



IASC advisory panel: Minutes (7 July 2020)

Date: 7 July 2020

Time: 16.00 – 18.00 (Virtual meeting)

Members

The Rt Revd Dr Alastair Redfern	Chair, The Clewer Initiative (Advisory Panel Chair)
Michael Clarke	CEO, The Passage
Rt Hon Fiona Mactaggart	Chair, Agenda and Fawcett Society; former Co-Chair, All-Party Parliamentary Group on Human Trafficking and Modern Slavery
Julia Mulligan	Police, Fire and Crime Commissioner, North Yorkshire
Dr Paul Rigby	Lecturer in Social Work, University of Stirling (Scotland)
Gillian Rivers	Partner, Penningtons Manches Cooper
Yasmin Waljee OBE	International Pro Bono Director, Hogan Lovells
The Baroness Young of Hornsey OBE	Co-Chair, All-Party Parliamentary Group on Sport, Modern Slavery and Human Rights

Apologies

Lara Bundock	CEO and Founder, The Snowdrop Project
The Rt Hon. the Baroness Butler-Sloss GBE	Co-Chair, All-Party Parliamentary Group on Human Trafficking and Modern Slavery
Sir Bernard Silverman FRS	Professor of Modern Slavery Statistics, Rights Lab, University of Nottingham
Mel Wiggins MBE	Former Project Coordinator, Freedom Acts (Northern Ireland)

In attendance

Dame Sara Thornton DBE QPM	Independent Anti-Slavery Commissioner
April McCoig	Victims and Partnership Lead, IASC
Jenna Teasdale	Research and Innovation Lead, IASC
Emma Crates	Private Sector Policy Lead, IASC
Shelley Perera	Staff Officer to Dame Sara, IASC
Katherine Lawson	Communications Officer, IASC
Amabel Kerr	Intern, IASC



1. Introduction, minutes and actions of the last meeting (Rt Revd Dr Alastair Redfern, Chair, IASC advisory panel)

The Chair opened the meeting and welcomed Advisory Panel members to this second virtual meeting of the Advisory Panel. The minutes from the last Advisory Panel on 21 April 2020 were agreed.

Actions of last meeting:

The following actions were **completed**:

- IASC Prevention Lead to follow up with Julia Mulligan and Alastair Redfern on National Farmers' Union contacts
- IASC Prevention Lead to feed back issue of training for frontline staff to Themis and Tribe Foundation re. financial sector work
- IASC Office to keep Baroness Young updated on virtual Ditchley Conference
- IASC Communications Officer to share 2019 NRM statistics with panel members
- IASC Research and Innovation Lead to incorporate query on ethnicity breakdown in the NRM into IASC response to survey on NRM data and share the survey results with Baroness Young when available
- IASC Victims and Partnership Lead to follow up with Julia Mulligan on potential PCC work building local support services for child victims of trafficking
- IASC office to follow up with panel members regarding a sub-group meeting for upcoming issues where relevant
- IASC office to follow up with Paul Rigby on his write-up of child trafficking issues in Scotland

The action for Dame Sara to obtain a timeline for publication of the modern slavery statements audit and continue to press for progress on the audit and modern slavery statements registry is **ongoing**: Dame Sara said that she has requested this data for the Annual Report and has received assurances from the Home Secretary that she will receive this.

The action for the IASC Prevention Lead and IASC Communications Lead to incorporate letters to CEOs as part of Operation Fort review launch is **ongoing**: this will place following on from the review launch.

The action for the IASC Communications Officer to publish policy regarding media requests and draw up new logo designs to share with the panel is **ongoing**: the media requests policy has been published. Following a further Advisory Panel meeting on communications, the Communications Officer has amended the logo and other policies to publish online.

The action for the IASC office to consider engaging with the Migration and Modern Slavery Envoy for a future meeting is **ongoing**: this would be most appropriate at a future meeting focused on international work.

The chair closed item 1.



2. Deep dive on Priority 1: Improving victim care and support

a) Improving the quality of victim care and support (April McCoig, IASC Victims and Partnership Lead)

April McCoig provided an overview of the Commissioner's ongoing work related to victim care and support (Priority 1 of the [Strategic Plan 2019-2021](#)).

