Human Trafficking Foundation

CITY OF LONDON

City Bridge Trust
20 years of investing in Londoners

LIFE BEYOND THE SAFE HOUSE

For Survivors of Modern Slavery in London

Gaps and Options Review

Report Produced by the Human Trafficking Foundation

July 2015

LIFE BEYOND THE SAFE HOUSE

for Survivors of Modern Slavery in London

Gaps and Options Review Report

Co-Authors:

Christine Beddoe, independent consultant
Lara Bundock, Founder and CEO of the Snowdrop Project
Tatiana Jardan, Director of the Human Trafficking Foundation

Graphic Design: Beatrice Lelli

EXECUTIVE SUMMARY

There is no clear picture about what happens to survivors of modern slavery once they are discovered in the UK. Those who are referred into the UK's National Referral Mechanism (NRM) and receive an initial positive ('Reasonable Grounds') decision may be able to access accommodation and support within the Government-funded safe houses for a 'recovery and reflection period ' of a minimum of 45 days period (Article 13, EU Convention Against Trafficking, 2005). However, what follows for them after that is unclear. Where do they go? What do they do? How do they survive? Some return home but many are believed to stay on in the UK, either lodging with 'friends' and contacts, or finding themselves dependent on housing allowance and other benefits. No one knows for certain.

On 20 January 2014, in a Parliamentary answer the Secretary of State for Justice said:

> ***"Since 1 July 2011 the Salvation Army has been contracted to provide support and assistance to adult victims of human trafficking for a minimum of 45 days or until a victims receives a 'Conclusive Grounds' decision. Under the terms of their contract with the Ministry of Justice, the Salvation Army is not required to maintain contact nor to record information on the location of victims once they have exited contract services." (HC Deb 20 Jan 2014 C27W/182091)***

The Home Office acknowledges that there is no obligation in the Government contract to monitor the outcomes for people who have received support or to collect data to show how survivors are assisted, and by whom, when they leave safe houses.

In 2014 the Human Trafficking Foundation (the Foundation), supported by the City Bridge Trust, set out to look at what could be done to change the current system which, in effect, allows victims to 'disappear', with no one being allocated responsibility for their future safety and welfare. The aim was to deliver a practical solution as to how adult survivors of modern slavery could be best supported and empowered to start a new life after they have left a safe house in London. The Foundation achieved this by interviewing survivors of modern slavery and asking them about their experiences and what they wanted after exiting the Government funded support scheme. The Foundation also interviewed charities and non-governmental organisations (NGOs) that provide advice and practical support to survivors, Local Authorities, the police and others who are professionally involved in the counter-trafficking sector.

Whilst conducting this research the Foundation heard many distressing stories about the difficulties faced by vulnerable adults in obtaining access to even the most rudimentary support after they had exited Government funded accommodation.

Judith, a survivor who had left safe house support said:

> ***"I was placed in a hostel. Poppy* did not know what type of place that hostel was. Poppy was so good to me. In the hostel I was living with 8 women. Every room had its***

kitchenette. The people there were ex-prostitutes, drug addicts, or ex-offenders. They place people there who would otherwise be out on the street. There were CCTV cameras everywhere in the house. The workers there knew I was not supposed to be there. In these hostels, guests do drugs, drink and fight with each other. I was bullied by one woman. Every Monday I would receive my money and buy food, which would be gone in one day. I had to give most of it to this woman because I was scared she could hurt me. She would bang at my door until I would hand over my food to her. I felt it was not safe for me to be there. There were also men coming and going in and out from the house. Poppy did not know that the Council had placed me in that hostel, they should not have placed me there. I had been a prostitute but not by my choice." (*Eaves Poppy Project is not subcontracted by the Government support scheme)

Furthermore, the lack of post safe house support and move-on guidance has a profoundly negative impact upon many staff working within safe houses:

"What I find challenging is that when they get a negative [Conclusive Grounds] decision and you have to stop working with them within two days, it's distressing, and telling them this is so hard. Sometimes we have to call people over the phone and tell them and we can hear them crying. In the cases of those who are given a positive Conclusive Grounds decision you still only have 14 days to work, and I find that 14 days is very short to make appropriate service referrals". [NGO Service Provider]

There are a growing number of adult survivors of modern slavery who are exiting safe houses and are likely to need the on-going support from professionals to find gateways into housing, health care, employment, training and English language courses. Although they have escaped and been placed in a short-term safe environment, if they lose any further engagement with statutory services they are at risk of being drawn back into exploitative or abusive situations, as demonstrated in Judith's case (above).

In 2014 the Government introduced new legislation including a package of reforms and statutory care guidance to make it easier for Local Authorities to understand their obligations to people in need of care and support (Care Act, 2014). According to the Government's Care Act factsheet "Under the Care Act, Local Authorities will take on new functions. This is to make sure that people who live in their areas:

- receive services that prevent their care needs from becoming more serious, or delay the impact of their needs;
- can get the information and advice they need to make good decisions about care and support;
- have a range of providers offering a choice of high quality, appropriate services." (DoH, 2015, pp. 1)

This new legislation may look promising, but for the majority of survivors of modern slavery the gateway to accessing onward support remains closed. Our report shows that the eligibility criteria for accessing safeguards under the Care Act do not fit with the circumstances of most survivors of modern slavery. In this report, we have tried to provide a new approach to the post safe house scenario – the period after a person is compelled to leave the Government support scheme. Some refer to it as 'follow-on housing', but it must

constitute more than this because the needs of survivors of modern slavery go far beyond the need for accommodation.

In the course of our research, we uncovered what many professionals working with adult survivors readily understand: you cannot simply pick up a phone and get a tailored package of support for someone who has been given a positive Conclusive Grounds decision and is therefore officially recognised as a victim of modern slavery. The situation is worse for men and women who initially receive a positive Reasonable Grounds decision but are later issued with a negative Conclusive Grounds decision denying them official recognition as survivors of modern slavery. In such cases the Home Office only allows 48 hours for an individual to exit a safe house, which is an inadequate timeframe to establish a pathway for alternative accommodation and support. Assisting in this process is particularly stressful for professionals who fully believe a person is a victim of modern slavery but have to abide by the refusal decision.

In cases where a positive Conclusive Grounds decision has been issued, support is still limited to a 14 day exit period, which is considered to be insufficient by the NGOs who participated in this research. Currently there are clear gaps in policy and protocols for keeping survivors of modern slavery "safe". As a result, the Foundation believes that urgent action from central Government and Local Authorities is needed to remedy the lack of *post safe house* assistance for survivors who are at risk of returning back to traffickers or falling into other abusive or exploitative situations.

Due to our concern about this situation we have decided to open a discussion about the associated risks of survivors suffering re-trafficking. These risks are virtually ignored in the Government's own Modern Slavery Strategy (November, 2014).

The Human Trafficking Foundation believes there is a causal link between the way a person is treated after being released from the control of traffickers and the potential downward spiral back to a situation of slavery or exploitation. We have found that the current options for housing and support in the *post safe house* period are not sufficient for survivors of modern slavery. If there is no effective strategy to prevent re-victimisation then generational cycles of abuse and exploitation of vulnerable people may continue unabated. Many professionals believe that survivors they come into contact with are at risk of further harm due to their specific vulnerability and situation, although there are no records kept or information collated to confirm or otherwise the extent of this problem.

PRINCIPAL RECOMMENDATIONS

1. That the Government issues guidance to Local Authorities on the interpretation of the Care Act, 2014 in order to make adult safeguarding support more accessible for survivors of modern slavery.

2. That a Model of Advocacy is introduced and made available to adult survivors of modern slavery beyond the duration of the 'recovery and reflection period'. Each potential victim referred into the NRM should have the opportunity to benefit from the help of a specialist advisor until a settled solution is reached. Lessons could be learnt from other support models for vulnerable groups, i.e. domestic violence, the homeless sector and alcohol and drug rehabilitation support services.

3. That a condition is added to the recently renewed Government contract with the Salvation Army[1] to produce detailed move-on care plans, including an individual risk and needs assessment for every survivor. This should be monitored in conjunction with the Model of Advocacy (as recommended above) for referred people whether the person is remaining in the UK or voluntarily returning to their country of origin. Such monitoring should be carried out at regular intervals for up to 2 years, based on individual needs. In order to implement this in cases of voluntary return, working relationships with recognised NGOs in the countries of origin should be developed.

4. That a multi - agency specialist working group, including Local Authority Adult Safeguarding Leads and NGOs, develop a 'Case Transfer Protocol' which can be adopted into existing guidance so that moving on from the Government-funded scheme becomes a safer and more streamlined process. To complement this we recommend a telephone based advice service be developed for front-line professionals to access knowledge and resources.

5. That the Home Office brings forward plans for an 'outcome based' support model, as recommended by the Centre for Social Justice (2013), drawn up in collaboration with specialist non-governmental organisations and statutory bodies, consistent with the Government's international obligations and best practice.

6. That further research is commissioned on the situation of survivors suffering re-trafficking and/or further victimisation in the UK, or when returning to countries of origin. In particular we urge the Government to review procedures to ensure that when the new NRM provisions are implemented, data is recorded that includes any indicators of re-trafficking or re-victimisation wherever possible.

7. That an independent cost analysis is carried out to assess the cost to the Government of providing move-on assistance to survivors as compared to the cost of providing social, welfare and health services when/if the survivor's condition deteriorates to the point of being highly vulnerable. This includes assessing the cost of provision of safe house support and other services in cases of re-trafficking.

1. Government contract for Adult Victims of Modern Slavery Care and Coordination Services (Home Office, 2015)

INTRODUCTION

In 2014, 2,340 potential victims of trafficking were referred into the National Referral Mechanism (NRM) (NCA, 2015). This is a 34% increase on the figure for 2013. Of the 2,340 people referred to the NRM, 1,669 referrals were for adults [71%] with 1,084 women, 583 men and 2 people who are transgender. The Foundation recognises that there will always be different levels of need and vulnerability, and a 'one size fits all' system for survivors is not appropriate. Research interviews with survivors and NGO staff highlight the importance of provision of individually tailored support to navigate welfare, health care and immigration services, as survivors try to move on from Government-funded accommodation and support.

