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Sarah Newton MP  
Minister for Vulnerability, Safeguarding and Countering Extremism  
Home Office  
2 Marsham Street  
London SW1P 4DF

11 September 2017

Dear Sarah,

**RE: Identifying, referring and supporting victims of modern slavery in the UK's National Referral Mechanism**

I am writing to inform you about the findings of the National Referral Mechanism (NRM) consultation that I launched following my initial letter to you in January 2017. The consultation has proven to be a very informative and insightful process with many lessons learnt.

In this letter I will outline the response from stakeholders to the issues and recommendations detailed in my initial letter to you, as well as bring to your attention a number of new issues that have arisen as a result of this consultation. I will also provide further recommendations on how the identification, referral and support system for victims of modern slavery in the UK can be improved.

I have held meetings with a wide range of stakeholders from all over the UK, including with The Salvation Army's subcontractors, members of multi-agency regional partnerships in West Midlands and West Yorkshire, members of the Anti-Trafficking Monitoring Group and Labour Exploitation Advisory Group, child trafficking non-governmental organisations (NGOs), as well as statutory authorities, including local councils and police. I have also held meetings with stakeholders in Scotland and Northern Ireland.

In addition I have met victims who bravely shared their stories with me. As we have discussed in our meetings, there is nothing more heart breaking than to hear from vulnerable victims - victims who we have a duty to protect and support - on how they have been let down and experienced their lives being put "on hold" pending the NRM decisions, often exacerbated by a lack of access to justice being served. However, on the contrary, meeting victims who have been supported through a successful recovery provides a blueprint for what can be achieved.

Following these meetings, many organisations have submitted their views on the NRM reform in writing. A full list of the organisations that contributed to the consultation is contained in Annex A.



There was a univocal consensus that the current NRM does not achieve the objectives it initially set out to and is therefore in need of a radical reform. Furthermore, I have received overwhelming support from the majority of stakeholders towards the recommendations I put forward in my letter to you of January 2017.

## **1. Access to support services**

Across the UK I have found evidence suggesting that access to safe and secure accommodation at all stages - pre, during and post NRM - is a key prerequisite to a successful and sustained recovery for victims of modern slavery. Such support significantly increases their trust in state agencies which in turn raises their likelihood and ability of supporting investigations and prosecutions.

### ***1.1 Examples of pre-NRM support***

I have seen some examples of good practice emerging in pre-NRM support provided to potential victims. For example, in Derby the local council is working with a charity to secure emergency accommodation immediately following rescue, before the victim needs to embark on the more complex processes of entering the NRM.

In Newcastle, the City Council has been involved in a number of police operations and have taken responsibility for providing 5 day emergency accommodation for potential victims of modern slavery. The council agreed to deliver a victim centred strategy that includes providing accommodation and initial safeguarding at a reception centre and ensuring support from all appropriate agencies to identify and address social care, health and welfare needs of vulnerable victims. This is achieved by allocating relevant professionals, including social workers and healthcare providers, at the victim reception centre. These professionals are fully trained and understand the needs of individuals and the impact that modern slavery has on victims. In addition these centres have a separate room set up for the completion of Achieving Best Evidence (ABE) interviews by police officers in a supportive environment. Having professional support services, access to accommodation and investigative facilities aligned to the centre significantly improved the victims' experience and the potential for prosecuting those who perpetrated the crimes.

Whilst pockets of good practice have started to emerge, the need for access to safe and secure accommodation, from point of rescue prior to entry into the NRM, is far greater and needs urgent support from the Government.

The Newcastle City Council model is a great example of a victim centred approach. As outlined, it is not just physical accommodation that is needed. Victims need the right advice provided in the right environment. They need to understand their entitlements in the UK and know that their plight is being taken seriously. A number of stakeholders have expressed the need for expert legal advice pre NRM to ensure that the potential victim understands the protection and support that the NRM provides, as well as understanding potential immigration implications.

Current support provision for potential victims of modern slavery seems to act as a gatekeeper, instead of a gateway, to support and protection services. In no other crime is a vulnerable victim required to sign multiple forms before being offered support and a place of safety. In no other crime do state agencies apply a two tiered decision making approach to establish whether a vulnerable victim of crime should be believed. This complex and disjointed process simply cannot continue.



