)

8 2019 UK Annual Report on Modern Slavery (October 2019) – UK Home Office

However much more needs to be done for identified victims to access justice, and both short-term and longer-term rehabilitative support. The complexity of a victim's needs and the systemic failures in properly identifying and addressing them throughout their journey jeopardises the chances for survivors to fully recover.

The limited resources and capacity available at the local level do not always enable effective implementation of the formal framework of support<sup>9</sup> provided by law. This report focuses on how national policies and frameworks translate into practice locally. We will look at Hertfordshire as a case study, hereby understanding the support and capacity available in districts within the county. The information collected from publicly available resources and interviews with different national and local stakeholders - from frontline staff, to safeguarding and housing teams in the different districts of the county - will serve as evidence of national shortcomings.

This report will also serve as additional evidence to promote recommendations that aim to raise awareness on how to effectively identify potential victims, and the rights they are entitled to. It will also look at the gaps that exist in the support provided and recommend additional resources to prevent re-traumatisation of survivors, allowing for long-term support to prevent re-trafficking of previously identified victims.

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<sup>9</sup> Help for adult victims of Modern Slavery – Home Office





# Legal structure for safeguarding victims

## International framework

The United Nations Palermo Protocol was signed and opened for ratification in 2000; it is the international legal framework, highlighting that effective action to prevent and combat trafficking in persons (human trafficking) requires a comprehensive international approach. Its aim is to prevent such trafficking, to punish traffickers and to protect victims of trafficking, specifically through protecting their internationally recognised human rights<sup>10</sup>. The United Kingdom signed the Protocol in December 2000 and ratified it in February 2006<sup>11</sup>.

The Council of Europe Convention on Action against Trafficking in Human Beings was adopted by the Committee of Ministers of the Council of Europe on 3rd May 2005, following a series of initiatives by the Council of Europe

in the field of combating human trafficking. Its intention is three-fold, to prevent HTMS, to protect its victims and to pursue perpetrators. This Convention goes beyond the minimum standards and strengthens the protection afforded to victims through a comprehensive scope of requirements, encompassing all forms of trafficking<sup>12</sup>. The UK signed the Council of Europe Convention on Action against Human Trafficking on 23rd March 2007 and it came into force in the UK in 2009<sup>13</sup>. Still, most victims will never obtain compensation for having been exploited. The GRETA report that monitors how the UK has implemented the Convention had positive words to say but raised questions about victim support, as the UK hasn't fully complied in terms of provision. Following online interviews with key national stakeholders and IASC<sup>14</sup>, GRETA findings highlighted the need for better access to justice for potential victims<sup>15</sup> and a need for better understanding of "non-punishment principles protecting victims who were coerced in committing an offense"<sup>16</sup>.

10 United Nations Human Rights Office of the High Commissioner

11 Chapter XVIII Penal Matters, United Nations Treaty Collection

12 Council of Europe, Actions Against Trafficking

13 ECPAT.org.uk

14 GRETA carries out third evaluation of the United Kingdom. Council of Europe website (October 2020)

15 Assistance to Victims of Human Trafficking, thematic chapter 8, General Report (p.36) GRETA Group of Experts on Action against Trafficking in Human Beings (October 2019) Council of Europe

16 ECPAT UK presents to the Group of Experts on Action against Trafficking in Human Beings for UK evaluation (September 2020) ECPAT UK

## The impact of Brexit

As negotiations are ongoing the implications of Brexit with regards to UK's implementation of International and European law within its national legal framework could possibly still change. However, from what we know now, UK law will take a snapshot of current EU law and continue to use it as it was implemented nationally. But as time goes on, and new legislation is promoted within the European Union, the UK will change things independently.<sup>17</sup>

It is important to note that even if major legal achievements through EU policies will remain under UK law post Brexit, the legal consequences are many and negative for the most vulnerable and most at-risk of exploitation. The ending of freedom of movement for EU citizens will have a direct impact on sectors vulnerable to exploitation. Many industries, reliant on low-skilled labour from EU countries, will be pressured to find alternative labour which in turn increases the risk of exploitation of low-skilled UK workers (footnote reference: Unseen UK website).<sup>18</sup>

It will be important to see whether the UK is able to maintain cooperation with EU organisations tackling organised crime (Europol and Eurojust for example) as this is instrumental in the prevention, prosecution, and therefore safety of modern slavery survivors. Following the same reasoning, given that post-Brexit, the UK no longer has real-time access to European security systems, UK Border Forces will arguably be less able to intercept traffickers. Additionally, as part of the Government's rhetoric for 'taking back control of borders' and their goal of 'reducing levels of overall migration'<sup>19</sup>, their new points-based immigration system was introduced by the Home Office as part of the Immigration Bill. However, similar to the introduction of a criminal offence for illegal working, this new system risks producing the

opposite effect. Indeed, limiting legal pathways for migration into the UK is likely to swell the demand for smuggling services to facilitate irregular entry.<sup>20</sup>

## National framework

Human trafficking is as much a domestic issue as it is an international one and investigations often follow money circulation across borders to find perpetrators<sup>21</sup>. There are two primary pieces of legislation which provide public sector support for adult victims of modern slavery.

## Modern Slavery Act 2015

The MSA 2015 is made up of seven parts. It consolidated and clarified existing legislation around HTMS and it also established the Office of the Independent Anti-Slavery Commissioner. Additionally, it introduced measures focused on supporting and protecting victims, including a statutory defence (Section 45) for slavery or trafficking victims, and special measures for witnesses in criminal proceedings<sup>22</sup>. As Rt Hon Karen Bradley MP, the former Minister for Modern Slavery and Organised Crime who worked on the Act says:

"We were trying to achieve two things without which we cannot break the cycle of Modern Slavery: first to find and support victims and second, to prosecute the perpetrators. The Act was an overall strategy of how to break that cycle [...] The fact that high profile cases are coming forward is a sign of improvement on this issue."<sup>23</sup>

First responders, as defined and listed under the MSA 2015 (see annex), whether public sector, private, or not-for-profit, have a responsibility to identify and refer potential victims of modern slavery for support. The MSA 2015 also introduced two new civil protection orders to prevent the harm caused by slavery and human trafficking offences: Slavery and Trafficking Prevention Orders (STPOs)

<sup>17</sup> Emily Kenway, Senior Policy and Communications Adviser at FLEX on the impact of the Brexit and the Immigration Bill on workers. HTF online forum August 20, 2020).