> ***"I have to go to a meeting at 2 pm with the solicitor as the Home Office said that I should not be supported by Mary[2] anymore. Mary can't come with me anymore, so I have to go there on my own. This is what she told me, but I haven't received any letters yet. ....I don't even know which way to turn, I don't know what to do. Since Mary stopped helping me, I haven't got a clue what to do, everybody knows I'm not in good health. I feel abandoned now." [Adeline, a survivor]***

> ***"If the survivor chooses to keep in touch with the service provider in the future we will always be there to talk to them. However we do not actively monitor the survivor after they have left the service. ... We are currently not aware of any government funding which supports monitoring of and supporting survivors after the NRM funding ends." [NGO providing accommodation and support services]***

As discussed further on, there are legal and practical barriers that prevent Local Authorities and health services accepting vulnerable survivors of modern slavery into their systems for safeguarding adults when they exit safe houses.

As with all statutory arrangements there are specific gateways for access. If a person cannot access a statutory gateway for support/accommodation, then currently it falls on the voluntary sector and volunteers to advocate for basic levels of support for those who are fortunate enough to be in their care. Lack of move-on support and guidance can leave survivors in despair and may increase the risk of falling back into exploitation or further harm (Helen Bamber Foundation, 2013). The lack of recognition of this problem in the Government's 2014 Modern Slavery Strategy is worrying. It does not provide a victim-centred approach to case transfer once a person leaves a Government-funded safe house. In particular we have identified the immediate need for a pro-active and trusted advocate who is dedicated to the best interests of a survivor and can act as a point of contact for them after they leave safe house support.

> ***"My experience with the clients who have been through the 45 days period is that they end up on the streets again. They are so incredibly vulnerable because their wounds have been opened up, because they only have 45 days to deal with those wounds, and it's not fair, but after 45 days they're out. We work with EU nationals and there are more men than women…the disillusion brings them so much despair.***

2. All names have been changed to protect identity

All this help is thrown at them, they are safe and then in a blink of an eye it's gone". [Megan Stewart, formerly from Thames Reach – homeless charity, now Anti-Trafficking Consultant]

In general, the system for Local Authority enhanced support in England and Wales responds to the needs of individuals that are based on past harm rather than on the prevention of future risk. In modern slavery cases, when a person is required to leave a safe house, it does not mean that the composite risks they faced while under the control of traffickers have all disappeared. Many will still fear the traffickers, some may still have to pay off debts, others may be worried about returning home because of stigma and risk to their families, others who want to find work cannot do so because they feel unable to disclose details about their past or they have nowhere to live. When there is no adequate move-on support, the level of a person's vulnerability and psychological difficulties can rapidly increase. As the situation deteriorates the services will ultimately have to do much more than they would have otherwise to help this person recover. Instead of pushing survivors to an unknown future without support, which can be disastrous, we need to empower people to gain control of their lives and to become active members of society, not a greater burden to it. The majority of survivors interviewed for this research stated that their main aspiration is to become independent, to learn English, to find a job and contribute to society.

Not all survivors' needs are the same. Some will feel able to move on with their life without much help, but for others this is more challenging. Triggers in everyday life can make someone who was gaining confidence in a safe house suddenly spiral downwards due to a variety of factors, such as re-traumatisation, depression, isolation, mental health episodes or fear of unknown futures. Furthermore, if survivors are still waiting for the determination of their immigration status, their prospect of starting a new life can be put on hold for months, or even years, after they exit safe houses. During this time, the uncertainty of the situation can exacerbate fragile emotional and mental health conditions.

Methodology

This research was confined to focusing only on the situation within London and Greater London. Some issues such as housing shortages are more acutely felt in London, but others have wide-reaching national significance. There is a lack of published data on what happens to survivors after they leave safe houses so this report inevitably draws heavily on anecdotal evidence provided by survivors and specialist NGOs. Nearly all of the participants in the research told us that they did so in the hope that sharing their own individual experiences might result in improved awareness and a better situation for others. With the help of a number of specialist support agencies who made connections for our researchers, the Foundation conducted face to face interviews with 10 adult survivors of modern slavery. All had been referred into the NRM and were at various stages of accessing support in London after leaving, or being about to leave, safe house accommodation. Interviews with these survivors were conducted in locations they had identified as feeling safe for them, and interpreters were used for two of the interviews. All of the participants were offered anonymity and confidentiality, and all of the questions were agreed in advance with professionally trained front-line workers. This was to ensure that the interview process met required ethical standards to avoid any potential risks of re-traumatisation of survivors (see appendix 1).

It was the Foundation's original intention to interview both men and women. However our researchers found it difficult to get access to male survivors of modern slavery in London. We can only speculate on reasons for this, but it does appear that support workers and safe houses are less likely to maintain contact with men than women. In addition, the lack of specialist accommodation and support for men who have been trafficked in London is likely to be a factor. It was also difficult to secure interviews with survivors of EU nationality. None of the safe houses were able to connect us to someone they had previously supported from the EU as they tend to 'disappear' off the radar after leaving. This issue was taken into consideration during our analysis and it is discussed in detail further on in the report.

Additionally, the Foundation researchers conducted two focus group workshops: one in November, 2014 with representatives from eight NGOs which provide direct support to survivors, and a second in February 2015, with representatives from London-based Local Authorities which are responsible for adult safeguarding and support in Croydon, Ealing, Hounslow, Lambeth, Sutton, Waltham Forest and the Greater London Assembly. The Foundation also sent Freedom of Information requests to 33 Local Authorities across London (see Appendix 2) and reviewed a number of reports and guidance documents. This literature review of existing academic research, policy documents and other publications from NGOs and think-tanks provided the conceptual framework against which empirical data, obtained through interviews and focus groups, was collated.

LEGISLATION AND POLICY REVIEW

For the purposes of this research the Foundation conducted a legislation and policy review in the field of modern slavery and adult safeguarding care in the UK.

Over the past 18 months the UK Government has prioritised the issue of modern slavery and has made commendable efforts to tackle this heinous crime. The Government has passed a Modern Slavery Act (2015), launched a Modern Slavery Strategy (HM Government, 2014) and published a Review of the National Referral Mechanism (Home Office, 2014).

The Modern Slavery Act (2015) is the first dedicated legislation on modern slavery bringing together all of the criminal offences under one Act. However, it is largely law-enforcement focused and, in our view, fails to provide sufficient protection for survivors.

The National Referral Mechanism (NRM), which was introduced in the UK in 2009 is a system for identifying victims of modern slavery and providing a gateway to support. Since it's conception, it has been criticised by many professionals in the field. As a result, the Home Office commissioned a review of the NRM publishing the findings in November 2014. The Review presents good principles such as, speeding up potential victims' access to care and introducing a standardized multi-disciplinary approach to decision-making on cases of modern slavery, regardless of their nationality. However, the practical recommendations suggest very little about post safe house support. They may improve the current situation for survivors who are in safe house accommodation, but the problem of life beyond the safe house has not been tackled.

The Modern Slavery Strategy (2014) states that the Government "puts victims at the heart of everything that we do" (pp. 5) and it does talk substantially about provision of support to victims of modern slavery. However, there is still no clear plan of action as to how the measures introduced by the Strategy will be implemented.

The new Care Act, 2014 was referenced a number of times during the focus group discussion with Local Authorities. It is one of the first pieces of legislation in adult health and social care that specifically addresses exploitation as a "form of abuse and neglect" (DoH, 2014). However, there are practical difficulties to implementing this legislation effectively which are discussed below.

The Care Act, 2014

The Care Act 2014 provides a consistent route to establishing entitlement to public care and support for adults in England and Wales who have specific needs. The Act sets out a new legal duty for the Local Authority to meet an adult's 'eligible needs'. It also introduces into eligibility criteria the concept of being 'ordinarily resident' in the local area (generally taken to be an established place of residence). The Care and Support Statutory Guidance states:

> ***"Safeguarding means protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and***

stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances." (DoH, 2014, Section 14)

Section 14.17 of the Care Act (2014) lists exploitation as "a form of abuse and neglect" that must be prevented. A safeguarding response that ensures appropriate case transfer and move-on from specialist safe houses would help to prevent the risk of re-trafficking and exploitation. However, in practice, the initial eligibility criteria (see below) for obtaining Local Authority adult safeguarding support is not met by the majority of survivors of modern slavery. Currently, survivors are often left without social work intervention or key workers who could provide safe, onward case transfer and management to help them navigate access to essential support including housing and health care.

"Survivors have to explain to an inexperienced person that they are more vulnerable than other homeless people because they have been trafficked, but there are situations where people from the homeless unit decided to interview victims on why they are illegal immigrants in the UK…Some housing professionals are amazingly helpful but others do a lot of damage. There are no protocols in place. It's dangerous for victims". [NGO Service Provider]

Evidence from both focus groups and the interviews with survivors, identified the inaccessibility of Local Authority care and lack of understanding of the specific needs of survivors of modern slavery amongst front line professionals. This makes it incredibly difficult for survivors to access support from statutory agencies.

Safeguarding Adults – Eligibility

The eligibility threshold for adults who have care and support needs is set out in the Care and Support (Eligibility Criteria) Regulations, 2014. The Regulations state:

In considering whether an adult with care and support needs has eligible needs, local authorities must consider whether:

- *The adult's needs arise from or are related to a physical or mental impairment or illness.*
- *As a result of the adult's needs the adult is unable to achieve two or more of the specified outcomes (examples include - developing and maintaining family or other personal relationships; accessing and engaging in work, training, education or volunteering; making use of necessary facilities or services in the local community including public transport; managing and maintaining nutrition – Section 2.2).*
- *As a consequence of being unable to achieve these outcomes there is, or there is likely to be, a significant impact on the adult's wellbeing. (Section 2.1)*

All three points must be satisfied in an individual assessment. Although the legislation does not preclude survivors of modern slavery from accessing support from Local Authorities, it presents practical obstacles. For example, most survivors' needs do not "arise from or

are related to a physical or mental impairment or illness", but are due to the impact of their past traumatic experiences and their specific vulnerability as victims of trafficking i.e social isolation, problems of autonomy and agency, and lack of knowledge of the UK (Helen Bamber Foundation, 2013). The eligibility criteria is set restrictively high and does not include the more specific needs of survivors of modern slavery.

The Government needs to recognise that lack of awareness and understanding of human trafficking and modern slavery by front line professionals makes it almost impossible for survivors to access Local Authority services. **The Human Trafficking Foundation urges the Government to issue specific guidance to Local Authorities on the interpretation of the Care Act, 2014 in order to make adult safeguarding support accessible to survivors of modern slavery, particularly for those with complex needs.** The Foundation believes that without such guidance even the most knowledgeable and committed Local Authority will struggle to place survivors of modern slavery into their adult safeguarding systems because of the 'eligibility criteria'.

