

## Anti-Slavery Lived Experience Advisory Panel Summit

### *Next Steps*

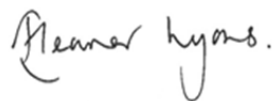
From the outset of my appointment as Independent Anti-Slavery Commissioner, I have been clear that survivor engagement is fundamental to how I approach this role. My role is to promote good practice, scrutinise the systems in place, and hold Government and others with a responsibility for tackling modern slavery to account. I cannot do this effectively without listening to, and learning from, those with lived experience of modern slavery and human trafficking.

I was honoured to host the inaugural Anti-Slavery Lived Experience Advisory Panels Summit. The purpose of the day was straightforward, to hear directly from Lived Experience Advisory Panels (LEAPs) about their priorities, concerns, and expectations.

Lived experience is knowledge - strategic, practical, and essential. It helps improve frontline practice and exposes the consequences of poorly designed policies. Across the thirteen LEAPs represented at the Summit, work has already shaped guidance, strengthened services, and contributed to national discussions. This has all made a real-world impact on people's lives.

I have consistently called for the establishment of a National Survivor Council and have submitted proposals to Government to support this. Such a council would ensure that survivor insight informs the national response to human trafficking and modern slavery. The Summit reinforced the urgency of this need. I will continue to press Government on why this step has not yet been taken and advocate for meaningful inclusion of survivor voices.

As I take this work forward, the recommendations shared by representatives at the Summit will remain central. They will guide my engagement with Government departments, policymakers, and the wider anti-slavery sector.



**Eleanor Lyons**  
Independent Anti-Slavery Commissioner

## Overview

Across the UK there are LEAPs, made up of experts with lived experience of modern slavery and human trafficking and co-ordinated by NGOs, to advise on organisational practice and external policy matters relating to modern slavery. The Lived Experience Advisory Panels Summit ('the Summit') was held in London on 17<sup>th</sup> March 2026 to bring together thirteen representatives of these different panels to share their Panel's priorities and recommendations for action to guide the work of the Independent Anti-Slavery Commissioner (IASC). The IASC would like to thank the Human Trafficking Foundation who were commissioned to organise and facilitate the Summit and to Ashurst for hosting the day.

Representatives were selected independently by their respective Panels, ensuring that the views and priorities of the wider group were clearly brought to the attention of the IASC and reflected in the Summit discussions. Each representative worked with their Panel in advance to identify the key issues and priority areas they believed the Commissioner should raise with Government. This report captures the full range of priorities highlighted during the day, alongside the actions the Commissioner intends to take in response. A readout of the priorities raised by each Panel is available in Annex A.

The feedback from the day was overwhelmingly positive, with all representatives agreeing that the day itself was impactful. Representatives provided constructive feedback on how to improve such meetings if held in the future, including: allowing more time allocated for each representative to share their Panel's views so that their points could be discussed with other Summit attendees; and ensuring meetings are prepared with long lead-in times so Panels have time to prepare. Representatives reported that they appreciated the chance to network, meet representatives from other Panels (providing peer-to-peer learning), and to speak directly with the IASC. Representatives felt that their voices were heard, that the day was trauma informed and that similar meetings should be arranged.

## Forward Plan

This section brings together the insights shared directly by the LEAP representatives at the Summit and sets out how the IASC will act on what was heard. The Commissioner has listened closely to the priorities, concerns and expectations raised and commits to taking forward a programme of work shaped by those insights. These commitments form part of a longer-term need for sustained survivor engagement, recognising that meaningful participation cannot be achieved through one event alone. The focus from this Summit will be on the actions that the IASC can progress over 2026, whilst also identifying longer-term areas the IASC and her office should carry forward in partnership with survivors. This approach aims to deliver for survivors at pace, ensure continuity, embed survivor leadership over time, and strengthen the foundations for long-term survivor-centred policy and practice.

## IASC Commitment: Embedding survivor inclusion in policy development

*The IASC commits to pushing the Government to embed survivor insight and leadership at every stage of policy development. The IASC will advocate for survivors to be involved from the earliest phases of shaping national priorities, not only during consultation. This includes setting clear expectations for Government on meaningful co-production, establishing consistent standards for survivor engagement across the sector, and promoting remuneration and professional pathways for survivors who contribute their expertise.*

### Survivor leadership, participation and collective influence

**What IASC will do:** The IASC will strengthen survivor leadership by promoting a consistent, high-quality approach to survivor involvement across Government and the wider sector. This includes setting clear expectations that survivor expertise must shape policy from the earliest stages, encouraging co-production approaches, and promoting consistent safeguarding, remuneration and ethical standards across LEAP groups and lived-experience structures.

The Commissioner will work with LEAPs and sector partners to call for the Government to create a National Survivor Council, which was identified as essential for embedding lived-experience insight within Government decision making. As part of this, the IASC will coordinate a joint letter to the Prime Minister calling for a properly supported, independent and accessible national mechanism that enables survivors to collectively influence policy, scrutiny and national priorities.