<sup>18</sup> Unseen UK website

<sup>19</sup> Oral statement to Parliament from the Home Secretary on March 24, 2021

<sup>20</sup> Global Initiative Against Transnational Organized Crime

<sup>21</sup> Caroline Haughey QC OBE

<sup>22</sup> UK Public General Acts

<sup>23</sup> Social Justice Conference: How can we secure justice for victims of modern slavery? (October 2020)

and Slavery and Trafficking Risk Orders (STROs)<sup>24</sup>, which some say are very helpful ways of getting support for victims<sup>25</sup>.

### Care Act 2014

The Care Act 2014 places a responsibility on local authorities to safeguard adults if they are at risk of abuse or neglect. Safeguarding, according to the Government's guidance on the Act "means protecting an adult's right to live in safety, free from abuse and neglect" and abuse includes modern slavery.<sup>26</sup>

### The National Referral Mechanism

The National Referral Mechanism (NRM) is a framework for identifying victims of HTMS and ensuring they receive the appropriate protection and support. From 29 April 2019 the new Single Competent Authority became responsible for all cases referred into the NRM, creating a single case working unit within the Home Office to replace the case working units in the National Crime Agency (NCA) and UK Visas and Immigration<sup>27</sup>. If the Single Competent Authority decides that an adult is a victim of modern slavery, they will be offered accommodation in a safe-house or supported in the community through outreach support via third party sub-contractors as defined by the Victim Care Contract.

There is a two-stage decision-making process (Reasonable Grounds and Conclusive Grounds) to determine whether a potential adult victim is eligible for support from the NRM<sup>28</sup>. To receive full support, a victim must be granted a positive Conclusive Grounds Decision. Accommodation and other services are granted for a reflection and recovery period of 45 days upon receipt of a positive Reasonable Grounds Decision. The potential victim must then wait for the Single Competent Authority to confirm their status as a victim of modern slavery by granting their case

a Positive Conclusive Grounds Decision. This can be extended if the victim needs this kind of support for a longer period of time or if there is delay in the conclusive grounds decision-making process. During the reflection and recovery period, information is gathered following the referral of the first responder (full list under Annex section below).

### The need for reform

Simply put, the NRM needs reform. There will often be delays around the granting of a Conclusive Grounds Decision<sup>29</sup>. In Hertfordshire, potential victims have had to wait for up to two years to receive that decision<sup>30</sup>. This has a negative impact on victim support as it increases distrust in the system and makes it harder to coordinate support for victims. It also increases the risk of losing contact with a potential victim which is already an existing challenge for support providers. Additionally, this is also an issue from an investigation and prosecution perspective; it jeopardises witness engagement. As the current UK's Independent Anti-Slavery Commissioner, states: "We cannot keep victims warm for 2/3years, they will lose trust and respect in the system."<sup>31</sup> Covid-19 and resulting trial delays increases this risk.

Law enforcement at the local level have reported that they do not get timely, consistent and regular information about victims and their journey through the NRM.

24 Guidance and forms for practitioners about Slavery and Trafficking Prevention Orders and Slavery and Trafficking Risk Orders.

25 Rt Hon Karen Bradley MP

26 Care and Support Statutory Guidance, Department of Health and Social Care

27 Victims of modern slavery – Competent Authority guidance Version 8.0 (September 2019) Home Office

28 National referral mechanism reform (October 2018) Home Office UK

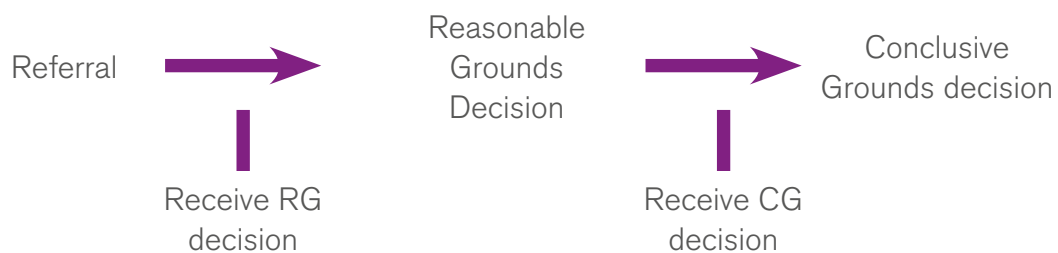
29 Rt Hon Karen Bradley MP,

30 Kat Rolle, HMSP Coordinator (2020)

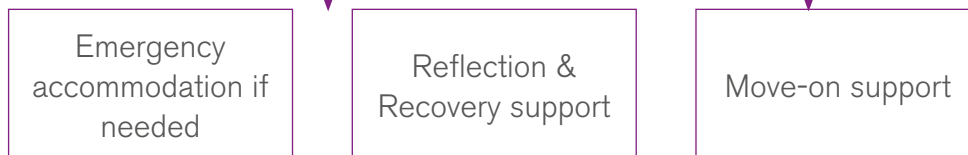
31 Social Justice Conference: How can we secure justice for victims of modern slavery? October 2020