The National Referral Mechanism and the NRM Review

The National Referral Mechanism is the process by which people who may have been trafficked are identified, referred, assessed and supported by the UK Government. The NRM was set up in the UK in 2009 following the signing and ratification of the Council of Europe Convention on Action against Trafficking in Human Beings (2005). Referral of a survivor into the NRM by a First Responder[3] is the official gateway for adult victims to access safe house and other support provided under the Government contract for victims of modern slavery. This contract is currently held by the Salvation Army.
However, even after a person is referred to the NRM as a potential victim of trafficking there are various points where they may 'drop out' of the route to specialist or statutory services. Currently there is a lack of information about what happens to those victims who exit the service. The Foundation has identified 3 key areas for consideration:

1. What happens to those adult survivors who choose not to be referred into the NRM?
2. If a potential victim is referred into the NRM and receives a positive Reasonable Grounds decision, but chooses not to access safe house support, or is not considered to be eligible for safe house support, what happens to them then?
3. What happens after a survivor leaves the safe house?

Currently, as referral is optional, not all adults who are considered to be potential victims of trafficking get as far as being recorded in the NRM process. During the Foundation's interview with the London Metropolitan Police (Met Police), it came to light that many potential victims of trafficking chose not to be referred to the NRM.

> ***"Only 60 out of 200, Tier 2 and Tier 3 [London] cases went in to the NRM in 2014." [Trafficking and Kidnap Unit, London Metropolitan Police]***

The Met Police told us that many of these people will still be vulnerable and in need of a range of assistance, even if this is not specialist or acute care provided by counter-trafficking services. This places an additional burden on police investigation teams, who must find a safe environment for victims of crime. The Met Police gave us a number of examples

3. Organisations qualified to refer potential victims in to the NRM

of situations in which they had had to appeal to a variety of charitable organisations for provision of victim accommodation and support. There is also no mechanism or policy to record the outcomes for these individuals.

As part of the NRM process, a potential adult victim of trafficking is entitled to safe accommodation and support under the EU Directive (2011). In England and Wales the Salvation Army has overseen this entitlement since 2011 under the Government contract. The data from the Salvation Army annual reports (2012, 2013, 2014) shows that a proportion of potential victims do not access safe house support after being referred to them for assistance.

According to the latest Salvation Army report, in 2014 there were 1,207 people referred into their adult victims support scheme but 318 of these did not enter one of the safe houses provided for various reasons. These reasons include not meeting the eligibility criteria, declining the offer of support or making no further contact beyond initial referral. Therefore it is clear that the NRM referral doesn't always result in potential victims being safely accommodated and assisted.

Since its inception the NRM process has been subject to much criticism. Part of the difficulty in assessing the success of the NRM and the Government scheme for providing support to adult victims is that there is no policy framework for reporting on the outcomes of people who are referred into the NRM.

The only data available is recorded in the NRM quarterly reports that are produced by the UK Human Trafficking Centre (UKHTC), part of the National Crime Agency. It records information on the number of potential victims of trafficking referred into the NRM, and the number of both positive Reasonable and Conclusive Grounds decisions that are made by the UK 'Competent Authorities'[4]. Decisions about who is, and is not, a victim of human trafficking (and their entitlement to support) currently are made by the UKHTC for referrals of EU nationals, and UK Visa and Immigration (UKVI) for non-EU referrals.

NRM statistics (NCA, 2012 – 2014) highlight the following:

	2012	2013	2014
Total number of Adult NRM Referrals	1186	1746	2340
Total Number of Adult positive Conclusive Grounds Decisions	371	542	621
= Balance remaining of people who are assumed to have received a negative decision at either reasonable or conclusive decision stage or a decision deferred to following year.	815	1204	1719

These figures show that there are a relatively low number of positive Conclusive Grounds decisions – on average 30% of the referral total each year - compared to the number of negative or outstanding decisions. These figures raise questions as to why the percentage of positive decisions is so low. More importantly, if the individual being referred was considered to have indicators of trafficking at the initial point of identification, or there were 'Reasonable Grounds' to believe they had been trafficked, then they must be vulnerable and in need of support, even if, further into the process, they are not believed to have been trafficked.

We interviewed survivors who had left safe houses with both positive and negative Conclusive Grounds decisions on their trafficking cases. They all voiced similar difficulties in moving on from safe house accommodation and starting their lives afresh. A positive Conclusive Grounds decision, in and of itself, does not provide any entitlement to statutory support, and, therefore, does not guarantee successful integration. Currently, the only advantage of a positive Conclusive Grounds decision is the ability to apply for Discretionary Leave in the UK (Home Office, 2013), or potentially to apply for asylum on the basis of being trafficked. The latter does not automatically guarantee obtaining refugee status. Of higher importance is the fact that a positive Conclusive Grounds decision has little or no impact on an individual's entitlement to housing, welfare support and statutory services. Members of our NGO Focus Group raised the following concerns on this subject:

> ***"Basically what they are doing is saying so yes you have a conclusive positive decision, you are trafficked, but here's your leaflet, you can go now." [NGO Service Provider]***

As there is no policy framework to ensure appropriate and cohesive case transfer or to monitor the outcomes for survivors after they leave safe houses, there is no reliable information as to where they go and what happens to them. It is not possible to say whether any of these individuals have been re-trafficked, exploited or subjected to further harm, but it is equally clear that there are no statutory agencies that can state with certainty that they have not. The only information available is anecdotal evidence from safe house staff who keep in touch with survivors on an ad-hoc basis, or NGOs who provide longer term specialised services outside of the Government contract, for example the *Helen Bamber Foundation* and *Eaves Poppy Project*.

> ***"Sometimes they call me to get advice and my help to get to things and I still work with them" [NGO Service Provider]***

Victim support agencies interviewed for this research believe that the current NRM process is flawed and does not put the rights of victims at the centre of decision making, which leaves highly vulnerable adults and children particularly at risk.

These views were also firmly stated in response to the National Referral Mechanism Review (Home Office, 2014). The purpose of the Review was to examine whether the NRM provides an effective and efficient means of supporting and identifying potential victims of human trafficking as part of the Government's wider commitment to eradicate slavery and protect victims through legislative and non-legislative work.

The Foundation has noted that post safe house support was not included in the key areas examined by the NRM Review team. However, the lack of support was raised by a number of NGOs and other professionals who gave evidence for the Review:

> ***"Many to whom we spoke thought that victims "are failed". Many survivors are still profoundly vulnerable and are left to negotiate on their own a return home or re-integration into the community alongside the accessing of any mainstream support". [Home Office, 2014, pp.34]***

The NRM Review report made a number of significant recommendations, including developing and monitoring integration services and *post safe house* support for survivors who have been given a positive Conclusive Decision and are therefore officially recognised as victims of trafficking by the Government:

> ***"Providing support based on an assessment of the individual needs of the victim. Consideration should be given to entry and exit timescales, support following conclusive identification, and the audit and inspection of support provision." [Home Office, 2014, pp. 8]***

At the time of writing this report the Home Office was planning pilots to test the recommendations of the NRM Review Report and was holding workshops with a group of specialized NGOs to gather their ideas as to how those might work. The two regions where the NRM Review recommendations will be piloted are West Yorkshire and the South West region (Dorset, Avon and Somerset, Gloucestershire, Wiltshire, Devon and Cornwall). The NRM one-year pilots are to be launched in summer 2015.

Modern Slavery Strategy

The Home Secretary, the Rt Hon Theresa May MP, launched the UK Modern Slavery Strategy in November 2014 with the welcome statement that "It puts victims at the heart of everything that we do" (pp. 5). Section 7.10 through to 7.18 of the Strategy document focuses on support for survivors of modern slavery. The Foundation believes that if these measures are fully implemented in the spirit in which they were intended, they, would go a long way to placing the rights of survivors at the centre of Government policy.

> ***"Once victims are identified we must ensure that they are provided with access to specialist support. These individuals have often endured horrific physical, psychological or sexual abuse at the hands of slave drivers and traffickers. The needs of survivors of modern slavery are amongst the most complex of any victims of crime, often requiring a multidisciplinary approach to address both the trauma of coming to terms with their experience and longer-term support to help them move on and rebuild their lives. Immediate support in safe accommodation is important but we also need to consider what help we can provide victims so that they can move forward with their lives." [HM Government, 2014, Section 7.10]***

The Modern Slavery Strategy also goes on to state:

> ***"The NRM Review also recommended that the Government should consider whether this support could be enhanced, including by:***
>
> - ***Consistently providing immediate access to safe accommodation for those that need it.***
> - ***Providing support based on an assessment of the individual needs of the victim and that consideration be given to entry and exit timescales.***

- ***Ensuring that planning for a safe transition from safe accommodation to independent living commences as early as possible and that this transition is as effective as possible.***
- ***Exploring the most effective ways in which the service can be extended to support victims once they leave the service.***
- ***Confirming that standards of support are provided at the agreed level through an audit or inspection of provision within the victim care contract." [HM Government, 2014, Section 7.18]***

After hearing about the experiences of survivors and specialist NGOs, the Foundation is anxious to see how the NRM Review recommendations will be put into action. At the time of writing this report we are yet to see an implementation plan with exact details how these aspirations will be realised, who will be allocated responsibility for them, the intended timeframe and how outcomes will be measured. It remains unclear as to who will lead on responsibilities outside the Home Office to co-ordinate effectively with Local Authorities, the NHS and other statutory agencies, and specialist NGO service providers.

The Modern Slavery Act, 2015

The Modern Slavery Act 2015 received Royal Assent on Thursday 26th March. It contains a package of legal reforms designed to improve the response of law enforcement and ensure that victims of this crime receive best practice protection and support. These include:

- Increasing the maximum sentence available for the most serious offenders from 14 years to life imprisonment;
- Ensuring that perpetrators convicted of slavery or trafficking face the toughest asset confiscation regime;
- Consolidating and simplifying existing modern slavery offences into one Act;
- Introducing Slavery and Trafficking Prevention Orders and Slavery and Trafficking Risk Orders to restrict the activity of individuals where they pose a risk of causing harm; and
- Strengthening law enforcement powers at sea to close loopholes which can prevent the police and Border Force being able to act on board vessels at sea.
- Creating a statutory defense for victims of modern slavery so that they are not inappropriately criminalised;
- Giving the courts new powers to order perpetrators of slavery and trafficking to pay Reparation Orders to their victims;
- Providing for child advocates to support child victims of trafficking;
- Extending special measures so that all victims of modern slavery can be supported through the criminal justice process;
- Providing statutory guidance on victim identification and victim services, including an enabling power to put the relevant processes on a statutory basis;

- Introducing protections for victims of abuse on an overseas domestic workers visa;
- Creation of an Independent Anti-Slavery Commissioner with a UK wide remit.