## ***1.2 Police operational activity and access to support***

In November 2016 modern slavery and human trafficking were elevated to a National Priority Threat by the National Crime Agency (NCA). I commend this increased threat level – something I have long been pushing for. Modern slavery is a serious and often organised crime that needs appropriate investment of assets and resources as in other similar types of serious and organised crimes. I also commend the increased operational activity by the NCA aimed at disrupting criminal networks.

While I strongly welcome this development, we must also accept that we have a duty to provide safety and protection to potential victims who are rescued by the police. It is a well-known fact that a large number of potential victims who are identified by first responders, including the police, do not consent to enter the NRM. I am concerned that a substantial number of potential victims of modern slavery identified by police forces, including those identified as a result of the NCA's intensification of operational activity, are not being provided with adequate, or indeed any, safeguarding irrespective of whether they agree to a referral into the NRM. Furthermore I am uncertain that those who are identified by law enforcement as potential victims, but have declined an NRM referral, result in submission of the MS1 "duty to notify" form.

It is important to ensure that any enforcement activity aimed at disrupting criminal networks goes hand in hand with safeguarding and is victim-centred. It is imperative that alternative safeguarding pathways are developed if an individual does not wish to enter the NRM, and that the reasons why potential victims decline referral are fully understood. This will inform support provision and develop more effective prevention.

Current provision has resulted in situations involving police officers using their personal credit cards to pay for victim accommodation in bed and breakfasts because there was no other alternative. The generosity of individual officers should be applauded, however access to support needs to be immediately addressed and appropriately resourced in order to prevent this.

## **2. NRM decision making and move-on support**

As I have previously stated, I believe that it is important to introduce an effective, robust decision making process that sits with a specially trained multi-agency group of experts to ensure a professional non-discriminatory and fair approach to all cases. This will allow for greater accountability and transparency in the decision making process. Such a process would, I believe, increase confidence in the system and also enhance the integrity of decision making.

It is also important to ensure this decision recognises victims of modern slavery as vulnerable victims of a serious crime, and therefore provides them with access into mainstream support services to help them integrate into society. Furthermore, the NRM decision ought to be formally recognised by relevant statutory authorities in order to guarantee that victims receive appropriate support tailored to their individual needs.

### ***2.1 Impact of pending decisions and negative conclusive grounds decisions***

According to the NCA's NRM End of the Year Summary 2016, out of the total number of 3,805 potential victims of modern slavery referred to the NRM in 2016, 2,053 potential victims were still waiting for a



decision at the end of the year - more than half. Moreover, 845 out of 3,266 potential victims referred in 2015, and 312 out of 2,340 potential victims referred in 2014, were also still waiting for a decision. This means that thousands of vulnerable potential victims have been waiting for months and, in some cases, years to get on with their lives. It goes without saying that this has a negative impact on victims' recovery. This also means the current process can be inefficient and resources could be more efficiently used.

I realise that you are keen to introduce a more credible and transparent decision making process and to reduce the time it takes for decisions to be reached. Therefore, I believe that a properly resourced multi-agency expert group will not only help unlock this back log of cases that are pending decision, but also prevent it from happening in future.

A number of front line charities have told me that although a positive conclusive grounds decision does not hold much legal weight, it is a crucial factor in a victim's recovery. Being believed makes a big difference for someone who has not only been exploited, but has then been waiting for a decision to affirm this truth for weeks, months and even years. On the contrary, a lengthy pending or potentially unjust negative conclusive grounds decision can be re-traumatising and detrimental to all the support efforts and recovery.

The Snowdrop project supported a survivor whose negative decision was overturned and "being believed" resulted in her engaging with police, receiving a leave to remain in the UK, learning the English language, having her first home and obtaining her first legitimate job (Case study 1, Annex B)

*Modern slavery survivor, supported by the Snowdrop Project*

*"Safe house stopped supporting me after the negative decision from the Home Office, so they [the Snowdrop project] accepted me and told me the reasons why they believed I was a victim of human trafficking. I was so excited, it really boosted my faith. For some time I would lock myself in the room because I didn't want to go out. But here I feel much better, I even come here for dancing."*

Therefore, it is important to ensure that there is a robust decision making process in place that works without delays and delivers a high quality decision. It is also important to ensure that there is an improved process to challenge disputed negative conclusive grounds decisions.

