

Independent Anti-Slavery Commissioner

Strategic Plan 2024-2026

January 2025

Independent Anti-Slavery Commissioner Strategic Plan 2024-2026

Presented to Parliament pursuant to Section 42 (10) (a) of the
Modern Slavery Act 2015

January 2025



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ISBN 978-1-5286-5416-6

E03284260 01/25

Printed on paper containing 40% recycled fibre content minimum

Printed in the UK by HH Associates Ltd. on behalf of the Controller of His Majesty's Stationery Office

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Help and Support

Modern slavery is a challenging issue, and this Strategic Plan may bring up strong feelings for some people. Please take care as you read this document.

If you or someone you know is being or has been exploited, or you are unsure if someone needs help, you are not alone. Assistance and advice are available.

If you have immediate concerns for your safety, the safety of another person, or there is an emergency, please call the police on 999. The police are here to serve and support you. You will also receive free medical assistance if required.

If you think someone is a potential victim but there is no immediate threat to life, please call the local police on 101.

If you need advice or do not want to call the police, you can call:

- The [Modern Slavery & Exploitation Helpline](#) on 0800 0121 700 (or contact them via an [online form](#)). They are available 24 hours a day and will help you and listen to your concerns. They can advise you and suggest who can assist you locally;
- [The Salvation Army](#) on 0800 808 3733;
- The [National Society for the Prevention of Cruelty to Children \(NSPCC\)](#) on 08088 005 000 or you can email them at help@nspcc.org.uk;
- [Victim Support](#) can be called on 08081 689 111;
- [Crimestoppers-uk.org](#) if you have information you wish to pass on 100% anonymously, via their 24/7 UK Contact Centre on 0800 555 111 or contact them via an [online form](#).

Terminology

'Modern slavery' is often used as an umbrella term which encompasses, amongst other things, human trafficking. Many stakeholders use modern slavery as an inclusive term; others use the combined term 'modern slavery and human trafficking', abbreviated to 'MSHT'. This plan uses the term 'modern slavery' to include reference to human trafficking.

When referring to people who have experienced human trafficking, modern slavery, or exploitation, this Plan uses the terms 'victim' and 'survivor'. We recognise that people identify themselves differently depending on how they feel about these two terms. We have also used 'potential victim' when individuals have been identified – either through a referral to the National Referral Mechanism or a Duty to Notify report – and are suspected of being a victim of modern slavery or human trafficking.

Foreword

Since the Modern Slavery Act 2015 was passed, much has been achieved to better support victims and improve our understanding of modern slavery. I have seen firsthand the dedicated teams across the UK who work tirelessly every day to support victims of modern slavery and pursue the perpetrators of these crimes. I commend their commitment.



These are solid foundations to build on. Now we must push forward to achieve the UK's goal of ending forced labour, modern slavery, and human trafficking by 2030. I took up my post of Independent Anti-Slavery Commissioner in December, after a twenty-month vacancy, so I am rebuilding the Commissioner's office at a critical point in our efforts to tackle modern slavery.

Sadly, in each passing year, we have seen consistent growth in the number of individuals exploited through modern slavery. Last year was no different. Shockingly, there were record numbers of children, women and UK nationals referred into the 'National Referral Mechanism', the framework used to identify potential victims of modern slavery and ensure they receive the support they need to rebuild their lives.

Against this backdrop, we cannot yield in our efforts to tackle modern slavery. As the UK places greater focus on tackling irregular migration, as with many developed nations, we must ensure we do not conflate modern slavery with illegal migration. Tackling irregular migration must not come at the expense of protecting victims from this horrific crime.

This Plan outlines the areas I will focus on over the next three years. I am grateful to everyone who has contributed to it and who has invited me to see their work firsthand and to those who responded to my consultation survey on what I should prioritise. I would particularly like to thank those with lived experience, for sharing their expertise.

The Plan sets out how my team and I will share best practice and commission research to ensure modern slavery remains at the top of the agenda drive and a national priority. I will do this by working collaboratively with stakeholders across the anti-slavery sector, businesses, the public sector, and policymakers in local, devolved, and national governments. They all have an important role to play. Tackling modern slavery is everyone's business.

I will encourage everyone to convene around the objectives set out in this Plan: preventing individuals from becoming exploited and re-victimised; doing more to protect victims by identifying and supporting them well; and increasing the prosecutions of this crime.

At the heart of all of this, it is vital that we listen to and incorporate the voices of those with lived experience of modern slavery into our work and policymakers' thinking. Meaningful engagement, combined with forward-thinking research, will help to improve our knowledge and understanding of modern slavery and what measures are most effective at tackling it.

I look forward to delivering this Strategic Plan over the next three years.

A handwritten signature in black ink that reads "Eleanor Lyons". The signature is written in a cursive, flowing style.

Eleanor Lyons
Independent Anti-Slavery Commissioner

Executive Summary

- **The role of the Independent Anti-Slavery Commissioner (IASC), its functions and powers were established in the landmark Modern Slavery Act 2015 (MSA).** This charges the Commissioner with ‘encouraging good practice sharing’ in the prevention, detection, investigation and prosecution of modern slavery, and support for victims. They also support the carrying out of research to improve our understanding of modern slavery and how it can best be tackled. The Commissioner works across the UK with public authorities, the sector, businesses, and law enforcement to pursue these goals.
- **This Strategic Plan covers the three-year period of the Commissioner’s appointment and sets out how the Commissioner will engage those with lived experience of modern slavery and collaborate with those across the anti-slavery sector to fulfil these functions.** Chapter 1 sets out how the Plan was developed with input from: roundtables with those with lived experience; the sector during engagements since the Commissioner’s appointment; and a dedicated stakeholder survey held between February and March 2024. The IASC will reflect on the delivery of this Plan in Annual Reports and review it annually to ensure it reflects emerging challenges and priorities.
- **Understanding the context in which modern slavery is tackled across the UK is vital.** Chapter 2 sets out the different approaches taken to this, modern slavery’s prevalence, and areas of IASC focus over the next three years. Understanding the true scale of modern slavery in the UK is a challenge itself. However, what is clear from NRM statistics is that:
 - Last year saw the highest number to date of potential victims (17,004) referred to the National Referral Mechanism (NRM), the framework used to identify and support potential victims. Of these, 44% (7,432) reported experiencing exploitation when they were children, up 138% in the five years between 2018 and 2023. The number of women and girls referred also increased, with sexual exploitation the common reported form of exploitation.
 - Whilst it used to be commonly thought that modern slavery involved human trafficking across international borders, UK nationals have gone from comprising 9% of all referrals in 2016, to 25% in 2023 (the largest group by nationality).
 - In 2023, there was a record number of adults (4,929) that did not consent to being referred to the NRM, but whom authorities had a ‘Duty to Notify’ the Government under the MSA were potential victims of modern slavery.
 - Authorities decided there were ‘reasonable grounds’ to believe an individual is a victim of trafficking in 55% of referrals in 2023, the lowest percentage on record.
- Accordingly, whilst the Commissioner represents the needs of all victims – and will remain responsive to new and emerging threats – the IASC will focus in particular on four groups which have arisen through consultation and latest NRM statistics above: children; women and girls; UK nationals; and those affected by the recent immigration legislation.

- **The Plan sets out the three core objectives – Prevention, Protection and Prosecution** – and two cross-cutting themes: integrating lived experiences perspectives into anti-slavery policy and efforts; and improving our understanding of modern slavery.
- **Objective 1 – Preventing modern slavery and re-victimisation.** Chapter 3 outlines why prevention is so important, what more can be done to protect the vulnerable from exploitation, ensuring there is early support and safe accommodation, and addresses efforts to prevent children from being exploited. It also examines how the IASC will look at tackling demand for criminal, labour, and sexual exploitation, and prevent domestic servitude and forced marriage. Finally, it outlines why it is everyone’s business, across government, the public and private sectors, and international partners to do all we can to tackle modern slavery.
- **Objective 2 – Protecting victims.** Chapter 4 looks at the important role first responders have in identifying victims and what can be done to improve awareness, and a victim-centric, trauma-informed approach across all first responder organisations (FROs). It outlines what can be done to improve adult victim care and support in the NRM, with multi-agency partnerships, independent advocacy, and access to legal aid. It also looks at what support can continue to be available to victims post-NRM to aid their recovery. The chapter also looks at the ‘Duty to Notify’ under the MSA and what more needs to be done to understand why more adults are choosing not to consent to be referred into the NRM. Alongside this, the chapter looks at how child victims can be supported and identified.
- **Objective 3 – Prosecuting offenders.** Chapter 5 sets out what can be done to improve prosecution rates by using provisions within existing legislation and pushing for specialised teams and training across police forces. It also looks at how victims can be better supported in their journeys through the criminal justice system and outlines why partnership working across law enforcement is critical to increasing prosecutions.
- **Integrating lived experience perspectives into anti-slavery policy and efforts is an area that will cut across everything the IASC does.** Chapter 6 considers why it is so important to listen to those with lived experience and outlines current best practice in this area. It lays out how the IASC plans to include lived experience expertise in the office’s work and policy thinking.
- **Improving knowledge and understanding of modern slavery will also be an integral aspect of the IASC’s work.** Chapter 7 looks at how the IASC will work with stakeholders to improve our understanding of modern slavery in the UK. It outlines four priority research areas: estimating the prevalence and nature of modern slavery; forecasting and mapping future risks; understanding the changing forms of exploitation; and identifying and testing novel approaches to tackling modern slavery in the UK.
- **This Plan and concluding list of actions provide the framework within which the IASC will develop an implementation plan and workstreams.** These will provide the structure of how the office will make recommendations and forge new partnerships.

Role of the Independent Anti-Slavery Commissioner

The Modern Slavery Act 2015 established the role and remit of the Independent Anti-Slavery Commissioner (IASC), its statutory functions and powers.¹ The legislation is clear that the Commissioner has no responsibility for or powers over individual cases. Their role is to ‘encourage good practice sharing’ amongst all those with a role to play in tackling every aspect of modern slavery and human trafficking in the UK. The Act also places a duty on public authorities to co-operate with the Commissioner, share data with them and comply with requests (to the extent specified).

The Commissioner works with charities and civil society, law enforcement bodies, local government, devolved administrations, the UK Government, health authorities, regulators, businesses, and international partners to identify and share best practice in:

- protecting people at greater risk of exploitation from modern slavery and improving resilience in communities to those who would exploit others;
- preventing modern slavery victims from being re-exploited;
- reducing demand for exploitation;
- joining forces with international partners to tackle the root causes of human trafficking and modern slavery and disrupt efforts abroad to exploit vulnerable individuals who may otherwise be trafficked to the UK;
- detecting modern slavery when it does happen and identifying victims;
- getting victims the support and assistance they need, which might include referral to the National Referral Mechanism (NRM);
- investigating modern slavery offences and prosecuting offenders;
- supporting victims’ journey through the criminal justice system; and
- conducting or supporting research to improve our understanding of modern slavery in the UK. And support the anti-slavery sector itself to identify gaps, and to forge new solutions, collaborations, and directions.

Across this work, the IASC will have a recognisable way of working and a clear function within a broad, diverse, and active anti-slavery ecosystem in the UK. The IASC also can form an Advisory Board to help shape their work. This Commissioner works to share best practice, commission research, and convene and collaborate with partners, whilst promoting an improved awareness of modern slavery. To these ends, the approach IASC will take is to:

- assess the overall functioning of individual and collective efforts to tackle modern slavery and consider their effectiveness;
- consult, collaborate with, convene and join up charities, law enforcement bodies, local government, health authorities, the UK Government, regulators, businesses and international partners, and champion the voice of those with lived experience of modern slavery to bring their insights to bear in identifying and removing barriers to improving our response to modern slavery and shaping activity among who work on modern slavery in the UK;
- make clear that tackling modern slavery is everyone’s business, that everyone has a role to play (including by integrating tackling modern slavery into their core work);
- raise awareness and educate others about modern slavery, including policymakers;
- support improved access to essential data to improve our understanding of modern slavery;

- improve our understanding of modern slavery (including emerging trends and threats) and how we can best address them;
- facilitate improved transparency of ongoing work to tackle modern slavery;
- inform development of modern slavery policies (and wider policies that have a bearing on modern slavery);
- commission and publish reports within their remit; and
- make recommendations to public authorities or require their cooperation or information (to the extent set out in the Act).

Chapter 1. Developing and taking forward this Strategic Plan

This Strategic Plan outlines the priority areas for the IASC’s work between 2024-2026 which is the term for which the Commissioner has been appointed. As it is at the start of the three-year term, the Plan focuses on key contexts, priority areas, ways of working, and the IASC’s strategy and approach to their role. To ensure it remains relevant and responsive throughout this period, the IASC will re-visit the Strategic Plan annually, in particular to reflect changes to the legislative or policy context.

Between taking up this post in December 2023 and finalising this Strategic Plan in April 2024, the IASC visited over 30 organisations across England, Wales, and Scotland, held over 85 meetings, spoke with more than 150 individuals, and explicitly sought input on the Strategic Plan in these conversations. A consultation survey was also held between February and March 2024, to which 60 organisations responded, from a range of stakeholders across local authorities, the NHS, charities and law enforcement. The IASC and office also conducted a series of roundtables with those with lived experience. This intense schedule of visits and conversations, in combination with a survey, has enabled the Strategic Plan development process to be highly inclusive and consultative, towards generating priorities that represent the needs and insights of the UK anti-slavery sector and, most importantly, of victims and survivors of modern slavery.

This consultation led to the development of three core objectives: Prevention, Protection and Prosecution (emulating the approach taken by the United Nations, OSCE and USA among others).² This work is underpinned by two cross-cutting themes: integrating lived experiences perspectives into anti-slavery policy and efforts; and improving our knowledge and understanding of modern slavery. The IASC will represent the needs of all victims and remain flexible to respond to new and emerging threats, whilst also focusing on four areas of potential victims which have arisen through the consultation and latest NRM statistics. These are: children and young people, women and girls, UK nationals and those affected by the recent immigration legislation. This overall approach is summarised below.

Independent Anti-Slavery Commissioner (IASC) Strategic Plan 2024-26

Objective 1:

Preventing modern slavery and re-victimisation

Objective 2:

Protecting victims: improving victim identification, the NRM, victim care and support

Objective 3:

Prosecuting offenders and supporting victims through the criminal justice system

Cross-cutting theme: Integrating lived experience perspectives into anti-slavery policy and efforts

Cross-cutting theme: Improving our knowledge and understanding of modern slavery

The IASC will represent all victims, with a focus on: children and young people; women and girls; UK nationals; those affected by recent legislation

The remaining chapters of this Strategic Plan outline the current context in the UK, key challenges and opportunities, and the IASC's main priorities across the three objectives. This Plan provides the framework within which the IASC office will develop an implementation plan and workstreams, make specific recommendations and forge new partnerships. Linking the Plan's strategic priorities is the overarching IASC strategy of working to make tackling modern slavery a priority for everybody – to make modern slavery *everyone's* business.

A glossary of key terms is at [Annex A](#).

Further detail on how this Plan has been developed and the consultation survey is set out in [Annex B – Methodology](#).

Chapter 2. Understanding the context of how modern slavery is tackled across the UK

Approaches to tackling modern slavery across the UK

The approach to addressing modern slavery both in the UK and abroad is a complex tapestry comprising almost every government department and work across central, devolved, and local governments. Below is a summary of the legislative approach to tackling modern slavery across the UK.

UK Government and the definition of 'modern slavery'

The UK ratified the Council of Europe Convention on Action Against Trafficking in Human Beings (ECAT) in December 2008.³ In 2009, to ensure compliance with ECAT, the UK Government developed the NRM to enable it to identify and support victims of modern slavery. In 2014, the UK Government developed the first Modern Slavery Strategy.⁴ This was developed and published during the process of passing the Modern Slavery Act 2015. At the time of passing, the Modern Slavery Act was world-leading legislation. Other countries, including Australia, have since passed similar legislation.⁵

The Modern Slavery Act contains no single definition of modern slavery; instead, it creates a number of offences under the umbrella of modern slavery.⁶ These comprise:

- an offence of *'slavery, servitude and forced or compulsory labour'* (under section one).
- an offence of *'human trafficking'* (under section two) where *'a person arranges or facilitates the travel of another person, with a view to exploiting them'*. 'Travel' is defined as *'arriving in, or entering, any country, departing from any country or travelling within any country'*. Section 3 defines 'exploitation' under this offence as involving any of the following: *'slavery, servitude and forced or compulsory labour', 'sexual exploitation', 'removal of organs', 'securing services by force, threats or deception', 'securing services from children and vulnerable persons'*.
- *'any offence with the intention of committing an offence under section two [human trafficking] (including an offence committed by aiding, abetting, counselling or procuring an offence under that section)'*.

The Crown Prosecution Service (CPS), the Crown Office and Procurator Fiscal Service (COPFS), and the Public Prosecution Service Northern Ireland (PPSNI) have detailed guidance on modern slavery.⁷ Further detail on defining modern slavery is set out in [Annex C](#).

