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The Royal College of Obstetricians and Gynaecologists
10-18 Union Street
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Dear Mr Edward Morris MD FRCOG,

I am writing to you about the lack of adequate provision of training for doctors in the area of Modern Slavery Human Trafficking (MSHT).

MSHT is an egregious violation of men, women and children for the purposes of forced labour, sexual exploitation, forced marriage, domestic servitude, organ harvesting and forced criminal activities, including county lines.

There is no accurate way of estimating how many people are living and experiencing MSHT within the UK. However, the National Crime Agency suggest “tens of thousands”¹, the Home Office estimated “10,000-13,000”² in 2012 and the Global Slavery Index estimate 136,000³. That would mean 2 per 1000 individuals.

There is an increasing amount of research which documents the severe impact of MSHT on the physical and mental health of victims and survivors, but we also know this is not limited to an individual. MSHT is a public health issue⁴, stemming from poverty and inequality, whilst self-perpetuating and contributing to detrimental social determinants of health. This country needs to address MSHT from a public health and healthcare perspective in order to tackle this crime in a person-centered, holistic and effective way.

Our health service needs an effective and coordinated response to MSHT. Some studies suggest as many as 68% of victims present to healthcare settings when they are experiencing exploitation, with

¹ The Guardian, 2017 Tens of thousands of modern slavery victims in UK, NCA says.

<https://www.theguardian.com/world/2017/aug/10/modern-slavery-uk-nca-human-trafficking-prostitution>

²HM Government. *Modern Slavery Strategy*. [online] London, 2014: Open Government Licence v3.0. Available at:https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/383764/Modern_Slavery_Strategy_FINAL_DEC2015.pdf [Accessed 30 Jun. 2019]

³ Global Slavery Index. *Country Data | Global Slavery Index*. [online] 2018. Available at:

<https://www.globalslaveryindex.org/2018/data/country-data/united-kingdom/> [Accessed 23 Jan. 2019].

⁴ Such E, Laurent C, Salway S. 2017. Modern Slavery and Public Health, Public Health England.

<https://www.gov.uk/government/publications/modern-slavery-and-public-health/modern-slavery-and-public-health> (last accessed 1 February 2018).

just over half of those being seen by emergency/urgent care practitioners⁵.

Despite this, healthcare professionals don't feel they have the knowledge and confidence to know what to do when they encounter someone who may be trafficked. In 2015, a survey of 782 NHS healthcare professionals found that 95.3% percent were unaware of the scale or extent of MSHT in the UK. One in eight healthcare professionals said they know or strongly suspect they have come in to contact with a victim (one in five in maternity services), yet 78.3% reported that they had insufficient training to assist trafficked people. Importantly, 86.8% reported lacking knowledge of the questions to ask to identify potential victims⁶. This research highlights a serious knowledge and confidence gap amongst frontline clinicians, who may be the only individuals encountering trafficked victims at their most vulnerable. Crucial opportunities to intervene and offer safety and choice are being missed.

“Safeguarding Children and Young People: Roles and Competencies for Healthcare Staff”, an intercollegiate document, established that “forced marriage, modern slavery and grooming and exploitation”, “county lines” and “child trafficking (internal and external)” are considered core competencies for all levels of safeguarding, expected of all healthcare staff⁷.

Whilst it is positive to see that your existing curriculum does mention MSHT, it is presently coupled with FGM as a “cultural practice” which does not accurately reflect the broad range of exploitation types that are encompassed by the term MSHT. The inclusion of MSHT in your curriculum in this context therefore has the potential to restrict the ability of training bodies to train and equip their healthcare professionals to identify and safely respond to MSHT. As such, responsibility rests solely on individual prioritisation within safeguarding teams, NHS Trusts and other healthcare organisations.

Under the terms of the Modern Slavery Act of 2015, I am charged with encouraging good practice in the prevention, detection, and investigation of slavery offences, and the identification of victims⁸. My first [strategic plan](#) was laid before Parliament in October 2019 and I have prioritised the care and support of victims. Herein lies a crucial opportunity to do so. It is a stated goal of NHS England to support staff in accessing training on how to identify and safeguard victims of MSHT⁹. Indeed, the duty to safeguard all adults and children is enshrined in the General Medical Council's statutory guidance, “Good Medical Practice”, upon which all medical education in the United Kingdom is based¹⁰.

⁵ [J Health Care Poor Underserved](#). 2016;27(3):1220-33. doi: 10.1353/hpu.2016.0131

⁶ Oram S, Hemmings S, Abas M et al. Provider Responses Treatment and Care for Trafficked People. Department of Health, 2016. <https://www.kcl.ac.uk/ioppn/depts/hspr/research/CEPH/wmh/assets/PROTECTReport.pdf>. (last accessed 5 February 2018).

⁷ The Royal College of Nursing. (2019). *Safeguarding Children and Young People: Roles and Competencies for Healthcare Staff* | Royal College of Nursing. [online] Available at: <https://www.rcn.org.uk/professional-development/publications/pub-007366> [Accessed 18 Oct. 2019].

⁸ Legislation.gov.uk. (2019). Modern Slavery Act 2015. Charter 30, Part 4, Independent Anti-Slavery Commissioner. [online] Available at: <http://www.legislation.gov.uk/ukpga/2015/30/part/4/enacted> [Accessed 18 Oct. 2019]

⁹ NHS England (2019). *NHS England » NHS England slavery and human trafficking statement*. [online] England.nhs.uk. Available at: <https://www.england.nhs.uk/safeguarding/slavery-human-trafficking-statement/> [Accessed 18 Oct. 2019]

¹⁰ General Medical Council (2019). *Good Medical Practice. Domain 2: Safety and quality*. [online] Available at: <https://www.gmc-uk.org/ethical-guidance/ethical-guidance-for-doctors/good-medical-practice/domain-2----safety-and-quality#paragraph-24> [Accessed 18 Oct. 2019].

Following consultation with NHS safeguarding leads and experts in the field, both clinical and within academia, this office has identified a key opportunity for the Royal Colleges to take the lead in the efforts to safeguard patients against MSHT with all its deleterious consequences. We propose that the inclusion of reference to MSHT within your curriculum would equip trainee doctors to safeguard this vulnerable patient population.

I am therefore writing to urge you in the strongest possible terms to include appropriate reference to Modern Slavery Human Trafficking (MSHT) and exploitation as a category of abuse within your curriculum for trainees in obstetrics and gynaecology.

I look forward to receiving your response. In the interests of transparency, I request that you respond in a way that enables me to publish your letter on my website.

Sincerely,

A handwritten signature in black ink, appearing to read "Sanjiv". The signature is fluid and cursive, with a long horizontal stroke at the end.

Independent Anti-Slavery Commissioner