The IASC will continue to listen and act on survivors' feedback on how they would further like the office to promote survivor engagement, and will convene regular engagement opportunities, including holding another IASC LEAP Summit to report on progress, gather further direction and provide a structured space for survivors to challenge and shape national priorities.

Together, these actions aim to elevate survivor voice from consultation to leadership, ensuring survivor expertise becomes embedded across policymaking, recruitment, scrutiny and long-term strategy.

**Rationale:** Representatives at the Summit told the IASC that current involvement by the Government is often tokenistic, taking place after decisions have already been made rather than shaping the direction of policy from the start. They highlighted the need for consistency across lived-experience groups, including safeguarding practices, remuneration and the recognition of lived experience as professional expertise.

A National Survivor Council is not currently established by the Government, meaning survivor expertise is not systematically incorporated into Government decision making. Other international partners have already established these Councils. Representatives emphasised that

without a coordinated national structure, engagement remains fragmented and dependent on individual organisations rather than a collective survivor voice.

Finally, representatives highlighted the importance of ongoing dialogue and accountability, explaining that one-off consultations do not meet the need for sustained influence. They called for regular updates, feedback loops and safe opportunities to challenge and direct the Government and the IASC's priorities. Strengthening survivor leadership therefore requires a combined approach: improving participation, securing representation, establishing collective influence and ensuring continued accountability over time.

### **Key messages from representatives:**

- Current involvement by Government is often tokenistic, with consultation taking place too late to influence decisions. Survivors want meaningful participation from day one.
- Survivors want co-production, not consultation, with remuneration, recognition as experts and clear career pathways for those working in the anti-slavery sector.
- Across LEAPS, people want consistent safeguarding, remuneration and ethics processes so lived-experience work is respected and valued equally.
- Survivors want a national structure that enables collective influence. Representatives supported coordinating a joint letter to the Prime Minister calling for a properly supported, independent and accessible National Survivor Council that can shape policy, scrutiny and national priorities.
- Collective voice strengthens impact. Representatives emphasised that joint working across lived-experience groups increases influence, supports consistency and enables survivors to shape national priorities together.

### **IASC Commitment: Holding Government to account**

*The IASC commits to using survivor insight to challenge Government on policies and systems that fail to protect people from exploitation. The Commissioner will raise survivor evidence with relevant departments, press for reforms that improve safety, stability and access to justice, and call out areas where Government action falls short. This includes scrutinising how the National Referral Mechanism, law enforcement responses and sponsored work visa routes impact survivors in practice. The Commissioner will focus on the priority areas survivors identified as most urgent, while also setting out longer term expectations for continued scrutiny. This is part of an ongoing commitment to ensure Government decisions are informed by lived experience and are accountable to those most affected.*

### **Legal visa pathways and preventing exploitation in “legal” migration routes**

**What IASC will do:** The IASC will hold Government to account for not preventing exploitation within legal migration routes, particularly sponsored work visas, where representatives described significant risks. The Commissioner will press for reforms that ensure stronger oversight and enforcement action against exploitative employment sponsors and robust labour exploitation enforcement through the new Fair Work Agency (FWA). The IASC will advocate for protections preventing employers from cancelling or threatening to

cancel a worker's visa when they report abuse, recognising how immigration dependence is used as a tool of control.

The Commissioner will also push for Government enforcement agencies to place greater focus on domestic work and develop rights-based induction processes for migrant workers. This should include early accessible information on rights, responsibilities, safe reporting routes and available support, delivered in partnership with labour market enforcement bodies. The IASC will continue to raise how legal visa routes are currently being used by perpetrators to exploit people and will call for a system that learns from international good practice and ensures migrant workers can report abuse without risking destitution, detention or deportation.

The IASC will continue to advocate for wrap-around support for survivors to support their recovery and livelihoods, including employment skills training.

**Rationale:** Representatives reported that exploitation through legal visa routes is widespread but poorly addressed within current systems. Workers who enter the UK on sponsored visas are often tied to a single employer, leaving them highly vulnerable if abuse occurs. The IASC was told that when exploitation is reported, visas can be cancelled, removing their right to work and leaving them without income or stability. This creates a powerful deterrent to disclosure. Also reported was that exploitative employers remained practicing in the UK with no accountability, operating with little oversight.

Exploitative recruitment fees, misleading information, and lack of clarity about rights further increase vulnerability. Representatives said that survivors are often brought into the UK without understanding their entitlements, contract terms or how to report abuse safely. At the same time, domestic work remains insufficiently regulated, with employers operating in private homes where there is minimal scrutiny and few enforcement checks. Greater enforcement activity, improving worker induction and creating safe reporting mechanisms are essential to reduce exploitation risks in legal migration routes.