## National referral mechanism journey

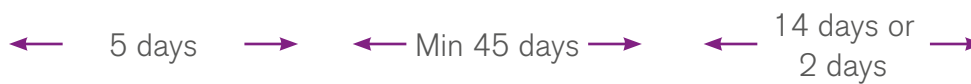
### Decision Making Process



### Victim Support



### Timeline





# Recommendation 1:

## Increase the transparency of NRM data for victim support coordination

### Context supporting recommendation 1:

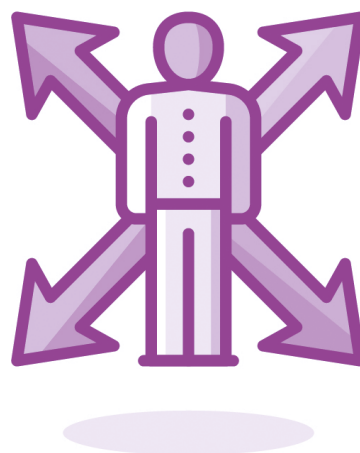
As frontline staff from Beacon, a Hertfordshire-based victim care centre, explained, the seriousness of abuse and trauma that victims suffer from, requires an ongoing needs-based assessment. Victims are unlikely to be able to communicate all layers of their trauma, let alone the support they need. It is important to build trust with victims; this is a determining factor for holistic care. Trust-building with victims takes time but is essential when we consider the fear that often stops victims from coming forward.

Should a victim in the care of Beacon for example, enter the NRM, they will be transferred to another facility, sometimes in a different region. Because NRM data on the victim's journey is only accessible to first responders, which NGOs like Beacon are not, they will lose contact with that victim.

In counties like Hertfordshire, a great deal of the support made available to victims is not affiliated with the NRM. This poses an obstacle in victim service providers issuing truly victim-centric care.

### So why should NRM information be accessible beyond NRM first responders?

Simply answered, to facilitate a victim-centred approach. What sometimes happens is that frontline organisations, like Beacon, will find the same victim that had already gone through the NRM, back in their care. Why? Because victims have a high-risk of being re-trafficked, particularly in cases where support is insufficient or too fragmented<sup>32</sup>. Delays, lack of support and feelings of isolation all increase the risk of additional exacerbating factors, like homelessness, destitution and desperation. Without a single point of contact throughout their journey, a victim may return to the only support system they know, which can be their former trafficker or someone in the area they call home.



First responders in the case of Hertfordshire, include the local authority, the police and Migrant Help, who are not based in the county. Even though The Salvation Army holds the Victim Care Contract with the Home Office, in Hertfordshire they only act as a coordinator for victims to access support with one of their contracted providers (e.g. Migrant Help). Their coordination support is only triggered once a victim enters the NRM. However, Beacon is the organisation that has been providing support to victims of all kinds in Hertfordshire from initial interaction to exiting their system for a number of years. We can only assume that victim service providers in other counties, which have long-standing experience of providing support to victims are also unable to get the NRM data on the people they support.

Police, who are also first responders and have access to NRM data, may come into contact with a victim from the outset, however they use an investigative approach which puts the victim's wellbeing second to investigating the crime. If information on a potential victim is by-in-large, only available to the police, as is largely the case in

<sup>32</sup> A Game of Chance? Long-term support for survivors of Modern Slavery, Dr. Caroline Murphy. The Centre for the Study of Modern Slavery (2018)

Hertfordshire, the system cannot be victim-centred. When potential victims are identified through a police investigation, their care will be coordinated by the police. But, by their own admission, that is not what police resources allow them to do best. Additionally, this information isn't timely, even for first responders. The police explained that the time delay is about 10 months for them to get any information about someone that they have to put through the NRM process<sup>33</sup>. Furthermore, even when information is provided, it is not necessarily passed on to the appropriate team or department(s) within the police. It therefore falls on the individual police officer to proactively chase that information over the course of months, if not years from referring the victim to the NRM process.

The way in which the system is structured today prevents ongoing rapport-building with a single point of contact that has a victim-centred approach. Additionally, greater transparency of NRM data would help us to identify issues within the system itself. Currently the National Crime Agency publishes data on the people that enter the NRM, but far less on the people that exit NRM support. There is also limited relevant data on victims of modern slavery that were sent to their home country once they were identified as victims of HTMS. Without a comprehensive picture of modern slavery and its victims' journeys, it is harder to identify gaps and correct systemic failings.

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<sup>33</sup> Interview number x dated dd/mm/yy

## Recommendation 2:

The national government should provide legal aid to a potential victim as soon as they are identified.

### Context supporting recommendation 2:

The provision of legal aid from the outset of potential victim identification would help ensure victim rights are upheld and would give them the space to make an informed decision on whether to enter the NRM process.

As a result of the insidious nature of exploitation, many HTMS victims have been forced into committing offences by the person or group exploiting them. Someone's personal situation (irregular immigration status, for example) can be used as a tool by exploiters to breed fear of authority. In Hertfordshire, it has been observed that potential victims with irregular immigration status or engagement in criminal activity will be reluctant to seek NRM support because of fear and misunderstanding of their rights. We can assume this is consistent across the country. Currently legal aid is provided as part of the NRM process, not before.

Legal aid as an immediate service to potential victims is important for helping them understand their rights, make an informed decision to enter the NRM or not, and defend any criminal actions they have committed as part of their exploitation under section 45 of the MSA 2015.

ATLEU, a charity providing legal representation to victims of trafficking and labour exploitation, believes that by regulating a victim's immigration status, the cycle of exploitation can be broken<sup>34</sup>. As previously stated, there is often a misunderstanding from potential victims around their rights which can translate into a fear of police. Their immigration status will remain irregular and their vulnerability to re-trafficking will remain high. Victims of modern slavery who are foreign nationals can end up in detention centres while they seek asylum in the UK. Often times, laws



already exist to the benefit of HTMS victims regardless of their immigration status. For example, in many cases, victims should have access to Assist and Release Rights. However, without the legal support, these rights are not accessed.