Encouraging identification and referral of victims

- **A public health approach to modern slavery:**

In February 2020, the Commissioner and Public Health England (PHE) held a roundtable to explore a public health approach to modern slavery, with three areas to progress:

- 1) PHE to develop a framework for multi-agency partnerships to respond to modern slavery through a public health lens;
- 2) PHE to develop work to better understand the health needs of victims of modern slavery and human trafficking as we understand the health needs of other vulnerable populations;
- 3) A commitment to encouraging consistent standards in care, including an understanding of how the system needs to change to best support survivors.

Following the roundtable, PHE took steps to commission an academic to develop the framework and to work with the IASC office to produce a joint report. This has been delayed due to Covid-19 but the office hopes to resume this work later this year.

The background to developing a public health approach was explained i.e. taking a preventative approach to modern slavery in the population. The Commissioner's focus is how multi-agency partnerships can adopt this in a practical way.

It was noted that a partnership called Surrey against Slaves (an alliance between police, healthcare, social services, Clewer Initiative and Santa Marta Group) has a similar approach to taking a preventative approach through the population.

It was suggested that PHE capacity may hinder further work in this area. The IASC office will continue to engage with the academic in order to keep this issue on the agenda.

ACTION: IASC Victims and Prevention Lead to follow up with Gillian Rivers on Surrey against Slaves.

- **Encouraging engagement between the GLAA, NGOs and Trade Unions**

In May and June 2020, the Commissioner hosted two meetings between the Gangmasters and Labour Abuse Authority (GLAA), NGOs and trade unions to discuss labour exploitation during Covid-19. The minutes are on the Commissioner's website. Attendees were reassured that the GLAA have remained operational during lockdown.



The meetings prompted thinking on how to improve reporting and intelligence flows between the sector and the GLAA. Three areas of work were identified:

- 1) How to raise awareness of the GLAA's role;
- 2) How to share efficiently share intelligences from NGOs and trade union with the GLAA;
- 3) Consideration of a pilot for third-party reporting.

Improving the quality of victim care and support

- **Engagement with NGOs and issues regarding victim care and support**

It was noted that the Commissioner meets with a range of anti-slavery NGOs on a quarterly basis, providing an opportunity for the sector to raise concerns and for the Commissioner to remain sighted on issues regarding the quality of victim care and support.

Two recent issues have been raised: NRM subsistence entitlements; and civil legal aid and changes to the fixed fee structure.

In response to concerns that some survivors have not been not receiving the subsistence they are entitled to, Dame Sara wrote an [open letter](#) to the sector in April 2020 outlining current policy on NRM subsistence. She has since raised this with The Salvation Army and will raise this with the modern slavery lead at the Department for Work and Pensions. Further changes to subsistence rates will take effect from 1 July 2020. The Commissioner will continue to engage with the sector and monitor changes.

On 8 June 2020, a new fixed fee for immigration and asylum cases was introduced as part of [The Civil Legal Aid \(Remuneration\) \(Amendment\) \(Coronavirus\) Regulations 2020](#). This was introduced without a full impact assessment or consultation and there are concerns within the sector that this change may exacerbate the challenges that victims of trafficking already face in accessing legal aid. The Commissioner has engaged with NGOs and lawyers to understand the impact of this change and has written to the Legal Aid Minister Alex Chalk MP to raise her concerns.

Panel Members suggested that service providers and charities which may come across potential victims could better signpost them towards information on accessing legal aid. Technical solutions to this were discussed, such as automated chat functions to inform potential victims of their rights.

A key existing gap in legal aid provision was raised, in that potential victims are not provided with legal support related to their decision of whether to enter the National Referral Mechanism or not.

ACTION: IASC office to track the impact of the changes to legal aid provision.



- **Exploring the interaction between the NRM and the asylum system**

The IASC office will be undertaking an audit of 100 NRM case files to examine the extent to which victims are interviewed within the NRM and the rationale for who is interviewed. A recent visit to UK Visas and Immigration (UKVI) in Leeds identified potential disparity within the system. This work has been agreed by the Home Office but has been delayed due to Covid-19. The office is also liaising with the Home Office to understand the interaction between NRM and asylum decision making processes and the impact on decision timescales for those who are in both systems.

- **Student placement – examining the legal basis for supporting victims**

The IASC office is hosting a 6-week paid intern who will research the legal basis for the state's responsibility to support victims of modern slavery, explore legal challenges that have been raised and the subsequent changes to victim care and support, and identifying areas of concern. A report will inform ongoing conversations between the Commissioner and officials on NRM transformation.