After the Modern Slavery Act had been in place for four years, an Independent Review Panel assessed its efficacy in four principal areas: transparency in supply chains; the role of the Independent Anti-Slavery Commissioner; the Act's legal application; and the safeguarding of child victims of modern slavery. The Review was published in 2019.⁸ It found that, although the Modern Slavery Act had been groundbreaking in its inception, it required some modifications and strengthening to adequately address the evolving nature of the threat.⁹ Following the Review, the UK Government undertook a consultation with stakeholders about

how best to address the recommendations specifically around transparency in supply chains.¹⁰ While these recommendations were to be addressed in a Modern Slavery Bill that was included in the Queen's Speech 2022, the planned bill was never introduced to Parliament.¹¹

Since then, other legislation has passed that has had or will have an impact on modern slavery. The Nationality and Borders Act 2022 (NABA) changed the wording of the 'reasonable grounds' threshold in the NRM to require the decision-maker to believe, on balance of probabilities, that an individual 'is' rather than 'may be' a victim of modern slavery or human trafficking.¹²

In January 2023, new statutory guidance under section 49 of the Modern Slavery Act introduced a new test requiring potential victims to produce objective evidence of their trafficking at the pre-reasonable grounds' decision stage. However, after two claimants successfully applied for judicial review of this guidance in July 2023, the Home Office withdrew it and issued revised statutory guidance which no longer requires a potential victim of modern slavery to produce 'objective' evidence corroborating a credible account of their experiences, to receive a positive reasonable grounds decision.¹³

The NABA also enshrined in legislation the right to a recovery period and support following a 'reasonable grounds' decision. It also provides individuals with temporary permission to stay in the UK on certain grounds, for people with a positive 'conclusive grounds' NRM decision (which is where a competent authority takes the decision, on the balance of probabilities, that there are sufficient grounds to decide that an individual is a victim of modern slavery).¹⁴ The NABA gave a legislative basis to the Public Order Disqualification (POD) and bad faith disqualification, enshrining and reflecting in primary legislation the UK's ability to withhold access to a recovery period if a person presents a 'threat' to public order or has made a claim of exploitation in 'bad faith', respectively.

More recently, the Illegal Migration Act 2023 (IMA) was introduced to address those arriving in the UK 'irregularly'.¹⁵ The IMA, if implemented, means that any potential victim of modern slavery who arrives in the UK 'irregularly' under section 2 of the IMA and who receives a 'reasonable grounds' positive decision will, unless they fall within the exceptions referred to below, be denied modern slavery protections they previously would have been entitled to, such as a reflection and recovery period of 30 days following a 'reasonable grounds' decision. This group would also be removed to 'safe' home countries or third countries.¹⁶ (There are exemptions if a potential victim, who is subject to the duty to remove, cooperates with an in-country investigation, if this cannot be done from overseas.) Section 29 of the IMA also extends section 63 of the NABA's POD to non-British citizens who have been convicted in the UK of any offence and has been sentenced to a period of imprisonment of any length for the offence, and to those liable to deportation. While section 29 can be implemented without the need for a 'safe country', other parts of the IMA relied on the Safety of Rwanda (Asylum and Immigration) Act receiving Royal Assent.¹⁷ This legislation is damaging to victims of modern slavery. Although the IMA has not yet been implemented, it is already creating fear amongst victims and may be contrary to the UK's wider obligations.¹⁸ The Act applies across the entire of the UK.

Parliamentary Committees have assessed both the NABA and IMA. In the summer of 2023, the Home Affairs Select Committee launched an inquiry into human trafficking; its report outlined 71 recommendations.¹⁹ These included a recommendation that: *'The Home Office, working together with key human trafficking sector partners, criminal justice practitioners and*

survivors, must accelerate and scale up efforts to develop a new and overhauled Modern Slavery Strategy’.²⁰ In its response, the UK Government did not take forward most of these recommendations, but it has committed to resume publishing Annual Reports on Modern Slavery.²¹ In January 2024, the House of Lords launched a Select Committee review of the MSA, which is expected to report later in 2024.²²

Scotland

In 2015, the Scottish Government introduced the Human Trafficking and Exploitation (Scotland) Act 2015 (HTESA), which enshrined in law: the offence of, and penalties for human trafficking and exploitation; protections afforded to victims in Scotland; and a requirement for Scotland to develop and publish a Trafficking and Exploitation Strategy.²³ The Scottish Government published its first Trafficking and Exploitation Strategy in 2017 and annual updates on progress (the most recent in 2022), and is currently revising its Strategy.²⁴

Northern Ireland

The legislative framework for Northern Ireland is the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (NI) 2015, as amended by the Justice (Sexual Offences and Trafficking Victims) Act (NI) 2022.²⁵ Some provisions of the UK Modern Slavery Act 2015 also apply to Northern Ireland, including provisions concerning: maritime enforcement (s37, s38, s39, Schedule 2); the Independent Anti-Slavery Commissioner (Part 4); overseas domestic workers (s53); and, transparency in supply chains (s54).²⁶ Section 12 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 required the Department of Justice to publish a Modern Slavery and Human Trafficking Strategy annually.²⁷ However, following the introduction of the Justice (Sexual Offences and Trafficking Victims) Act (Northern Ireland) 2022, the provision to publish an annual strategy has been substituted with “every 3 years”. The Northern Ireland Executive is in the process of developing its latest strategy, which will be published shortly.

Wales

Legislation on modern slavery and immigration is reserved to the UK Parliament. The National Assembly for Wales (now renamed Senedd Cymru) voted to give consent to relevant provisions of the Modern Slavery Act. The Welsh Government has a vision of Wales as a ‘Nation of Sanctuary’.²⁸ Most of the provisions of the NABA and the IMA were considered to be ‘reserved’ to the UK Parliament to legislate, but the Senedd voted to withhold consent to areas they considered to be within devolved competence, such as children’s social care.²⁹

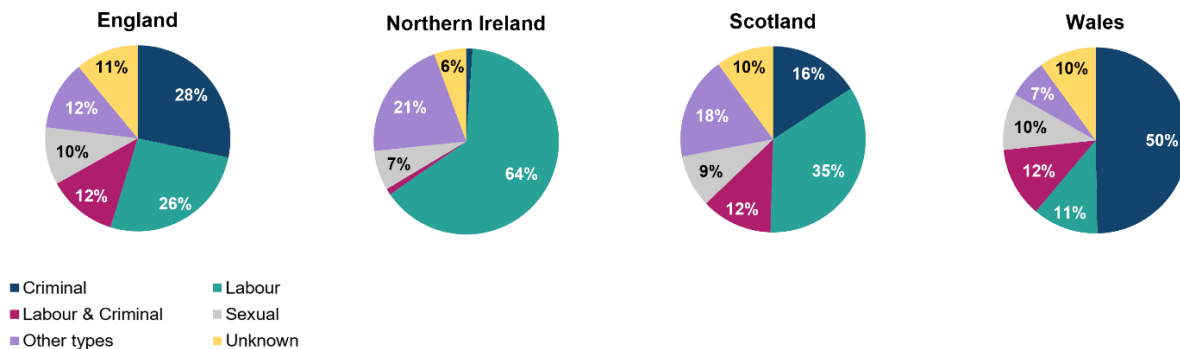
Prevalence of modern slavery across the UK and functioning of the NRM

There are an estimated 49.6 million people globally in modern slavery and the reasons people fall into exploitative situations are complex and varied.³⁰ In the UK, estimates of the number of potential victims over the last decade have ranged from between 10,000-13,000 to 122,000, but there is no up-to-date, widely-accepted official estimate.³¹ The higher figure of 122,000 is an estimate in the 2023 Global Slavery Index, that there were 122,000 people living in modern slavery in the UK in 2021.³²

The latest full-year NRM statistics for are for 2023. Last year, there were 17,004 potential victims in the UK. This is the highest ever number of potential victims identified and is reflective of an almost year-on-year increase since the NRM began, as illustrated by a 628% increase in the same period between 2014 and 2023.³³

In 2023 there was also the highest number to date of annual Duty to Notify cases: 4,929 reports (up 8% on 2022). (See also Research area: estimating the prevalence and nature of modern slavery across the UK).

In 2023, 24% (4,088) of potential victims were female and 76% (12,903) were male. UK nationality were the most commonly-referred group of potential victims (25%), followed by Albanian (24%), Vietnamese (6%), Sudanese (6%) and Eritrean (5%). Across the devolved administrations, there were variations in the most commonly-reported forms of exploitation. In England, criminal exploitation was the most prominent form of exploitation reported (28%), closely followed by labour exploitation. In Wales, criminal exploitation was the most reported form of exploitation (50%), in Northern Ireland it was labour exploitation (64%), and in Scotland it was labour exploitation (35%). The four charts immediately below provide a breakdown of referrals to the NRM in 2023 by country (where the police force investigating the referral is based) and exploitation type.



The proportion of positive reasonable grounds decision was its lowest for any year since the NRM began: 55% positive. Prior to the reasonable ground threshold changes in 2023, the proportion of positive decisions had been 89%. In 2023, the median amount of time it took to receive a reasonable grounds decision was 23 days, although this increased as the year went on (with the median being 43 days between July and September 2023, ten times the official 5-working day target).

NRM decision times for conclusive grounds decisions in 2023 remained especially lengthy. The average (median) time taken from referral to a ‘conclusive grounds’ decision was 526 days (c. 17 months) in 2023. This compares to 544 days in 2022. Almost 10,000 conclusive grounds decisions were made in 2023, with 66% of conclusive grounds decisions being positive (compared to 89% in 2022). More specifically, 76% of decisions issued by the Single Competent Authority were positive and 30% issued by the Immigration Enforcement Competent Authority were positive.

The latest analysis of the NRM by the UN body International Organisation of Migration (IOM) outlines some of the challenges with the current NRM that particular affect some cohorts, this Plan outlines how IASC will work with policymakers to address some of these.³⁴ The IOM analysis outlines that potential victims of modern slavery wait ten times longer than the 5-day

target to receive an initial decision, leaving them without specialist support for longer, meaning they are more vulnerable to re-trafficking.³⁵ There was a much larger number of negative reasonable grounds decisions between July and September 2023 for foreign nationals compared to UK nationals, despite changes to the ‘objective evidence’ requirement that was introduced.³⁶ There are significant variations between the numbers of positive decisions based on which type of organisation referred a potential victim of modern slavery.³⁷ The NRM is also presenting challenges for child potential victims of modern slavery who struggle to access support and protection.³⁸ It also found that women referred to the NRM as potential victims of modern slavery waited twice as long as men for a final (conclusive grounds) decision.³⁹

Areas of IASC focus

The IASC represents all victims and will remain flexible in role to respond to new and emerging threats and cohorts which may need extra attention and care. In the latest NRM statistics, we can see: an ever-increasing proportion of children and young people being exploited; a growing number of women and girls being exploited; UK nationals comprise the largest group of potential victims by nationality; and there has been an increase in Duty to Notify reports and a drop in those receiving positive reasonable grounds, that appears to be as a result of the recent legislative changes.⁴⁰ As a result, across the IASC’s three objectives, the IASC will focus on these cohorts.

Children (under 18s)

Of the total number of potential victims in the NRM reported, 44% (7,432) reported experiencing exploitation when they were children. Indeed, the number of potential victims reporting exploitation as children has more than doubled over the last five years from 3,129 in 2018 to 7,432 in 2023 (138% growth). One factor behind the substantial increase in overall number of children being exploited is an increase in criminal exploitation. This has grown by 22% over the last three years (from 2,568 referrals in 2020 to 3,123 referrals in 2023), such that criminal exploitation made up 42% of all child referrals in 2023.

Unlike most other nationalities, where potential victims referred are more commonly adults, British children comprise 78% (3,350) of all UK nationals referred in 2023. Of children of all nationalities referred last year, British boys alone accounted for 35% (2,611).

Women and girls

Overall, of the 17,004 potential victims referred in the NRM in 2023, 76% of potential victims referred in the NRM were male (12,903), 24% (4,088) were female. However, the number of women and girls referred has been increased at a faster rate over recent years (by 40% between 2021-2023, compared to 32% growth in men and boys referred over the same period). Indeed, last year the number of men and boys fell, whereas the number of women and girls increased by 13%.

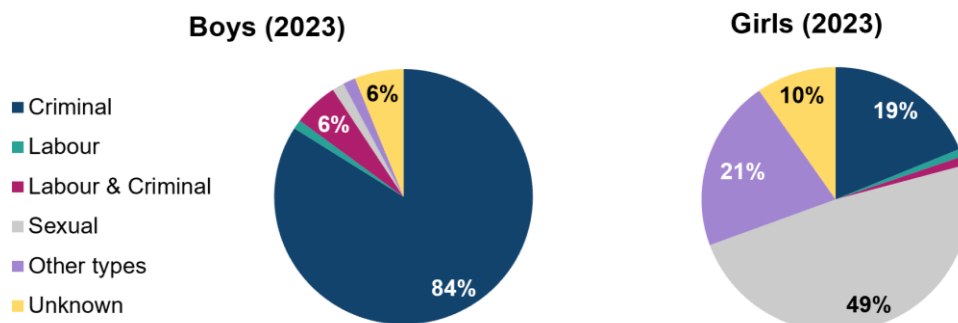
Sexual exploitation has long been the common reported form of exploitation by women and girls (comprising 1,470 or 36% of all women and girl referrals in 2023).

Over the last 3 years, the number of UK nationals that reported experiencing child sexual exploitation as girls grew 43% (from 249 in 2020 to 357 in 2023).

Alongside this, referrals for UK-based exploitation were at their highest on record; one factor behind referrals reporting UK-based sexual exploitation increasing by 9% last year (from 653 in 2022 to 714 in 2023).

UK Nationals

In 2023, UK nationals were the most common nationality of potential victims referred in the NRM (25%, 4,299). Whilst human trafficking used to be most commonly considered a problem of exploitation across international borders, UK nationals – adults and children – have been an ever-growing proportion of modern slavery victims identified in the NRM. For example, in 2016 (after the MSA was passed), UK nationals accounted for 9% (328) of all referrals, whereas last year they accounted for 25% (4,299). The two charts immediately below break down NRM referrals for UK nationals in 2023 by gender and exploitation type.



Those affected by changes to recent immigration legislation

As referenced above, one of the concerns raised by the anti-slavery sector during the past two years has been the potential impacts from NABA and the IMA on victims of modern slavery.⁴¹ From survivors, the IASC has heard the strength of feeling about how modern slavery and human trafficking have been wrongly conflated with illegal migration. The provisions of the IMA have yet to be implemented, but survivors report that the legislation has created fear amongst potential victims about coming forward, which human traffickers have used against those they are exploiting.

It is too early to see the full impact of this legislation. Although there has been a rise in the numbers who do not consent to go into the NRM when they have been identified as a potential victim of modern slavery. In 2023, there were 4,929 Duty to Notify reports (an all-time high, up 8% on the previous year). The increasing numbers of Duty to Notify reports suggest that individuals are becoming less willing to engage with the NRM. Alongside this the proportion of positive reasonable grounds decisions was at its lowest (55%) for any year since the NRM began. A reduction in positive decisions and increase in wait times can be linked to the threshold change on 30 January 2023, which was revised once more on 10 July 2023.

The IASC will represent all victims of modern slavery, particularly focusing on sharing best practice in tackling modern slavery of four groups: children and young people; women and girls; UK nationals; and those affected by the recent immigration legislation.

Chapter 3. Objective: Preventing modern slavery and re-victimisation

Importance of prevention

Prevention of modern slavery is one of the underdeveloped parts of the response to modern slavery in the United Kingdom. Prevention can be described as: *‘An on-going process of avoiding and minimising exploitation and harm. This can be achieved by intervening before exploitation and harm occurs, by intervening early, and by treating harms. It also includes action to prevent re-exploitation/re-trafficking. Prevention includes enabling people to exercise choice, control over their lives and to thrive’*.⁴² There is little evidence about what works to prevent modern slavery and individuals from becoming exploited and it is particularly important we learn more about this.⁴³

Protecting the vulnerable from exploitation

The reasons behind why someone may become exploited are complex and varied. Exploitation can occur when someone’s individual circumstances interact with wider structural circumstances. Alongside this, vulnerable people can be at risk of exploitation. *‘Severe and multiple disadvantage’* (where individuals experience at least three out of the following: homelessness, substance misuse, domestic violence, offending and the criminal justice system, or mental health issues) can put individuals at greater risk of exploitation from modern slavery.⁴⁴ Long-term consistent support, safe and secure housing, access to education and healthcare, trauma-informed services and safety from traffickers all help to protect individuals from harm and re-victimisation.⁴⁵ Those with learning disabilities or unstable situations can also be more at risk of exploitation.⁴⁶ Local multi-agency working is crucial to wrapping care around vulnerable people and providing early protection to prevent exploitation.⁴⁷

Role of safe accommodation in preventing exploitation

Modern slavery can be both a driver and a consequence of homelessness. People experiencing homelessness, not only those sleeping rough but also those who experience invisible forms of homelessness such as ‘sofa surfing’, squatting or in temporary accommodation, are particularly vulnerable to coercion, deception and abuse due to various factors such as, lack of a protective environment from friends and family, abject poverty, substance misuse, and mental health problems.⁴⁸ This vulnerability can be present from a young age. In 2022-23, around 6,000 16-17-year-olds presented as homeless to their local authorities in England leaving them vulnerable to exploitation.⁴⁹ In addition, when survivors escape their exploiters, they often sleep rough before finding help.⁵⁰ Anecdotal evidence shows that some survivors might be homeless while receiving support under the Modern Slavery Victim Care Contract (MSVCC), especially if they receive outreach support only; and some survivors become homeless after exiting the NRM with positive conclusive grounds decisions.⁵¹

The homelessness support sector (local authorities and the third sector) is therefore crucial, not only in identifying potential victims and signposting them to First Responder Organisations (FROs) or referring them to the NRM, but also providing pre-NRM emergency accommodation and supported housing during and post-NRM. For victims who are destitute when they are

referred to the NRM, emergency short-term accommodation is at local authorities' discretion, until they receive a positive reasonable grounds decision.⁵² This can make potential victims vulnerable if they do not have a safe place to stay.

The IASC will work with organisations that help homeless people, government, and researchers to raise the profile of the risk of homeless people being exploited.