The final version of the Modern Slavery Act changed significantly from the initial draft of the Modern Slavery Bill that was published by the Government in December 2013. Over 18 months the Government took into consideration the views of many knowledgeable and expert individuals and organisations, and as a result key measures were introduced into the Bill, which will have a significant positive impact for victims, and for those fighting this crime.

However, the Foundation recognises that the Act is not perfect; it is only a basis from which to work from. There are gaps in the legislation, as well as strategy and policy issues, which need to be addressed and improved in order to be truly victim-centred and to provide the most effective continuous support for recovery and integration.

RE- TRAFFICKING

> ***"Adults are not a priority; they are not seen as vulnerable…these women are put temporarily in hostels, which are actually potential recruitment grounds!" [NGO Service Provider]***

There is very little information available about victims of modern slavery who, having been identified in the UK and taken to a place of safety, are subsequently re-trafficked, exploited or exposed to further harm from perpetrators in the UK or abroad. The Modern Slavery Strategy (Home Office, 2014) fails to define 're-trafficking' or consider it in detail. For the purpose of this report we are using the definition used by the International Organisation for Migration (IOM), in their report *The Causes and Consequences of Re-trafficking: Evidence from the IOM Human Trafficking Database* (2010):

> ***"Re-trafficking shall mean a situation in which a person has been trafficked on one occasion as set forth in the definition provided in the United Nations Palermo Protocol; has then exited that trafficking situation by any means; and has then later re-entered another trafficking situation, again as stated in the United Nations definition." (pp. 17)***

Of course, modern slavery extends beyond human trafficking but the fundamental concept of someone being re-victimised after having escaped a previous situation of exploitation is one that we believe is under reported or more likely not reported at all.

In answer to a Parliamentary question about persons referred into the NRM more than once the Home Office Minister for Modern Slavery, Karen Bradley MP, replied:

> ***"The current National Referral Mechanism (NRM) system is not designed to be able to accurately identify this type of information. Personal details collected at the point of entry to the NRM are not currently recorded in a way which permits the definitive identification of individuals who have been referred more than once. This is due to a number of factors in the way the data is provided by both responding agencies and potential victims, as well as how it is collated and recorded. The recommendations of the NRM review, when implemented, will make provision for this type of data in the future." [HC Deb 23 Feb 2015 c224410W]***

In describing the results from interviews conducted with survivors of modern slavery who had subsequently been re-trafficked, IOM described an area of weakness in the reintegration options that are offered to survivors in relation to seeking future employment.

> ***"After assistance, none of the beneficiaries stated having been able to secure regular employment (n=9), although a small minority were employed in irregular forms of work (n=2). As the majority remained unemployed, the employment situation of many of the trafficked persons at the end of the reintegration assistance was therefore similar to their situation immediately prior to first recruitment by their traffickers. In addition, many of the women indicated that they still considered***

themselves to be economically poor at the end of the monitoring process. While such a finding demands more attention, it reveals the need to consistently monitor and evaluate the efficacy of reintegration options." [IOM, 2010 p. 49]

IOM concluded that case monitoring should be finalised only when it is believed that a victim is economically and socially capable, and able to live independently.

The Foundation agrees with this conclusion. There is no statutory requirement to assess and monitor the support needs of survivors after they have exited safe houses. The onus is on survivors being able to pro-actively seek help for themselves, or on limited and ad-hoc support that may be provided by a small number of NGOs who work independently of the Government contract.

"If the survivor chooses to keep in touch with the service provider in the future we will always be there to talk to them. However we do not actively monitor the survivor after they have left the service. ... We are currently not aware of any government funding which supports monitoring of and supporting survivors after the NRM funding ends." [NGO Service Provider]

This means there is no hard statistical data about what is happening to people beyond their stay in a safe house. There is now a wealth of qualitative information and reports which raise concerns about survivors' safety and barriers to successful integration. This has to be given serious consideration by the Government and followed by the development of a pro-active response.

The Foundation believes that a condition should be added into the recently renewed Adult Victims Care and Coordination contract for provision of detailed move-on care plans, including a risk and needs assessment for every survivor. This should be monitored in conjunction with the model of advocacy (as per recommendation 2) for each referred person whether the person is staying in the UK or voluntarily returning to their country of origin. Such monitoring should be carried out at regular intervals for up to 2 years, based on individual needs. In order to implement this in cases of voluntary return, working relationships with recognised NGOs in the countries of origin should be developed.

The Modern Slavery Strategy & Re-trafficking

The Modern Slavery Strategy (Home Office, 2014) does little to consider the risk of re-trafficking for victims after they exit safe houses and offers only a light-touch approach to a long-term, sustainable recovery. There are two passing references: the first concerns efforts that the Border Force will make in source countries:

"Disrupting traffickers and identifying potential victims at the border. Border Force will work closely with law enforcement agencies and civil society organisations in source countries to intercept traffickers, prevent victims from being trafficked to the UK in the first place and provide enhanced support and protection against re-trafficking." [Home Office, 2014, Section 6.17]

The second concerns the securing of compensation for victims as a remedy to prevent re-trafficking:

> ***"We know that compensation for victims is very important in the process of recovery and also in preventing possible re-trafficking. It can improve the chances of a victim's psychological recovery and eventual reintegration into society and can also offer economic empowerment and protection from being re-trafficked." [Home Office, 2014, Section 7.44]***

Neither of these two aspirations addresses core questions about how statutory bodies identify, monitor and mitigate risk to each individual based on their specific circumstances.

On 23rd February 2015 the Home Office Minister for Modern Slavery, Karen Bradley MP, replied to a Parliamentary question on the numbers of suspected victims who had been re-trafficked after referral to the NRM:

> ***"The information requested is not available as it is not routinely recorded as part of the National Referral Mechanism process. However, the NCA's 'Strategic Assessment on the Nature and Scale of Human Trafficking in 2013,' which was based on additional information and intelligence, identified that there were three cases where a potential victim had experienced a secondary period of exploitation following recovery during the period 1 January 2013 to 31 December 2013. Similar intelligence assessments were produced in 2011 and 2012 which contained no data relating to the number of potential victims that may have been re-trafficked.' [HC Deb 23 Feb 2015 c 224197W]***

Without an efficient monitoring system in place, it is not possible to understand the potential risks faced by survivors after they exit safe houses, including their risk of being re-trafficked. Lack of such data precludes the Government from assessing the social return on investment in initial safe house care and the long-term outcomes of such intervention. The Foundation urges further research on the situation of survivors suffering re-trafficking and/or further victimisation in the UK, or when returning to home countries. In particular we urge the Government to review the procedures to ensure that when the new NRM provisions are implemented, data is recorded that includes indicators of re-trafficking or re-victimisation wherever possible.

Other responses to Re-Trafficking

> ***"[EU citizens] are encouraged to consider returning to their country of origin. In my experience of both male and female victims, about 50% choose to return and the rest will chose to remain in the UK…[they] will seek out any support networks … to find a place to stay whilst they continue to seek work. Sometimes they will stay with family friends as an informal tenant - this puts them at high risk of exploitation as they now "owe" this person. Others (mostly male) will become street homeless due to lack of support and funds, and will often turn to alcohol and find themselves in trouble for theft etc. All these individuals, whom we have witnessed this happening to, remain extremely vulnerable to exploitation and re-trafficking in the future. Some have returned to their traffickers as they have nowhere else to stay." [NGO Service Provider]***

The Centre for Social Justice (CSJ) report It Happens Here: Equipping the United Kingdom to fight modern slavery (Slavery Working Group, 2013) stated that:

> ***"A number of support providers in touch with our review voiced fears that many survivors are vulnerable to isolation and even re-trafficking after receiving their Conclusive Grounds decision. This reflects the lack of focus on complete reintegration..." (pp.173)***

The CSJ also recommended that an outcome-based support model should be developed for aftercare providers to ensure that survivors are able to rebuild their lives and enjoy long-term safety from re-trafficking.

Two years after the CSJ report was published, it is clear that this recommendation has not been adopted. Each survivor that participated in our research interviews reported varying experiences. For example, two Albanian survivors we interviewed entered the NRM at similar times and were supported in the same safe house. One of them received a positive Conclusive Grounds decision and was promptly connected to community and psychological support services through the diligence of her support worker. The other was still waiting for her Conclusive Grounds decision after two years; she had to leave the safe house before a decision was made, and she ended up feeling extremely isolated and 'forgotten'.

> ***"I have been here [the UK] for 2 years... I feel like nobody cares about me... If you wanted someone to be safe and you say you want to help someone, try to finish everything in a short time, help her get everything she needs, but not to keep her safe [just] to live again on the streets... Why do you [Government] make us wait for 2 years to make us ready for our life? Always I am trying to forget my past and move on, but I cannot." [Vera, a survivor]***

This is just one example of the disparity within the current system. It is a situation that the Foundation finds unacceptable in dealing with vulnerable people. Therefore we support the CSJ's recommendation and urge the Government to bring forward plans for an 'outcome based' support model, drawn up in collaboration with specialist non-governmental organisations and statutory bodies, consistent with the Government's international obligations and best practice.

In the report *Hidden in Plain Sight*, the Anti-Trafficking Monitoring Group reported:

> ***"The risks with moving victims on too quickly from assistance provision included re-trafficking, which some service providers saw as an increasing trend. There was also worrying anecdotal evidence to suggest that service providers have been advised to make victims homeless after 45 days; destitution making them eligible for other services, and so reducing the strain on the limited resources available within the NRM." [ATMG, 2013, pp 35]***

In 2014 the Modern Slavery Bill Evidence Review committee published a report - *Establishing Britain as a world leader in the fight against modern slavery,* which concluded:

> ***"For the majority of victims the recovery and reflection period can only represent a very early and limited stage in the intricate and long term process of sustained recovery. The Panel heard frequently that individuals too often do not receive the support they need in order to rebuild their lives and increase their resilience against re-trafficking, which is a significant risk for some. At the end of the reflection period, there is often a steep cliff-edge where support ends." [Butler-Sloss, Field & Randall, 2013, pp. 60]***

The analogy of a 'cliff-edge' is particularly apt in this context, and it is one that came across clearly during interviews with survivors who had already been referred to the NRM and had left, or were about to leave, the Government support scheme. If no additional assistance is provided, a survivor's situation can quickly deteriorate, with ultimate human and financial costs.