It was noted that the legal basis of the NRM and the two-stage decision system would be explored.

A [report](#) on workers' rights post-Brexit by the University of Nottingham Rights Lab was flagged.

- **Preventing the exploitation of overseas domestic workers**

Overseas domestic workers are particularly vulnerable to exploitation and are among the most hidden of modern slavery victims. In his [independent review](#) of the Overseas Domestic Worker Visa in 2015, James Ewins QC made two recommendations to prevent exploitation of overseas domestic workers: the provision of information leaflets on to worker's rights at the point of visa application overseas, and the introduction of information sessions on arrival in the UK.

There has been a lack of progress on these recommendations. In May 2020, Dame Sara met the Minister for Immigration to raise this; an update due for the end of June 2020 has not been received.

b) Taking a longer-term view of victim care and support (April McCoig, IASC Victims and Partnership Lead)

- **Access to work for survivors**

Whilst there are some schemes offering training and employment to survivors the current system is not doing enough to enable survivors to live a life of sustainable independence.

The Commissioner has hosted two workshops to discuss access to work and the barriers that survivors experience. In March 2020, Dame Sara [wrote to](#) the Minister for Safeguarding to suggest an initiative that would permit victims of modern slavery to work whilst awaiting NRM and asylum decisions. Due to a wider Home Office Borders, Immigration and Citizen System review of asylum



seeker right to work, the minister [confirmed](#) that she will not commit to a scheme for survivors of modern slavery at this time.

The office is focusing on building the evidence base on the benefits of work and the harms of not working and the IASC Victims and Partnerships Lead and IASC Research and Innovation Lead are pursuing opportunities for research into this area.

Panel members noted the importance of work as an anchor, for security and to embed them into communities. A previous pilot attempt and current schemes which support prison leavers were cited as possible models to explore.

ACTION: IASC Victims and Partnership Lead to follow up with Julia Mulligan on an initiative linked to National Probation Service reform and Alastair Redfern on a previous pilot in Brighton.

- **Accessing housing and accommodation for survivors**

The Strategic Plan sets out the importance of access to housing to support recovery and prevent further exploitation. The Commissioner is aware of issues within the system, including victims with complex needs being signposted to local authorities for support, and challenges in exiting those with no recourse to public funds from the NRM through the Recovery Needs Assessment process.

The Home Office announced two projects to examine issues regarding support for victims with complex needs and access to accommodation. The IASC office provided feedback on plans for a stakeholder workshop, which was postponed due to Covid-19. The office will attend a smaller forthcoming workshop with local authorities and the Ministry of Housing, Communities and Local Government (MHCLG) to explore these issues further.

In June 2020, the Government agreed to lay an amendment to the Domestic Abuse Bill to grant automatic priority need status for housing to survivors of domestic abuse. Dame Sara has written to the minister to encourage this provision to be extended to survivors of modern slavery. The IASC Victims and Partnerships Lead is engaging with the domestic abuse and homelessness sector and encouraging the Home Office to apply learning from this policy area.

Advisory Panel members raised the long timeframes for victims including homeless victims to access safe accommodation, particularly in London. It was noted that in some areas, partnership working between the policy and local authorities has improved access to accommodation. Other members noted that some victims with recourse to public funds have not been offered safe house accommodation or suitable local authority housing. It was noted that there have been a number of pilots on this but little concrete action.



c) Involving victim experience and participation (April McCoig, IASC Victims and Partnership Lead)

Black Lives Matter has encouraged reflection about anti-racism in the anti-slavery sector including leadership within the sector and the services that are providing support to survivors of modern slavery and extent to which they are inclusive.

The Commissioner has started a dialogue with NGOs (AFRUCA Safeguarding Children, the Sophie Hayes Foundation, Palm Cove Society and BAWSO) to consider how the sector may be able to respond. The Commissioner will support an event on the 23 July hosted by the Human Trafficking Foundation and the BME Anti-Slavery Network (BASNET) to explore practical next steps for the sector. The Commissioner will attend the Survivor Alliance Nottingham Chapter in the coming weeks.

Panel members noted that this is an important issue which is not just about the voices of survivors, but about professional expertise and reflection by NGOs and the sector more widely. More thinking on language used is needed as is fresh thinking on who to engage with.