Preventing children from being exploited

In 2023, the number of referrals for potential victims who were children (under 18 years old) when they reported being exploited was the highest on record (7,432; comprising 44% of all referrals).⁵³ More must be done to prevent children and young people from being exploited. This is an area of focus for the IASC. Children can be trafficked by criminals for child sexual exploitation, criminal activities, forced marriage, labour exploitation and/or domestic servitude. Such exploitation is child abuse, and it can happen to any child. It can be hard for children to understand what is happening to them, particularly if they have been groomed by criminals.⁵⁴ It can also be especially difficult for children to identify exploitation within family structures, as one person reflected: *'Trafficking is sometimes from within the family and from people you love and know and it's hard to stop it there. Young people must be able to trust their relatives and people they love. That's where the prevention work should be done'*.⁵⁵

Criminals are willing to target children and young people's vulnerabilities. Criminal gangs are increasingly inclined to target all children regardless of whether they are known to statutory services already, simply because they are more vulnerable as children.⁵⁶ Children are also at increased risk post-pandemic and research has shown that the pandemic impacted the ability of organisations to safeguard those exploited in child criminal exploitation, and left children and young people isolated.⁵⁷ There is a growing number of children absent from school, with 1.8 million persistently absent in England alone.⁵⁸ Children outside the locus of a school support network are more likely to be targeted by criminals and less likely to be in the care of professionals who can identify and support them.⁵⁹ It is important that schools and professionals are aware of the risks of children being exploited. The IASC has heard from several survivors about their exploitation which started when they were children and that they think more interventions should be focused on preventing children from being exploited from a young age.

Children in care who are not in appropriate placements are at increased risk of being targeted by criminals. Some reports show that in 2020, one in three trafficked children went missing from local authority care, and that trafficked children – who go missing – do so an average of eight times a year.⁶⁰ Children in care should be protected, in stable and loving environments with statutory services joined-up around their needs, to help reduce the risk of exploitation. The absence of protective parents or guardians, being in care, and adverse childhood experiences have all been shown to intensify a child's risk to exploitation.⁶¹

Children with an unstable immigration status are also at increased risk of exploitation. Unaccompanied children previously housed in hotels by the Home Office, contrary to the Children Act 1989, are at increased risk.⁶² Some of the children accommodated in these hotels were as young as ten years old.⁶³ No child should be housed in a hotel or excluded from local authority care. Children going missing from hotels puts them at particular risk of exploitation, and there were 447 missing episodes from July 2021 to June 2023.⁶⁴ All children should be in the care of the local authority who should be safeguarding them.

The IASC will work across stakeholders to focus efforts on providing more support for children to prevent them from being exploited and call for all children in care to be in appropriate loving environments and not housed by the Home Office.

Tackling demand for exploitation

Many victims face multiple forms of exploitation. Those reported as facing multiple forms of exploitation can be referenced as ‘Other’ in NRM statistics. This category encompasses reported combinations of exploitation type, such as ‘domestic and criminal’ and ‘sexual and criminal’. It also encompasses less commonly mentioned exploitation types, such as ‘organ harvesting’ and ‘domestic servitude’. Below outlines different efforts to tackle demand for exploitation.

Criminal exploitation

Criminal gangs across the country are becoming more ruthless in their exploitation of children (under 18 years of age).⁶⁵ Criminals are using children to carry drugs, weapons and money across the country, with children being exploited after accepting small ‘gifts’ such as sandwiches, only to find they are forced to ‘repay’ these.⁶⁶ Such exploitation can range from pickpocketing and begging to money laundering, violence and drug dealing.⁶⁷

In 2023, there were 3,123 referrals for criminal exploitation where individuals reported experiencing exploitation as children, accounting for just under one fifth (18%) of all referrals (17,004), making it the most common form of reported exploitation in 2023. This particularly affects British boys such that, of UK nationals that in 2023 reported experiencing exploitation as children, 65% were boys who reported criminal exploitation.⁶⁸ However, the number of girl victims in these statistics may be underrepresented with professionals not always accurately identifying girls in criminal exploitation and criminals targeting children from all backgrounds.⁶⁹

Whilst criminal exploitation is the most reported exploitation type for children, often children experience multiple forms of exploitation at once. The NRM is one source of information for how children are being exploited by criminals and gangs, but the scale of criminals’ exploitation of children could be higher than the statistics alone reflect.⁷⁰ Several preventative programmes tackle criminal exploitation, including Look Closer, Catch 22, and Missing Person’s Safecall.⁷¹ But, robustly tackling criminal exploitation requires consistent efforts to tackle organised crime and disrupt the perpetrators.

The IASC will work with policymakers and law enforcement to encourage a focus on preventing and tackling criminal exploitation, which disproportionately affects children.

Labour exploitation

In 2023, just over a quarter (26%) of potential victims referred into the NRM were referred for labour exploitation.⁷² For the last 10 years, labour exploitation has been the most common form of exploitation faced by *adults* referred into the NRM.⁷³ Labour exploitation as a form of modern slavery can occur when working conditions demonstrate one or more of the International Labour Organisation’s 11 forced labour indicators.⁷⁴ In the UK in 2023, unlike

criminal exploitation, the majority of potential victims of labour exploitation were not UK nationals.⁷⁵

Increased risk of labour exploitation noted in relation to use of restrictive visas includes the Seasonal Worker visa, the Health and Care Worker visa, the Overseas Domestic Worker (ODW) visa and Student visas. With an increased reliance on overseas workers as a response to labour shortages in the UK, there has been an upward trend in the number of people entering the UK on temporary or restrictive work visas.⁷⁶ There is evidence of workers being exploited when partaking in these visa schemes, including being deceived or given misinformation about their role, being forced to pay large sums for visas and being forced into debt bondage, or not being given a clear contract or workers' rights.⁷⁷ As a result, workers on these visas are particularly vulnerable to exploitation, particularly where they have an insecure migration status. The risks that individuals will be exploited for their labour increase when individuals have insecure or restricted immigration status, as this can mean that they are less likely to feel able to challenge or leave exploitation or seek help from the authorities for fear of destitution or immigration detention and removal. It is important that work migration schemes are developed with early engagement from experts, to ensure that they do not create or exacerbate risks of exploitation for already vulnerable sectors and workers.⁷⁸

Recently, there has also been a steep increase in the exploitation of care workers that have come to the UK on the Health and Social Care visa scheme. Using data collected through the Modern Slavery & Exploitation Helpline, the charity Unseen reported a 606% increase in the number of modern slavery cases in the care sector from 2021 and 2022.⁷⁹ There are reports of victims being tricked into paying large recruitment fees, facing poor and cramped accommodation in the UK where they are charged over the odds, and are trapped in exploitative work as a result of the high levels of dependency created by the visa, as well as the lack of recourse to public funds.⁸⁰

Labour market enforcement in the UK faces difficulties in responding to these challenges. While the International Labour Organisation's Labour Inspection Convention maintains a benchmark of one labour market inspector per 10,000 workers, the UK has just 0.29 labour inspector per 10,000 employees, sitting 27th out of 33 OECD countries.⁸¹ This under-resourcing means that labour market inspectorates conduct an extremely limited number of proactive inspections of workplaces.

The Gangmasters and Labour Abuse Authority (GLAA) is working to address reports of exploitation in the care sector in England and Wales.⁸² The GLAA can monitor and suspend sponsor licences in some sectors. It operates to inform workers of their rights and has powers to investigate modern slavery (forced or compulsory labour) in England and Wales, across any employment sector.⁸³ Where there are reports of exploitation which do not meet the modern slavery threshold of exploitation, there can be challenges determining whose role it is to investigate, meaning that a situation sometimes deteriorates before meaningful action can be taken. Alongside this, the Office of the Director of Labour Market Enforcement (ODLME) has been undertaking work to understand the challenges of the care sector issue and how the three enforcement bodies that sit within the ODLME remit can work together to address the spectrum of labour rights abuses. The three enforcement bodies under the ODLME's remit are the Employment Agency Standards Inspectorate, National Minimum Wage team and GLAA. Previously, the Government committed to bringing these together into a Single Enforcement Body, to address the full spectrum of potential illegal behaviour from employers.⁸⁴

The IASC will work with the Gangmasters and Labour Abuse Authority, the Office of the Director of Labour Market Enforcement and any future Single Enforcement Body across government and the charity sector, to ensure migrant workers are informed of and can exercise their rights.

The IASC will press the Home Office to develop relevant visas in consultation with experts in the anti-slavery sector.

Sexual exploitation

Sexual exploitation disproportionately affects women and girls, and those who pay to abuse them are disproportionately men.⁸⁵ Women and girls are a priority group for the IASC. Many of the women who are sexually exploited already face multiple vulnerabilities, such as a history of childhood sexual abuse or homelessness, or they could have been trafficked as children.⁸⁶ Evidence suggests that many of the men who purchase sex are from privileged backgrounds; in the UK, they are most likely to be aged 25-34 and work in professional occupations.⁸⁷

Tackling the demand for sexual exploitation is part of the UK's international obligations.⁸⁸ The Sexual Offences Act 2003 (SOA) currently does little to deter sex buyers, partly due to its lack of enforcement.⁸⁹ As noted by the Home Affairs Select Committee Inquiry on Human Trafficking, elements of SOA are particularly under-utilised, such as section 53A (paying for sexual services of a prostitute subjected to force).⁹⁰

In February 2024, the Scottish Government published a strategic approach to challenging and deterring men's demand for prostitution.⁹¹ This primarily consists of: disrupting, deterring demand and tackling prostitution's drivers; improving access to support and tackling stigma; recognising those involved in selling/exchanging sex are victims of exploitation; creating a new support pathway; and establishing a multi-agency group both to support the strategy's implementation and to inform the wider policy approach. Whilst this strategy has only recently been launched, if successful at helping victims, it offers a potential model for other nations in the UK on how to reduce demand for sexual exploitation.⁹² Trafficking Awareness Raising Alliance (TARA) are funded by the Scottish Government to support women in Scotland who have been trafficked for the purposes of commercial sexual exploitation. Alongside this strategy, women will also be supported by Routes Out Services which provide exiting support for women engaged in the selling or exchange of sex.⁹³

In Northern Ireland, the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 introduced a new offence of paying for sexual services.⁹⁴

As well as reducing demand, another area where further work is needed is establishing how professionals identify child sexual exploitation. Victims of child sexual exploitation, in particular girls, can struggle to acknowledge what has happened to them and how these experiences are linked to trafficking and modern slavery. The World Health Organisation defines sexual exploitation as: 'Actual or attempted abuse of a position of vulnerability, power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another'.⁹⁵ But current guidance for professionals in this country does not make this clear, making it harder for them to accurately identify child sexual exploitation and provide the right support for victims.⁹⁶ This must change; there should be more greater clarity for professionals to help them identify and support victims of sexual exploitation.

UK demand for sexual exploitation also harms children abroad. In 2022 alone, nearly half a million Filipino children, or 1 in 100 Filipino children, were trafficked to produce online child sexual exploitation material.⁹⁷ Data suggests that the UK is consistently amongst the top five countries in the demand side of online sexual exploitation of children in the Philippines, both in terms of volume and value of identified Suspicious Transaction Reports (STRs) related to online sexual exploitation of children.⁹⁸ More must be done to tackle this demand.

More broadly, the internet acts as an enabler of trafficking for sexual exploitation: 75% of victims of trafficking for sexual exploitation are advertised online.⁹⁹ This is often in the form of Adult Service Websites (ASWs), platforms where many sexual services are advertised online. These can allow traffickers to anonymously advertise victims of sexual exploitation.¹⁰⁰ The people advertised on these platforms can face violence throughout their experiences.¹⁰¹ These platforms are currently unregulated and should be properly regulated to provide better protection for women and girls. Pornography can also feed demand for sexual exploitation; the frequent use of pornography has also been associated with sex buying and it has been shown to shape men's desires.¹⁰² Pornography can also feature women who are being exploited. As part of its work, the Pornography Review's independent assessment of the legislation, regulation and enforcement of online pornography will consider what can be done to enable the reporting and identification of exploitation and trafficking in the pornography industry.¹⁰³ The Online Safety Act 2023 made modern slavery and human trafficking a priority offence, and this provision must be implemented rapidly and effectively.¹⁰⁴

The IASC will work with Parliamentarians and government departments on how to best tackle demand for sexual exploitation.

The IASC will work with government and key stakeholders (such as Ofcom, the National Crime Agency's Child Exploitation and Online Protection, and the National Police Chiefs' Council Lead for Child Protection and Abuse Investigations) to press for greater efforts to tackle demand for child sexual exploitation.

Domestic servitude and forced marriage

Domestic servitude is perhaps the most hidden form of modern slavery – concealed in private households – and so it is often the most difficult to identify and resolve. These cases tend to be smaller in number, with one or two people being forced to work for an employer for little or no wage, usually for extremely long hours and under strict supervision, suffering abuse and prison-like conditions. The ODW visa has been highlighted as a route that is open to misuse by unscrupulous, usually wealthy employers who wish to bring their domestic staff with them from overseas.¹⁰⁵ A total of 19,780 domestic workers were granted ODW visas to work in the UK in the year to June 2023. Recent research indicates that working conditions can be poor and these workers are particularly vulnerable to exploitation.¹⁰⁶

Forced marriage is also an area of concern in the UK, as tackled by the joint Home Office and Foreign & Commonwealth Office Forced Marriage Unit. Young women and girls can be married against their will, to men they may have never met. This situation can develop into one of domestic servitude, where women and girls are made to undertake housework and held captive through violence or the threat of violence. The minimum age for marriage was raised to 18 in 2022.¹⁰⁷ However, a new report indicates that a substantial proportion of professionals are unaware of this change to the law, hindering their ability to identify and respond to cases effectively.¹⁰⁸

The IASC will work with the Government to help reduce the risk to workers under the Overseas Domestic Worker visa.

The IASC will work with key stakeholders in the anti-slavery sector and the sector working to combat honour-based abuse (including forced marriage) to push for comprehensive training and procedures to protect children from the risk of forced marriage.

Making prevention everyone's business

Raising awareness of modern slavery is critical to prevention. Modern slavery is a problem that affects the whole of society and its wellbeing.¹⁰⁹ The public and consumers can also be mobilised in prevention efforts.¹¹⁰ That is why, preventing modern slavery is everyone's business, it requires a whole system approach at national and local levels, where communities, the public sector, and the private sector all play a role in preventing individuals from becoming exploited.¹¹¹ There is also a role for faith groups to play, as many already do, in reaching out into communities to work on identifying and preventing modern slavery.¹¹² Across all stakeholders there needs to be an encouragement of professional curiosity and awareness about the role they must play in tackling modern slavery.

The IASC will convene and coordinate across all stakeholders who have a role to play in preventing modern slavery to make prevention everyone's business.

The role of the private sector

Businesses have a critical role to play in tackling modern slavery as a significant risk in their operations and supply chains. This includes working with their suppliers to identify forced labour issues either in their production and manufacturing and/or their recruitment practices. It is the responsibility of businesses not to distance themselves from high-risk suppliers, but to work collaboratively to rectify the situation and ensure workers throughout their supply chains are not subjected to forced labour.¹¹³

Section 54 of the MSA introduced requirements around transparency in supply chains for businesses with a turnover of at least £36 million. At the time this was introduced, this was world-leading. Businesses in scope of the legislation are required to publish an annual slavery and human trafficking statement outlining what steps they have taken to tackle issues of modern slavery in their supply chains. The Modern Slavery Statement registry was launched in 2021 to act as a central platform for these statements, allowing greater scrutiny by the public, researchers, and government.¹¹⁴ Consumers can use this platform to check businesses' progress in tackling modern slavery. Whilst the registry is a welcome step there is disparity amongst the Statements and their quality, there is little evidence of the downstream outcomes and there is a case for needing to improve section 54's enforceability.¹¹⁵ The Home Secretary has injunctive powers against organisations who fail to comply with the legislation.¹¹⁶ The Government has committed to introducing financial penalties for companies that fail to produce such Statements when so compelled. To date, however, no such penalties have been levied against companies for not complying with the requirement.¹¹⁷

Internationally, regulatory measures have been introduced which have the potential to help prevent exploitation. Other countries have moved to introduce mandatory human rights due diligence, such as Switzerland, France, Germany and Norway.¹¹⁸ At the time of writing the

Strategic Plan (April 2024), the European Union Parliament and Council also look set to introduce the EU Corporate Sustainability Due Diligence Directive (applying to companies with over 1,000 employees and an annual turnover of €450m).¹¹⁹ In the UK, Baroness Lola Young has proposed a Private Members' Bill that would place a duty on commercial organisations and public authorities to protect human rights and prevent against environmental harms.¹²⁰ Other countries have introduced forced labour trade import bans and other sanctions like asset freezing, to help mitigate forced labour.¹²¹

The IASC will: encourage a strengthening of the UK's policy response to forced labour in domestic and global supply chains; push for mandatory human rights due diligence legislation in the UK; work with businesses to improve compliance with provisions in the Modern Slavery Act 2015 and promote best practice.

The role of the public sector

The public sector has an important role to play in addressing potential risks of modern slavery in its supply chains. This was acknowledged in 2022 in the Queen's Speech, which announced a new Modern Slavery Bill with an extension to public bodies of the section 54 requirement.¹²² However, this Bill has never been introduced to Parliament. Despite this, many public bodies are leading the way already: central government, some local councils and other contracting authorities have voluntarily published modern slavery statements.¹²³ This is important given the enormous £259 billion spending power and leverage of the public sector.¹²⁴ Procurement for local government and third-party revenue expenditure, for example, totals around £60 billion a year.¹²⁵ Multiple local councils have acknowledged their role in making sure their supply chains are free from modern slavery and over half of all local councils in England and Wales have voluntarily published a statement, with several completing in-depth analyses of the modern slavery risk in their procurement.¹²⁶

The IASC will encourage public bodies to voluntarily emulate the transparency of supply chain provisions that modern slavery legislation across the UK requires of businesses.