The Foundation believes an independent cost analysis should be carried out to assess the cost to the Government of providing move-on assistance to survivors, in comparison with the cost of providing social, welfare and health services when/if the survivor's condition deteriorates to the point of being highly vulnerable. This includes assessing the cost of provision of safe house support and other services in cases of re-trafficking.

THE VOICES OF SURVIVORS

Ten adult survivors, women between the ages of 18 and 50, were interviewed by the Foundation for this research. They came from non-EEA countries including Albania, Nigeria, Congo and Vietnam. They had all been through the NRM referral process and were at various stages of accessing support in London after leaving, or being about to leave, the safe house provided under the Government adult victim support scheme.

In overview, we found that each interviewee was still clearly affected by the psychological impact of their trafficking experiences. Each spoke of their desire to start a new life, to contribute to society and become self-sufficient and independent. This included desires to raise their own family, to obtain training in topics such as law and social care to help others, to write books, learn new skills and find a job. However, across the interviews participants also highlighted a number of problems that impede their recovery as they strive for a new life. The most prominent themes that emerged were isolation & risk of future harm.

Isolation

Isolation and the feeling of abandonment after being told to exit the safe house was an issue for each survivor we interviewed. Although a number of small charities offer outreach support, it is not always available, and is dependent on the location where survivors are subsequently housed. A number of survivors told us that the cost of public transport was too high for them and made accessing specialist support services a real challenge on their limited subsistence. It was evident from interviews that dealing with day to day situations, such as attending appointments, reading letters, paying bills or meeting friends, felt overwhelming without support and thus provoked and exacerbated feelings of isolation.

> ***"When you move from the safe house, the trauma, the fear, you don't have that care anymore. Even if they do give you a person to support you, it's a one time, like once a week. At the safe house it's totally different, everything we need is there and people are there to explain things to us. A lot of people are from Africa, they don't have education. In the safe house someone is there to guide you. So when you get out from the safe house it's difficult because you are used to people telling you what to do, and it's hard without that help. Outside it's really different. You need to go to the doctor, to the housing people and people don't have any knowledge about that."*** ***[Ife, a survivor]***

> ***"You know the [safe] house here they help a lot, but when you left this house you felt like you are rubbish. Here you are safe, but when you go out from this house you feel like rubbish because nobody care, nobody call you, if you have any problem, nobody care for you…" [Katrin, a survivor]***

> ***"[At the safe house] I have everything already, when I was upset everybody came to talk with me, but there [in NASS accommodation5] nobody cares for you, if you are sick, or if you miss something, nobody cares. With £36 they give to us, this is***

not enough, to leave the house you know, to go from my house to the post office I wanted £3 for the bus to go there. What do you have to do to go to college, to do some shopping, because the food here is very expensive? When I left the [safe] house I didn't have clothes, just small clothes. They find the clothes they give you, but for me it was very big and I was very small, and you know, the weather changes. When I left the house I just had summer clothes, for the winter I didn't have nothing, and what can I get with £36 pounds? For me, I'm talking about myself, nobody cares... nobody comes to me to say "are you alright?", nobody calls me, nobody says nothing, that's it. If I got any problem, everything, I'm coming here [back to the safe house], because nobody helps me, I don't know why..." [Anna, a survivor]

Every survivor who spoke about social isolation, post safe house, also referred to increased symptoms of depression or trauma. These included feeling unable to leave their house, difficulty in concentrating or forgetting what they were doing, suffering nightmares, crying every day, and losing hope or motivation. A meta-analytic review of social isolation studies found significant links between social isolation and increased rates of early mortality (Holt-Lunstad et al, 2015).

"I am not the type that interacts a lot. I am here in my room. I am hallucinating. Sometimes I would see my children, I would see my dead ones, so I always want to be in my room so that I can control myself. Sometimes I pray to God, please help me, sometime I feel like I should just die". [Nina, a survivor]

When supporting a vulnerable client group, such as survivors of trafficking, whose symptom levels of depression and anxiety are already far above the average population (Zimmerman et al, 2006), it should become a priority to reduce the risk of such symptoms increasing further. In addition to the human cost to individuals' health and well being, it is likely to place unnecessary pressure on health and social care services at a later date which could be prevented with earlier interventions. Without addressing these issues **"psychological symptoms remain extremely problematic and are likely to inhibit survivors from re-engaging in normal daily activities such as caring for a family, employment or education"** (Zimmerman et al, 2006, pp. 17).

Risk of future harm

In the course of this research we encountered survivors who had left safe houses in a variety of different practical, legal, emotional and psychological states. Some of the situations they then found themselves in are cause for concern. We learned that some survivors of forced prostitution or sexual exploitation had been housed in mixed accommodation with both men and women, and some had had experienced sexual harassment or attacks. Some survivors were housed in areas where they had previously been exploited, placing them at great risk. Others who lacked spoken or written English skills had no access to language courses, resulting in resulting in social isolation and a lack of ability or confidence to ask for assistance. Some who had intrusive symptoms of complex trauma and/or depression had no access to counseling or therapeutic support (Helen Bamber Foundation, 2013). Some women were separated from their children abroad had no ability to contact them.

As this excerpt from one of our research interviews demonstrates there is no formal and cohesive transition from a safe house to settled and safe living conditions.

IFE: When I moved out of the [Safe] house I went to a bed and breakfast and I got harassed by men, so another abuse again. I moved to North London, Hammersmith and Wembley, so I stayed in three bed and breakfast places. I was in that place for 6 months. The first one in North London, which had guys there, I I was in for one month. The second one I stayed in for two days because the traffickers had taken me to that place before , and a girl who saw me, called me by my name, and I thought it was not safe for me so I asked to be moved. Now they moved me to West London in a temporary accommodation. I have been there for seven months.

INTERVIEWER - So it's been about a year and a half since you have been moved from the safe house and you moved 5 times and you are still in a temporary accommodation?

IFE: Yes.

INTERVIEWER: What effect is it having on you to move several times?

IFE: It's really torturing; I wonder to whom I should talk to... if you are helping us, help us once and for all. Every day I have to go to the council, I have been trafficked in prostitution,... by this time I'm supposed to be settled but it's still the same issue, I'm on my own...

INTERVIEWER: Is it confusing?

IFE: It is really confusing. The government ....I don't know what to say, I have depression, mental problems, but I don't know where my issue fits in the system, it's supposed to be simple, people should know how to treat me... for a month they give me money, but then they say they have not received my sick note....they book me in one month the GP....there is no place for us to tick...I don't have enough money to eat and take the medicine, so the life it's not easy, that's why some people want to kill themselves, every time I think ok now I'm free, but then I need a job, but if I take a job people need to know my background.

INTERVIEWER: When you left the safe house did you have a (NRM) decision on your trafficking?

IFE: Yes, that I was trafficked.

Professionals working with survivors who participated in our NGO focus group told us that survivors leaving safe houses remained highly vulnerable. Many were at risk of developing alcohol and substance addictions, becoming homeless, suffering deterioration of their mental health, developing debt problems (with associated exploitation risks), facing obstacles in obtaining gainful employment and being re-trafficked. Although the professionals working with survivors routinely raise concerns about future risks, there is no coherent Government strategy on mitigating risk that makes use of this experience and knowledge. The ATMG stated:

> ***"As far as we know none of the women we interviewed had been re-trafficked after first entering the NRM, but it is not hard to see how the current system can push people toward the conditions that create additional vulnerability to being exploited." [ATMG, 2013, pp.38]***

It is unacceptable that people who are supported to leave a situation of exploitation will, soon afterwards, find themselves in a position similar to that which made them vulnerable to trafficking in the first place. Known risk factors for trafficking include (but are not limited to) a previous history of trafficking/subjugation, poverty, destitution, poor employment opportunities, psychological vulnerability and social discrimination. Examples of all of these can be found in the transcripts of the survivor interviews and the NGO focus group. If survivors are still experiencing the same risk factors after leaving safe houses, then the problem is simply being put on hold.

> ***"Physically exiting a trafficking situation does not always equate to escaping the ramifications of having been exploited. The initial trafficking experience may in itself contribute to a situation of re-trafficking. Indeed, the control mechanisms involved in trafficking do not necessarily end at exit and/or escape from a trafficking situation, as trafficker(s) may still exert control over victims of trafficking through threats and/or "debts" owed. Moreover, when trafficked persons return to the same socio economic situation that contributed to their trafficking in the first instance, they are potentially vulnerable to further trafficking harm." [IOM, 2010, pp.54]***

It is also not always a safe solution to 'simply' send someone home. Once again, without appropriate support in place, trafficking risk factors still remain:

> ***"A case of a victim who was re-trafficked a year after being referred to the NRM was presented at a Ministry of Justice and Salvation Army conference in November 2012. The service provider believed that the reason for the re-trafficking was because the victim had been returned to the country of origin too soon, there being no legal basis for the person to remain in the UK." [ATMG, 2013, pp.47]***

The Government's approach to 'prevention' in the Modern Slavery Strategy largely focuses on law enforcement responses and so-called 'upstream awareness' - creating awareness of the phenomenon outside the UK to prevent people from falling prey to traffickers and facilitators in their country of origin in the first place. It is important to deal with risks overseas, however the Strategy misses the opportunity to provide a more progressive approach to the prevention of Modern Slavery by detailing the risks that are faced by victims after they are identified in the UK.

The Human Trafficking Foundation would encourage the Government to focus more attention on this by supporting independent research and increasing channels of communication with professionals who are working with survivors both within and outside of the Government contract in order to better understand the risks of future harm and the risks of re-trafficking.

MOVING ON TO A SAFER FUTURE

It is vital that Local Authorities play a leading role in developing appropriate systems and safeguards for victims of trafficking and help to shape the post safe house response. In the course of this research the Foundation sent out Freedom of Information (FOI) requests to 33 London Boroughs to identify their responses to adult victims of trafficking. We asked:

- What guidelines, procedures and policies they have for assessing the needs and providing support to adult victims of trafficking;
- How many adult victims of trafficking currently reside in the Local Authority area;
- How many adult victims of trafficking presented to their Local Authority housing and community services between 01/04/2013and 31/03/2014.