**Key messages from representatives:**

- Reporting exploitation can lead to visa cancellation, leaving workers destitute or at risk of deportation. Representatives highlighted that this threat is routinely used.
- Recruitment fees and unclear rights create vulnerability. People are charged excessive fees, given misleading information and arrive in the UK on work visas without understanding their legal protections.
- Safe reporting pathways are needed. It was stated that there is no trusted mechanism to report exploitation without risking immigration consequences, which prevents early intervention.
- Migrant workers need early, clear information on their rights.
- The Overseas Domestic Workers visa requires proper oversight. Representatives called for employer registration, safe multilingual reporting routes and stronger regulation of domestic work, recognising how hidden work environments increase risk.
- Access to training, skills development and safe employment opportunities is essential to rebuilding survivors' lives and reducing vulnerability to re-exploitation.

## **NRM reform and separation from immigration control**

**What IASC will do:** The IASC will continue to call for reform of the National Referral Mechanism so that it provides holistic trauma-informed support and is clearly separated from immigration enforcement. The Commissioner will use survivor evidence to highlight to Government the urgent need for a safer, more consistent and more coherent system. This includes advocating for decision-making processes that reduce risks of re-traumatisation, clear and accessible communication with potential victims, improved safeguarding for children and young people, and routes that allow survivors to seek help.

The IASC will push for a system that records testimony safely and appropriately so that survivors do not have to repeatedly retell traumatic experiences and will monitor Government progress in meeting its commitments on NRM reform. The Commissioner will also call for Government communications that reduce stigma, separate trafficking from harmful immigration narratives, and encourage survivors to seek help without fear of being criminalised or disbelieved.

Through this work, the IASC aims to ensure the NRM genuinely supports recovery, protects against re-exploitation and upholds the rights and dignity of survivors.

**Rationale:** Representatives at the Summit described the NRM as unclear, inconsistent and, for many, traumatising. They told the IASC that the process can take months or years, creating prolonged uncertainty that undermines safety, stability and recovery. The current 45-day recovery period following a positive conclusive grounds decision is insufficient for people to stabilise, process trauma or rebuild their lives. Representatives said these short timeframes do not reflect the realities of trauma or the long-term nature of recovery.

The link between the NRM and immigration enforcement generates fear and can deter survivors from entering the system at all. Some individuals avoid the NRM because they are afraid of deportation, detention or negative immigration outcomes. For children and young people, survivors stressed that decisions must involve safeguarding partners rather than immigration teams, recognising their distinct needs and vulnerabilities.

A lack of consistent safeguarding, unclear processes and repeated retelling of trauma further undermine survivor trust in the system. Negative public narratives around immigration also contribute to fear, stigma and disengagement, making it harder for victims to come forward and receive support. Reform is therefore essential to ensure the NRM provides a safe, supportive and survivor-centred response.

### **Key messages from representatives:**

- Timelines are too long and support is too short. Conclusive grounds decisions can take months or years and 45 days of support afterwards is not enough time to stabilise or recover.

- Fear of immigration consequences deters people from entering the NRM. Some avoid the NRM entirely because they fear deportation or negative immigration outcomes.
- Children and young people need safeguarding-led decisions, not immigration-led processes. Child cases must involve safeguarding partners.
- Repeating traumatic experiences causes harm. People want a system that safely records testimony, so they do not have to repeatedly retell their story to multiple professionals.
- Negative immigration narratives increase fear and stigma. Harmful public messaging discourages people from seeking help and makes them feel criminalised rather than protected.

### **Training, identification and safe reporting**

**What IASC will do:** Push for trauma informed training for first responders, clarity on what trauma informed practice means, and safe reporting routes that do not link to immigration enforcement. Highlight the importance of accessible ESOL provision and practical navigation support within statutory services as part of safe and effective identification. IASC will encourage Government and frontline agencies to provide materials to ensure survivors can understand their rights, communicate with services and safely navigate housing, education, employment and legal systems.

**Rationale:** Representatives described significant gaps in frontline understanding of exploitation, trauma, disability and hidden vulnerabilities. They said that professionals often miss key indicators or misinterpret distress, fear or withdrawal because training is inconsistent or relies on narrow assumptions about what exploitation looks like. Survivors also said that people avoid reporting exploitation because routes are unsafe, unclear or linked to immigration enforcement, exposing them to further risk.

The IASC was told that survivors face barriers navigating basic systems, and that ESOL provision, safeguarding practice and identification processes vary widely across the UK. These inconsistencies can lead to harmful referrals, re-traumatisation or missed opportunities to protect children and adults at risk. Strengthening awareness, identification and safe reporting is essential for earlier intervention and long-term safety.

### **Key messages from representatives:**

- Professionals often miss indicators of exploitation, especially where trauma, disability or hidden vulnerabilities are involved. There is inconsistent understanding across police, health services and frontline agencies.
- Survivors need safe reporting routes not linked to immigration enforcement. Fear of deportation or being treated as an offender stops people from coming forward.
- Language barriers block identification and support. Free and accessible ESOL is essential to understand their rights and participate safely in key processes.
- Frontline responses can be harmful. Survivors can be disbelieved, retraumatised or asked to repeatedly retell traumatic experiences.
- Domestic environments are high-risk and low-visibility, and survivors stressed that professionals are not consistently trained to recognise exploitation in private homes or informal work settings.

