

20 November 2020

Rt Hon Priti Patel MP
Home Secretary
Home Office
2 Marsham Street
London
SW1P 4DF

Dear Home Secretary,

I write further to the [letter](#) of the 6 November 2020 from Crisis and the wider homelessness sector raising their concerns regarding the new Immigration Rules which make rough sleeping grounds for cancelling or refusing permission to stay in the UK for non-UK nationals.

As the Independent Anti-Slavery Commissioner, I also have significant concerns regarding the introduction of these new rules. As you may be aware, recent research and work undertaken by the sector has evidenced the significant links between homelessness and modern slavery^{1 2}. These links are two-fold: those who are rough sleeping are vulnerable to being targeted by traffickers, whilst those who flee their traffickers or exit the support that is provided through the National Referral Mechanism can also find themselves rough sleeping and consequently become at risk of re-trafficking.

I understand that the Government has emphasised that these rules will be used sparingly and only as a last resort where individuals have refused all other support that is offered to them. Whilst this may be the case, the fear of the rules being enforced will remain and may become a barrier to individuals seeking support. Mistrust and fear of authorities is already a control mechanism that is used regularly by traffickers. Furthermore, there is the risk that the new rules will be used as a recruitment tool by traffickers and that they may also force vulnerable individuals to remain in exploitative work in order to avoid becoming homeless and potentially subject to deportation. The Covid-19 pandemic will undoubtedly further exacerbate vulnerability, contributing to both increased unemployment and risk of homelessness.

I therefore urge you to reconsider these changes to the new Immigration Rules. I am aware that the homelessness sector has already offered their support and commitment to work with the Government to achieve an end to rough sleeping, so would encourage engagement and communication on this issue to continue to build on the good work of the 'Everyone In' initiative earlier this year.

¹The Passage (2019) [Responding to modern slavery and exploitation in the homelessness sector](#)

²Hestia (2019) [Underground lives: Homelessness and modern slavery in London](#)

I am very conscious of the time sensitive nature of this correspondence given that the new Immigration Rules are due to come into effect on 1 December 2020, therefore 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.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Sam Yuen". The signature is fluid and cursive, with the first name "Sam" being more prominent than the last name "Yuen".

Independent Anti-Slavery Commissioner