A Modern Slavery lead from the Passage, an organisation that tackles homelessness nationally, stressed the importance of providing legal aid to their clients as an essential element of their recovery<sup>35</sup>. It is important that their clients understand they are victims of a crime and that there are resources available to them. They may decide to go through the NRM process, which can provide them with safe emergency accommodation as an alternative to the standard available housing which may not shelter them from their traffickers. For foreign nationals who want to seek asylum in the UK, a route that can open access to public funds, they would also need legal support.

<sup>34</sup> ATLEU Website

<sup>35</sup> Interview dated September 2020

## Recommendation 3: Forbid detention of HTMS victims

### Context supporting recommendation 3:

It is a common practice in the UK for people who are seeking asylum and who have been charged with a crime to be held in a detention centre. Unfortunately, victims of trafficking are also ending up in detention centres because of crime they committed as part of their exploitation. This practice occurs despite what is provided for in law: victims of human trafficking should not be detained, prosecuted or punished for crimes they are forced to commit as a result of being trafficked<sup>36</sup>. This has been incorporated into the Modern Slavery Act 2015.

The Hurtado Jesuit Centre (HJC), in London, who welcomes over 200 refugees to their day centre and drop-in services, has found that even when victims are a positive Conclusive Grounds decision on their trafficking case, their detention can last quite some time. In fact, in many cases, despite a positive Conclusive Grounds (CG) decision, victims will remain in detention. HJC work with a victim, for example, who had been trafficked for the purpose of selling illegal substances. Even though the victim received a positive Conclusive Grounds decision, they remained in detention for the crime they were coerced into committing during their exploitation.

This issue is multi-layered and complex. First, when a potential victim has been coerced into committing an offence, their victim status is less likely to be acknowledged. Detention officers and bail judges often misunderstand the different layers and complexities of HTMS, and as result, they will overlook this in cases, failing to understand how these are in fact victims who were forced into illegal activities. Additionally, victims may be in the presence of their controller or around other victims, making them less likely to open up about their situation.<sup>37</sup> In Hertfordshire,

**1,256 potential trafficking victims were held in prison-like detention centres, in 2019, due to their immigration status. Many will go on to become 'confirmed' victims, with 42 already recognised as having been trafficked. Conversely, the State only convicted 35 traffickers in the same period**

Thomson Reuters Foundation UK's immigration policies are threatening survivors of modern slavery by Maya Esslemont | After Exploitation (18 October 2020)

local victim support providers are aware of these risks but without proper safeguards in place, such as an enforced blanket ban on the detention of victims of trafficking, we cannot prevent this from happening in Hertfordshire in the future. We believe there should be an absolute ban on detention of modern slavery victims. Victims referred into the NRM should be released and supported with any of their needs. Bail judges should systematically authorise the immediate release in cases of victims who enter the NRM.

<sup>36</sup> See EU Trafficking Directive, Article 8.

<sup>37</sup> Modern Slavery Protocol for Local Authorities – Human Trafficking Foundation



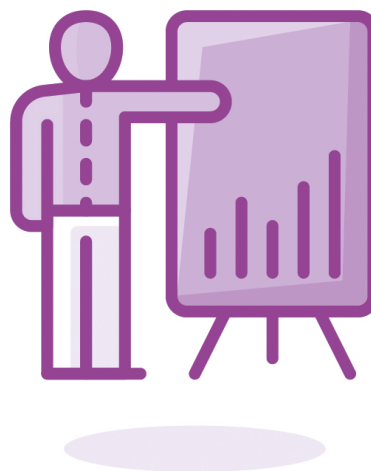
## Recommendation 4:

### Provide HTMS awareness training to local authorities

#### Context supporting recommendation 4:

For victims of trafficking to receive care and support, they must first be identified. For them to be identified, those most likely to come into contact with potential victims, should be aware of modern slavery and how it can be spotted. While we do see reporting of modern slavery in Hertfordshire, the numbers are wildly smaller than the national estimates<sup>38</sup>. In 2016 only 26 victims were identified. By 2018, however, the number grew to 59 victims, and reached 120 by 2019. We can assume that the prevalence of modern slavery is much higher than reported. This has been suggested by several local stakeholders, including safeguarding leads and the Hertfordshire Modern Slavery Partnership (HMSP). They stress the importance of (1) training to spot the signs of modern slavery and (2) data recording to evidence the magnitude and scale of the issue.

In Hertfordshire, a police officer from OpTropic, the local specialised police unit, had taken it upon himself to deliver the training to many district and county level authorities. But this was discontinued due to the limited capacity of police. The HMSP Coordinator has since developed, and made available for free, training resources on how to spot the signs of a potential victims of modern slavery and how to report it. In addition, the HMSP has been growing its network of partner organisations through intense outreach efforts, raising awareness on the issue locally. Unfortunately, in areas where there isn't resource or capacity for a partnership coordinator, it is unclear who will lead the push for training. As is the case in Hertfordshire, safeguarding teams already feel stretched in their capacity.



Standardised training with resources for its roll out would benefit organisations around the country in helping them spot potential victims of modern slavery. Training should include information on the role different organisations can play in spotting, reporting and supporting victims. It should also include information on how victims end up in exploitation<sup>39</sup>. Most times, there is not one, but multiple factors that render a person vulnerable to exploitation. Vulnerability is not just about fleeing dire circumstances in a foreign country; many of the victims identified, are, in fact, UK nationals. With better and consistent training, we can expect more cases to be identified. Otherwise, we risk continuing to under report the issue, which in turn underemphasises its prevalence. The risk is that local level organisations will continue to underestimate the problem and therefore will not prioritise it. The result is that fewer victims will be found and fewer will be supported out of their situations of exploitation.