- Survivors want consistent safeguarding and trauma-informed practice across services, with frontline agencies working directly with survivors to improve training and practice.
- Navigation support is needed, as survivors struggle to understand housing, healthcare, education and legal processes without clear explanations or help.

## Children and families

**What IASC will do:** The IASC will hold Government accountable for delivering a truly child-focused strategy on trafficking, ensuring that child survivors receive specialist, long-term support and advocacy that reflects their specific needs. The Commissioner will call on local authorities to strengthen their safeguarding responsibilities by ensuring access to independent guardianship for all children, supported by clear statutory duties and consistent quality standards. The Commissioner will also press for improved awareness of child exploitation, and the ability to recognise its signs, to be fully embedded within safeguarding practice across local authorities, schools, and partner agencies, recognising children’s distinct vulnerabilities and the need for coordinated protection from the earliest point.

**Rationale:** Children affected by trafficking experience deep trauma and long-term harm, yet survivors told the IASC that support systems are inconsistent, fragmented and often fail to meet children’s needs. Lack of independent guardianship and variation in local safeguarding practice mean children do not always receive advocacy, stability or a trusted adult to navigate complex systems alongside them. Representatives stated that early intervention is often absent, and that trauma-informed approaches in schools and children’s services are patchy or insufficient.

Representatives also highlighted the significant emotional and psychological harm caused by long delays in family reunion, with children separated from parents abroad for years while waiting for decisions. This separation undermines recovery, increases vulnerability and can place both children and parents at further risk. Without secure immigration status or a route to settlement, children face ongoing instability that makes recovery harder and re-exploitation more likely.

### Key messages from representatives:

- Children need stability and long-term security. Child survivors require five-year leave to remain and a clear pathway to settlement to support recovery.
- Exploiters are finding new ways to target and exploit children and young people.
- Early intervention is essential. Representatives emphasised the importance of trauma-informed practice in schools, early safeguarding engagement and consistent specialist support.
- Independent guardianship must be available nationally. Children need trusted adults who can advocate for them and ensure their rights are upheld.
- Family separation causes serious harm. Children being separated from parents abroad causes ongoing trauma for both children and parents.
- A long-term child strategy is needed. Representatives stressed the importance of a coordinated, national approach that recognises children’s specific vulnerabilities and the long-term nature of recovery.

## Access to justice and low prosecution rates

**What IASC will do:** The IASC will challenge Government to improve justice outcomes for survivors by pressing for trauma informed policing, specialist training for investigators and prosecutors, and access to high quality legal advice regardless of immigration status. The Commissioner will also advocate for a fair and accessible criminal injuries compensation system that recognises the harm survivors have suffered. This includes pushing for reforms that simplify the application process, widen eligibility and remove barriers that prevent survivors from receiving compensation.

The IASC will call for ring-fenced national funding for specialist modern slavery and human trafficking policing, recognising that without protected resources, forces cannot maintain the expertise needed to identify victims, safeguard people at risk and disrupt organised exploitation.

**Rationale:** Representatives told the IASC that low prosecution rates allow traffickers to operate with impunity and undermine trust in the justice system. Many described survivors being treated as offenders rather than victims, with poor understanding of exploitation among officers and investigators leading to missed opportunities for evidence gathering, safeguarding and early intervention. Lack of legal aid for survivors without asylum claims places people in debt and increases vulnerability to further exploitation, while gaps in legal advice leave survivors unable to navigate complex criminal justice processes. Representatives also reported that criminal injuries compensation is extremely difficult to access in practice. They said eligibility rules do not reflect the realities of coercion and trauma, and that application processes are confusing, lengthy and retraumatising. Without legal advice and accessible compensation pathways, survivors face additional barriers to recovery, recognition and long-term stability.

The Home Office has confirmed it will no longer fund the Modern Slavery and Organised Immigration Crime Unit (MSIOCU), leaving a significant gap in national coordination and specialist policing capacity.

### Key messages from representatives:

- Police often treat victims as criminals, which prevents disclosure and reinforces fear.
- Survivors rarely see justice, and the low prosecution rates leave them feeling that reporting harm achieves nothing.
- Lack of legal advice leaves people vulnerable, unable to understand their rights and at risk of further exploitation.
- Accessing criminal injuries compensation is extremely challenging, most applicants do not qualify or cannot navigate the system without support.
- Compensation is about recognition as well as financial support, and that being excluded from this process deepens the sense that their harm is not acknowledged.
- Specialist policing is essential because only trained officers understand trauma, recognise indicators of exploitation and investigate cases in ways that do not cause further harm.