The Procurement Act 2023 gives commercial procurement teams stronger powers to exclude and debar suppliers from supplying to government.¹²⁷ All contracting authorities must comply with Procurement Policy Note 02/23, which provides guidance on how they can identify and mitigate modern slavery in their at-risk supply chains.¹²⁸ In addition, section 47 of the Health and Care Act 2022 requires the Secretary of State for Health and Social Care to assess the potential risks of modern slavery and human trafficking within NHS supply chains.¹²⁹ In 2023, a review identified 21% of NHS suppliers as high risk, noted the reliance on supplier submissions and commented on the need for greater transparency in supply chains.¹³⁰ It is vital the NHS across the UK works to reduce the risk of modern slavery across all of its supply chains.

The IASC will work with the UK Government, devolved administrations, and the NHS across the UK to support and monitor the delivery of key recommendations made in the December 2023 Review of risk of modern slavery and human trafficking in NHS supply chains.

The role of government

To improve efforts to prevent modern slavery, we must recognise the impact that wider laws, policies, and government interventions can have on potential victims and survivors.¹³¹ At a national level, government plays a critical role in tackling and preventing modern slavery. The UK Government has made some specific measures to prevent modern slavery, such as the Modern Slavery Prevention Fund (MSPF).¹³² It has also made efforts to tackle the serious organised crime gangs who are often behind modern slavery crimes.¹³³

The Government's approach to prevention in England and Wales was initially set out in its 2014 Modern Slavery Strategy.¹³⁴ A refresh of this strategy is needed and would reinforce the Government's commitment to preventing and tackling modern slavery. A new Strategy for England and Wales and accompanying implementation should be cross-government. This approach would be in line with a whole system or public health response to modern slavery, which would prioritise prevention and early intervention, help to improve awareness and resilience in the community, prevent exploitation and improve communities' readiness to respond.¹³⁵

The Scottish Government published its Trafficking and Exploitation Strategy in 2017, and reviewed this in 2020 and 2023. This year, its Strategy will be refreshed, which should take a cross-departmental and preventative approach.¹³⁶ The Northern Ireland Modern Slavery and Human Trafficking Strategy covering 2024 – 2027 is expected to be published summer 2024.

Local and devolved teams also have an important part to play in preventing modern slavery. Local authorities have a core role in preventing exploitation by supporting vulnerable children and adults, and overseeing safeguarding, community safety, social care, housing and public health.¹³⁷ For example, councils are working with partners to safeguard children as outlined in the statutory guidance 'Working Together to Safeguard Children', through local safeguarding partnerships and work with schools.¹³⁸ These partnerships should be used to develop strong modern slavery prevention responses.

The IASC will: encourage the UK Government to update its 2014 Modern Slavery Strategy for England and Wales; press for prevention to be prioritised in the development and implementation of all modern slavery strategies across the UK; and encourage close working across-government so that modern slavery is considered in the development of wider policies (e.g. safeguarding, poverty, migration).

The role of international partnership

Modern slavery is a crime that often crosses borders, making it critical that the UK Government works with international partners to reduce the threat of modern slavery in the UK. Vulnerability to exploitation is increasing globally, due to the Covid-19 pandemic, armed conflict, and climate change, making international partnerships more important than ever.¹³⁹ The UK does have a Modern Slavery Fund that was created with the aim of reducing the prevalence of modern slavery internationally.¹⁴⁰ Alongside this, all government-led international development interventions should fully integrate modern slavery into their policy thinking and work.¹⁴¹ The Government should work with international allies to prevent modern slavery, including by embedding best practice in trade deals and working in countries to improve stability and human security.

UN Sustainable Development Goal (SDG) 8.7 on modern slavery intersects with a range of other SDG targets, recognising that modern slavery can have the same root causes as other international development issues.¹⁴² The UK's Modern Slavery Envoy encourages joint action towards the UK meeting its obligations under SDG 8.7 by 2030: to take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking.¹⁴³ Former Prime Minister Rt Hon. Theresa May has established an independent Global Commission on Modern Slavery and Human Trafficking with the aim of restoring momentum towards achieving SDG 8.7.¹⁴⁴

Wider international partnerships are also critical in preventing modern slavery upstream. The Council of Europe's Group of Experts of Action Against Trafficking in Human Beings (GRETA) undertakes country visits, listening to experts and policy officials to develop recommendations for action by signatory countries to ECAT.¹⁴⁵ The Organisation for Security and Co-operation in Europe (OSCE) works with partner countries to align goals and directives on a range of issues of shared interest. In 2003, the OSCE established the Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings to help participating states develop and implement effective policies to combat human trafficking. The US Trafficking in Persons report assesses the actions taken by countries globally against trafficking and is published annually by the US Department of State.¹⁴⁶ The UK Government collaborates with Five Eyes partners (US, Canada, Australia, and New Zealand) to tackle forced labour in supply chains and identify opportunities to align approaches. Other countries have national anti-slavery commissioners, comparable to the IASC. For example, New South Wales' Anti-Slavery Commissioner (in Australia) and the newly announced Australia-wide Anti-Slavery Commissioner both have similar remits to the UK IASC role.¹⁴⁷ Both will be important international partners.

The IASC will work with international partners to encourage and share best practice in preventing modern slavery and work with the UK Government to encourage a co-ordinated focus on integrating modern slavery prevention into international policy and priorities.

Chapter 4. Objective: Protecting victims – improving identification, victim care and support through the National Referral Mechanism and beyond

Improving identification and the NRM

The number of potential victims referred into the NRM by FROs has been growing year-on-year since the NRM was created, with a 628% increase in referrals between 2014 and 2023.¹⁴⁸ FROs are both statutory and non-statutory organisations, with different bodies taking on this role in Scotland and Northern Ireland, compared to England and Wales.¹⁴⁹ Through referrals, these organisations play a critical role in the response to tackling modern slavery, acting as a point of contact for the competent authority and outlining the potential victim's exploitation. They can also play a vital role in raising awareness of modern slavery within communities. Many FROs work within communities to proactively increase awareness and identify potential victims, for example, the Medaille Trust and BAWSO in Wales.¹⁵⁰

First responders' role in identifying victims

It is important that everyone who is a designated first responder is aware of their role and responsibilities.¹⁵¹ First responders need to be able to spot the signs that someone may be a potential victim of modern slavery; and across all responsible organisations, professional curiosity should be encouraged as an aid to identification. This is particularly important in the case of certain types of potential victims whom organisations may need more training and awareness to identify, such as UK nationals.¹⁵² UK nationals are not always correctly identified by professionals, who can fail to recognise them as potential victims of modern slavery. The IASC has heard from UK national survivors that professionals can more easily overlook them, as they could speak English and did not present in a way that professionals recognised as consistent with modern slavery. Reports have also described missed opportunities in preventing UK nationals from becoming exploited.¹⁵³ UK national victims of modern slavery being correctly identified as such, and adequately supported, is a focus area for the IASC. FROs need to be cognisant that each potential victim may present differently to front-line professionals, and will have unique needs, different experiences, and characteristics. Alongside this they need to act in a trauma-informed, victim-centric way and understand how this pulls through to the way the interview and interact with potential victims.

Key areas for front-line response include Border Force, HM Prison and Probation Service (HMPPS) for England and Wales, the Scottish Prison Service and Northern Ireland Prison Service. Border Force is part of the UK's defence against perpetrators and its protection of migrant victims of modern slavery. Border Force applies a modern slavery lens to its work and has Safeguarding and Modern Slavery (SAMS) officers.¹⁵⁴ These trained and registered first responders can refer a passenger at port. SAMS officers have a challenging but vital role in identifying potential victims in a short amount of time at the border. Whilst HMPPS is neither a first responder or a designated organisation able to directly notify the Home Office of suspected MSHT (through the Duty to Notify), it is developing further operational guidance and frameworks to support prison and probation staff in identifying potential victims of modern slavery and providing safeguarding and support.¹⁵⁵ The statutory guidance developed by HMPPS applies across England and Wales, not the devolved administrations. If HMPPS can

create more opportunities to identify potential victims within the prison and probation systems, this may contribute to reducing the number of unidentified potential victims in prisons, who may be there due to the crimes they were forced to commit by their traffickers.¹⁵⁶ It is also worth acknowledging that individuals serving sentences may have reasons for not seeking to be formally identified as victims and it is important that an improved understanding is developed to enable joined-up cross-government responses when this happens.

Whilst the NHS is not a designated FRO in England, Wales, and Scotland, it is in a critical position to support the identification of potential victims.¹⁵⁷ Many victims will first be seen by healthcare professionals when presenting with physical or mental health issues.¹⁵⁸ Therefore it is vital healthcare professionals have a good understanding of modern slavery. Health and social care trusts are FROs in Northern Ireland.¹⁵⁹ The new Integrated Care Partnerships and Integrated Care Systems in England present an opportunity to strengthen this role of the NHS in identifying victims, with an opportunity for improved awareness.

The IASC will push for trauma-informed, victim-centric training for all designated first responders and statutory services who may encounter potential victims and support the work of non-first responder organisations like the NHS and HM Prison and Probation Service in their efforts to identify potential victims.

First responders acting in a trauma informed way towards potential victims

First responders often encounter potential victims at a moment where the individual is particularly vulnerable and may be suffering from trauma. They are often the initial contact a potential victim has with the NRM. Many individuals with lived experience have told the IASC that at the time they were identified as a potential victim, they were unaware of the NRM and what was happening to them. That is why it is critical that FROs act in a trauma-informed way with potential victims, including obtaining informed consent from adult victims to refer them. It is important that the NRM framework is explained in an understandable way to potential victims.¹⁶⁰

All guidance and advice that first responders give potential victims is critical, and the implications of recent legislative changes need to be fully communicated to organisations, including that there is no firewall between the NRM and the Home Office Immigration and Enforcement Teams. The NABA, and IMA when it is implemented, will create a more challenging environment for foreign national migrants to come forward as potential victims of modern slavery.

The IASC will call for clear communication to first responder organisations of the implications of recent legislative and policy changes for potential victims of modern slavery, to improve awareness and understanding.

Improving adult victim care and support

Once a potential victim enters the NRM and has a positive reasonable grounds decision they can receive entitlements such as accommodation, living needs allowance, a recovery payment for them and any child dependents, and a support worker. Some emergency entitlements are available before a reasonable grounds' decision.¹⁶¹ The care and support provided for survivors should be victim-centric, trauma-informed, should build and establish a relationship of trust,

provide holistic support, be non-judgemental, empower survivors and outcomes should be monitored.¹⁶² In England and Wales, the MSVCC for supporting adult victims is managed by the Salvation Army and partner providers. The MSVCC is due to be retendered next year and will be called The Adult Victim Support Contract.¹⁶³

In Scotland, the Scottish Government manages the Victim Centred Approach Fund (VCAF), a grant scheme that is up for renewal in April 2025.¹⁶⁴ TARA and Migrant Help are the NRM crisis support providers in Scotland. Both organisations are funded directly but separately by the Scottish Government to deliver NRM support.¹⁶⁵ In Scotland, statutory support providers have no explicit baseline of minimum support provision and there is no equivalent to the Modern Slavery Statutory Guidance in England and Wales.¹⁶⁶ In Northern Ireland, Migrant Help is the main support provider and they also work with the Woman's Aid Federation.¹⁶⁷

The IASC will work with government and devolved administrations to call for support services to be tailored to individual needs providing holistic, long-term, trauma-informed, and culturally competent interventions and developing trusted relationships between practitioners and survivors.

Potential victim journey through the NRM

Once in the NRM, against a backdrop in the number of referrals, there has been an increase in waiting times for a potential victim to receive a reasonable grounds or conclusive grounds decision. These waiting times have meant delays in victims obtaining support and affect survivors' mental health, as they wait for decisions to be made. Over the years, there have been differing policy approaches to assessing potential victims, including Multi-Agency Assurance Panels (MAAPs) which acted as a quality assurance process from 2019-2022.¹⁶⁸ These were removed to reduce the NRM waiting time, but the length of time victims spend in the NRM continues to be too long. Such long waits have consistently been raised by survivors as having a negative impact on their wellbeing and recovery journey and can be particularly challenging for those who do not have the right to work.¹⁶⁹ This is also echoed in accounts from organisations supporting victims.¹⁷⁰ During this time in the NRM, professionals need to be able to approach potential victims in a victim-centric and trauma-informed way, and practitioners should be cognisant of the need for 'cultural competence' in their responses to victims.¹⁷¹

Victims of modern slavery may present with multiple and complex needs, such as substance abuse or severe mental illness, that require specialist skills and resources. Although there are many organisations across the country providing support to survivors, there is a need to develop expertise in supporting survivors with more complex needs. Throughout the IASC's consultation on the development of this Strategic Plan, many organisations called for reform of the NRM, with a particular view that it is not working for children and young people or UK nationals. For example, once UK nationals are identified as potential victims, there is lack of clarity as to whether local services, the MSVCC in England and Wales, and devolved equivalents, should be accommodating their needs, or whether they should be supported through more traditional benefits. This means they can fall through the gaps in terms of receiving the support they need and that full data on the scale of the issue of exploitation of UK nationals is not always captured.¹⁷²

The IASC will push for a review of the National Referral Mechanism and the decision-making process with a focus on ensuring that support is tailored to the individual needs of all potential victims and that timescales are reduced.

Independent Advocacy

Survivors of modern slavery often encounter significant obstacles in their journey to recovery, including challenges in accessing legal services and systems, community services, welfare, housing, healthcare and employment. These systems can be difficult to navigate, particularly against a backdrop of the trauma that many survivors have endured. Access to these systems is fundamental to a victim's successful recovery and achieving sustained financial and social independence, as well as reducing the risk that they are re-trafficked. It can also take some time for the survivor to come to terms with what they have experienced and accept that it was modern slavery. This is why support and independent advocacy are vital.

It would be of great benefit to improving survivor outcomes, especially long-term outcomes, to formally introduce and recognise Independent Modern Slavery Advocates (IMSAs) who are person-led and trauma-informed to improve the safety, resilience, and empowerment of each survivor.¹⁷³ They can provide individual, tailored support to match victims' unique needs, prevent victims from having to tell their account to professionals multiple times, and act as a single point of contact in navigating many complex systems. They can also work alongside other professionals working with victims. Individuals with lived experience have spoken to the IASC about how much of a difference this makes.

The IASC will work with the Government and the sector to push for victims of modern slavery to have independent advocates in their recovery journey to help them navigate complex systems.

Legal aid

For many victims of modern slavery, access to legal aid is essential but can be an issue for both UK and foreign nationals. In the NRM, all potential victims of modern slavery who receive a positive reasonable or conclusive grounds decision are entitled to legal aid. This includes criminal and civil legal aid, legal aid for immigration advice, advice on an asylum claim, employment law advice and for a civil claim of damages.¹⁷⁴ Notwithstanding this entitlement, limited capacity of expert legal advice means many people cannot access the legal aid they should be entitled to; research points to legal aid deserts in England and Wales.¹⁷⁵ Research suggests this is due to the complexity of the funding approach that means it can be financially non-viable for legal practitioners to take modern slavery cases (which can often take many months, if not years, to prosecute). This factor, coupled with a person's migration status, requires a legal practitioner to have expertise in immigration rules and modern slavery, making them a scarce resource.¹⁷⁶

In 2021, GRETA urged the UK Government to ensure there is better access to legal assistance and free legal aid and to take further steps to ensure that: *'victims, and in particular children, receive legal assistance during the identification process and are properly informed of their rights and options before entering the NRM; and access to free legal aid is ensured across the UK and is granted in a timely manner'*.¹⁷⁷

In Scotland, under the Human Trafficking (Scotland) Act 2015, victims may get access to legal support and counselling shortly after being identified, giving them access to early help.¹⁷⁸ This establishes that victims may be provided with legal advice support. There is no statutory guidance on when and to whom legal advice should be provided. The Scottish Government funds legal advice clinics for victims, such as access to a solicitor for an initial triage of their issues.¹⁷⁹ It does not always follow that victims are given legal representation in presenting their case within the NRM or in front of tribunals or courts.

The IASC will work with legal practitioners to identify how to improve access to expert legal advice for modern slavery survivors and will work with the Government to encourage an increased level of legal aid support for survivors.

Multi-agency partnerships

Multi-agency partnerships bring together local organisations to identify next steps for supporting victims. The most recent assessment of multi-agency modern slavery partnerships identified there were 98 partnerships across the UK.¹⁸⁰ There are also Multi-Agency Risk Assessment Conferences (MARACs) developed by The Passage in conjunction with Westminster Council, and Slavery Exploitation Risk Assessment Conferences (SERACs) in some local councils.¹⁸¹ Local partnerships have knowledge of local services that can wrap support around victims and can provide joined-up discussions about the care that is needed.¹⁸² This can be particularly helpful when bringing together housing and homelessness services who can work to ensure the victim has accommodation, helping individuals to access support they need from a place of safety and prevent re-trafficking.¹⁸³ There is guidance for councils on how to tackle modern slavery, and there is a multi-agency resource called the Anti-Slavery Partnership Toolkit, which continues to be updated.¹⁸⁴ However, there remains a patchwork of provision and support across local authorities, with experiences of support differing dramatically across various parts of the UK, resulting in unequal outcomes for survivors' wellbeing and recovery.¹⁸⁵ Scotland, has been exploring the development of regional partnerships which have proven effective across the UK in coordinating across local statutory services.¹⁸⁶ A more consistent approach through local partnerships, where leadership, engagement and accountability are encouraged would help to care for more victims.