## **2.2 Work and Pensions Committee recommendations**

On 30 April, the Work and Pensions Committee published its report on the inquiry into support for victims of modern slavery. The report aims to achieve *"the creation of a world-leading structure of services that cares for and protects, as effectively as we can, the victims who have escaped from slavery"*. It puts forward a number of strong recommendations that I support. The report recognised that victims of modern slavery of different nationalities are currently treated differently by different agencies and that this *"has created a confusing landscape that is poorly understood by victims and professionals alike"*.

The Committee recommends that all victims who are provided with a positive conclusive grounds decision automatically receive one year's leave to remain, with entitlements to recourse to public funds, and a personal move-on plan which will act *"as a social passport to support"*. In addition, it is important to ensure that victims continue to receive support within the safe-house until the personal pathway is in place.



I must note that I agree with the Committee that such a decision does not necessarily mean creating a pull factor for victims or for their traffickers. Any potential risk can be mitigated by a professional and effective decision making process that will serve as a gateway for any fraudulent claims, coupled with a robust intelligence and law enforcement response to disrupt criminal networks. I believe that each case, including the provision of leave to remain, should be considered as part of the decision making process by the multi-agency group. It is important that we entrust authorities to make the correct decisions.

The Committee recommends introducing exemptions for victims of modern slavery from the Habitual Residency Test, Jobseeker's Allowance Easement and a concession for modern slavery victims, similar to that of victims of domestic violence. I commend such an approach where, as I have previously stated, victims of modern slavery should not be treated differently from other victims of crime, such as domestic violence and sexual abuse.

The Committee has also recommended that the Department for Work and Pensions (DWP) ensures that all frontline staff are trained in identifying potential victims and referring them for assistance, as well as having knowledge of the kind of support needed by victims of modern slavery. I was pleased to learn that this work has already been started by the DWP who are currently working with the Salvation Army to establish a network of Partnership Managers for each safe house; the aim is that this will ensure a smooth move-on transition and better support to victims upon exiting safe accommodation.

### ***2.3 Long-term support for victims***

I strongly believe that following a positive conclusive grounds decision, the NRM support provision ought to include move-on and long-term support focusing on successful outcomes for victims. We can no longer have a system that supports vulnerable potential victims until the Competent Authorities make a conclusive grounds decision, at which point the victim is to abruptly exit accommodation and suddenly survive without support, prior to full recovery. The "recovery and reflection" period was introduced in order to build confidence in victims and encourage them to come forward and cooperate with authorities to help pursue criminals. We need to ensure that support meets this objective and is not merely a 'tick box' exercise to comply with minimum levels or interpretation of an international treaty or protocol.

Discussions on the need for long-term support have been ongoing for many years. Multiple reports evidencing the need for such support have been published. A number of organisations have taken their own initiative and created a variety of projects providing long-term support services to victims of modern slavery, including accommodation, outreach, drop-in facilities, education, and employment opportunities. There are pockets of good practice scattered across the UK, but there is no consistency. Some organisations call it "a postcode lottery" - if a victim resides in an area with long-term support provision, they are considered to be lucky.

It is important to deliver a system built on consistency, professionalism and accountability, with high quality care services provided to victims of modern slavery until they fully recover. Needs-based, individually tailored, move-on support plans should be developed for all victims before they leave the safe house and the multi-agency decision making panel should make recommendations for long-term support following the receipt of a positive conclusive grounds decision.



A good example of providing long-term support is the most recent work developed by City Hearts in the North West of England. City Hearts launched their Integration Support Programme (ISP) which focuses on providing a connection to the community, a stable income and monitoring the victim's recovery. Since January 2017, 73 survivors have benefited from the ISP and have shown successful outcomes.

The ISP includes drop-in facilities, regular phone calls to monitor the needs of victims and support to victims where and when necessary. During the first six months, with a limited investment, thanks to the programme it was possible to prevent one case of suicide, prevent several cases of homelessness, help victims to join ESOL classes, find employment opportunities and support benefit and asylum claims. Collecting data through case monitoring has allowed for better understanding of the needs of victims after they leave the safe house.