<sup>38</sup> In 2013, it was estimated that there were 10,000-13,000 victims of Modern Slavery in the UK. In 2020 a joint report between the Centre for Social Justice and Justice & Care estimated that the number was in fact closer to 100,000.

<sup>39</sup> Dimple Ananda, a Service Manager at the Medaille Trust, a UK-based charity that aims to bring restoration and freedom to victims of human trafficking

## Recommendation 5:

Local authorities should use existing support infrastructures to ensure HTMS victims are cared for

### Context supporting recommendation 5:

As of March 2020, in Hertfordshire, only one of the ten districts (Stevenage Borough Council) has produced a specific internal reporting pathway<sup>40</sup> for suspected modern slavery victims. Many safeguarding leads explained that the lack of resources compromised the level of support they could provide at local authority level<sup>41</sup>. The problem is thus two-fold: There is a lack of resource that limits the capacity of local authority to be sufficiently focused on modern slavery; and there is a lack of district-specific pathways designed to ensure proper modern slavery victim referral processes. Statutory guidance produced by the Home Office set out what local authorities must do to comply with the law, but outreach does not often trickle down effectively from national policy to frontline staff locally.

In those districts without modern slavery-specific reporting pathways, however, when cases *had* been identified, staff used the same pathways as they would use for domestic abuse victims. Their unique understanding of the support available in their district and their wider network built over many years, provided an informal resource that compensated for the lack of formal pathways. There is something to be learned from the Hertfordshire case study in this instance: In order to overcome resource and capacity barriers, local authorities should use existing support infrastructures to ensure HTMS victims are identified and cared for.

### How to overcome these barriers:

Locally certain safeguarding processes are already implemented and funded. In Hertfordshire there tends to be better awareness of domestic abuse than there is of modern slavery. Domestic abuse is also tackled more proactively with the support



of policies and funding from central government; £40 million was dedicated to supporting survivors of domestic abuse and to mobilise extra police powers for domestic violence protection orders<sup>42</sup>.

In Hertfordshire, the Herts Domestic Abuse Helpline is a “support and signposting service for anyone affected by domestic abuse. [They have] “contact details for around 177 specialist support services in Hertfordshire that could help...The Helpline is a registered charity and its services contribute to the countywide drive to reduce domestic abuse, FGM, forced marriage, honour-based abuse and domestic homicide under the Herts Sunflower Partnership”. The specialist support services already mapped by the Domestic Abuse Helpline could be used to assist potential victims of modern slavery. It would be integral, however that those involved in the domestic abuse partnership received modern slavery awareness training.

<sup>40</sup> Tackling modern slavery Council case studies (p34) Local Government Association

<sup>41</sup> Interview numbers x,y,z dated...

<sup>42</sup> Major review of police response to domestic violence (September 2013) Home Office and The Rt Hon Theresa May MP

## Recommendation 6:

County-wide coordination of housing support to balance regional disparities in available accommodation, broadening the scope of action under the Homelessness Reduction Act 2017

### Context supporting recommendation 6:

As part of the Homelessness Reduction Act 2017 certain public organisations ([full list here](#))<sup>43</sup> now have a duty to refer people they think are or may become homeless within 56 days to local housing authorities. Most districts and boroughs have designated channels for other organisations to do this e.g. housing associations, local support providers. At best, when appropriate and available, vulnerable people, including potential victims of modern slavery, will be offered supported housing, with their own small flat or room, including the ability to use a communal area. This type of housing support is not always available as capacity and resources for housing vary from one district to another within Hertfordshire. Also, despite national legal frameworks like the Homelessness Reduction Act 2017, local implementation varies as housing stock management and ownership also vary from one district to another. Finally, referring back to Recommendation 4 and the need for HTMS training, local authorities might not be able to spot the signs that someone is a potential victim of modern slavery and/or not be aware of the housing rights this person is therefore entitled to.

Supported housing is managed by care staff who are available to help clients, day and night. As often observed by housing professionals, continued and consistent support is essential, because their clients don't know what to do to access the support that they are entitled to, even though they may have already been identified as vulnerable. At times, public housing officials will also work with police to coordinate a police response to meet the needs of an identified potential victim of modern slavery.



### How to overcome local disparities in available housing support:

Local authorities in Hertfordshire have tried to address the disparities among its districts on access to housing support in, notably for potential modern slavery victims, a number of different ways. District housing authorities interviewed explained that if the victim's needs were housing related, they would assess the client, and place them in interim accommodation according to Provision 188 of the Housing Act 1996: 'Interim Duty to accommodate in case of apparent priority need'. However, the problem remains because of the different systems in place in each district. Therefore, it is strongly recommended that for an area like Hertfordshire, where the districts and boroughs have their own operations, that a more coherent housing framework for those as vulnerable as victims of modern slavery should be coordinated at county level. The County Council is arguably best place to coordinate available emergency housing. Better mapping of the housing structures available in the county would also help to improve access to emergency housing for potential victims waiting for a Reasonable Grounds Decision.

<sup>43</sup> Local Authorities Duty to Refer email list.

Hertfordshire authorities have identified housing growth over the 13-year period to 2031 of an average of 6,425 dwellings per annum. With the increase in privately owned housing stock, there will be more people who may come into contact with victims of modern slavery. Again, referring back to Recommendation 4 and the need for HTMS awareness training, there is an opportunity to train those managing houses as they can provide important intelligence. Indeed, training should at the very least be mandatory for local authority housing officers, but staff from housing associations should receive training as well.



## Recommendation 7:

County Councils should secure a mandatory budget to provide immediate emergency housing to potential victims of abuse

### Context supporting recommendation 7:

If for example, a potential victim of modern slavery is identified during a police investigation in Hertfordshire, it falls onto the police to arrange emergency support, including emergency housing and coordinate ongoing support. They will, for example, rent a hotel room for a few nights, allowing enough time to secure an appropriate longer-term accommodation option. Police will also secure the potential victim by placing officers onsite<sup>44</sup>. If the potential victim then decides to enter the NRM, national government will pay for pre-NRM accommodation, but it can take days for a victim to agree.