The IASC will work with multi-agency partnerships local and national anti-slavery actors to support and share best practice in tackling modern slavery and supporting victims.

Improving care and support for child victims

Local authorities are responsible for support provision to children referred into the NRM and have statutory responsibilities for their safeguarding. The vast majority (91%) of referrals from local authorities in 2023 were for children under 17, an 8% increase on the year before.¹⁸⁷ Half of local authorities referring into the NRM between 2015-2023 could not provide information about the gender, nationality, location of exploitation, type of exploitation that occurred, and what decision was recorded at reasonable or conclusive grounds stages.¹⁸⁸

The devolved decision-making pilots for children under 17 are an example of multi-agency working, bringing together local safeguarding partners who can make both reasonable and conclusive grounds decisions for the child.¹⁸⁹ Conclusive grounds decisions for child victims should be made within 90 days in pilot sites for potential child victims, providing decisions far

quicker than the wider NRM. The devolved decision-making pilots are currently in 20 sites and the IASC has heard from local authorities that they have been very promising.¹⁹⁰

The Independent Child Trafficking Guardian (ICTG) service plays a critical role in providing advocacy and support for child victims of modern slavery, explaining what is happening to them, and working closely with other partners to wrap care around the children and their unique needs.¹⁹¹ The service in England and Wales is available to potential child victims, regardless of nationality or immigration status.¹⁹² Currently, children who are within 100 days of their 18th birthday, or whose age is disputed, are excluded from the pilots.¹⁹³ In Scotland, the Guardianship Service provides support to unaccompanied children seeking asylum and trafficked children, though not UK national children.¹⁹⁴ In Northern Ireland, the Independent Guardian Service was introduced by section 21 of the Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015.¹⁹⁵ This services supports ‘separated children’ from their legal guardians or children who are victims or potential victims of trafficking.¹⁹⁶ ICTGs can also attend decision-making meetings about children on their behalf.¹⁹⁷ ICTGs have been shown to have a positive effect on young people’s outcomes.¹⁹⁸ Unfortunately, ICTGs are currently only available in two thirds of the England and Wales.¹⁹⁹ This should apply country-wide and there should be no sharp drop off in support for potential victims when they turn 18.

The IASC will call for devolved decision-making pilots to be rolled out for child victims across the country and for all children to have Independent Child Trafficking Guardians to advocate for their needs.

Post-NRM support

It is important to recognise that, for survivors, recovery can be non-linear and non-timebound. Some charities and organisations also provide long-term support and care for survivors.²⁰⁰ Due to the trauma that many survivors have experienced, ongoing access to healthcare and mental health support can be vital. Post-NRM, survivors’ lack of access to wider system support such as mental health services, housing and immigration services can have a negative impact on their recovery.²⁰¹ Survivors told the IASC that secure and suitable post-NRM housing is the most important outcome they wish to achieve and that, without a safe place to stay, there is an increased risk of re-exploitation and re-trafficking.²⁰²

After victims receive their conclusive grounds decisions and exit the NRM, they may still require support, so it is important there is no sharp drop off in support post-NRM. In England and Wales, a Recovery Needs Assessment (RNA) is undertaken for confirmed victims of modern slavery (unless they choose not to have one), to assess the ongoing care they need and determine if and when they will no longer receive MSVCC support.²⁰³ Concerns have been raised about the bureaucratic nature of the RNA process which can impede victims from obtaining the ongoing support they need. The current MSVCC in England and Wales includes funding for Reach-In Support Services which are intended to help survivors who are in their transition to independence, but still require support and advice.

Whilst it is not described as a ‘Recovery Needs Assessment’, both Scotland and Northern Ireland provide longer-term support based on the needs of the individual.²⁰⁴

The IASC will work with Government and its devolved equivalents to push for long-term support for survivors after the National Referral Mechanism, such as Reach-In support.

Adult consent to be referred to the NRM

Specified public authorities in the Modern Slavery Act 2015 (police forces and local authorities in England and Wales, GLAA and NCA) have a statutory Duty to Notify the Home Office when they suspect a person may be a victim of modern slavery or human trafficking.²⁰⁵ Home Office staff within UK Visas and Immigration, Border Force and Immigration Enforcement are also required, as a matter of Home Office policy, to comply with the Duty to Notify.²⁰⁶ The Duty to Notify provisions of the Modern Slavery Act 2015 apply to England and Wales only.²⁰⁷

This Duty to Notify is discharged either by: referring a victim into the NRM; or completing a notification to the Home Office when a potential adult victim does not consent to an NRM referral, either because they wish to remain anonymous or do not want specialist support.²⁰⁸ (Such notifications are also made where authorities are unable to contact potential victims and do not know their personal details).²⁰⁹

Each year, as seen through higher notifications to the Home Office, the number of potential adult victims in England and Wales who choose not to enter the NRM has been rising.²¹⁰ There is little understanding of why adults may not consent to go into the NRM, partly exacerbated by first responders not always writing a reason for the lack of referral. We know that in 2020 and 2021, of those adult victims who opted not to be referred into the NRM, and where the first responder gave a reason, the most common reason was the person denied the exploitation experience or victim status, and/or felt that the NRM didn't apply to them (23% of reports which included at least one reason). This was followed by wanting to put the experience behind them (14%); being afraid of the traffickers (10%); a refusal to engage (8%); and the individual feeling safe / was already being supported (8%).²¹¹ Exacerbating the gap in understanding, the Home Office currently only publishes a limited amount of Duty to Notify data. It does not publish data by exploitation type, country or first responder area in the country; this makes it difficult to analyse the reasons behind the increase in numbers of adults who choose not to be referred in to the NRM.²¹²

In Scotland, section 38 of the Human Trafficking and Exploitation (Scotland) Act 2015 included a similar 'Duty to notify and provide information about victims.' To date, regulations have not yet been introduced to bring it into effect, however, the Scottish Government does have plans to introduce them.²¹³

In Northern Ireland, section 13 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 includes a 'Duty to notify the National Crime Agency about suspected victims' of slavery, servitude and forced or compulsory labour offences (section 1), or human trafficking offences (section 2).²¹⁴ As in Scotland, regulations to bring this Duty to Notify into effect are not yet in place but the Northern Ireland Executive intends to introduce them as a priority following the publication of their Modern Slavery Strategy.

The IASC will work to better understand the reasons behind increases in Duty to Notify referrals in England and Wales and call on the Government to collect and publish more detailed, granular Duty to Notify data. The IASC will also support work by the devolved administrations to implement a Duty to Notify.

Chapter 5. Objective: Prosecuting offenders and supporting victims through the criminal justice system

Law enforcement and improving prosecution rates

Modern slavery remains a largely hidden and complex crime.²¹⁵ As of July 2023, law enforcement across the UK had approximately 4,500 live investigations into modern slavery crimes.²¹⁶ Despite this, across the UK the prosecution and conviction rates for modern slavery are too low.²¹⁷ For example, in England and Wales, only 1.9% of all modern slavery crimes resulted in a charge in the year to September 2023.²¹⁸ Representatives of law enforcement and the criminal justice system have said themselves that this is too low and that this cannot be a low risk, high reward crime.²¹⁹ It is also acknowledged that individuals may be prosecuted for serious offences other than modern slavery human trafficking when a plea is offered by defendants.²²⁰

Utilising provisions in the Modern Slavery Act, the Human Trafficking and Exploitation (Scotland) Act and Human Trafficking and Exploitation Act to improve prosecutions

The MSA also established Slavery and Trafficking Risk Orders (STROs) and Slavery and Trafficking Prevention Orders (STPOs) which were introduced in England and Wales by Part Two of the Act. These allow the courts to place a range of prohibitions on the behaviour and activities of a person who poses a risk of committing slavery or trafficking offences.²²¹ STPOs are used at sentencing and are aimed at individuals who have been convicted to prevent further abuse.²²² In Scotland, Trafficking and Exploitation Risk Orders (TEROs) and Trafficking and Exploitation Prevention Orders (TEPOs) under the Human Trafficking and Exploitation (Scotland) Act 2015 provide broad equivalents to STROs and STPOs, respectively.²²³ In Northern Ireland, the legislation provides for STPOs only.²²⁴

These orders have been used effectively in some modern slavery cases, such as Operation Fort where the judge imposed STPOs on the convicted parties.²²⁵ Both STPOs and STROs are used by the GLAA in their work to safeguard against modern slavery.²²⁶ The orders can be used to prohibit perpetrators' activities, although their implementation needs to be monitored to ensure compliance. When used effectively, they can be powerful tools in tackling perpetrators.²²⁷

However, a recent report showed that STPOs and STROs remain an uncommon tool used by magistrates or judges in the criminal justice response to modern slavery cases. Key issues with their implementation include a lack of awareness, understanding, training, and guidance, as well as insufficient mechanisms for coordination, data collection, information sharing, and monitoring.²²⁸ There is a scarcity of data and evidence on the implementation and impact of STPOs and STROs, making evaluation of the effectiveness difficult. Better understanding is required on how to make these provisions more effective in supporting victims and increasing prosecutions.

The IASC will work to understand further how provisions within legislation in England and Wales, Scotland, and Northern Ireland to tackle modern slavery and support law enforcement in prosecuting criminals are being applied, and work to improve implementation.

Statutory defences to prosecution of modern slavery victims

Alongside this, in the England and Wales, section 45 of the MSA introduced a statutory defence for slavery or trafficking victims which provides that an adult is not guilty of an offence for certain crimes if they were ‘*compelled*’ to commit them, and ‘*this compulsion is attributable to slavery or relevant exploitation*’ defined by the Act. For children, a different threshold applies.²²⁹ Law enforcement must also consider whether someone may be able to claim the statutory defence. The evidence on the use of this defence in practice is limited in understanding its strengths and barriers to success. More research is needed on how this defence can be used in the best interests of victims of modern slavery and better data collection on its use and outcomes.²³⁰ In Scotland, section 8 of the Human Trafficking and Exploitation (Scotland) Act 2015 places an obligation on the Lord Advocate to make and publish instructions about the prosecution of a person who is, or appears to be, the victim of a human trafficking offence.²³¹ PPSNI provides similar policy for prosecuting cases of modern slavery and human trafficking.²³² We return to considerations of how we can better understand use of these defences in [Chapter 7. Improving our knowledge and understanding of modern slavery](#): Priority research areas.

Specialised teams and training in local forces to improve prosecutions

Most modern slavery cases will be handled by the 43 local police forces in England and Wales, the territorial police forces of Scotland and Northern Ireland or the British Transport Police. Forces in England and Wales are supported by Regional Organised Crime Units (ROCs). Each of these forces and their officers have a critical role to play in addressing organised crime and the perpetrators behind modern slavery offences. The IASC has met many officers whose professional curiosity and dedication have proven crucial to identifying potential victims and tackling modern slavery perpetrators, this best practice can be shared with all teams. Ideally all forces would have specialised teams with the right training and awareness.²³³

The College of Policing and the NPCC’s Modern Slavery and Organised Immigration Crime Unit (MSOICU) offer training to forces on modern slavery and human trafficking.²³⁴ Police Scotland provide equivalent, bespoke modern slavery training reflecting the legislative differences under the Human Trafficking and Exploitation (Scotland) Act 2015. A tailored online module on modern slavery – reflecting Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015– is compulsory for all officers and staff in Northern Ireland, and detectives also benefit from a nationally recognised Modern Slavery Human Trafficking specialist investigators course.

Alongside this, teams of financial investigators in forces play in an important role in ‘following the money’ in addressing this predominantly financially-motivated crime.²³⁵ Despite the importance of these financial investigators, there is a shortage of them.²³⁶ Further training, and specialised teams in all forces, would improve efforts to tackle modern slavery and human trafficking.

The IASC will work with law enforcement across the UK to ensure the right training and teams are in place to increase prosecutions and promote best practice sharing.

Supporting victims' journeys through the criminal justice system

For potential victims, there can be a distrust of law enforcement because of their exploitation. Victims may also have a criminal record because of their exploitation and the crimes they were forced to commit, notwithstanding Parliament's intention through the MSA and similar legislation in Scotland and Northern Ireland to provide them with a defence from prosecution. This can have a lifelong impact on their recovery journey and ability to find employment and pursue opportunities, can lead to socio-economic hardships and multiple disadvantages, which can increase the chances of re-exploitation. More needs to be done to look at how victims with criminal records because of their exploitation can be supported and protected. Alongside this, for victims navigating the criminal justice system, it can be a long and complex process, sometimes taking years for victims to see legal justice. Victims may also be taking significant risks when giving evidence.²³⁷

Law enforcement recognises that it can take months to obtain information from victims.²³⁸ This backdrop has been exacerbated by long waiting times in the NRM, with the median time taken from referral to conclusive grounds decisions made across the competent authorities in 2023 being c.17 months (526 days).²³⁹

Alongside this, the recent IMA will mean that law enforcement may require victims to support prosecution efforts from abroad, making engagement more challenging.²⁴⁰ This legislation, combined with the European Court of Human Rights (ECtHR) ruling *VCL and AN vs UK*, means that law enforcement face challenges keeping victims engaged with a long and lengthy process.²⁴¹ In this case, the ECtHR ruled that the UK was in violation of Article 4 (prohibition of slavery and forced labour) and Article 6 (right to a fair trial) of the European Convention on Human Rights after charging two Vietnamese minors found working on a cannabis farm with drug cultivation offences. The two individuals pleaded guilty, were convicted and then granted a positive 'conclusive grounds decision', acknowledging that they were victims of labour and criminal exploitation as a result. The court found that the prosecutors should, wherever reasonably possible, wait for an individual who is in the NRM to receive a conclusive grounds decision.²⁴²

In Scotland, the decision to prosecute lies with the COPFS, informed by the Lord Advocate's instructions for the non-prosecution of victims of human trafficking.²⁴³ The Lord Advocate's instructions suggest that, generally, prosecutors must wait for a conclusive grounds decision before making a final decision on whether to prosecute the accused person and before serving an indictment or complaint on an accused person. Prosecutors can, however, exercise their discretion to decide not to prosecute an accused person as soon as the evidence, including a reasonable grounds decision, and/or public interest supports that decision.²⁴⁴ In Scotland, victims of human trafficking are recognised as vulnerable victims and witnesses.²⁴⁵

The IASC will seek to identify further measures that can help to strengthen modern slavery victims' engagement and trust in the criminal justice system. The IASC acknowledges long waiting times in the National Referral Mechanism (NRM) create challenges for maintaining victim engagement in the criminal justice system, so will push the Home Office to reduce NRM wait times.

Supporting the needs of victims in the criminal justice system

Victims of modern slavery should receive the same support as victims of other crimes. It is important all relevant legislation recognises their needs, including the Victims and Prisoners Bill which is progressing through Parliament.²⁴⁶

Currently, one way that victims of modern slavery can be supported through the criminal justice system is by Victim Navigators. These Victim Navigators are provided in partnership with Justice and Care and are embedded in some police forces and the GLAA to provide support for victims and build trust with victims. The Scottish Government recently announced additional funding for Victim Navigators to work alongside Police Scotland's National Human Trafficking Unit.²⁴⁷

Victim Navigators have also been able to advise the police on how to gather best evidence from their clients by approaching them in a trauma-informed way. Victim Navigators have provided strategic advice in over 1,000 investigations (to March 2024) and have increased victims' engagement with the police to 92%, providing police with key evidence to improve investigations and prosecution rates.²⁴⁸ Embedding a Navigator Hub in every ROCU will see every police force and survivor have access to the support provided by a Navigator. It will also allow ROCUs to utilise the resource to help improve investigations into modern slavery, and to increase victim identification and engagement.²⁴⁹

The IASC will advocate for the rollout of Victim Navigators across the UK.

Evidence-led prosecutions

Law enforcement can face challenges with victim engagement, in 52% of modern slavery cases the suspect was not identified, and in 32% of cases the victims do not support the prosecution progressing.²⁵⁰ Some survivors' recovery journey means that they may choose not to support prosecution efforts. Victims are often traumatised by their experiences, making it challenging for them to engage with the criminal justice system. In these cases, 'evidence-led prosecutions', where the victim's testimony is not required as part of the prosecution case, can be pursued. Guidance by the CPS, Lord Advocate and PPSNI, do outline that victim support is not required for a prosecution and that there are other evidential sources to prove modern slavery even without victim testimony.²⁵¹ There are concerns about how much the evidence-led approach is being utilised in the domain of modern slavery and human trafficking, to the same degree as with other crimes.²⁵²

The IASC will work with law enforcement across the UK to identify new approaches to training and guidance that could lead to more evidence-led prosecutions.

Working in partnership

To respond to the complexity of modern slavery, local police forces cannot work alone. Regional coordination and partnership working across all parts of law enforcement is critical in tackling this crime in the UK, and internationally.

A number of public bodies – Border Force, CPS, COPFS, Home Office, HM Revenue and Customs (HMRC), GLAA, NCA, NPCC, PPSNI and police forces across the UK – all have

key roles to play to improving the UK's response to tackling modern slavery and sharing best practice.