This example shows that with a strong will and limited investment it is possible to provide move-on and long-term support based on individual needs of victims. Not only that, but we can monitor and evaluate the outcomes of their recovery. If this can be done in one region of England, I see no reason why this cannot be introduced across the UK.

Earlier this year I was delighted to endorse a new initiative, Brighter Future, developed by the Co-op. As the UK's fifth biggest food retailer, the Co-op is leading the way in providing long-term support for victims, jointly with City Hearts and the Snowdrop Project. Brighter Future provides work placement and employment opportunities for survivors of modern slavery. I believe that such an initiative not only helps bring victims back into employment, but also back to dignity and a strong sense of empowerment. This is changing and restoring lives. However, in order to enable victims to be ready to take on these life changing opportunities, long-term support is vital. We must ensure the emotional needs of victims are addressed, their immigration status is in order and their knowledge of English is sufficient (Case study 2, Annex B).

Recently I met a survivor, a UK national, who was sexually exploited as a child from 12 to 18 years. She told me her story and the failings of the child protection system and the NRM. However she is now happy, having been supported for over two years to overcome her trauma and regain control of her life. She wrote a poem dedicated to the organisation that has supported her in the course of these years, the Snowdrop Project, and these are just a few lines that speak for themselves:

*Modern slavery survivor, supported by the Snowdrop Project:*

*"Although you can be rescued and the torture comes to an end, it takes long-term healing to truly start to mend."*

*"From too many years filled with such guilt and shame, to the day your counsellor shows you that you were never to blame."*

*"Living a life no longer defined by our past, support we can rely on that we know will last."*

#### **2.4 Protecting child victims of modern slavery**

During the consultation I have been made aware about limitations of support provision available for children of victims of modern slavery. The current Government contract with The Salvation Army does not include providing specialised support services to children who have experienced trauma, either due to being exploited together with their parents or through witnessing the exploitation of their parents whilst living in the same precarious conditions.



These children are extremely vulnerable and have a wide range of needs to be addressed including, but not limited to, psychological and emotional needs, accommodation, access to education and possible irregular immigration status. Placing these children in safe houses with their parents, without providing further needs assessments and specialised protection as required by existing child protection legislation, can be detrimental to their recovery and wellbeing.

I was informed of a shocking case of an Albanian woman with a 9 year old child who was brought to the UK and locked in a property in Kent. The mother was forced into sexual exploitation. This was witnessed by her daughter. They managed to escape and were referred to the NRM for support. For many months they were trying to cope with their trauma and the consequences of exploitation. After 18 months, the little girl got a negative conclusive grounds decision and the mother is still waiting for her decision to this day. This long wait, with a negative decision as an outcome, has harmfully impacted the recovery of both the mother and young girl (Case study 3, Annex B).

### ***2.5 Dispersal to National Asylum Support System accommodation***

A number of organisations have highlighted concerns around dispersal of non-EU victims to National Asylum Support System (NASS) accommodation following their exit from the safe house. Because of the “no choice” policy, victims of modern slavery often get sent away to NASS accommodation far away from their support network. Many have found that this has adverse effects on a victim’s recovery and can be detrimental to physical or emotional health. It can also be damaging to children. I believe that an individually tailored pathway for victims will help prevent this.

## **3. A more robust data collection mechanism and intelligence picture**

I was pleased to learn that the Home Office has begun scoping work on developing a digitalised system for recording and analysing NRM data. I believe this piece of work is crucial and must be prioritised. At the present moment, everyday opportunities for capturing and analysing data are being wasted. This data and information is crucial, not only with regards to victim support and decision making, but also for a more robust intelligence picture to disrupt the criminal gangs and punish the perpetrators.

### ***3.1 Crime recording***

I have raised significant concerns in the past about failure to record modern slavery crime and I am delighted to see progress being made. According to police recorded crime data made available by the Home Office, the number of modern slavery crimes (crime code 106) has risen from 870 in financial year 2015/16 to 2,244 in 2016/17. This is a significant improvement. However, I believe more needs to be done to ensure that law enforcement fulfil their duty and properly record and investigate every allegation of modern slavery crime, whether a potential victim agrees to go into the NRM or not. This will ultimately lead to more criminals being locked up in prison and more victims having access to the justice they deserve.