We received replies from 28 Local Authorities. Their responses demonstrated that there was an inconsistent and confused understanding about the duties and obligations to support victims of human trafficking. We were particularly concerned by the large number of replies from Local Authorities that said they had no specific guidelines, procedures or policies in place for assessing the needs and supporting victims of trafficking; although 8 respondents did point to the Pan-London Safeguarding Adults procedures. The majority of responses were quite weak on knowledge of how many adult victims of trafficking currently reside in their borough. Only two respondents gave a number, others did not answer or said they did not have the information. Nevertheless, from shared knowledge within the NGO sector in London, the Foundation is aware that there are numerous cases of survivors living within those boroughs.

Overall, the response to our FOI requests shows that across London Boroughs there is no common contact point when it comes to handling data on adult victims of trafficking. One Local Authority suggested we contact the police instead; another said they do not assess for trafficking unless there is a child involved. More generally, Local Authorities do not attempt to conduct an assessment if a victim has already been referred to the National Asylum Support Service (NASS). The results of the FOI sample show that information about adult victims of trafficking is not recorded across Local Authority record management systems. We noted the responses from one authority that Housing Services do not record trafficking because it is not on the 'P1E', which is the Government tool for recording homelessness.

A number of Local Authorities indicated that they did not receive any information from the NRM about victims, even those who were in their authority area. The Human Trafficking Foundation is aware of a number of multi-agency projects engaging Local Authorities in developing good practice but greater sharing of this knowledge is needed. It would be practical to develop regional or cross-border hubs that can draw on expertise gathered in one Local Authority to inform others.

The consequence of poor practice and lack of inter-regional communication can be seen in an example provided by a London Local Authority below:

Maria was first identified by social services in the North of England when she was 17 years old. A Welfare Assessment was completed by the Local Authority and it concluded that there were child sexual exploitation (CSE) concerns. Maria disclosed that she had been forced to have sex with Asian men for money. An investigation was undertaken in respect of the trafficking allegations. Maria then moved to live with some unrelated adults with whom she said she felt safe.

However, two months later a referral was made to the police from a medical centre stating that Maria had attended the medical centre with her boyfriend's adult sister, saying that she had fallen off a bike. Both women were found to have cigarette burns on their feet and Maria had deep wounds to her legs and lower back that were infected. On discovering this, police and an allocated social worker persuaded Maria to leave that flat and stay in local authority accommodation.

An NRM referral was then completed for Maria as a victim of trafficking. She remained with the North England Local Authority for a month until her 18th birthday. Her social worker noted concerns that Maria did not understand what was happening, or what was being discussed with her. However, no formal assessment of her mental capacity was undertaken. Maria was then referred through the NRM to a safe house in London.

The manager of the safe house notified the London Local Authority about Maria's case via a safeguarding alert regarding physical, emotional and financial neglect. Maria was then referred to the Learning Difficulty Team based upon information ascertained from the safe house. However, the Learning Difficulty Team were reluctant to accept any responsibility without a formal assessment from the placing borough (the North England Local Authority). The case was then allocated to the Adult Social Care Team.

Maria received a Positive Conclusive Grounds decision, formally recognising her as a victim of trafficking, and her stay was extended in the safe house for a couple of weeks until appropriate accommodation was identified. She was moved to a Learning Difficulty Supported Living Project for initial period of 6 weeks. Shortly after that, a safeguarding alert was raised and police became involved when Maria made allegations of harm against a male member of the supported-living staff. Two weeks later the police were called again as another safeguarding alert was raised due to Maria having sexually assaulted a male service user. A decision was then made to move Maria to new supported-living project for women only, which was outside the London borough. Maria then contacted police to complain about her placement and made allegations of sexual abuse. She also contacted ambulance services threatening to harm herself. She was admitted to a London hospital where a psychiatric assessment was conducted.

Key issues: Maria has been relocated approximately 5 times since coming to the UK, 3 of these while she was within the NRM system. Approximately 32 professionals were involved in her case. There was no formal case transfer from the North England Local Authority to another London borough. This resulted in information being lost and delay in providing an adequate and efficient response to Maria's needs.

Housing

The pathway to short or long term housing for survivors of modern slavery once they have left safe houses is complex and confusing. In London this is compounded by the serious housing shortage and extremely long waiting lists for vulnerable people, including families with young children. Although housing is not the only requirement for survivors while they recover and restart their life, it is of course a fundamental need, and it provides the basis around which all other support and services are linked. The Modern Slavery Strategy (HM Government, 2014) is not explicit as to how the Home Office and Local Authority systems for housing and health should work together to ensure continuity of support in the fragile post safe house period. It is this lack of formal channels of communication between Government agencies that has failed the women interviewed in this report. Housing pathways differ depending on whether an individual has recourse to public funds, which is based on their immigration status. In the course of this research the Foundation has heard distressing accounts of vulnerable people being placed in highly inappropriate housing, often after long periods of waiting, and only with the assistance of hard fought negotiation and advocacy by voluntary sector organisations.

Survivors from non-EU countries who have no residential status in the UK are often advised to apply for asylum if, on returning, they fear persecution, torture, or even death and are unable to receive protection from their own country. If successful, this can offer a longer term of leave in the UK. A number of survivors we interviewed, who were in the process of an asylum claim, had been placed in mixed hostels or shared-room accommodation which is delivered by the National Asylum Support Service (NASS). Survivors are often dispersed to various locations throughout the UK due to a lack of available NASS accommodation in London. This often results in their separation from support networks, specialist services and familiar geographical areas, which can increase social isolation, psychological difficulties and further risks of harm.

> ***"These individuals will be allocated housing provided by the National Asylum Support Service. The standard of housing provided has a reputation for being far below basic hygiene and safety standards, and very ill-equipped. People may have to share bedrooms with more than one person. Some NASS housing is placed very far away from relevant services." [NGO Service Provider]***

During the course of this research, we found that survivors from EU/EEA countries can find themselves in uncertain and distressing situations due to new Housing Benefit Amendment Regulations (SI 2014/539) that came into force on 1 April 2014 which limit the right of EEA nationals to access Housing Benefit. Although they have the right to remain and work in the UK, they are unable to access social housing or subsistence after they leave the safe houses. Obtaining privately rented housing is not possible for any person who does not have a stable income, a deposit, references and funds to pay rent, which is the situation of many survivors who have suffered trafficking, exploitation and have then tried to recover in a safe house. They are hindered by a range of barriers to gaining employment, including lack of a home address, lack of recognised education and skills, limited knowledge of written and spoken English and lack of understanding of the job market. These problems can be compounded by lack of confidence/assertion skills, limited independent living experience, managing challenges on a daily basis, and physical and/or mental health needs. Many EU/EEA survivors are, therefore, limited to only three practical options: returning home, becoming homeless in the UK or living with acquaintances or friends in the UK. Each of

these options can be unsafe. The last option of living with friends can be a risk due to the nature of 'survival relationships' whereby one person becomes entirely dependent upon another. They may end up under the control of someone who is violent, who subjects them to exploitation/further harm or they may be put at risk from others whom they know from their previous trafficking situation.

> ***"My experience with clients who have been through the 45 days [Recovery and Reflection] period is that they end up on the streets again and they are so incredibly vulnerable because their wounds have been opened up, they have only had 45 days to deal with those wounds, and it's not fair, but after 45 days they're out... [we] work with EU nationals and it was more men than women...the disillusion brings them so much despair. They have all this help thrown at them, they are safe and then in a blink of an eye it's gone". [Megan Stewart, formerly from Thames Reach, now an independent Anti-Trafficking Consultant Trainer and Campaigner]***

In other cases where residential status was not a barrier, survivors were only offered shared facilities provided by Local Authorities under general needs housing that ignored the safety of the victim, increasing levels of distress, and often the need for mental health support (as evidenced by Ife).

Survivors who have obtained Discretionary Leave in the UK must, in general, apply to the local council for housing as a homeless person because there is no other category available to them.

> ***"Victims of trafficking who become homeless, sometimes after leaving the care and security of safe houses, have to go the Housing Options Team for their local borough and explain that they are more vulnerable than other homeless people because they have been trafficked...few of them will understand that this is required, or know how to do this. Sometimes there are situations where professionals from the homeless unit will respond by 'interviewing' them about how they came to the UK and asking them to explain traumatic details about their background, which is inappropriate and causes clients facing homelessness additional stress." [NGO Service Provider]***

General needs (or Local Authority) housing is available to those who are resident and are able to pay for the rent either through housing benefit or other income. This is accommodation-only provision on either a temporary or longer term basis, with a range of affordable tenancies offered to those who may also be in receipt of, or eligible for, welfare benefits. The majority of public housing stock is comprised of Housing Association and Residential Social Landlord (private rented) properties that must be assessed as suitable with regards to affordability, location, size and the effect it may have on a survivor's health.

Every local council has its own 'allocations scheme' (or 'housing register') for council housing in its area. An allocations scheme sets out the rules that the council uses to decide who they should house. Allocations schemes vary from area to area as local councils can decide who gets priority for housing, but there are still some general rules about priority housing that all councils have to follow.

There has been a recent development in case law that should have a positive impact on the provision of housing for vulnerable people, including survivors of modern slavery. A

Supreme Court judgment on 13th May 2015 states that in deciding whether a homeless applicant is vulnerable, councils should compare them to an 'ordinary person' rather than an 'ordinary homeless person', as was previously the case (Hotack v London Borough of Southwark 2015). Thus, a survivor is less likely to need to find evidence as to why they are more vulnerable than other homeless people. Simply proving that they are a trafficked person with a positive Conclusive Ground decision will evidence that they are more vulnerable than an 'ordinary person', making it easier to obtain priority for housing as a vulnerable homeless person.

The Government's Modern Slavery Strategy states:

> ***"Crucially, discretionary leave status provides a victim with automatic entitlement to financial support, most notably Housing Benefit and Job Seekers Allowance."[HM Government, 2014, para 7.39]***

Although this is technically correct, the Modern Slavery Strategy fails to acknowledge that a Positive Conclusive Grounds decision does not automatically entitle the person to discretionary leave. This requires a separate application (Home Office, 2013) that is almost impossible to obtain without support. This point was discussed in both focus groups and it emerged that the positive NRM Conclusive Grounds decision, in and of itself, holds very little weight and is unrecognised by the Local Authority. Therefore, the Foundation believes that the Home Office needs to look at their strategy in this respect.