## Legislative reform and exemptions for survivors

**What IASC will do:** The IASC will advocate for changes to legislation and policy to ensure survivors are not harmed by rules that fail to reflect the realities of exploitation. The IASC will press for targeted exemptions and protections within immigration, employment, benefits and wider government frameworks so that survivors are not disadvantaged by systems designed without their experiences in mind. This includes championing reforms that create stability, reduce fear and support long term recovery, as well as working with Government departments to ensure legislation acknowledges the impact of trauma and avoids re-traumatisation. The Commissioner will use survivor evidence to highlight where current laws create or worsen vulnerability and will call for survivor informed policy development across all relevant areas.

**Rationale:** Representatives reported that existing laws and policies often fail to recognise the long-term effects of coercion, trauma and instability. Instead of promoting safety and recovery, some frameworks create barriers that increase fear, uncertainty and exposure to further harm. For many survivors, immigration rules are a major source of stress and instability. Unclear or insecure immigration status, lengthy decision times and limited routes to settlement leave people unable to rebuild their lives, maintain employment or access essential services. Survivors also described how laws not designed with exploitation in mind can penalise them for actions or circumstances that were the direct result of coercion. Without specific protections, survivors remain at risk of re-trafficking, destitution and emotional harm.

### Key messages from representatives:

- Existing legislation can increase fear and vulnerability, especially where rules do not take account of trauma or coercion.
- Survivors want laws that acknowledge trauma and avoid re-traumatisation during every stage of support and immigration processes.
- Survivors must be supported rather than penalised for experiences linked to exploitation.
- Uncertainty in immigration status amplifies vulnerability, creates instability and prevents long term recovery.
- Barriers to settlement undermine survivors' ability to rebuild their lives, plan for the future and feel safe.

### **IASC Commitment: Improving knowledge and awareness**

*The IASC commits to improving national understanding of the exploitation that is already harming people in the UK today, recognising that current systems are not responding effectively or consistently to the realities survivors face. This commitment also includes strengthening the evidence on how prevention, protection and prosecution can be improved, as well as developing clearer insight into new and emerging threats that survivors said require early action. By grounding this work in the insight representatives shared at the Summit, the IASC aims to provide Government with stronger evidence so the national response can prevent exploitation earlier, protect people more safely and hold perpetrators to account.*

**What IASC will do:** The IASC will encourage and collaborate on new research projects informed directly by what representatives shared at the Summit. Survivors' views will be built into the research so that the findings reflect real experiences and not assumptions about how exploitation happens, what works to prevent it and how people can be fully supported to recover. The IASC will share more information about these new research projects with LEAPs shortly.

## Annex A: Lived Experience Advisory Panels' Policy Priorities

### Ambassadors for Change, Helen Bamber Foundation

The Ambassadors are calling for better access to quality legal advice and representation for survivors of modern slavery. This is essential for those looking to navigate complex systems as part of their recovery, and also their case within the justice system. Quality legal advice addresses numerous issues; if given at an early stage it is more prudent financially, and makes recovery for survivors easier to manage. Far too many survivors are struggling to find effective legal representation through legal aid, often being forced to turn to private legal representation, which is costly and can lead to debt building up and therefore risks of further exploitation. The barrier put in place by a lack of legal representation undermines the justice process, and people's access to it.

The Ambassadors are calling on the Government to uphold the rights of survivors, ensuring that they are treated fairly and effectively. This goes beyond the NRM and includes issues such as housing, and other issues that will have implications to a person's long-term recovery. To help develop these rights, and surrounding policies, the Government should properly consult with survivors to gain a more thorough understanding of on-going issues and what actions could be put in place to address them. Survivors could further advise on the development of trauma-informed practice by statutory agencies, which would help people who enter support in the future.

Long term support is essential, and stability is a crucial part of this. Routes should be provided to survivors to secure legal status in the UK. With this comes the chance to integrate fully into communities and the right to work. Recovery is a long-term process, and people ought to be given the chance to remain in the UK.

### Changemakers, Anti-Trafficking and Labour Exploitation Unit (ATLEU)

The Changemakers are calling for better inspection and regulation of domestic work within private homes. Domestic workers must be registered with an inspectorate body, so this work is properly regulated, and people feel safe to work. Too often people suffer from restricted wages and communication with others. It is unjust that people are expected to work in these circumstances that undermine people's dignity. If people are identified as having been exploited, they are then put in a system in which decisions can take months, if not years. People cannot be expected to recover from trauma in such a system.

When in these systems, many are denied the right to work. The Changemakers state that people need independence and should be given the chance to contribute to their society and communities. Denial of the right to work is harmful to individuals, it can impact their pride and sense of autonomy. It adds to feelings of isolation and lack of control over one's own life. The right to work should not just be seen in regard to income, but rather in terms of identity and autonomy.

The Changemakers stress that it was not just the survivor themselves who deals with the outcomes of trafficking, it is also their family. Many families are separated across international borders, with children and parents kept apart. This means children grow up with instability,

which adds to ongoing trauma. Children may experience emotional distress and psychological harm, and may be made more vulnerable without parental support, making them more susceptible being trafficked themselves as a result. Families must be reunited as soon as possible; it is a key part of recovery and safeguarding.