### ***3.2 A more robust intelligence picture***

Until recently NRM forms have sat dormant on NCA’s files and have not been disseminated for investigation, nor have these files been treated as a source of intelligence. Valuable information collected



by the Competent Authority throughout the NRM decision making process is not systematically collated, analysed or disseminated to partners. Such conduct with NRM information on vulnerable victims of crime is reminiscent of the failings outlined by the Bichard Inquiry. Some of the shortcomings exposed by Sir Michael included handling of information by the police that was “deeply shocking... and opportunities had certainly been missed...It was impossible that offenders had not slipped through the net”. The systems were “fundamentally flawed” and “senior police officers had failed to grasp the scale and nature of the problem.”

I have raised my concerns with you in our regular meetings, as well as with the current and former Director General of the NCA. I have also shared concerns with the NPCC lead for modern slavery, and I am aware that these issues are being addressed and we are beginning to see improvement. However, much more needs to be done. It is important to remember that for law enforcement to not recognise NRM information as intelligence, does not change the fact that it is indeed intelligence. The Bichard Inquiry outlined there was an alarming ignorance of what constitutes intelligence; the same could be said for what we are witnessing here in 2017.

Today, I am launching a report which examines the dynamics of Vietnamese nationals’ exploitation en route to, and within, the UK, a copy of which has been shared with you. The research included inter alia analysis of NCA NRM data and UK Visas and Immigration (UKVI) held NRM files for 75 Vietnamese victims who had received a positive conclusive grounds decision. Analysis highlighted issues around the transmission of NRM decision outcomes, data quality and lost intelligence opportunities. It also identified that limitations of the current NCA NRM data system cast doubt over whether the NCA published statistics for non EEA nationals can be wholly relied upon – this may have serious implications on our understanding of the threat picture.

I am clear that NRM data is not being treated as the valuable source which it is. For this to be achieved it is important to develop a more robust digitalised NRM data system and to recognise that NRM data does indeed constitute as intelligence - and should be treated as such.

As stated, I am pleased that the NCA elevated modern slavery to the National Priority Threat and have taken a lead on developing the national and regional intelligence picture. It is encouraging that the newly created Joint Slavery and Trafficking Analysis Team (JSTAC) under the Police Transformation Fund is now up and running. The first threat assessments have already been produced aiming to inform our law enforcement response. It is in the early stages, however I hope to see the JSTAC turning into a central point for collection and analysis of all data and intelligence on modern slavery. This will in turn build a holistic and comprehensive national picture of the nature and scale of the crime.

### ***3.3 Section 52 of the Modern Slavery Act***

I am concerned with the lack of progress around implementation of Section 52 of the Modern Slavery Act (‘Duty to Notify’) and lack of a comprehensive communication strategy to support this. It became evident from the consultation that there is little knowledge amongst statutory authorities regarding their duty to notify the Secretary of State about suspected victims of modern slavery and human trafficking. I am concerned that presently Section 52 fails to achieve what it was set to, i.e. improving identification of victims, raising awareness of modern slavery and building a more comprehensive picture of the nature and scale of modern slavery in order to inform the law enforcement response. On the latter, it is important to



ensure that any data received through the duty to notify is effectively collated and analysed, together with the NRM and other data or intelligence.

### **3.4 Data collection and monitoring beyond the NRM**

Currently, there is no data collected on what happens to victims beyond the NRM. The Salvation Army publishes annual reports which show that upon exiting the safe house the majority of victims return home, move into private accommodation or move into National Asylum Support Services. There is no mechanism in place to check what happens to victims beyond that point.

A report titled “Fresh Start” was recently published by the University of Liverpool and stated that 76% of victims exit the NRM support provision into the unknown.

In addition, the Work and Pensions Committee concluded that it is unacceptable that no data is recorded on cases of re-trafficking. It recommended that any reform to the NRM included *“the recording and collecting of instances where victims have been processed through the framework more than once”*, and stated that this should be implemented as a matter of urgency.

My report on the trafficking of Vietnamese nationals highlights the same concern and provides a number of recommendations to tackle this issue, such as recording and publishing data where victims have been processed through the NRM more than once as well as instances of people going missing.

## **4. Child victims of modern slavery and human trafficking**

During the NRM consultation a number of issues have been raised around identification and support to child victims of modern slavery and trafficking; these issues require special attention and urgent action.