> ***"Some housing professionals are very helpful but others may be damaging in the way that they confront the client. This could all be improved if clear protocols were put in place for accommodating victims of trafficking." [NGO Service Provider]***

The Foundation is concerned that, at the current time, the only route to stable housing in the post safe house period applies if the the person has 'residency' status in the UK). If survivors of modern slavery are pushed into destitution as a result of not being able to access suitable housing then any progress achieved during the initial stage of recovery in the safe house, is undone very quickly. It is possible that survivors can find themselves in a worse position than before they were first trafficked.

Advocacy

The Human Trafficking Foundation believes that there is an urgent need for an integrated and coordinated system of support that brings together housing and advocacy services during the post safe house period. Currently, if a survivor is fortunate enough to be connected to the support of specialised NGOs, professionals can spend hours, days, or even weeks, of unpaid time simply trying to negotiate what should be made available to them in terms of basic support.

> ***"Work on housing for victims of trafficking can be really difficult at all stages…it depends on what is available at the time. When you have a client, you immediately think of your 'little team' of contacts out there who might be able to help this person to the next stage. You just hope that you can bridge contact for your client with the right person, who will be willing and able to meet their needs." [NGO Service Provider]***

Due to the restrictive time scales, contracted safe houses are sometimes placed into precarious financial positions because they are not able to move survivors on to safety in the allocated time. This can result in two options. Organisations can use up limited financial resources to keep people longer than they should, (thus not taking new people who are in desperate need) or rushing survivors out of the safe house into whatever accommodation is available, regardless of suitability.

> ***"There is a conflict, so when you work with 10 women do we just carry on working with those 10 women after the 14 days or do we try to work with another 10 women who have nothing? It's a very difficult decision." [NGO Service Provider]***

Until move-on housing is settled, survivors are often unable to address their other pressing needs, including tracing family members, securing training, employment, and resettlement. For those in need of therapy and mental health support this can be a very challenging time. For those with dependent children the situation is extremely worrying.

The Foundation organised a focus group on 18th February 2015 with representatives of the London Local Authority Adult Social Care and Safeguarding services and the Greater London Authority (GLA). The discussion went into the challenges and opportunities faced when assessing gateways to housing and support for survivors of modern slavery, and in particular the barriers which are created by the current lack of a single coherent framework and guidance.

The participants of the focus group agreed that there are numerous problems in responding to requests for housing and social care support when survivors exit safe houses. Some are related to problems of supply, such as the critical shortage of housing in London and the South East, but others are a result of the statutory guidelines. Local Authority representatives referred to the provisions under Part 1 of The Care Act, 2014 that enable Local Authorities to commission an Independent Advocate when safeguarding adults. This was viewed as potentially useful, but the eligibility of survivors of modern slavery is not guaranteed.

Local Authority representatives pointed out that the condition of eligibility established under the Care Act, 2014 means that a Local Authority must be satisfied that an adult's need for care and support is due to a physical or mental impairment or illness and that they can be considered an 'ordinary resident' in the area. Guidance for Local Authorities (DoH, 2014) says they must consider at this stage if the adult has a condition as a result of either physical, mental, sensory, learning or cognitive disabilities or illnesses, substance misuse or brain injury. The authority should base their judgment on the assessment of the adult and a formal diagnosis of the condition should not be required.

Focus Group participants were keen to point out that there are many lessons that can be learned from the policy and protocols for responding to domestic violence. The increased profile of the Violence against Women and Girls agenda may give directions for future.

> ***"Concerning guidance…you are given something to refer to, you're all referring to the same language and the same guidance and you can actually raise it with people and say "this is how it is supposed to be done" and that holistic ethic gets in then." [NGO Service Provider]***

The 2014 Modern Slavery Strategy suggests that once NRM-referred individuals exit a safe house, there is, a 'support-net' available. However, this 'support net' is only in reference to accessing benefits with discretionary leave. Based on evidence from interviews with survivors, NGOs or Local Authorities, this 'support net' is not sufficient for 'recovery in the UK' as the Strategy suggests (Para 7.39).

The Foundation is of the view that if a person is referred into the NRM and receives a positive Conclusive Grounds decision, confirming their status as a victim of trafficking, it should follow that the NRM decision itself should be enough of a trigger for enhanced support if it is required. The victim should not need to continue to prove themselves 'worthy' of support and risk getting rejected on the grounds that the person interviewing them doesn't fully understand what 'human trafficking' means. In other words, the NRM Conclusive Grounds decision should have consistent status and meaning across all statutory services in order to provide access to future services.

The NRM decision currently holds no validity outside of the UK jurisdiction and greater consideration must be given to how to strengthen the recognition of it both in the UK, and abroad, so that victims can have confidence in the 'system'. However, we also believe that even in circumstances whereby a person has been referred to the NRM but has not received a positive Conclusive Grounds decision, assistance and support should be made available to them. It can be assumed that any person in a safe house is a vulnerable person and will need further support and assistance on exiting, regardless of a decision that has been made on their case. The system of decision-making is not infallible and is often criticised (Home Office, 2014, Section 7). A 'reconsideration' of a negative Conclusive Grounds decision cannot be appealed but only judicially reviewed by request from a solicitor. This could result in a new decision and/or duration of leave to remain. If a judicial review is approved, survivors should have access to continued support while waiting for a 'reconsideration' decision.

The Foundation considers this a major problem in developing standards in post safe house care. We recommend the introduction of a model of advocacy that can be made available to adult survivors of modern slavery beyond the duration of the 'reflection period'. Each potential victim referred into the NRM should have the opportunity to benefit from the help of a specialist advisor until a settled solution is reached. Lessons could be learnt from other support models for vulnerable groups, e.g. domestic violence, the homeless sector, alcohol and drug rehabilitation support services.

Case Transfer

There was collective concern expressed by Local Authority participants in the focus group when we discussed the Home Office's expectation that safe house staff terminate all support within 48 hours of a negative Conclusive Grounds decision, and to terminate all support within 14 days of a positive Conclusive Grounds decision. Participants agreed that 48 hours is far too short to arrange suitable and safe accommodation to ensure people 'get back on their feet' and even 14 days is too short in London where housing waiting lists are so long.

Without a common framework for 'case transfer' the time taken to make and receive referrals for move-on support after a survivor is required to leave the safe house is still largely dependent on who picks up the phone. A common opinion across the NGOs

providing support to survivors is that they should be able to make the referral to a new support service and have peace of mind that it will proceed on the basis of a universally agreed set of principles for a well-managed case transfer. This is preferable to spending a lot of time explaining the basics of human trafficking and modern slavery to someone who has never knowingly dealt with such a case before. A London Council contributed the following case study of Michelle for this report. It demonstrates what can happen when there is no appropriate case transfer management or monitoring.

Michelle approached Council Y Social Services in a London borough in order to enquire about Housing & Personal Support. Michelle was over 18 and was seven months pregnant at the time she first made contact with the council.

The allocated social worker recognised trafficking indicators that suggested that Michelle was trafficked to the UK at the age of 15 for the purposes of domestic servitude & benefit fraud. A referral was made through the National Referral Mechanism and the service user was contacted by the Salvation Army and relocated to a city in the North of England. Council Y did not receive any further information about the outcome of the NRM or any support provided.

Several months later, the social worker who previously interviewed Michelle, met her by chance on a street back in the London borough. Michelle was with her baby. The social worker spoke with Michelle who said that she had been given a negative NRM Conclusive Grounds decision and when her safe house support ended, she returned to Borough Y as she did not know anybody in the city where she had been placed in the North of England. Michelle did not want to engage any further with Council Y as she said that she had lost faith in the system.

The Foundation, like other organisations and statutory agencies working with survivors, is keen to show that the provision of support under the Government contract is only half of the picture for survivors and that insufficient consideration has been given to what happens at the point where safe house providers have no alternative but to terminate their involvement and support. The Foundation recommends that the Government addresses this by establishing a multi-agency specialist working group, including Local Authority Adult Safeguarding Leads and NGOs, to develop a 'Case Transfer' Protocol which can be adopted into guidance. This would mean that moving on from the Government scheme becomes a safer and more streamlined process. To complement this we recommend a telephone based advice service be developed for front-line professionals to access knowledge and resources.

CARE STANDARDS

In 2014 The Human Trafficking Foundation published a professional's guide - the Trafficking Survivor Care Standards (Andreatta, 2014). The guide came after a long process of consultation with a group of front-line NGOs directly working with survivors of trafficking. The group identified the need for establishing care standards based on the practical experience of the key agencies currently providing victim support, which provides guidance on care provision and promote a consistency of approach across the country to ensure better outcomes for all trafficking survivors.

> ***"The Human Trafficking Foundation's Trafficking Survivor Care Standards is an excellent resource for practitioners who work with victims of trafficking in any field of practice. It contains a wealth of wisdom from expert trafficking organisations working across the UK. There is vital information about standards of care, straightforward guidance on best practice working with interpreters, the meaning of informed consent, access to healthcare services, working with survivors who have psychological needs, and applying therapeutic principles to contact work with survivors." [Helen Bamber Foundation]***

The Trafficking Survivor Care Standards aim to improve service provision by ensuring that adult survivors of trafficking consistently receive high quality care wherever they are in the UK. They provide a flexible framework with guiding principles and practical recommendations that support agencies can incorporate into their own existing policies and procedures. Their ultimate goal is to promote an integrated, holistic and empowering approach that places the real needs of survivors at the centre of the process of sustained recovery. This is feasible within the defined structures of NRM related support, however standards of care require more than the individual efforts of interested practitioners. Cohesive policies, structures and move-on protocols are also required to support wide implementation and monitoring.

The Care Standards were officially endorsed by the UK's first independent Anti-Slavery Commissioner, Kevin Hyland OBE. He stated the following:

> ***"I am committed to ensuring that survivors receive the care and support they need to rebuild their lives. The guidelines laid out in this document provide clear navigation of the pathways that can be followed to ensure that every survivor across the UK will receive consistently high quality levels of support. I look forward to working with the Foundation to ensure that these recommendations are adopted and implemented across the country."***

CONCLUSION

Modern slavery has occupied governments both in the UK and overseas for many years. Although the commonly accepted view is that slavery was abolished 200 years ago, we know this is not the case. The UK Government has made some significant steps to address modern slavery in the UK by introducing new legislation - the Modern Slavery Act, 2015 - as well as drawing up a Modern Slavery Strategy and reviewing the National Referral Mechanism. However, our research shows that there is a disparity between theory and practice. Unfortunately, there are many gaps within the current system that allow survivors of modern slavery to lose contact or 'disappear' soon after being found in the UK.