### **Creative Resilient Empowered Women (CREW), Sophie Hayes Foundation**

CREW call for the vulnerabilities that exist in society, which are exploited by traffickers, to be addressed. Issues relating to immigration status, no right to work, housing, and visa policies are all potential factors that can lead to someone being trafficked. The Government must consider long term outcomes and not just short term actions if they properly want to address the issues. One key issue is the right to work as at present many survivors cannot achieve a level of financial independence and security. While recovery is different for everyone, the right to work is needed for everyone. Economic independence is vital as it reduces vulnerability and allows survivors to rebuild their lives.

CREW also state the need for a commitment to survivors as more than just beneficiaries of support, but also as expert leaders. They must be enabled to play a key role in the shaping of training for agencies that may encounter survivors of modern slavery. The meaningful inclusion of lived experience can lead to much needed systemic change of the NRM.

Survivors must be able to recover long term and a crucial first step to this are efficient decision-making processes. For many, NRM and immigration decisions can still take months, trapping people in a system where they cannot move on from their exploitation, and are not able to take important steps, such as finding work and developing their autonomy. Survivors need to be given the chance to develop while in support, with the opportunities to gain employability skills and network with others.

### **Empowered Voices, Hestia**

The Empowered Voices group work to influence and shape internal services within Hestia, alongside external facing policy work with key stakeholders and policy makers.

Empowered Voices are calling for people to recognise the importance of meaningful lived experience engagement and contributions within service delivery and policy development. This engagement must allow for personal growth for survivors and also the opportunity to network, socialise and celebrate. Meaningful engagement means seeing individuals as more than an information source, and therefore it is important to ensure there is time to focus on the positive work that's been done and for people to flourish within these opportunities.

It is essential that decision makers, such as the Home Office engage properly with lived experience groups and include them throughout policy development, not just as a tick box exercise. Empowered Voices will continue to call on Government to engage meaningfully and, in a trauma-informed way. Meaningful engagement also allows individuals to develop their own confidence and understanding of the issues that are impacting them.

Empowered Voices call for conclusive grounds decisions to be meaningful in practice, and not just on paper. Everyone who receives a positive Conclusive Grounds decision should receive

leave to remain within the UK to continue their recovery. Temporary solutions lead to uncertainty and do not address long term issues; Conclusive Grounds decisions must be made meaningful and come with tangible outcomes for survivors.

### **Lived Experience Advisory Panel (LEAP), Human Trafficking Foundation**

LEAP state that not enough is being done to tackle the rising prevalence of online exploitation. Current guidelines and online safety policies in the UK do not reflect what is happening, with no real safeguards in place for young people online. Various online platforms, including online gaming, are easy for potential traffickers to use to speak to people, with no real safeguarding measures in place. These platforms can be linked to increasing criminal and sexual exploitation, and radicalisation of young people. LEAP call for better protections in the Online Safety Act, and real enforcement measures behind it. In addition to this, training should be developed to inform parents, schools and organisations what is happening online.

Further action is required to support potentially vulnerable groups who are often overlooked. Groups such as young carers, who are forced to choose between opportunities such as continuing in fulltime education and keeping their financial benefits. This inconsistent, non-guaranteed, allowance means that these young people are a risk group for exploitation as they are not given security.

LEAP believe more needs to be done to foster collaboration between different lived experience groups, and that through working together, stronger more effective outcomes will be achieved. Presently, there are discrepancies in the way groups work, and in the ways people are remunerated. Standardised safeguarding and remuneration procedures should be established, to ensure that people are fairly treated and given protections as they carry out essential work within the anti-slavery sector.

### **Modern Slavery Lived Experience Advisory Panels (LEAP), Migrant Help**

LEAP believe that the negative narrative around immigration must be challenged, and that it is fundamental to the work to improve responses to trafficking. Refocusing to look at the positives such as the positive impact of immigration in the healthcare system can help the public see the importance of migrants in the UK. At present, migrants do not feel safe or wanted in the country, and this impacts on their safe integration and it is a negative for the country as a whole. This has a direct impact on support for survivors, as immigration control is now prioritised over protection and recovery.

Processes such as the NRM need to be trauma-informed, with survivors not being required to re-tell their stories and run the risk of being retraumatised. Methods such as recording testimony so it can be safely stored and accessed when needed should be considered. When survivors are in support they should be approached with compassion and be believed. People need to feel safe and protected and given access to services such as mental health support and GPs. Support needs to be longer term, with the 45 day post Conclusive Grounds recovery time extended to 90 days.

The LEAP are also calling for greater efforts to enable early reporting for potential victims in sponsored work situations. These workers are dependent on the organisations that sponsor their

visas and are therefore susceptible to further exploitation. There needs to be greater outside support for workers in these situations, and labour enforcement agencies should be included in training and inductions of these workers, so they are aware of their rights and reporting routes should they be exploited.