There is, therefore, an argument for why the role of providing emergency accommodation should sit with the local authority instead of the police. Importantly, it would bring the local authority into the picture sooner. From there, an initial safeguarding assessment, which would be completed by the local authority, for example, would allow a clear understanding of where to signpost a victim. It would also promote a victim-centred approach and allow a better assessment of a potential victim's needs. Finally, in addition to alleviating the drain on police resources for the provision of emergency accommodation, local authority could use its access to housing for quick action.



### Looking at best practices through regional initiatives

Other local authorities in the UK are seeking to address the housing needs of modern slavery victims. An example of good local practice is the Humber Modern Slavery Partnership. It has implemented a protocol that sets out the arrangements for participating local authorities to secure urgent accommodation for those awaiting an NRM decision outcome, in cases where it is deemed unsafe/inappropriate for the individual to be housed in the local authority area from which the NRM referral originated<sup>45</sup>.

Another example of good local practice is the Passage in London. They will provide emergency accommodation to people who are homeless and potential victims of modern slavery.

<sup>44</sup> Phone interview conducted in December 2019

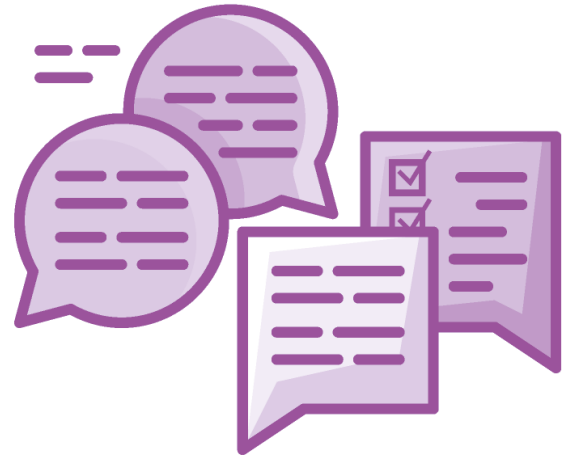
<sup>45</sup> Urgent Rehousing Out of Area While Awaiting Decision on NRM Referral DRAFT Humber Modern Slavery Partnership

## Recommendation 8:

Implement needs-based assessment processes throughout a victim's journey to allow for diverse needs to be identified and address properly

### Context supporting recommendation 8:

Depending on where a survivor is in their journey, different needs may come to light, which will need to be addressed to increase chances of rehabilitation and reduce the risks of re-exploitation. As the modern slavery lead at the Passage explained, some of the people who became homeless as a consequence of fleeing exploitation are not street savvy yet and rough sleeping is a traumatic event in itself. She described a typical case that she dealt with: it took the client five months to barely recover "enough" from trauma to be able to tell her story.



It is reasonable to assume that if a potential victim is not given the proper time and support to recover from trauma, they might not be able to provide enough information during the minimum 45-day period while the case is considered through the NRM process. This could explain why some potential victims receive a negative grounds decision despite being modern slavery survivors. For those who do receive a positive grounds decision, and therefore the benefit from NRM support, they currently do not benefit from continued needs assessments to tailor support to their individual circumstances. Without continued support, many can become at risk of homelessness and/or are vulnerable to being re-trafficked.

As detailed in the first recommendation on NRM data sharing to increase coordination of support, outcomes for victims will be stronger if they are victim-centric and based on their individual needs. It is therefore recommended that a victim's needs should be assessed every six months<sup>46</sup>.

Survivors of modern slavery who have benefited from NRM support also explain that the road to recovery is not linear, particularly for those who were victims as minors. Indeed, as survivors explained

during the Human Trafficking Foundation's forum entitled *The Voice of British Survivors of Human Trafficking: The challenges faced before, during and after the NRM* (February 2021), the long-term impact of such trauma requires targeted support even years after victims have been rehabilitated in society. Effective needs assessments should also follow a long-term approach.

<sup>46</sup> Local Authorities' Referral Pathway for Adult Victims of Modern Slavery (2019) Human Trafficking Foundation

## Recommendation 9:

Assign a caseworker to every potential modern slavery victim

### Context supporting recommendations 9:

Every professional interviewed for this report, locally in Hertfordshire and nationally, recommended, as a necessity, that every potential victim be assigned a caseworker. Not only would this allow for better coordination and for complex needs to be addressed through tailored support, but the assigned caseworker would act as a single point of contact for potential victims and survivors to build a relationship with. There is a lack of standard long-term support policies and therefore a lack of data collection on what happens to victims in the long-term.

Hope for Justice has advocated for a single point of contact for the victim to act as an advocate to build trust with, to help them to understand the systems they find themselves in, as well as represent their voice throughout the process of recovery. Hope for Justice calls for the merging of legal and social work teams into one multi-disciplinary team - moving towards an accredited and replicable model – Independent Modern Slavery Advocates<sup>47</sup>.

The caseworker should be allowed access to the NRM in order to coordinate support and encourage ongoing needs assessment to ensure the complex needs of a victims are being addressed and therefore putting the client on a path towards long-term rehabilitation.

And the evidence for the effectiveness of coordinated support in addition to police investigations (not in lieu of) is there. A perfect example is The Navigate Programme implemented by Justice and Care UK which coordinates, through victim specialists that are embedded in the investigation process, support with partner



organisations. This varies from legal advice, to arranging food, or planning healthcare appointments. This is what the police doesn't have time or capacity to do and what victims don't want police to do for them. 83% of victims supported through the programme, compared to 30% nationally, are willing to share information to help the investigation<sup>48</sup>.

### How would this look like locally?

For this to be implemented, particularly at local level where there are still very few modern slavery cases identified, building on existing structures for survivors of domestic abuse could be an effective and resource-efficient way to ensure similar support is provided to victims of modern slavery.