### **4.1 Poor decision making process**

I have received irrefutable evidence of poor decision making on cases of child trafficking that negatively affects not only the wellbeing of the child but also the work of child protection and police officers. A number of partners across England, Scotland and Northern Ireland have stated that ‘remotely controlled’ decision making by the Competent Authorities who never meet the child is not the right approach. In Northern Ireland, I was told by the Police Service Northern Ireland (PSNI) and practitioners from Health and Social Care Trusts about cases they have dealt with in which they have identified and worked with child victims of trafficking on their recovery and were positive about the child’s trafficking experience, only to then receive a negative conclusive grounds decision from the UKVI who have never met or worked with the child (case study 4, Annex B).

A reformed NRM must put children’s welfare at the heart of the identification process. This can be achieved by embedding case management and decision making on child modern slavery and human trafficking cases into the existing child protection system. It is the child’s wellbeing and best interest that have to come first. The professionals directly working with the child come together in a multi-agency panel to make decisions on the child’s welfare or needs, but these can be seriously undermined by NRM decisions made elsewhere without the adequate knowledge, experience or expertise mandated for child protection. Existing multi-



agency safeguarding should be utilised and resourced to manage these important life changing decisions for children, with due consideration of the best interest of the child.

In 2016 there were 1,278 children referred to the NRM as potential victims of modern slavery. It is not clear to me what happened to these children. How many received positive conclusive grounds decisions, how many negative, and what happened to them afterwards? Have they gone missing from local authority care? Or have they been protected and successfully reintegrated in the UK? Or perhaps they have been successfully reunited with their family at home? We must ensure that all possible protection measures are put in place, in line with current legislation and policies, to protect trafficked children. Part III of the Children's Act 1989 clearly states that it is a general duty of every local authority, amongst others, to safeguard and promote the welfare of children within their area who are in need. I must reiterate, it is our legal and moral duty to protect and safeguard these children.

#### ***4.2 Independent Child-Trafficking Advocates scheme***

Last year I wrote to your predecessor, the Rt Hon Karen Bradley MP, recognising some of the Government's concerns and supporting further enrolment of the Independent Child Trafficking Advocates (ICTAs) scheme in three early adopter sites. One of my recommendations was to create an independent and transparent evaluation mechanism for the implementation of ICTAs in early adopter sites. In my letter, I also recommended that if at any point of ICTA implementation in early adopter sites, for example at mid-term evaluation, the panel considers that the pilots are successful, the Government should proceed with national implementation as soon as possible.

I was delighted that the Independent Expert Advisory Panel for the assessment of the ICTAs was put in place and my office was invited to be a member. However, it has met only once since its inception, in November 2016, and is due to meet for the second time this month. It is not clear to me how the implementation of ICTAs is developing, their level of work, their successes or their challenges.

I also highlighted the need for protection of all child victims of modern slavery across the UK to be enhanced utilising existing safeguarding policies and guidance. This is echoed by the issues identified by this consultation, as it can be the complexity of the NRM decision making process that can actually be detrimental to the wellbeing of the child.

#### ***4.3 Need for good quality legal representation and durable solutions***

It has been brought to my attention that a child's immigration status often takes precedence over their status as a child victim of modern slavery. Whilst modern slavery is closely linked with migration and often illegal entry to the UK, it is, first and foremost, abuse and exploitation of children. Many children are extremely vulnerable and have suffered abuse before they became victims of modern slavery. This destroys childhoods.

The role of the immigration legal advisors in supporting victims of modern slavery, in particular children, can be crucial. Child victims often have psycho-social needs that need to be addressed. Uncertainty or delays in resolving their immigration status may lead to even higher levels of anxiety, fear and depression that could potentially result in self-harm or suicide attempts. It is therefore vital to ensure that child victims of modern slavery have access to high quality legal and immigration advice as soon as they have been



rescued and put in a place of safety. The role of ICTAs to help children through the criminal justice system should not be underestimated.

Article 16.2 of the EU Anti-Trafficking Directive states that all Member States should take necessary measures “with a view to finding a durable solution based on an individual assessment of the best interest of the child”.

A report by UNICEF and UNHCR titled *Safe and Sound* defines a durable solution as a) long-term and sustainable; b) ensuring that the child is able to develop into adulthood and is provided with the environment that will meet his or her needs, as well as fulfil their rights under the Convention of the Rights of the Child; c) will not put child at risk of persecution or harm.