### **Lived Experience Advisory Panel (LEAP) – Modern Slavery Policy & Evidence Centre**

The MS PEC LEAP believe the system of lived experience inclusion must be professionalised; survivors are experts and should be more than participants included for the sake of ticking a box. People with lived experience should be treated as more than just story tellers, but as professionals who can be included at all stages of initiatives, such as design, development and implementation of research and policy. Often career pathways are limited for survivors working in the anti-slavery sector, limiting growth and opportunity. MS PEC LEAP call for organisations to offer greater access to training and development opportunities and ensure fair pay and remuneration. There ought to be set standards on issues such as remuneration, to create consistency and to ensure work is respected.

MS PEC LEAP state that there are barriers to accessing justice, which is demonstrated in the low prosecution rates of traffickers. There are increasingly large numbers of identified survivors, yet prosecution rates remain low and perpetrators are not brought to justice. These low rates undermine the importance of a Conclusive Grounds decision in the NRM, as what is the benefit of being recognised as a survivor if your perpetrator does not face justice? When someone reports their experiences, meaningful action must be taken to ensure that processes of the law take place. Better training is needed for those working in the justice system so they can better understand the issue and work with those reporting crimes.

Linked to this is the difficulties for survivors to access compensation through bodies like the Criminal Injuries Compensation Authority (CICA). In practice, very few people can access compensation, and it remains out of reach for many. By linking support services and schemes like CICA, data and information could be shared efficiently, helping survivors access the compensation they deserve.

### **Survivor Leadership Council, Hope for Justice**

The Survivor Leadership Council are calling for greater survivor involvement in decision making at every level of Government. A crucial part of this is the establishment of a National Survivor Council, which will be able to advise different government departments and speak out on issues effecting survivors and those at risk of exploitation. Survivors' voices need to be properly considered, not just treated as a tick box exercise. The next Independent Anti-Slavery Commissioner should be someone with lived experience of modern slavery.

At present the system has too many gaps in support, which means people fall away from essential services when they reach certain points of their recovery. One example of this is the cliff-edge experienced by young people when they turn 18. Children should be able to safely transition into adult focused support, as traffickers are aware of this cliff edge and they take advantage of it. Putting measures such as the Independent Modern Slavery Advocate (IMSA) model on a statutory footing will enable survivors to have more tailored support, which will

aid their recovery. Preventing re-trafficking through these models is more effective for everyone in the long run.

The Survivor Leadership Council highlight that traffickers don't create vulnerabilities, they exploit the ones that already exist. If the Government want to prevent trafficking and exploitation these need to be addressed. This includes recognising vulnerable groups and those who aren't usually considered. Men and boys need to be protected, as well as the focus on the Violence against Women & Girls agenda, as there is currently a stigma preventing male survivors coming forward. This needs to be addressed from an early age, with schools playing a key part in awareness raising.

### **Trafficking Awareness Raising Alliance (TARA) Advisory Group**

The TARA Advisory Group (TAG) will continue to work with Scottish Government to improve the actions being taken to address challenges within the National Referral Mechanism (NRM) and identification processes of survivors. TAG is calling for better information to be published on the issues, written in trauma-informed language. This, alongside better training for first responders such as Police Scotland, will result in higher quality referrals which properly reflect individuals' experiences, and support more informed and consistent decision-making processes. TAG recognises that progress has been made, but believes much more must be done. TAG will continue to engage with women being supported by TARA and use these engagements to produce information and educational materials that will help others. TAG believe that English for Speakers of Other Languages (ESOL) classes should be free and accessible to all as this would help survivors navigate different processes, from coming forward for support to activities such as meetings with their children's schools. Work must be done to help survivors understand legislation and policies within the UK, to enable them to navigate their own support, the job market and opportunities such as further education.

TAG call for continuous support and engagement with survivors and services, that extends beyond receipt of NRM decision or asylum decision. Currently, people are left without long term support meaning they can be left in vulnerable positions due to difficulties in navigating housing, employment or tax processes. Such problems can lead to increased levels of debt which put people in further places of vulnerability. These forms of vulnerability can be found within those forced into underpaid jobs.

### **Unseen Survivor Consultants Group**

The Unseen Survivor Consultants Group stress the importance of tackling the increasing use of digital platforms which are being used in exploitative ways. The use of social media for false job adverts, recruitment into exploitative situations, coercion and blackmail are meaning people are at increasing risk of exploitation. Online gig economy platforms also create environments where people can be more likely to be forced to work. Companies operating these platforms must have clear processes for cooperating with law enforcement when exploitation is suspected. Digital awareness and education are also vital, so people are better able to protect themselves from these online risks.

Preventative online action and stronger digital protections are indicative of the need to take early action, that looks to stop modern slavery from occurring in the first place, not just react

to it once it has already occurred. By acting pre-emptively, society can reduce the conditions that allow exploitation to develop in the first place.

