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13 May 2020

Victoria Atkins MP  
Parliamentary Under Secretary of State (Minister for Safeguarding)  
Home Office  
2 Marsham Street  
London  
SW1P 4DF

Dear Minister,

I am writing to you regarding my continued concerns in relation to the well-being of vulnerable victims of modern slavery and the support that is available to them at this extremely difficult time.

I welcome the government's commitment to bring forward an amendment to the Domestic Abuse Bill that will ensure victims of domestic abuse are automatically given 'priority need status' to access housing, as announced by the Secretary of State for Housing, Communities and Local Government The Rt Hon Robert Jenrick MP on 2 May and confirmed in a subsequent Ministry of Housing Communities and Local Government press release of 7 May. This is an important step that will go a long way in supporting the recovery of survivors of domestic abuse.

As you will be aware, victims of modern slavery also experience significant difficulties in accessing local authority housing. The Homelessness Code of Guidance for Local Authorities (2018)<sup>1</sup> provides guidance on how housing authorities should apply their statutory duties in relation to homelessness and contains chapters on both domestic abuse and modern slavery. Importantly, both chapters state that victims may have a priority need for housing if they are '*assessed as being vulnerable according to section 189(1)(c) of the 1996 Housing Act*'. I am acutely aware of the challenges in evidencing vulnerability in order to be considered priority need and qualify for settled housing which have led to amendments to the Domestic Abuse Bill.

For victims of modern slavery who have fled a situation of exploitation, access to safe accommodation is vital. Whilst the UK Government make provisions to accommodate victims through the National Referral Mechanism, this is only a short-term measure and is not always the most appropriate option of support for all victims. Without access to safe accommodation, individuals may be left with no option but to return to a situation where they are at risk, or alternatively, find themselves rough sleeping which we know can leave them at risk of further exploitation<sup>2</sup>.

I therefore strongly request that the amendment to the Domestic Abuse Bill and the automatic grant of priority need status is extended further to include survivors of modern slavery. Proving

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<sup>1</sup> Ministry of Housing, Communities and Local Government (2018) Homelessness Code of Guidance for Local Authorities, available at [https://assets.publishing.service.gov.uk/media/5a969da940f0b67aa5087b93/Homelessness\\_code\\_of\\_guidance.pdf](https://assets.publishing.service.gov.uk/media/5a969da940f0b67aa5087b93/Homelessness_code_of_guidance.pdf)

<sup>2</sup> The Passage (2019) Responding to modern slavery and exploitation within the homelessness sector, available at <https://www.antislaverycommissioner.co.uk/media/1115/understanding-and-responding-to-modern-slavery-within-the-homelessness-sector.pdf>

vulnerability can be hugely distressing for victims and relies heavily on the awareness of housing officers to recognise why a victim of modern slavery may be vulnerable. An automatic grant of priority need would clarify the responsibility of local authorities towards modern slavery victims, improve the consistency of responses to those who present as homeless and avoid the need for lengthy correspondence with lawyers.

The announcement on 2 May 2020 also included £3.8 million of funding for community-based domestic abuse and modern slavery services. I understand that £1.73 million of this amount is earmarked for modern slavery to be used for the additional costs incurred within the Victim Care Contract (VCC) as a result of Covid-19. There is however confusion about whether any more of this £3.8 million is available for smaller charities who fall outside of the VCC but are doing outstanding work to support vulnerable victims during this time. I would be grateful if you could clarify how the remaining £2.07 million is to be spent. In addition, it would be beneficial to have further clarification on whether modern slavery charities are also eligible to apply to the National Lottery Community Fund and if so, how they can apply. Smaller charities do not have the capacity to navigate complex funding landscapes whilst providing essential frontline services which are currently under significant pressure. For this money to be able to reach the most vulnerable, the bidding process needs to be straightforward and clearly communicated to the sector.

Finally, you may be aware that the All-Party Parliamentary Group on Human Trafficking and Modern Slavery recently canvassed the sector for their concerns in the context of Covid-19. I have been briefed by The Rt Hon Karen Bradley MP on the findings from this survey and one of the issues raised was a need for a Single Point of Contact (SPoC) to act as a conduit between the Home Office and the sector to mirror the arrangements already in place with the British Red Cross for asylum matters. I would strongly suggest that the Chairs of the Modern Slavery Victim Support Group (MSSIG) should undertake this role and having spoken to them directly, I understand that they would be happy to do this. The representative from the Home Office would have to be of appropriate seniority to ensure that this communication is meaningful. I would be happy for my office to provide support for any arrangements made.

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,



**Independent Anti-Slavery Commissioner**