If we look at Independent Domestic Violence Advisors (IDVA), they are the main point of contact for domestic abuse victims at high risk of harm to set up a safety plan for them and their children. IDVA will work with those experiencing domestic abuse and those who have faced domestic abuse in the past<sup>49</sup>. They have accredited training and work with their clients on the safety plan which ensures their immediate and medium-term safety.

<sup>47</sup> Presentation at the modern slavery national conference 2020 by Phillipa Roberts, Director of Legal Policy (Solicitor) and Olivia Nightingale, Independent Modern Slavery Advocate.

<sup>48</sup> Christian Guy from Justice and Care

<sup>49</sup> Women's Aid UK

They work within a framework and coordinate the support for their clients. According to SaveLives.org, studies have shown that when high risk clients engage with an IDVA, there are clear and measurable improvements in safety, including a reduction in the escalation and severity of abuse and a reduction or even cessation in repeat incidents of abuse.

Hertfordshire has an IDVA service which, in line with legislation, supports men and women survivors of domestic abuse. This support is coordinated through their helpline and as developed on previously, considering the current number of identified cases of modern slavery, they could potentially add victims of modern slavery to the remit of people they support. We would recommend in depth training on modern slavery as well as the creation of a modern-slavery focused role within that team to ensure it remained a high priority.



## Recommendation 10:

Coordinated efforts to encourage and enable prosecutions of HTMS perpetrators

### Context supporting recommendations 10:

As prosecutors say, witnesses need to tell their story for prosecutions to take place. Fighting HTMS starts with care and support but it should not end there. Pursuit of justice is also what survivors want. Law enforcement authorities need to be able to dismantle criminal organisations that use HTMS.<sup>50</sup> In the largest labour exploitation case in Europe, “Operation Fort”; with over 300 victims, 60 witnesses were brought forward. They later said they felt liberated. Juries also want to hear from victims and witnesses directly.

The number of prosecutions decreased in 2019 despite the fact that the number of police operations increased by 29% and there are more victims identified each year. This is observed at an international level as well, not only in the UK, says the McCain institute.<sup>51</sup>

### What to do

It is again a question of capacity to build and put modern slavery on the agenda as an issue to tackle in coordination between different national and local stakeholders. For example, local authorities currently record if someone has approached them fleeing violence. However, when it comes to recording modern slavery, the process is not automatic. Also, law enforcement could benefit from training on offences associated with human trafficking and modern slavery so they don't attempt to charge for alternative and less appropriate offences instead (e.g. rape, physical assault). The problem with going for alternative offences is that risk protection orders become harder to enforce and we end up with an incorrect understanding of the prevalence of the crime of HTMS.<sup>52</sup>

“ The number of prosecutions decreased in 2019 despite the fact that police operation increased by 29% and there are more victims identified each year. ”

46 Christian Guy from Justice and Care

51 Dame Sara Joanne Thornton, DBE, the current UK's Independent Anti-Slavery Commissioner (October 2020)

52 Rt Hon Karen Bradley MP

# A step further

## Modern Slavery (Victim Support) Bill

In 2018, charities, business representatives and parliamentarians gathered to launch the Free for Good campaign for the introduction of the Modern Slavery (Victim Support) Bill. The aim of this bill is to provide victims with a guaranteed right to support during the period when the decision about their modern slavery status is being made by the Single Competent Authority, and for a further minimum of 12 months afterwards, including granting them the right to leave to remain in the UK during this period. As Frank Field MP, who brought this Bill to Parliament, states: “How can we expect victims of modern slavery to recover from their trauma in just 45 days?” If passed, this Bill would act as a crucial safety net, which would go a long way towards helping modern slavery victims recover and rebuild their lives.

## Judicial Review: Holding Central and Local Government to Account

UK Judicial Review is a remedy designed to keep a check on any public body carrying out a public decision-making function. As public bodies, local authorities make thousands of public-facing decisions and each one has the potential to impact on individuals and groups. The purpose of Judicial Review is to give the public the chance to challenge a local council’s use of its administrative powers. Where there is such a claim against a decision in the public realm, a case may be heard by the courts. The courts’ scope is limited and supervisory. Often the court is looking at the procedural basis of decisions and making judgements about adherence to legal procedures as set by Parliament. As such, local authority decisions will be at risk if they have not followed the laws that cover the decision-making function that they are exercising. These might be contained in any number of UK laws, such as The Local Government Act 2003 or The Childcare Act 2006.

It is important for local authorities to be on top of the legislation that is relevant to the work that they are undertaking<sup>53</sup>.

We know that local authorities are not always abreast of their required duties towards modern slavery victims and might fail in providing support provisioned in existing legislation.

With regards to housing rights for a victim of HTMS, Judicial Reviews such as the case of XPO v Hammersmith and Fulham London Borough Council [2018] EWHC 1391 (QB) 7<sup>th</sup> June 2018, are a good example of how the State and local authorities can be brought to justice for failing to provide “suitable” accommodation as required by the Housing Act 1996, hereby understood as “safe and appropriate” accommodation, and that in the context of supporting trafficking victims, the word “safe” was to be understood as safe from being trafficked<sup>54</sup>.