If a multi-agency decision making panel is formed, and child modern slavery cases are embedded into the child protection system, it is possible to empower and collect the views of all professionals to find a solution in the best interest of the child. Furthermore, coordination and monitoring of its implementation will be made possible.

## **5. Need for a professional response and accountability**

The introduction of the Modern Slavery Act and the Prime Minister’s leadership have resulted in increased levels of awareness and commitment to fighting modern slavery and human trafficking across the UK by all statutory agencies, including police, local authorities, the NCA, border and immigration authorities, health professionals and social workers. It is essential that this abusive crime has a response commensurate to the risk it poses to individuals and our own national security.

Pockets of good practice in victim identification, victim support and crime disruption are emerging across the country. However, the response is inconsistent. I have also been made aware of bad practice that has caused damage to victims’ recovery, as well as undermining police investigations. For example, not all frontline professionals, both in statutory and non-statutory sectors, are aware of the victim’s rights and entitlements in the UK, including access to support and healthcare, discretionary leave entitlements and compensation.

Section 49 of The Modern Slavery Act stipulates that the Secretary of State must issue guidance to public authorities and other persons on identification and care for victims of modern slavery. I believe that such guidance should promptly be developed setting the minimum standards of professionalism in victim identification and care, and creating an accountability framework to ensure these are adhered to.

Scotland and Northern Ireland have embedded support provision to potential victims in the NRM, in the period between the reasonable grounds and conclusive grounds decision, in their statute. Furthermore, both Acts recognise the fact that support may be required prior to the NRM referral and after the conclusive grounds decision is being made, and therefore allow for its provision if it is deemed necessary. Recently, the Cabinet Secretary for Justice in Scotland, Michael Matheson, has announced that the support period for victims in Scotland will be extended to 90 days. I welcome this announcement and, as stated in my initial letter, as the UK’s Independent Anti-Slavery Commissioner I believe it is essential to ensure consistency across the whole of the UK following the good practice of Northern Ireland and Scotland in supporting victims. Currently Lord McColl’s Private Member’s Modern Slavery (Victim Support) Bill provides



further evidence to support this, as well as an opportunity to ensure victims of modern slavery get the support they so rightly deserve.

In order to provide high quality care to victims of modern slavery, I believe support organisations and workers need to be appropriately resourced and trained. Public authorities need to embed awareness raising and training within their internal staff learning and development structures at a strategic level, not piecemeal. Minimum care standards and a possible accreditation framework needs to be developed to ensure professionalism and accountability for all frontline statutory and non-statutory organisations working with vulnerable victims of modern slavery.


To conclude, I would like to reiterate that the time has come for a radical reform of the NRM that will provide holistic support to victims of modern slavery and human trafficking focusing on their needs and successful reintegration. The NRM was established eight years ago, and it has already been under review for four years. It has been two years since the NRM pilot schemes were launched and I am aware that the NRM pilot evaluation report is soon to be published.

I do not doubt the Government's commitment to lead on the issue of modern slavery and improve the existing NRM. Following my initial recommendations and the positive discussions we have had, I was delighted to see that the Home Secretary, the Rt Hon Amber Rudd MP, committed to a radical reform of the NRM to boost support for slavery victims in the UK. In a public announcement earlier this year the Home Secretary acknowledged: improvements need to be made to the immediate support given to victims to prevent re-trafficking; training must be delivered to frontline staff to improve identification of victims; victim processes need to be streamlined; and long-term support needs to ensure victims are able to rebuild their lives.

These commitments from the Home Secretary are a crucial step forward in the fight against modern slavery. The Home Secretary stated: "I am committing us to go further in making sure that we have the right system in place to help those in the trap of modern slavery find a way out of it".

Building on what has already been achieved, I look forward to further engaging with you and your officials to ensure there is a world leading support system for victims of modern slavery and human trafficking in the UK.

With best wishes,



**Kevin Hyland**

UK Independent Anti-Slavery Commissioner

**CC:**

**Lynne Owens, Director General, National Crime Agency**

**Mark Thomson, Director General, UK Visas and Immigration**

**Chief Constable Shaun Sawyer, National Policing Lead for Modern Slavery**