The NPCC and the MSOICU already work across all forces and law enforcement partners to improve police forces' response to modern slavery, by supporting the collection and development of intelligence, creating guidance, and offering bespoke modern slavery training.²⁵³ The NCA has made modern slavery a key national priority. It focuses on serious organised crime 'upstream, overseas, and online'.²⁵⁴ The NCA leads regular surges in operational activity focusing on labour and sexual exploitation co-ordinated by the NCA – codenamed Operation Aidant. Each quarter, this focuses on different areas of concern, for instance in the first quarter of 2024 it has focused on the care sector.²⁵⁵ Alongside this, the NCA and several individual forces participate in Joint Investigation Teams (JITs) with other countries to investigate cross-border cases.²⁵⁶

The GLAA also works upstream in-country by regulating and licensing labour providers in the UK and overseas in shellfish gathering, agriculture, horticulture, and food processing sectors to reduce the risk of exploitation. The GLAA also has the power to investigate modern slavery (forced or compulsory labour) in England and Wales and can provide support to Police Scotland investigations into modern slavery, across any employment sector. Alongside this, Border Force continues to play an important enforcement role with its ability to identify and detain known perpetrators at ports. Through Project TALITHA, Border Force has also worked to end modern slavery by labour exploitation in the UK commercial fishing sector with its codenamed OPERATION HEBWICH. They did this by shutting down systemic abuse, creating 'disincentives' and including prevention strategies in business as usual.²⁵⁷

All these organisations should continue to make modern slavery a key focus. In addition, other parts of law enforcement can make tackling modern slavery a new priority. For example, Police and Crime Commissioners are elected leaders in law enforcement and set the priorities for their areas with their Police and Crime Plans.²⁵⁸ These should include modern slavery as a priority.

The IASC will work with all law enforcement partners in their efforts to tackle modern slavery and human trafficking in the UK and abroad to encourage cross-partnership working and to ensure it is a joint priority to tackle this horrific crime.

To increase the number of prosecutions of modern slavery offences, the CPS, COPFS and PPSNI also have an important role to play. Only a 'small number' of human trafficking and modern slavery cases are referred to the CPS, for instance, 271 in 2023.²⁵⁹ The CPS in England and Wales and COPFS in Scotland have National Leads for Human Trafficking and Modern Slavery and networks of modern slavery leads across, for example across each CPS area, to help drive up the number of successful prosecutions. PPSNI's Modern Slavery and Human Trafficking Unit (MSHTU) leads on prosecuting modern slavery offences in Northern Ireland. CPS guidance is clear that investigators should seek early advice where modern slavery charges are being considered.

The IASC will work with police forces across the UK, the Crown Prosecution Service in England and Wales, the Crown Office and Procurator Fiscal Service in Scotland, and Public Prosecution Service for Northern Ireland to encourage increased partnership between law enforcement and prosecutors to increasing the number of prosecutions of modern slavery cases.

Chapter 6. Integrating lived experience perspectives into anti-slavery policy and efforts

Listening and responding to those with lived experience of modern slavery is critical to understanding how modern slavery and human trafficking are changing, which vulnerable groups may be being targeted, how criminals are exploiting these individuals, and how we can better identify and support victims, including in their experience of the criminal justice system. Meaningful inclusion of survivors and engagement with their lived experience expertise, in a way that is trauma-informed and prevents harm, is critical to improving research and policies.²⁶⁰

Expert panels of survivors have been established in other countries to inform modern slavery policy, for instance, in the U.S., Albania and internationally across the 57 members of the OSCE.²⁶¹ In Australia, the NSW Anti-Slavery Commissioner formed an Advisory Panel where 20% of members have declared lived experience of modern slavery.²⁶²

Lived experience panels in other areas have been established in the UK to inform provision of support to other vulnerable groups, such as those with lived experience of dementia, gambling harms and Covid-19.²⁶³

There are multiple examples of lived experience advisory groups in the modern slavery field, each with different compositions, modes of operation and remits. For example, the Human Trafficking Foundation administratively supports a Lived Experience Advisory Panel (LEAP) established in April 2022 to ensure expertise from those with lived experience is embedded in the work of the anti-trafficking sector.²⁶⁴ A Survivor Consultants Group hosted by Unseen is composed of 13 individuals with lived experience of modern slavery who work with researchers, businesses and government, and influence Unseen's initiatives.²⁶⁵ The Modern Slavery and Human Rights Policy and Evidence Centre (MSPEC) has run a Lived Experience Advisory Panel (LEAP) to advise on all aspects of the Centre's work.²⁶⁶ The Rights Lab (University of Nottingham) hosts a Survivor Research Advisory Group that shapes Lab strategy and major projects. This is part of *InSPIRe* (Involving Survivors in Policy & Intervention Research), a joint initiative between Survivor Alliance and the Rights Lab to include lived-experience peer researchers in research conception, design, and implementation in significant ways.²⁶⁷

Several other NGOs and charities, like Hestia and Trafficking Awareness Raising Alliance, have their own LEAPs to help shape and inform their practice and work.²⁶⁸ Some also support survivors to engage with government. For example, Hestia worked with survivors to give oral evidence to the Home Affairs Select Committee inquiry into human trafficking in 2023.²⁶⁹

Another model of engagement that focuses on a specific kind of input is the Lived Experience Expert Group (LEEG) on the Government Response Index (GRI), a repeated 3-day workshop facilitated by Survivor Alliance and Walk Free in collaboration with a selected in-country partner organisation.²⁷⁰ The workshop is a safe and inclusive environment where up to 20 survivors of modern slavery and human trafficking come together and learn about the GRI in the Global Slavery Index (GSI) that assesses governments' response to slavery. The workshops include interactive activities that seek to identify and address gaps within the current grading system and milestones within the GRI. Participants learn about the importance of survivor

leadership and ways to leverage the GSI to support the development of local survivor-led advocacy strategies with the support of Survivor Alliance and Walk Free.

In addition, initiatives in the UK such as the Survivor Alliance and the Freedom Fund have run an Employment Pathways Programme that place survivors of slavery and trafficking into paid positions within anti-slavery organisations.²⁷¹

In its most recent evaluation report on the UK, GRETA recommended that the Government should involve ‘*survivor organisations in the design and delivery of assistance to victims of trafficking*’.²⁷² The official response to this report noted the value that the UK Government places on embedding survivors in future policy and the value gained from engaging with survivors directly to better understand their needs and experiences of the NRM.²⁷³ Similarly, in 2020, the Independent Commission for Aid Impact (ICAI) published its review of the UK’s approach to tackling modern slavery through aid programming and recommended that UK government departments should draw more systematically on survivor voices to develop effective programming reflecting lived experiences.²⁷⁴ The Government’s response to these recommendations has included a greater focus on engaging survivors, for example, when considering what the Modern Slavery Innovation Fund supports. Nevertheless, over three years on from the Review, the UK still has no standing, government-sponsored panel of survivors of modern slavery specifically to inform UK policy development and victim support.

The IASC will work with the UK anti-slavery sector and the Government to establish a national Survivors Advisory Council consisting of those with lived experience of modern slavery, creating an empowered platform to help integrate survivors’ perspectives into the work of the IASC, inform development of policy by the Government and provision of improved support to victims.

This would build on good practice across the sector to date. It would be a remunerated panel, ethically delivered and trauma-informed, to minimise the risk of re-traumatisation. In the medium-term, the IASC would welcome establishing such a panel on a statutory basis to formalise its important part in the policy-making process (pending agreement and suitable opportunity to legislate to this end). However, the IASC judges there is value in initially establishing such a panel on a non-statutory basis in the first instance.²⁷⁵

Chapter 7. Improving our knowledge and understanding of modern slavery

IASC approach to improving our understanding of modern slavery in the UK

Evidence and data are essential to informing effective policymaking and practice in response to modern slavery. Notwithstanding ongoing work across the anti-slavery sector to research the scope and prevalence of modern slavery in the UK, in particular from academia and charities, significant gaps in our understanding remain. There has been a growing base of research, data and evidence into modern slavery in the UK in recent years. Despite a growth base of research, data and evidence into modern slavery in the UK in recent years, gaps remain in our knowledge and understanding of modern slavery. Some of these research gaps have been mapped, to outline some potential priority areas of focus which are yet to be covered.²⁷⁶

A key role of the IASC is undertaking and supporting the delivery of research.²⁷⁷ To fulfil this requirement the IASC aims to maintain and strengthen historic research collaborations, such as with the Rights Lab (University of Nottingham), the world's largest group of modern slavery researchers, to ensure the UK gets as much value as possible from research and innovation in this field.²⁷⁸ The IASC will also create new partnerships to improve understanding of modern slavery in the UK. A dedicated Head of Strategic Analysis will enable the IASC to produce and commission research of its own and in collaboration with research partners.

The IASC will build on existing research and work with academics and the UK anti-slavery sector to share and draw attention to recent and emerging research. The IASC will also work with researchers to better understand long-standing data and knowledge gaps; support and co-produce new research on topics of mutual interest; and encourage increased focus on areas to ensure the sector is prepared and ready to respond to growing types, tools, and methods of exploitation.

The IASC will identify and seek to unlock barriers to information sharing and transparency that too often stand in the way of improving our understanding of the scale of the challenge; improving support of victims; supporting law enforcement and prosecutions; and improving the targeting and effectiveness of action to prevent modern slavery.

The IASC will use its powers under the Modern Slavery Act 2015 to require cooperation on sharing data and information from certain law enforcement, border security, local government and health authorities as set out in the legislation.²⁷⁹

The IASC will engage constructively with the Home Office and request access to data under the Data Sharing Agreement between the IASC and the Home Office as necessary, with the aim of securing researchers' improved access to more detailed National Referral Mechanism data where this would help to address gaps in our understanding of modern slavery.

Sharing of research into modern slavery

Currently there is no global or UK-specific comprehensive repository of knowledge and research into modern slavery. Through the Modern Slavery Innovation Fund, the Home Office

previously funded a global knowledge platform (Delta 8.7) led by the United Nations University Centre for Policy Research (UNU-CPR). This highlighted the most useful policy-relevant data, evidence, research and news on ‘what works’ to tackle modern slavery globally, to help policymakers achieve UN Sustainable Development Goal 8.7 on modern slavery.²⁸⁰ Unfortunately, as yet, there is no equivalent replacement for Delta 8.7 that focuses on policy-relevant data and research findings since the platform closed.

Globally, the United Nations International Organisation for Migration (IOM) operates a Counter Trafficking Data Collaborative, a hub for global trafficking data.²⁸¹ The US Government has recently funded the development of a Human Trafficking Data Warehouse, via a competitive grant award to a US-based university, that provides for the secure collection, storage, cleaning, and filling in the gaps of the wide variety of human trafficking data types and sources.²⁸²

However, there is no equivalent centralised government-sponsored repository of research and data on modern slavery in the UK, although the UK-based NGO the Freedom Fund maintains a Slavery Research Library and the IASC website hosts a Resources section.²⁸³

The IASC will explore with the UK anti-slavery sector what requirement may exist for a modern slavery knowledge platform or data hub in the UK and, if there is evidence there is a need for one, will work with the sector to identify and consider potential development opportunities for a platform or hub.

Priority research areas

Through consultation with academics, people with lived experience, and civil society across the anti-slavery sector between February and March 2024, the IASC identified some pressing gaps in our understanding and several data access issues. Four broad priority areas are outlined here, and through further consultation, the IASC will develop specific research questions and priority topics within each broad area.

| | |
|----------------|---------------------------------------------------------------------------------------------|
| Research areas | <u>Estimating the prevalence and nature of modern slavery across the UK</u> |
| | <u>Forecasting and mapping the risks of modern slavery in the UK</u> |
| | <u>Understanding the changing forms of exploitation</u> |
| | <u>Testing new approaches to tackling modern slavery in the UK</u> |

Estimating the prevalence and nature of modern slavery across the UK

There is widespread consensus across the UK anti-slavery sector that our ability to tackle modern slavery in the UK is impaired by a lack of adequate understanding of its scope and scale.

In 2014, the Home Office's Chief Scientific Advisor, Professor Sir Bernard Silverman, used multiple systems estimation (MSE) to produce a Home Office estimate that there were 10,000-13,000 potential victims in the UK.²⁸⁴ The Home Office has not re-estimated modern slavery prevalence since this exercise was undertaken. The Office for National Statistics (ONS) commended this exercise, but also cautioned against repeating it for several reasons, including '*changes to the content of some data sources, the dependence on administrative data and issues surrounding the statistical model*'.²⁸⁵ As such, whilst this was a significant step forward in understanding the scale of modern slavery in the UK, the estimate of 10,000-13,000 is no longer considered accurate for 2024. As Professor Sir Silverman explained in 2020: '*that work was always tentative and is now several years old. While the data and method used may have been the best available at the time, the figure was always likely to be a conservative estimate*'.²⁸⁶ He added more recently: '*The estimate produced was inevitably somewhat conservative, as has been amply demonstrated by subsequent NRM figures*'.²⁸⁷

In 2020, the Centre for Social Justice, working with West Midlands Police and the National Data Analytics Solutions (NDAS) estimated there could be at least 100,000 potential victims of modern slavery in the UK.²⁸⁸ Alternate estimates by the Walk Free Foundation, put the number of victims of modern slavery in the UK higher still. For its 2018 Global Slavery Index (GSI), Walk Free extrapolated from surveys in other countries (not including the UK) to estimate prevalence in the UK.²⁸⁹ It estimated there were 136,000 victims of modern slavery in the UK.²⁹⁰ The 2023 GSI provided an updated estimate for the UK of 122,000 victims using a similar methodology.²⁹¹ ONS has cautioned against treating the GSI estimate for the UK '*as accurate or reliable*' given the significant differences between the UK and the small countries in which data was collected (albeit that this note of caution in 2020 preceded updates by Walk Free to its methodology).²⁹²

The ten-fold difference between the Home Office 2014 estimate and, for example, the GSI 2018 estimate, alongside on-going methodological debates, illustrates the need for further work on the scale of modern slavery in the UK.²⁹³ New research has tested methods and estimated prevalence of modern slavery in other countries, for a range of forms and sectors, opening-up new possibilities for the UK.²⁹⁴

To support this further understanding, greater transparency is needed about the demographics of exploitation. Where data exists, ensuring adequate access to it is vital to addressing gaps in our understanding. Research may also be able to focus on key related questions of measurement, such as prevalence within specific sectors, across forms of exploitation, and for key populations (for example, children), and identify correlations between high prevalence and risk factors relating to geographies and indices of multiple deprivation.²⁹⁵

The IASC will continue to work closely with researchers to support work developing methodologies for UK prevalence estimation. The IASC will also look at what research needs to be done to improve the understanding of the prevalence and demographic nature of modern slavery in the UK.

Forecasting and mapping the risks of modern slavery in the UK

The same difficulties in estimating current prevalence for the UK, including data access, apply to assessing key risk factors and the projecting risk into the future. However, recent research has developed new approaches to understanding and mapping risk levels for modern slavery, for example in fishing, deforestation, food production, and brick production.²⁹⁶ Other research

has used data and methods like machine-learning to analyse risk factors and drivers for modern slavery to ‘predict’ levels of slavery in countries.²⁹⁷ Researchers are also beginning to project risk forward into the future. For example, the UK Government is supporting work via the Modern Slavery Innovation Fund to test new methods for using data analysis, artificial intelligence, and earth observation to map forced labour risk at scale, focused internationally (in India), and this includes projecting patterns of heat stress affecting worker vulnerability until 2050.²⁹⁸

This focus on understanding and projecting risk to inform policy development includes the 2019 report by the UN Special Rapporteur on contemporary forms of slavery including its causes and consequences which assessed how expected changes in the future of work, demographics, migration, and the environment may shape modern slavery in the years to come.²⁹⁹

Risk forecasting in the UK context would help policymakers, law enforcement and others who provide support to modern slavery victims know how best to prepare for future changes in modern slavery prevalence and patterns. By identifying historical correlations between risk factors, it may be possible to project future risks of modern slavery, and focus on specific risks, for example for children or in specific sectors in the UK. Risk projections could also include modelling geographical hotspots in the UK, now and in the future, potentially in collaboration with Ordnance Survey.³⁰⁰ Risk forecasting methods used by the finance sector may also offer useful approaches.

The IASC will support efforts by researchers and across the UK anti-slavery sector to identify new methods if forecasting and mapping the risks of modern slavery in the UK.

Understanding the changing forms of exploitation

We know from the recent focus on an increasing number of cases of modern slavery in the care sector that modern slavery evolves, perpetrators respond to new opportunities and constraints; and events like pandemics, natural disasters and conflicts cause shifts in vulnerability and risk.³⁰¹ Another factor driving changes in modern slavery patterns will be new legislation, for example as the European Union (EU) passes new mandatory human rights and environmental due diligence legislation and considers a regulation banning forced labour from EU supply chains, this is likely to change business behaviour and the perpetration of forced labour in response.

The internet is a particularly fast-evolving area for modern slavery risk and response. In engaging with the UK anti-slavery sector, international partners, and those with lived experience, the IASC repeatedly heard that that modern slavery is increasingly facilitated through the internet. Demonstrating the growing interest in this area, a recent event and report in partnership with FCDO outlined opportunities to promote and protect human rights new technologies provide, but also the complex risks they pose to human rights.³⁰² A 2023 report by the UN Special Rapporteur on contemporary forms of slavery examined the use of technology, specifically, in facilitating and preventing contemporary forms of slavery.³⁰³ The Code 8.7 initiative, supported by the UK Government’s Modern Slavery Innovation Fund as part of Delta 8.7, previously brought stakeholders together to use AI and computation science to tackle modern slavery.³⁰⁴

As these initiatives suggest one key area for further exploration in why and how people are exploited in new ways is online exploitation and the use of emerging technologies, such as AI. New research and analysis will help to better understand the use of online technologies in modern slavery and human trafficking, and the role that digital platforms can play in prevention and victim identification, working with social media companies and law enforcement. This may include specific focus areas, like evolving threats to children and young people and tackling demand for sexual exploitation online. As with other emerging topics under this third main priority area – changing exploitation forms – research can identify both where a new influence, like technology, is increasing slavery risk and where it can be used by the anti-slavery sector for prevention and protection.

The IASC will work with the UK anti-slavery sector, academia, and law enforcement to identify and prioritise research on why and how people are being exploited in new ways, including how technologies are being used both to enable and tackle exploitation.