A significant proportion of survivors are failed after leaving Government funded safe houses in London. However, this problem is not London specific, but occurs nationwide. Potential victims of modern slavery have been, and are currently being, identified across the UK as highly vulnerable and traumatised. They may be accommodated and provided with safety and support for a short period of time, but then they must find their own way to survive, instead of being supported and empowered. Unfortunately for some of them, this means either becoming homeless, going back to the control of traffickers or falling back into abusive or exploitative situations. The extent to which this is happening is unclear due to the lack of long-term monitoring, and therefore a lack of data-based evidence.

The Foundation believes that we can no longer rely on ad-hoc initiatives or voluntary support from charitable organisations. The Government needs to address this issue and introduce appropriate measures to ensure consistent and coherent move-on and *post safe house* support across the UK. Assisting survivors of modern slavery seems to be the only field where Government is investing millions of pounds per year without a proper monitoring and evaluation scheme to assess the long-term outcomes.

This report urges the Government to review its approach to move-on support for survivors of modern slavery, including case transfer and monitoring, to ensure more efficient and successful integration of survivors into society. This would help prevent risks of further re-trafficking and re-exploitation. There needs to be appropriate long-term support in place, better understanding of the modern slavery phenomenon by Local Authorities, a more accessible gateway to further accommodation and support, clear guidance on mainstream adult social care, and a reliable Model of Advocacy. With this cohesive approach, survivors are more likely to recover and regain control over their lives, and become more confident and independent, which in turn will allow them to become active members of society.

ACKNOWLEDGEMENTS

The Human Trafficking Foundation is grateful for the financial support of **the City of London Corporation's Charity, City Bridge Trust** for providing financial support to carry out this research.

This report would not have been possible without the participation of all the survivors, who bravely spoke about their experiences, professionals who provided unwavering support and our dedicated research team.

We would like to thank all those who participated in Focus Group discussions and individual interviews including:

Helen Bamber Foundation

Hestia

Housing for Women

Kalayaan

The Medaille Trust

Passage

Poppy, Eaves Housing

Megan Stewart, independent consultant, formerly from Thames Reach

Trafficking and Kidnap Unit at the London Metropolitan Police

London Boroughs of Croydon, Ealing, Hounslow, Lambeth, Sutton, Waltham Forest and the Greater London Assembly

A special thanks goes to **Cristina Andreatta** for initiating and establishing this research project and **Emma Wade** for administrative support and editing. We are grateful to **Rachel Witkin** (Helen Bamber Foundation) for her final guidance and comments. We also thank our research assistants **Alessandra Sciarra, Olga Sánchez de Ribera, Daria Jinga and Ekaterina Shubert** for their contributions to this report.

REFERENCES

Andreatta, C (2014) ***Trafficking Survivor Care Standards;*** London: The Human Trafficking Foundation

Anti-Trafficking Monitoring Group (2013) ***Hidden in Plain Sight: Three Years on: Updated Analysis of UK measures to protect trafficked person***s; London: Anti-Slavery International

Butler-Sloss, B; Field, F; Randall, J (2013) ***Establishing Britain as a World Leader in the Fight Against Modern Slavery: Report of the Modern Slavery Bill Evidence Review***; London: Centre for Social Justice

Care Act 2014, Chapter 23; London: The Stationery Office

Care and Support (Eligibility Criteria) Regulations 2015; SI 2015/313

Council Directive 2011/36/EU of the European Parliament and of the Council of 5 April 2011 on preventing and combating trafficking in human beings and protecting its victims; Official Journal of the European Union L 101/1; 15.04.2011 pp. 1-11

Council of Europe Convention Against Trafficking in Human Beings (2005) CETs 196

Department of Health (2014) ***Care and Support Statutory Guidance: Issued under the Care Act 2014***; London: The Stationery Office

Department of Health (2015***) Care Act 2014 Part 1: Fact Sheets*** [Online] Available from: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/366080/Factsheet_1_-_General_responsibilities.pdf [Accessed 18.06.2015]

Helen Bamber Foundation (2013) ***Understanding the process of recovery for victims of human trafficking, In: Trafficking in Human Beings Amounting to Torture and other Forms of Ill-treatment***; Vienna: OSCE pp. 111-113

HM Government (2014) ***Modern Slavery Strategy,*** November 2014; London: The Stationery Office

Home Office (2013) ***Discretionary Leave*** [Online] Available from: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/312346/discretionaryleave.pdf [Accessed 20.06.2015]

Home Office (2014) ***Review of the National Referral Mechanism for victims of human trafficking***; London: The Stationery Office

Holt-Lunstand. J, Smith. T, Baker. M, Harris. T, Stephenson. D (2015) ***Loneliness and Social Isolation as Risk Factors for Mortality: A Meta-Analytic Review***; Perspectives on Psychological Science 10 (2) p.227-237

Hotack v London Borough of Soutwark (2015) UKSC 30 [Online] Available from https://

www.supremecourt.uk/cases/uksc-2013-0234.html [Accessed 18.06.2015]
Housing Benefit (Habitual Residence) ***Amendment Regulations 2014***; SI 2014/539

Jobe, A (2010) ***The causes and consequences of Re-Trafficking: Evidence from the IOM Human Trafficking Database***; International Organisation for Migration, Geneva

Modern Slavery Act 2015, Chapter 30, London: The Stationery Office

NCA (2012-2014) ***National Referral Mechanism Statistics***; Available at: http://www.nationalcrimeagency.gov.uk/publications/national-referral-mechanism-statistics [Accessed 18.06.2015]

NCA (2015) ***National Referral Mechanism Statistics - End of Year Summary 2014***; 19 Jan 2015 [Online] Available at: http://www.nationalcrimeagency.gov.uk/publications/502-national-referral-mechanism-statistics-end-of-year-summary-2014/file [Accessed 18.06.2015]

Salvation Army (2012) ***Supporting adult victims of human trafficking: Update on the first year of The Salvation Army's anti-human trafficking contract***; Available at: http://www.salvationarmy.org.uk/Anti_Human_Trafficking_Latest_Report [accessed 18.06.2015]

Salvation Army (2013) ***Supporting adult victims of human trafficking: Update on the second year of The Salvation Army's anti-human trafficking contract***: Available at http://www.salvationarmy.org.uk/Anti_Human_Trafficking_Latest_Report [accessed 18.06.2015]

Salvation Army (2014) ***Supporting adult victims of human trafficking: Update on the third year of The Salvation Army's anti-human trafficking contact***: Available at http://www.salvationarmy.org.uk/Anti_Human_Trafficking_Latest_Report [Accessed 18.06.2015]

The secretary of state for the Home department answered how many people have been identified in each of the last five years as having been referred to the National Referral Mechanism more than once. HC Deb 23 Feb 2015 c 224410W

The secretary of state for the Home department estimated how many suspected victims of modern slavery were subsequently re-trafficked after being referred to the NRM. HC Deb 23 Feb 2015 c 224197W

The secretary of state for Justice gave information about the contact made with human trafficking victims after the 45-day reflection period. HC Deb 20 Jan 2014 c27W/182091

Slavery Working Group (2013) ***It Happens Here: Equipping the United Kingdom to Fight Modern Slavery***; London: Centre for Social Justice

Zimmerman. C, Mazeda. H, Yun. K, Roche. B, Morison. L, Watts. C (2006) ***Stolen Smiles: A summary report on the physical and psychological health consequences of women and adolescents trafficked in Europe***: London: The London School of Hygiene and Tropical Medicine

Appendix 1

Interviews with survivors – questions

1. Thanking survivors for taking part - Asking them what their understanding is regarding the purpose of the interview and clarifying any doubts and/or concerns (an informed consent form will be circulated in advance to the interview, explaining the aim of the research and the terms for involving participants).
2. Ice breaker questions: How old are you? How long have you been here? What do you like about London? If someone gave you three wishes today, what would you do with them?
3. Is there anything about your experience that you think it would be useful for us to know before we ask further questions?
4. Thinking back to your experience in the safe house/safe house:
    - What is the best thing you experienced?
    - What was the worst thing?
5. How long were you there for? If you had been given the opportunity, would you have stayed longer? Why?
6. When you exited did you have a decision about your trafficking case? ** Ask theproviders about whether the survivors would understand this question **
7. Can you remember the day before you left the safe house? What were you feeling? What did you imagine would happen? Were you worried about anything? Were you excited / hopeful for something?
8. Do you remember a month later? Where were you then? How did you feel at that point? Were you surprised by this?
9. What mattered most to you on leaving the safe house (your three most important things)?
10. Is there anything else on this list that you recognise mattered to you and that you would like to add:
    - A place to live
    - (Help with) bringing up a child
    - Education
    - Emotional support
    - Financial support
    - Fulfilling your dreams
    - Going home
    - Finding a job
    - Learning English
    - Making friends
    - Gaining permission to stay in the UK
    - Coping with/understanding a police investigation
    - Reconnecting with family
    - Self- confidence
    - Staying safe
    - Support for your health
    - Understanding how to live in England
    - Understand the immigration and asylum systems

- Understanding the benefit system

11. Could you tell us about 1 or 2 experiences that felt important or a big part of your life after you left the safe house?
12. Did you receive any support after you exited the safe house?
    - If yes, in relation to what and was it useful?
    - If no, did you look for help? Was there anything that stopped you from looking?
13. If someone was leaving a safe house tomorrow, what would you encourage them to do?
14. If you could change one thing about what you have experienced after leaving the safe house, what would it be?
15. If you could tell the Queen one thing about life in England that should be changed, what would it be?
16. When you think about your life now, what makes you happy?
17. What would you like to be doing in 5 years' time?

Appendix 2

Freedom of Information requests to Local Authorities - questions

1. Which guidelines, procedures and policies does your Local Authority have in place for assessing the needs of and supporting adult victims of trafficking?
2. In the UK, adult human trafficking victims are formally identified through the National Referral Mechanisms which is a framework for ensuring they receive the appropriate protection and support. How many adult victims of human trafficking currently reside in your Local Authority area? For example:
    - In Home Office National Asylum Support Service accommodation;
    - In The Salvation Army's subcontracted support accommodation;
    - Within your own service provision;
    - Other.
3. How many adult victims of human trafficking have presented and/or have been referred to your Local Authority for housing and community services between 01/04/2013 and 31/03/2014?