<sup>53</sup> New Conversations 2.0 LGA guide to engagement. Compiled by the Local Government Association and The Campaign Company, with help from The Consultation Institute (February 2019)

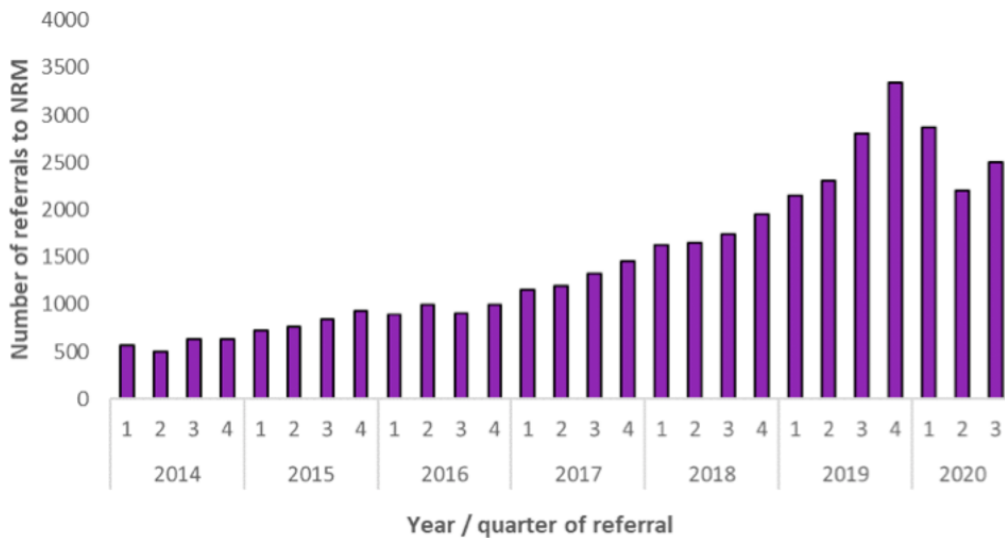
<sup>54</sup> Brief Overview of Local Authority Powers and Duties Towards Support for Adult Victims of Modern Slavery in England – Hope for Justice

## COVID-19

Lockdown measures implemented in March 2020 in response to the COVID-19 pandemic and the social distancing measures that followed have had the unintended consequence of adding a barrier between victims and first responders and other support organisations that could be able to identify and support to them. It has also made it harder for victims to come forward due to increased isolation. A national increase in the number of identified potential cases demonstrates better awareness of the problem. As we see in this figure, there is a steady increase in the number of NRM referrals from 2014 to 2019. As of quarter 2 of 2020, we saw a decline in referrals for the first time in a few years. This decline coincides with lockdown measures enforced to reduce COVID-19 cases.

There will be a need for recovery work and increased efforts to find people who have been exploited. We will also need to consider the newly vulnerable people who have been out of work and who might be at greater risk of exploitation as the economic impact of COVID-19 continues to unfold.

Number of quarterly NRM referrals from 2014 to 2020



# Annex

## Set of Interview questions – standard for all stakeholders

### About their role

1. What is your role?
2. Do you come into contact with potential victims?
3. What do you know of the journey victims go through once they've been identified?
4. Do you see or hear of any gaps in that journey?
5. How does your organisation support that journey?
6. What do you know about immediate support for victims?
7. What do you know about long-term support for victims?
8. What challenges are you aware of that might delay or prevent a victim from receiving support (whether that's short term/immediate support, or longer-term rehabilitation support)?
9. What would help your organisation overcome these challenges?

### Knowledge of victims' needs

1. Have you had training on Modern Slavery? When?
2. What kind of training on victim support do you believe practitioners would benefit from?
3. Can you think of a time when cultural sensitivity allowed for better victim support?
4. Who should communication target in order to effectively raise-awareness?
5. What additional support should be implemented to ensure proper care and recovery for victims?

## Services, Capacity, and Resources

1. Can you share more about the victim support services you have?
2. When a victim is identified, what is your role within the support process?
3. Is there effective housing accommodation for identified victims? Does this depend on their consent to the NRM?
4. What support is available for adult victims who do not consent to the NRM?
5. If your organisation encounters victims directly, does it have a safe, calm, and consistent environment to have a private conversation with victims?
6. Do you have to go through specific training to conduct victim interviews in your organisation?

## Authority or Coordination

1. From your experience what limits multi-agency coordination of victim support?
2. Is there a platform that allows cross-department communication?
3. Which organisation, besides police, should be the one to coordinate efforts supporting victims?
4. Is your organisation currently able to adjust the pathway a victim goes through according to their individual risk/needs?
5. Does your organisation collect data on a victim's journey? If so, how?
6. Do you collect data on the percentage of victims who are re-trafficked in your area?
7. Does your organisation have a Modern Slavery lead or equivalent? What is their role and when do they intervene?

## NRM Concern (NGO-Police or other first responder - Competent authority - police X NGO)

1. Do you know what the NRM is and how it works?
2. How could the NRM process be improved from your standpoint?
3. Have you filled out an MS1 form?
4. Have you filled out an NRM form?
5. Have you or your organisation received any updates from the single competent authority around any outcomes for victims that have gone into the NRM? How many?



## **First responder organisations**

In England and Wales, a first responder organisation is an authority that is authorised to refer a potential victim of Modern Slavery into the National Referral Mechanism. The current statutory and non-statutory first responder organisations are:

### **Police Forces**

**Specified Home Office Departments: UK Visas and Immigration, Border Force, Immigration Enforcement**

**National Crime Agency**

**Local Authorities**

**Gangmasters and Labour Abuse Authority (GLAA)**

**Health and Social Care Trusts (Northern Ireland)**

**The Salvation Army**

**Migrant Help**

**Medaille Trust**

**Kalayaan**

**Barnardo's**

**Unseen UK**

**Tara Project (Scotland)**

**NPCC (CTAC)**

**BAWSO**

**New Pathways**

**Refugee Council**

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**Hertfordshire County Council**

**Hertfordshire Modern Slavery Partnership Coordinator**

**NHS**

**OpTropic Serious and Organised Crime Hertfordshire Constabulary**

**The Hurtado Jesuit Centre**

**Housing leads from Hertfordshire County districts**

**Safeguarding leads from Hertfordshire County districts**

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# Support and access to justice for adult victims of modern slavery

Highlighting national shortcomings  
from a local perspective 2020

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