Testing new approaches to tackling modern slavery in the UK

Nearly 10 years after the Modern Slavery Act became law, the UK anti-slavery sector has amassed a great deal of evidence on what works to tackle modern slavery. Outside the UK, other countries and intergovernmental initiatives also continue to release new evidence on best practice, and initiatives like the ‘Five Eyes’ Working Group on Forced Labour in Supply Chains (bringing together the UK, US, Canada, Australia, and New Zealand) work to share innovations across countries.³⁰⁵

There needs to be more focus on testing new approaches to tackling modern slavery, across all areas of prevention, protection, and prosecution, and on then scaling approaches that work across communities, parts of the UK and supply chains. This may include learning from other, related sectors, for example children’s rights or gender-based violence, to adapt approaches for the anti-slavery response.

The IASC will work with researchers and other parts of the anti-slavery sector to identify innovations in anti-slavery response and how to share, learn from and scale success, as well as how to learn from areas that do not work effectively enough.

Research could examine ‘what works’ for survivor recovery journeys, through looking at long-term outcomes for survivors. Another potential specific topic under this fourth priority area of testing new approaches to tackling modern slavery in the UK could be the two new tools for tackling modern slavery introduced by the Modern Slavery Act in England and Wales: STPOs and STROs.³⁰⁶ As a recent report noted, data and evidence on the implementation and impact of STPOs and STROs is scarce, making evaluation of their effectiveness difficult.³⁰⁷ Similar data considerations apply to Scotland, where use of TEROs and TEPOs is also difficult to evaluate. For example, as Senior Investigative Officers (SIOs) may decide against applying for a TERO where doing so could highlight pre-charge evidence that may prejudice an ongoing investigation.

The IASC will look at what additional data can be published to evaluate the effective deployment of Slavery and Trafficking Risk Orders, Slavery and Trafficking Prevention Orders, Trafficking and Exploitation Risk Orders and Trafficking and Exploitation Prevention Orders.

Another example under this priority area of testing new approaches to tackling modern slavery in the UK may be the effectiveness of provision in the MSA (section 45) to provide a statutory defence to prosecution (with some noted exceptions, for example around harming others), for criminal offences that exploited individuals have been compelled to commit as victims of modern slavery where they had no realistic alternative.³⁰⁸ Whilst the 2019 Independent Review of the MSA looked at how to ensure an appropriate balance between the need to protect victims from criminal prosecution and preventing criminals from abusing this protection to avoid justice, it did not collect or review data on when it has been used. There is anecdotal evidence that this statutory defence has been misused by some (e.g. gang members). Equally, there is evidence to suggest the defence is being under-used by others, particularly for children. The legal profession does not always advise clients to claim it when they have been victims of modern slavery, which is so critical to ensuring they get the protections they deserve. As noted in recent evidence to the House of Lords inquiry into the MSA, there is presently no evidence base for section 45 because the defence can be employed at any time within an investigation.³⁰⁹

The IASC will encourage the Government to consider an annual data return from police forces in England and Wales on the use of section 45 (statutory defence) in the Modern Slavery Act 2015, to help assess and then address any challenges in its use and look at how the equivalent is being utilised across the UK.

List of Actions

Chapter 2. Understanding the context of how modern slavery is tackled across the UK

1. The IASC will represent all victims of modern slavery, particularly focusing on sharing best practice in tackling modern slavery of four groups: children and young people; women and girls; UK nationals; and those affected by the recent immigration legislation.

Chapter 3. Objective: Preventing modern slavery and re-victimisation

2. The IASC will work with organisations that help homeless people, government, and researchers to raise the profile of the risk of homeless people being exploited.
3. The IASC will work across stakeholders to focus efforts on providing more support for children to prevent them from being exploited and call for all children in care to be in appropriate loving environments and not housed by the Home Office.
4. The IASC will work with policymakers and law enforcement to encourage a focus on preventing and tackling criminal exploitation, which disproportionately affects children.
5. The IASC will work with the Gangmasters and Labour Abuse Authority, the Office of the Director of Labour Market Enforcement and any future Single Enforcement Body across government and the charity sector, to ensure migrant workers are informed of and can exercise their rights.
6. The IASC will press the Home Office to develop relevant visas in consultation with experts in the anti-slavery sector.
7. The IASC will work with Parliamentarians and government departments on how to best tackle demand for sexual exploitation.
8. The IASC will work with government and key stakeholders (such as Ofcom, the National Crime Agency's Child Exploitation and Online Protection, and the National Police Chiefs' Council Lead for Child Protection and Abuse Investigations) to press for greater efforts to tackle demand for child sexual exploitation.
9. The IASC will work with the Government to help reduce the risk to workers under the Overseas Domestic Worker visa.
10. The IASC will work with key stakeholders in the anti-slavery sector and the sector working to combat honour-based abuse (including forced marriage) to push for comprehensive training and procedures to protect children from the risk of forced marriage.
11. The IASC will convene and coordinate across all stakeholders who have a role to play in preventing modern slavery to make prevention everyone's business.

12. The IASC will: encourage a strengthening of the UK’s policy response to forced labour in domestic and global supply chains; push for mandatory human rights due diligence legislation in the UK; work with businesses to improve compliance with provisions in the Modern Slavery Act 2015 and promote best practice.
13. The IASC will encourage public bodies to voluntarily emulate the transparency of supply chain provisions that modern slavery legislation across the UK requires of businesses.
14. The IASC will work with UK Government, devolved administrations and the NHS across the UK to support and monitor the delivery of key recommendations made in the December 2023 Review of risk of modern slavery and human trafficking in NHS supply chains.
15. The IASC will: encourage the UK Government to update its 2014 Modern Slavery Strategy; press for prevention to be prioritised in the development and implementation of modern slavery strategies across the UK; and encourage close working across-government so that modern slavery is considered in the development of wider policies (e.g. safeguarding, poverty, migration).
16. The IASC will work with international partners to encourage and share best practice in preventing modern slavery and work with the UK Government to encourage a co-ordinated focus on integrating modern slavery prevention into international policy and priorities.

Chapter 4. Objective: Protecting victims – improving identification, victim care and support through the National Referral Mechanism and beyond

17. The IASC will push for trauma-informed, victim-centric training for all designated first responders and statutory services who may encounter potential victims and support the work of non-first responder organisations like the NHS and HM Prison and Probation Service in their efforts to identify potential victims.
18. The IASC will call for clear communication to first responder organisations of the implications of recent legislative and policy changes for potential victims of modern slavery, to improve awareness and understanding.
19. The IASC will work with government and devolved administrations to call for support services to be tailored to individual needs providing holistic, long-term, trauma-informed, and culturally competent interventions and developing trusted relationships between practitioners and survivors.
20. The IASC will push for a review of the National Referral Mechanism and the decision-making process with a focus on ensuring that support is tailored to the individual needs of all potential victims and that timescales are reduced.
21. The IASC will work with the Government and the sector to push for victims of modern slavery to have independent advocates in their recovery journey to help them navigate complex systems.

22. The IASC will work with legal practitioners to identify how to improve access to expert legal advice for modern slavery survivors and will work with the Government to encourage an increased level of legal aid support for survivors.
23. The IASC will work with local and national anti-slavery actors to support and share best practice in tackling modern slavery and supporting victims.
24. The IASC will call for devolved decision-making pilots to be rolled out for child victims across the country and for all children to have advocates that can support their needs.
25. The IASC will work with Government to push for long-term support for survivors after the National Referral Mechanism, such as Reach-In support.
26. The IASC will work to better understand the reasons behind increases in Duty to Notify referrals and call on the Government to collect and publish more detailed, granular Duty to Notify data. The IASC will also support work by the devolved administrations to implement a Duty to Notify.

Chapter 5. Objective: Prosecuting offenders and supporting victims through the criminal justice system

27. The IASC will work to understand further how provisions within legislation in England and Wales, Scotland, and Northern Ireland to tackle modern slavery and support law enforcement in prosecuting criminals are being applied, and work to improve implementation.
28. The IASC will work with law enforcement across the UK to ensure the right training and teams are in place to increase prosecutions and promote best practice sharing.
29. The IASC will seek to identify further measures that can help to strengthen modern slavery victims' engagement and trust in the criminal justice system. The IASC acknowledges long waiting times in the National Referral Mechanism (NRM) create challenges for maintaining victim engagement in the criminal justice system, so will push the Home Office to reduce NRM wait times.
30. The IASC will advocate for the rollout of Victim Navigators across the UK.
31. The IASC will work with law enforcement across the UK to identify new approaches to training and guidance that could lead to more evidence-led prosecutions.
32. The IASC will work with all law enforcement partners in their efforts to tackle modern slavery and human trafficking in the UK and abroad to encourage cross-partnership working and to ensure it is a joint priority to tackle this horrific crime.
33. The IASC will work with police forces across the UK, the Crown Prosecution Service in England and Wales, the Crown Office and Procurator Fiscal Service in Scotland, and Public Prosecution Service for Northern Ireland to encourage increased partnership between law enforcement and prosecutors to increasing the number of prosecutions of modern slavery cases.

Chapter 6. Integrating lived experience perspectives into anti-slavery policy and efforts

34. The IASC will work with the UK anti-slavery sector and the Government to establish a national Survivors Advisory Council consisting of those with lived experience of modern slavery, creating an empowered platform to help integrate survivors' perspectives into the work of the IASC, inform development of policy by the Government and provision of improved support to victims.

Chapter 7. Improving our knowledge and understanding of modern slavery

35. The IASC will build on existing research and work with academics and the UK anti-slavery sector to share and draw attention to recent and emerging research. The IASC will also work with researchers to better understand long-standing data and knowledge gaps; support and co-produce new research on topics of mutual interest; and encourage increased focus on areas to ensure the sector is prepared and ready to respond to growing types, tools, and methods of exploitation.
36. The IASC will identify and seek to unlock barriers to information sharing and transparency that too often stand in the way of improving our understanding of the scale of the challenge; improving support of victims; supporting law enforcement and prosecutions; and improving the targeting and effectiveness of action to prevent modern slavery.
37. The IASC will use its powers under the Modern Slavery Act 2015 to require cooperation on sharing data and information from certain law enforcement, border security, local government and health authorities as set out in the legislation.
38. The IASC will engage constructively with the Home Office and request access to data under the Data Sharing Agreement between the IASC and the Home Office as necessary, with the aim of securing researchers' improved access to more detailed National Referral Mechanism data where this would help to address gaps in our understanding of modern slavery.
39. The IASC will explore with the UK anti-slavery sector what requirement may exist for a modern slavery knowledge platform or data hub in the UK and, if there is evidence there is a need for one, will work with the sector to identify and consider potential development opportunities for a platform or hub.
40. The IASC will continue to work closely with researchers to support work developing methodologies for UK prevalence estimation. The IASC will also look at what research needs to be done to improve the understanding of the prevalence and demographic nature of modern slavery in the UK.
41. The IASC will support efforts by researchers and across the UK anti-slavery sector to identify new methods of forecasting and mapping the risks of modern slavery in the UK.

42. The IASC will work with the UK anti-slavery sector, academia, and law enforcement to identify and prioritise research on why and how people are being exploited in new ways, including how technologies are being used both to enable and tackle exploitation.
43. The IASC will work with researchers and other parts of the anti-slavery sector to identify innovations in anti-slavery response and how to share, learn from and scale success, as well as how to learn from areas that do not work effectively enough.
44. The IASC will look at what additional data can be published to evaluate the effective deployment of Slavery and Trafficking Risk Orders, Slavery and Trafficking Prevention Orders, Trafficking and Exploitation Risk Orders and Trafficking and Exploitation Prevention Orders.
45. The IASC will encourage the Home Office to consider an annual data return from police forces in England and Wales and the Crown Prosecution Service on the use of section 45 (statutory defence) in the Modern Slavery Act 2015, to help assess and then address any challenges in its use and look at how the equivalent is being utilised across the UK.

Annex A – Glossary

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| APPG | All Party Parliamentary Group |
| ASW | Adult Service Websites |
| ATMG | Anti-Trafficking Monitoring Group – Collects, analyses and reports on implementation of the Council of Europe Convention on Action against Trafficking in Human Beings, examines the impact of anti-trafficking measures on trafficked persons’ human rights; and identifies examples of good practice of anti-trafficking interventions in the UK. |
| CAPE | Capabilities in Academic Policy Engagement |
| COPFS | Crown Office and Procurator Fiscal Service |
| CPS | Crown Prosecution Service |
| CQC | Care Quality Commission |
| ECAT | Council of Europe Convention on Action Against Trafficking in Human Beings |
| ECtHR | European Court of Human Rights |
| FCDO | Foreign, Commonwealth and Development Office |
| FRO | First Responder Organisation |
| GLAA | Gangmasters and Labour Abuse Authority. In England and Wales, the GLAA is responsible for investigating reports of Modern Slavery. In Scotland, Police Scotland investigates reports of modern slavery but the GLAA support this activity to target, dismantle and disrupt serious and organised crime. |
| GRETA | The Group of Experts on action Against Trafficking in Human Beings (monitors Council of Europe Convention on Action against Trafficking in Human Beings) |
| GSI | Global Slavery Index (operated by the Walk Free Foundation) |
| HMPPS | His Majesty’s Prison and Probation Service |
| HMRC | His Majesty’s Revenue and Customs |
| HTESA | Human Trafficking and Exploitation (Scotland) Act 2015 |
| HTF | Human Trafficking Foundation |
| IASC | Independent Anti-Slavery Commissioner |

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|------------------------|-----------------------------------------------------------------------------------|
| ICTG | Independent Child Trafficking Guardian |
| IE | Immigration Enforcement |
| IMA | Illegal Migration Act 2023 |
| IMSA | Independent Modern Slavery Advocate |
| INSPIRE Project | Involving Survivors of slavery in Policy & Intervention Research. |
| IOM | United Nations International Organisation for Migration |
| JIT | Joint Investigation Team |
| LEAP | Lived Experience Advisory Panel |
| MAAP | Multi Agency Assurance Panel |
| MARAC | Multi-Agency Risk Assessment Conference |
| MSA | Modern Slavery Act 2015 |
| MSE | Multiple Systems Estimation |
| MSHTU | Modern Slavery Human Trafficking Unit, Police Service for Northern Ireland (PSNI) |
| MSOICU | Modern Slavery and Organised Immigration Crime Unit |
| MSPEC | Modern Slavery and Human Rights Policy and Evidence Centre |
| MSPF | Modern Slavery Prevention Fund |
| MSU | Modern Slavery Unit (Home Office) |
| MSVCC | Modern Slavery Victim Care Contract |
| NABA | Nationality and Borders Act 2022 |
| NCA | National Crime Agency |
| NDAS | National Data Analytics Solutions |
| NGO | Non-Governmental Organisation |
| NPCC | National Police Chiefs' Council |
| NRM | National Referral Mechanism |
| OCG | Organised Crime Group |

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|----------------|------------------------------------------------------------------------------------------------------------------|
| Ofcom | The Office of Communications |
| ODA | Official Development Assistance |
| ODLME | Office of the Director of Labour Market Enforcement |
| ODW | Overseas Domestic Worker |
| ONS | Office for National Statistics |
| OSCE | Organisation for Security and Co-operation in Europe |
| POD | Public Order Disqualification |
| PPSNI | Public Prosecution Service for Northern Ireland |
| PSNI | Police Service of Northern Ireland |
| ROCU | Regional Organised Crime Unit |
| SAMS | Safeguarding and Modern Slavery officers |
| SCA | Single Competent Authority |
| SERAC | Slavery Exploitation Risk Assessment Conference |
| SIO | Senior Investigative Officer |
| SOC | Serious Organised Crime |
| STPO | Slavery and Trafficking Prevention Order (under the Modern Slavery Act 2015) |
| STRO | Slavery and Trafficking Risk Order (under the Modern Slavery Act 2015) |
| TEPO | Trafficking and Exploitation Prevention Order (under the Human Trafficking and Exploitation (Scotland) Act 2015) |
| TERO | Trafficking and Exploitation Risk Order (under the Human Trafficking and Exploitation (Scotland) Act 2015) |
| TISC | Transparency In Supply Chains |
| TOEx | The Tackling Organised Exploitation Project |
| TSA | The Salvation Army |
| UNCRC | United Nations Convention on the Rights of the Child, signed in 1989 |
| UNU-CPR | United Nations University Centre for Policy Research |

Annex B – Methodology

Incorporation of lived experience of modern slavery in the Strategic Plan

Throughout the development of the Strategic Plan, the IASC spoke to individuals and groups with lived experience about what they recommend as key priorities. The IASC would like to thank everyone who participated for sharing their thoughts. Recommendations from survivors helped shape the three objectives in this Strategic Plan and the cross-cutting themes. The reflections from the panels with those with lived experience expertise are summarised below.

Preventing modern slavery and re-victimisation

Prevention and early support came were key themes for those with lived experience expertise with whom the IASC engaged. Many survivors reflected that their exploitation began when they were children, and expressed that professionals and communities need to be better equipped to spot this. Survivors commented on the role of the school in identifying exploitation by teachers, wellbeing staff, teaching assistants or other support staff. Survivors also spoke of the vulnerabilities of children to local gangs and how they feared reprisals against them and their families.

Survivors also explained how important it is for everyone to be aware of modern slavery, across communities, stakeholders, and policymakers. They felt that support and early intervention would have occurred in their cases if everyone in the sector had been playing their part to look after the most vulnerable. Survivors noted a need for better understanding of modern slavery is and entails, for improving prevention efforts.