The Group call for a change in immigration systems that would mean vulnerabilities are removed rather than made worse. The asylum system at present does not allow asylum seekers to work until after a year of being within the UK, and even then, they have limited options as to what work they can do. Giving asylum seekers the right to work earlier, with more options of safe, legal, jobs, could reduce the likelihood of people being pushed into exploitative labour. When people arrive in new countries they should not be treated as criminals, but as individuals who need safety, stability and the ability to integrate. Safer migration pathways, and support once arriving within the UK, is essential for the long-term stability of potentially vulnerable groups.

### **Voice of Domestic Workers**

The Voice of Domestic Workers strongly urge for domestic work to be properly recognised in labour regulations and legislation. Many domestic workers are isolated from communities and protections, and coerced through their immigration status, which is dependent on their employer. The Overseas Domestic Workers Visa exacerbates vulnerabilities. The situation would be greatly improved by mandating proper working conditions and enforcing things such as contracts and payslips.

This should be done by expanding the capacity of labour inspectorates, including the newly formed Fair Work Agency (FWA). The FWA must include domestic work within its remit and put in place safe, trusted, multilingual reporting routes, so workers can report abuse without fear. Employers should be required to register the fact that they have domestic workers with the FWA, who can then ensure this work is safe for the individuals. The Voice of Domestic Workers state that these steps would strengthen accountability for both employers and recruiters, helping to prevent exploitation occurring in the first place. It is important that people feel safe within domestic worker roles. These workers must themselves be given training to know what to do in cases of exploitation, and training must also be given to police forces to ensure they are aware of domestic servitude.

In addition to these steps, the Government must remove blocks to settlement, ensuring that there are clear routes for people to have secure status within the UK. This would reduce the vulnerability of migrant domestic workers who are currently too reliant on their employers.

### **Voice of Impact, Change and Empowerment (VOICE), West Midlands Anti-Slavery Network**

VOICE recognise that being identified as a survivor of modern slavery should mark the beginning of recovery, not the end. Support tends to focus on the initial crisis point when services first interact with people and does not address long term issues relating to things like housing, joblessness or immigration status. The lack of focus on long term stability creates a gap between recognition and recovery and within that gap, vulnerability remains. Recovery is not linear and should not be rushed, this needs to be reflected in support, which is often time limited. There needs to be a shift from reactive responses to more preventative, long-term approaches.

The blurring of immigration and modern slavery policy negatively impacts the trust that survivors place in systems of support, and limits access to them. This is made even more dangerous as exploitation evolves continuously, exemplified by new digital forms of exploitation, and becomes harder to detect.

VOICE also call for meaningful, consistent inclusion of survivors within decision-making. This means proper engagement and partnership from the start of projects or processes, with fair recognition and remuneration throughout. VOICE highlight the difference between inclusion and influence, calling for survivor engagement to be more than a tick box exercise. Survivors should not only be supported by systems, they should help shape them. VOICE state that when lived experience is embedded consistently and meaningfully, services aren't just improved, harm is prevented before it happens, and systems are created that work in practice.

Finally, VOICE call for consistency in training and practice. Terms such as 'trauma-informed' are widely used, but not consistently understood, applied, or assessed in practice. This results in a post-code lottery of support, and in some cases, unintentional harm and re-traumatisation. True trauma-informed practice requires more than awareness. It requires the ability to recognise trauma responses in real time, understand communication and behavioural cues, build trust safely, and respond appropriately. Survivors should be included within the co-design of training, with their experiences adding important perspectives to how to work with survivors, and also greater insight into forms of exploitation that can be overlooked. This includes consideration of hidden vulnerabilities and under-recognised vulnerable groups, such as people with learning difficulties. This training needs to be structured, tested and accountable to ensure safety for all involved.

### **Youth Advisory Group, ECPAT UK**

The Youth Advisory Group made clear that it is essential that young people's voices are heard when decisions are being made about their futures. These voices must be part of a national strategy on child exploitation, one which is committed to, and enforced by, Government to prevent exploitation and provide long term care to young people who experience human trafficking and modern slavery. This strategy should address the root causes of exploitation, looking at national and international issues and, through this, prevent exploitation.

Within the UK, care and recovery planning must include access to specialist services such as mental health access and specialist advice, otherwise there is an increased risk that young people will fall through the gaps between different forms of support and services. There needs to be greater awareness within services, which can be built through specialist training for all first responders to ensure that child trafficking is identified early.

The Youth Advisory Group also stated that the NRM needs to be reformed, with decisions being made on a local level by safeguarding partners. Additionally, the Independent Child Trafficking Guardians being expanded across all local authorities. This will help the needs of children to be properly advocated for, and that those voices are heard. Finally, Conclusive Grounds decisions within the NRM should come with leave to remain in the UK for a minimum of five years, with a clear pathway to indefinite leave to remain for stability, which is essential for children to thrive.