

18 February 2021

Interpersonal Abuse Unit  
Violence Against Women and Girls (VAWG) Team  
5th Floor, Fry Building  
2 Marsham Street  
London  
SW1P 4DF

Dear Sir,

**Call for evidence on the Violence Against Women and Girls Strategy 2021-2024**

I write to you as the UK Independent Anti-Slavery Commissioner in response to your call for evidence on the Violence Against Women and Girls Strategy 2021-2024. Given the remit of my role and the very nature of modern slavery as a hidden harm, I am keen to ensure that the updated strategy incorporates the specific circumstances and experiences of victims and survivors of modern slavery and human trafficking. I was pleased to see that as part of the call for evidence you are encouraging those with lived experience to share their views; this is an important area that I also highlight within my 2019-2021 Strategic Plan<sup>1</sup>.

The Ending Violence against Women and Girls Strategy 2016-2020<sup>2</sup> made some reference to modern slavery and exploitation and the refreshed strategy published in 2019<sup>3</sup> highlighted the need to make links between VAWG and related issues such as modern slavery and exploitation. However, I also note that the refreshed strategy explicitly stated that ‘the crimes addressed through this strategy are the crimes that disproportionately affect women and girls, which are domestic abuse, sexual violence, stalking, and so-called ‘honour-based’ violence including forced marriage and Female Genital Mutilation (FGM)’, therefore did not incorporate modern slavery. Earlier this month my office attended a focus group as part of the VAWG Strategy 2021-2024 call for evidence on ‘Prostitution and sex work, commercial exploitation, trafficking and modern slavery’. Whilst this was a welcome opportunity, I am conscious that in focussing on modern slavery within the context of sex work and sexual exploitation, the workshop was not able to explore the wider forms of exploitation that could be considered VAWG and that modern slavery is not yet embedded as part of this agenda.

During the first three quarters of 2020, there were 7,586 referrals for potential victims of modern slavery into the National Referral Mechanism (NRM), including 2,057 referrals for women and girls<sup>4</sup>. In addition to sexual exploitation, we know that domestic servitude disproportionately affects

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<sup>1</sup> Independent Anti-Slavery Commissioner [2019] [Independent Anti-Slavery Commissioner’s Strategic Plan](#)

<sup>2</sup> HM Government [2016] [Ending Violence against Women and Girls Strategy](#)

<sup>3</sup> HM Government [2019] [Ending Violence against Women and Girls Strategy Refresh](#)

<sup>4</sup> Home Office [2020] [National Referral Mechanism Statistics](#)

women and girls and a research report<sup>5</sup> recently published by Focus on Labour Exploitation (FLEX) provides evidence of labour abuses and risks faced by female migrant workers in the cleaning sector, including pay violations, a lack of access to social security such as sick pay, and experiences of sexual harassment. I am also aware of an increasing number of women who are survivors of child sexual exploitation being referred for support as potential victims of modern slavery as well as women and girls being criminally exploited by county lines. I would therefore strongly urge you to include reference to modern slavery and human trafficking in all its forms, including sexual exploitation, domestic servitude, labour exploitation and criminal exploitation within the updated VAWG Strategy. An inclusive strategy is vital for a cross-Government approach to violence and vulnerability and is especially important given that women and girls may experience a range of abuses.

The UK has international obligations to provide support to potential victims of modern slavery, including those set out by the Council of Europe Convention on Action against Trafficking in Human Beings (ECAT) 2005<sup>6</sup>. In 2009, the Home Office introduced the NRM as a framework for identifying potential victims and providing support. Adult victims referred into the NRM are entitled to support through the Victim Care Contract (VCC) which can include access to safe accommodation, a support worker and financial assistance for a minimum of 45 days. Whilst victims of modern slavery supported through the VCC may not experience some of the challenges faced by victims of other forms of VAWG, such as in cases of domestic abuse where Refuge spaces often require an individual to be eligible for housing benefit, there are a range of common issues. For example, the gaps in longer-term support for those with no recourse to public funds and a need to do more to support survivors' recovery move towards sustainable independence. Given these areas of overlap and the need for wider system co-ordination to respond, it would be sensible to be thinking about these issues through a shared strategic framework to enable collaborative solutions.

I was encouraged to read that you are seeking the views of those involved in preventative activity as part of your call for evidence. As you may be aware, my 2019-2021 Strategic Plan<sup>7</sup> highlights the need to ensure that efforts to rescue those at risk and prosecute those responsible are matched by a determined focus on prevention. I am particularly interested in the value of a public health approach and my office is currently working alongside Public Health England in supporting the University of Sheffield in their research to refine a framework for a public health approach to modern slavery. Over the past 6 months I have also been liaising with the Violence Reduction Units that are in place in 18 police force areas to understand more about their approaches and identify potential areas of overlap with my remit. It is evident that there are many examples of promising practice in their efforts to deliver primary, secondary and tertiary prevention. I would therefore encourage you to continue to incorporate the principles of a public health approach within the updated VAWG Strategy and consider any learning that could be drawn from wider policy areas

The Covid-19 pandemic has in many ways exacerbated the vulnerability of those who were already vulnerable and is also creating new vulnerabilities to exploitation including where individuals are urgently seeking income and may therefore be more willing to take on precarious employment and

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<sup>5</sup> Focus on Labour Exploitation [2021] [‘If I could change anything about my work..’ – Participatory research with cleaners in the UK](#)

<sup>6</sup> [Council of Europe Convention on Action against Trafficking in Human Beings](#) [2005]

<sup>7</sup> Independent Anti-Slavery Commissioner [2019] [Independent Anti-Slavery Commissioner’s Strategic Plan](#)

abusive or undesirable working conditions thinking that it is their best or only option<sup>8</sup>. In addition, where there are surges in recruitment and where processes to protect people are short circuited, this can create an environment where exploitation can thrive. We know that the pandemic is also having an impact on the courts and criminal justice system and that it is likely to become increasingly difficult to keep vulnerable victims and witnesses engaged for extended periods.

Furthermore, the new immigration system has the potential to increase vulnerability to exploitation, trafficking and modern slavery<sup>9</sup> as traffickers are swift to adapt and will seek to abuse new arrangements. It is essential that the potential risks and unintended consequences are identified, that the impact is monitored and mitigating action is taken. The updated VAWG Strategy must therefore take into account these significant societal level changes.

I hope this response is useful. If you require any further information please contact the Victims and Partnerships lead at my office, April McCoig at [April.McCoig@iasc.independent.gov.uk](mailto:April.McCoig@iasc.independent.gov.uk).

Yours sincerely,



**Independent Anti-Slavery Commissioner**

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<sup>8</sup> Independent Anti-Slavery Commissioner (2020) [‘Traffickers could profit when UK eases lockdown, anti-slavery chief warns’](#)

<sup>9</sup> Independent Anti-Slavery Commissioner (2021) [Protecting individuals from exploitation by criminal traffickers and unscrupulous employers: Identifying and mitigating risks in the EU Settlement Scheme and the UK’s new points-based immigration system](#)