Finally, survivors characterised recent legislation, particularly the IMA, as inaccurately conflating the issue of trafficking with illegal migration. Whilst many of the provisions within the Act are not yet commenced, as one survivor said: “*rhetoric matters*” and that the legislation was already creating fear and confusion. They thought the current legislation and the narrative around it creates an environment where potential victims are less likely to come forward. They spoke about how traffickers can already use the legislation to create fear amongst victims and keep them in exploitative situations.

Protecting victims – improving identification, victim care and support through the NRM and beyond

Those with lived experience expertise covered a range of topics with the IASC on the identification process and the support and care they had received in the NRM.

First responders: Survivors spoke about the difficulty in understanding what the NRM was once they had been identified by a first responder, particularly as many did not recognise themselves to be victims at the time and may be suffering from trauma. They felt that first-responders often did not fully explain the implications of the NRM or the length of time that the decision-making process can take, so that they could meaningfully ‘consent’ into entering it. They also did not think all first responders understood their roles and how to recognise exploitation. Finally, they noted that some religious and cultural norms could make people less

aware or make first responders nervous to report exploitation for fear of being culturally insensitive, and that there should be more training in this area.

The NRM: Many survivors spoke about their respect for the teams that had supported them throughout the NRM and how invaluable individual support workers had been to their recovery. The length of time NRM decisions are taking made many survivors feel like they were stuck in ‘limbo’ particularly when they were not provided with regular updates. Survivors spoke about the adverse impact this had on their mental health. Those without the right to work, also spoke about how the lack of a job could add to their negative feelings.

Accommodation: Survivors reported being in inadequate accommodation, for example with issues around privacy, no cooking facilities, or other issues, such as leaks, crumbling plaster and unstable flooring, going unfixed. Women who had been sexually exploited spoke about how it could be traumatising having to share bathrooms with men. Some survivors spoke about how relocation, sometimes at short notice, by support services was hard to cope with and could be retraumatising, especially when there were pre-existing mental health conditions. Survivors also explained that relocation away from community support increased their risk of loneliness, sleeplessness, feeling unsafe and isolated.

Legal aid: Many survivors mentioned they had had issues accessing legal aid and getting legal representation (in particular, from immigration lawyers) to take on their cases. The cost of legal representation was referenced by survivors who could not afford their own solicitors. They noted that the two-week window to appeal a negative decision could make a person more vulnerable to exploitation whilst trying to fund legal fees.

Post-NRM support: Finally, survivors discussed the moving on process. They said that even with a positive decision, it is difficult to find work and move out of support because often the decision has taken so long that they have become ‘institutionalised’. They felt that after getting a positive decision, people should be given support until they are on their feet and that it should not feel like a ‘fight’ for support anymore. For those who received a negative decision they spoke about how damaging this could be to their wellbeing.

Prosecuting offenders and supporting victims through the criminal justice system

When talking to survivors about their experience of the criminal justice system, many acknowledged that their experiences whilst being exploited made them distrustful of the police and authorities. They noted the importance of support workers and advocates in rebuilding their trust to confide their experiences to the police. Some survivors mentioned that they had only been able to talk to law enforcement with this support in place.

Some survivors noted a positive experience of engagement with law enforcement and individual officers. Others had found law enforcement to be insensitive and engagement had left them feeling like criminals rather than victims. They noted the length of time and complexity of the process, wherein they often had to recount their experiences multiple times. Survivors wanted more clarity about what the progression through the criminal justice system entailed so they had clear expectations and felt more encouraged to continue to engage.

Improving our knowledge and understanding of modern slavery

Those with lived experience spoke to the IASC team about how important it is was to improve *everyone's* knowledge and understanding of modern slavery. They spoke about how it is important for there to be knowledge of modern slavery in communities, to help prevent victims from becoming exploited, to a wider big picture of national and international Governments understanding the issue. Survivors raised the importance of improving knowledge and understanding across every theme that we spoke to them about, making it clear that to provide long-term solutions to this problem more must be done to research it, invest in professionals understanding the issues, and communicate to individuals and organisations about modern slavery.

Survivors also spoke about how we need to understand more about the scale of the issue, in a world where criminals are willing to exploit individuals in new and different ways, a lot of this being facilitated by the online world. At the heart of much of the survivors calls for more work to be done to improve knowledge and understanding of modern slavery was a desire to protect individuals in the future from being exploited.

Input to the Strategic Plan from key stakeholders engaged in tackling modern slavery across the UK

IASC conducted a survey with stakeholders between February and March 2024 to help shape key priorities for the IASC in tackling modern slavery. The survey received 66 responses from a range of organisations including law enforcement, the NHS, local authorities, charities, survivors, and policymakers. A full list of everyone who responded is below.

Alongside this survey element of their consultation, the IASC was also grateful for specific additional input from: the Bakhita Centre for Research on Slavery Exploitation and Abuse (St Mary's University), CEASE, The Passage, Rights Lab (University of Nottingham), the National Police Chiefs' Council and others.

This consultation helped to shape the objectives of the Strategic Plan looking at: preventing modern slavery and re-victimisation; protecting victims - improving victim identification, victim care and support through the NRM and beyond; prosecuting offenders and supporting victims through the criminal justice system. It also informed the Plan two cross-cutting themes of: integrating lived experiences perspectives into anti-slavery policy and efforts; and improving our knowledge and understanding of modern slavery.

Survey consultation responses under these objectives are summarised below.

Preventing modern slavery and re-victimisation

Some survey consultation responses stressed the IASC's role in supporting improvements in our understanding of the drivers of modern slavery, explaining that this is critical to preventing vulnerable individuals becoming victims of modern slavery.

Particular areas of focus in responses were around children and young people, with consultation responses outlining a need to improve understanding of what is contributing to the growing

number of UK-born children who are identified as victims in the NRM and what improvement in services is needed to help prevent this.

Alongside this, responses referred to sharing best practice on prevention across the UK and identifying new and novel approaches to help prevent individuals from becoming exploited. More broadly, respondents suggested looking upstream at policy development on immigration and labour policies to try and reduce labour exploitation. Responses also highlighted the need for more work on tackling sexual exploitation.

Respondents also spoke about a “public health” approach by government. This would mean a safeguarding approach by everyone who encounters potential victims, which would allow for a holistic, wrap around care model for victims that would aid recovery.

Transparency in supply chains and the role of the commercial sector was mentioned in the consultation responses. It was suggested that section 54 of the Modern Slavery Act 2015, where some commercial organisations must prepare a modern slavery statement, could be replaced by other legislation, for example Mandatory Human Rights Due Diligence legislation and measures to stop goods from entering or leaving the UK market if forced labour was found to be in any part of the supply chain.

Protecting victims – improving identification, victim care and support through the NRM and beyond

Respondents suggested that an IASC policy priority should be working to support the sector to achieve better identification of modern slavery victims and enhanced support. Many organisations stressed the importance of ensuring support to victims is trauma-informed, to better help them.

There were multiple mentions of the need for reform of the NRM, with a recognition that the relevance and demand of the NRM has changed over time, which has resulted in lengthy delays. Pre-NRM support and protection was also referenced, with comments that it has become more challenging to provide potential victims of both modern slavery and human trafficking with support due to recent legislative changes and the need to ensure safe reporting for modern slavery and better lists of contacts for where to report issues. A response also pointed to the 2017 Government announcement of funding for Places for Safety, suggesting that there should be capacity and availability of an immediate safe space for victims to consider their next steps in relation to the NRM.

The important role of first responders was also raised, with respondents referencing the need for all NRM first responders to be appropriately trained. There were suggestions that training should be mandatory, and that online training should be developed. Several local authorities responded to the consultation, suggesting that advice and training on the identification of slavery for local authority officers would be welcome, and that local authorities should have a mandatory self-assessment toolkit. Respondents reflected on the 2023 NRM statistics, that local authorities refer more people to the NRM than any other first responder, so their importance in identifying modern slavery, referrals, victim care and support is critical. It was also suggested that there should be a national rollout of the pilot scheme for devolved decision-making to allow for better understanding of local hotspots and more effective multi-agency working.

Responses suggested that, accompanying NRM reform, there needs to be innovation to the Modern Slavery Victim Care Contract, with support that is both timely and sustainable. There were calls for more and properly resourced support workers for potential victims in the NRM, with recognition that there needs to be more tailored, and additional support for children and young people. Specialised care and support for those identified as having been sexually exploited was also noted. Respondents also referenced some of the challenges of the length of time in the NRM combined with many potential victims' inability to work during this period and suggested the need for more skills-building opportunities. Another challenge referenced was the difficulty in finding legal practitioners who can give legal advice to potential victims.

Respondents described the importance of multi-agency working and excellent models of good practice that could be shared more widely, such as Nottingham's Slavery Exploitation Risk Assessment Conference (SERAC).

Regarding move-on support post-NRM, respondents described the need for safe accommodation for all survivors regardless of their immigration status. Respondents also recommended that victims should be able to continue to receive mental health and psychological support even after exiting the NRM and have access to safe accommodation.

Prosecuting offenders and supporting victims through the criminal justice system

The IASC received comments and suggestions on improving policing and the prosecution of perpetrators. Respondents mentioned that the proportion of modern slavery offences that are prosecuted is disappointingly low, and that greater focus should be placed on this, to enhance offender deterrence.

Respondents described how the lengthy criminal justice system can be difficult for victims, with delays leading to victims withdrawing their support for cases. The respondents highlighted that victims need to be provided with the right support, including necessary legal support and should have access to meaningful justice.

Other consultation responses suggested a need to focus on the quality of investigations and successful criminal justice outcomes. There was a mention of needing to support law enforcement to prioritise modern slavery investigations and for the Criminal Prosecution Service to focus on trial backlogs.

Respondents also referenced the need for greater clarity on how to identify modern slavery cases amongst professionals to help improve policing and prosecutions. There were comments that sex trafficking, sexual exploitation, labour exploitation, and county lines need particular focus and additional guidance is needed for law enforcement to pursue offenders of these crimes. There were also references that 'cuckooing' should be recognised as a specific criminal offence.

There were references to ensuring there is greater clarity in the legislation around modern slavery crimes so that more perpetrators can be brought to justice and receive tougher sanctions. Respondents also suggested that criminal exploitation and cuckooing should be added to the MSA, and noted there could be better use of the current powers outlined in the legislation, for example an increase in the use of STROs and STPOs, TEROs and TEPOs to help disrupt perpetrators. Finally, there were calls for better use of the section 45 defence under the MSA.

Improving our knowledge and understanding of modern slavery

Respondents stressed that although the Home Office regularly publishes NRM statistics, there is a gap in understanding about overall prevalence of modern slavery in the UK and the prevalence and nature of certain types of exploitation such as adult sexual exploitation, and of exploitation patterns for very vulnerable groups such as children. Respondents also noted there is more research needed on longer term outcomes for survivors.

Finally, respondents explained the need for new understanding and knowledge about support and victim care that is developed through listening to the voices of those with lived experience.

Respondents to IASC stakeholder survey (February to March 2024)

Below is a list of the stakeholders who were comfortable being named as respondents to the survey – we thank them all for their contributions.

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| Anti-Trafficking Monitoring Group | Hope for Justice |
| Arise | Human Trafficking Foundation |
| Ashurst | Justice and Care (The Centre for Social Justice) |
| Border Force | Kalayaan |
| Broxtowe Borough Council | Kent County Council |
| Calderdale Council | Latin American Women's Rights Service (LAWRS) |
| Car Wash Association | Lewisham Modern Slavery and Human Trafficking Network |
| Caritas Bakhita House | Medaille Trust |
| Causeway | Metropolitan Police |
| Cheltenham Borough Homes | Migrant Help |
| Church of England | Modern Slavery and Human Rights Policy and Evidence Centre (MSPEC) |
| Coventry City Council | NHS England |
| East London Francophone Ltd | Nordic Model Now! |
| Focus on Labour Exploitation (FLEX) | North Lincolnshire Council |
| Gangmasters & Labour Abuse Authority (GLAA) | One By One |
| Glass Door Homeless Charity | Police Scotland |
| Hartlepool Borough Council | Rights Lab (University of Nottingham) |
| Helen Bamber Foundation | Romanac Consulting Ltd |
| Helena Kennedy Centre for International Justice, Sheffield Hallam University | Safer Kirklees (Kirklees Council) |
| Hestia | Safer Wolverhampton Partnership |
| Hibiscus Initiatives | Sandwell Council |
| HM Prison and Probation Service (HMPPS) | Scottish Government |
| Hope at Home | |

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| Shiva Foundation |
| Slough Borough Council |
| Sophie Hayes Foundation |
| STAGE Project - Adult Sexual Exploitation Partnership |
| Survivors Against Domestic Abuse (SADA) |
| Survivors of Human Trafficking in Scotland (SOHTIS) |
| The Passage |
| The Salvation Army (TSA) |

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| The Snowdrop Project |
| Three Rivers District Council |
| Thurrock Community Safety Partnership |
| Trafficking Awareness Raising Alliance (TARA) Service |
| University of Suffolk |
| Unseen |
| Warwick District Council |
| West Sussex County Council (WSCC) |
| Westmorland and Furness council |

Annex C – Defining modern slavery

Modern Slavery is a term used to encapsulate both offences in the Modern Slavery Act 2015 (MSA): slavery, servitude and forced or compulsory labour; and human trafficking.³¹⁰

The Government’s Explanatory Notes to the MSA describe modern slavery as ‘*a brutal form of organised crime in which people are treated as commodities and exploited for criminal gain*’.³¹¹ But the MSA itself does not define ‘slavery, servitude and forced or compulsory labour’.

The Crown Prosecution Service (CPS) publishes guidance on the MSA.³¹² It defines:

- **slavery** as ‘*exercising the right of ownership of another person as one might an animal or an object*’;
- **servitude** as ‘*the imposition, by coercion, of an obligation to provide services*’;
- **forced labour** as ‘*direct compulsion to work for another*’; and
- **compulsory labour** as ‘*indirect compulsion to work for another*’.

It references the definition of human trafficking from the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons (‘Palermo Protocol’).³¹³ This states: ‘*Trafficking in persons is the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control of another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or removal of organs.*’

Annex D – References

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This sets out that role of the Independent Anti-Slavery Commissioner is to encourage good practice in: (a) the prevention, detection, investigation and prosecution of slavery and human trafficking offences; (b) the identification of victims of those offences. In sharing best practice in these areas, they may also have regard to the provision of assistance and support to victims of slavery and human trafficking offences. In this pursuit of these functions, the things the Commissioner can do include:
- making reports on any permitted matter to the Secretary of State, the Scottish Ministers and the Department of Justice in Northern Ireland;
 - making recommendations to any public authority about the exercise of its functions;
 - undertaking or supporting (financially or otherwise) the carrying out of research;
 - providing information, education or training;
 - consulting public authorities (including the Commissioner for Victims and Witnesses), voluntary organisations and other persons;
 - co-operating with or working jointly with public authorities (including the Commissioner for Victims and Witnesses), voluntary organisations and other persons, in the United Kingdom or internationally.
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- ⁵ *Modern Slavery Act 2018, No. 153*, Australian Government, [link](#).
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- ¹² *Nationality and Borders Act 2022, c.36*, [link](#).
- ¹³ *SSHD withdraws new evidential test for 'reasonable grounds' decisions in modern slavery statutory guidance*, Matrix Chambers, 2023, [link](#).
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- ¹⁴ *Nationality and Borders Act 2022, c.36*, [link](#).
- ¹⁵ *Illegal Migration Act 2023, c.37*, [link](#).
- ¹⁶ *Rwanda Treaty and Bill and UK's legal obligations towards victims of modern slavery*, Modern Slavery & Human Rights Policy & Evidence Centre, 2024, [link](#).
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- ¹⁷ *Nationality and Borders Act 2022, c.36*, [link](#).
Illegal Migration Act 2023, c.37, [link](#).
Safety of Rwanda (Asylum and Migration) Act 2024, UK Parliament, accessed 25 April 2024, [link](#).

- 18 *Nationality and Borders Bill: immigration outcomes for child victims of trafficking*, Every Child Protected Against Trafficking, 2022, [link](#).
- 19 *Human trafficking. First Report of Session 2023-2024*, House of Commons Home Affairs Committee, 2023, [link](#).
- 20 Ibid. Paragraph 31
- 21 *UK Government Response to the House of Commons Select Home Affairs Select Committee report on Human Trafficking*, February 2024, [link](#).
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- 34 *Updated analysis of the National Referral Mechanism data*, International Organisation for Migration, 2024, [link](#).
- 35 The Home Office introduced new decision making in July 2023 following the High Court decision in June. Nevertheless, the median waiting time to receive a 'reasonable grounds decision' made between July and September 2023 was 47 days, ten times the official 5-working day target.
- 36 Between 2019 and 2022, there were no noticeable differences in the rate at which UK and foreign nationals received positive reasonable grounds decisions. However, in 2023, twice the proportion of UK nationals (8 in 10) received positive RG decisions, compared to foreign nationals (4 in 10). The IOM suggests legislation changes have had profoundly different impacts on people depending on their nationality.
- 37 Of those who received reasonable grounds (RG) decisions in the first 9 months of 2023: of those referred into the NRM by local authorities, 81% received a positive RG decision; of those referred by the police, 64% received a positive RG decision; of those referred by the Home Office, 35% received a positive RG decision.
- 38 Statutory guidance says the Single Competent Authority (SCA) is responsible for all child cases. However, the data shows that: the Immigration Enforcement Competent Authority (IECA) has made nearly 700 reasonable grounds decisions for child cases since it was established in November 2021. Before the changes to decision making on 30th January 2023, at least 90% of decisions for child cases made by the IECA per quarter were positive. Whilst the SCA positive decision rate remained relatively stable at 80% between April and June, the IECA positive rate fell to just 12%
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978-1-5286-5416-6