ACTION: IASC office to discuss these issues further with Baroness Young following July event.

d) Presentation on support for child victims of trafficking in Scotland (Dr Paul Rigby, Stirling University/IASC advisory panel member) IASC briefing (Dame Sara Thornton, IASC)

Dr Rigby gave an update on discussions around presumption against prosecution in Scotland and support for child victims of trafficking via the Scottish system in the context of the NRM. This item will be covered more fully at a future meeting.

e) Rapid Evidence Assessment on multi-agency decision making (April McCoig)

Dame Sara has made calls for NRM decision making for children to be devolved to local authorities. A national pilot to trial this approach has now been agreed by ministers. The IASC office and ECPAT UK are producing a joint rapid evidence assessment on existing models for multi-agency decision making at a local level to identify good practice and 'what works'.

In April 2020, a rapid [call for evidence](#) was launched to gather examples of existing models. This was not limited to the modern slavery sector and responses were received from a range of stakeholders. Desk-based research was also conducted along with a series of semi-structured interviews with practitioners and policy makers.

The IASC Victims and Partnerships lead is working with ECPAT UK to draft a report which will explore four existing decision-making models in more detail. This will develop a series of principles of good practice and make recommendations to inform Home Office thinking on the pilot for devolved NRM



decision making. In addition to the rapid evidence assessment, the IASC Victims and Partnership lead is working with the Home Office to plan a workshop for local authorities to discuss the pilot.

Panel members noted similar pilots elsewhere (e.g. in Scotland) and asked whether this work was limited to England and Wales; it was noted that this is UK-wide. The issue of commissioning local services for children in the context of the national picture and join-up was raised.

ACTION: IASC Victims and Partnership Lead to follow up with Julia Mulligan on contact in the Ministry of Justice interested in this area.

The chair closed item 2.

3. IASC briefing (Dame Sara Thornton, IASC)

a) Annual Report 2019/2020

Dame Sara gave an update on progress around the Annual Report 2019/2020. This has been written and is complete aside from a number of data sets which have been requested. It was shared with the Home Office and Devolved Administrations at the beginning of June. The plan is for this to be laid in Parliament in September.

Panel members noted that this could be an opportunity to get a debate in Parliament.

b) Impact of Covid-19

Dame Sara noted that it is difficult to get data on what has happened to modern slavery victims during Covid-19. The NCA, police and GLAA have conducted a three-week national intensification to ascertain information. There is a concern that some victims will be at risk of further harm if they are accruing debts to their traffickers at a time when they cannot make money.

A big concern is about new vulnerabilities created by the pandemic: those who have lost jobs, and those with NRPF who may take on unsuitable work. This has been highlighted by Leicester coverage.

A panel member noted work by the APPG for Ethics and Sustainability in the Fashion Sector on reshoring to the UK. They are trying to get a meeting with the business minister on this. Further, a House of Lords select committee on Covid-19 is considering what's happening under the pandemic.

ACTION: IASC office to keep in touch with Baroness Young on work by the APPG for Ethics and Sustainability in the Fashion Sector and on the House of Lords select committee.



- c) ***Operation Fort - What businesses should learn from the UK's largest anti-slavery prosecution***
- d) ***Preparing For Impact - How we can overcome barriers and cultivate a culture of collaboration, understanding, and respect to achieve impact on survivor support***

Dame Sara gave an update on these two IASC reviews. There were launched via online events which were well-attended; the office will use this format again in future.

The event on Operation Fort had good engagement with the sector with business leaders suggesting practical solutions and referencing the IASC Maturity Index and Agenda for Action. It was clear that more data sharing needs to happen in the agriculture sector.

There were three events to launch the IASC and PaCCS report on research impact. This included a meeting with the APPG on Human Trafficking, a main launch and a 'brunch and learn' with the Home Office. There is an opportunity to take the learnings regarding collaboration, understanding, and respect in the Modern Slavery Policy and Evidence Centre. Thinking on who is responsible for knowledge consolidation was mentioned.

The chair and panel congratulated the Commissioner on the successful completion of the reports and launch events. The chair closed item 3.

4. Update on IASC office, structure and staffing (Dame Sara Thornton, IASC)

Budget:

Last time it was said that the office was under budget, but following further queries the final year end figure showed a spend of £573,609.87. The majority of this, £510,562.82, was on pay and £63,047.05 on non-pay.

Resourcing:

Since March the chief of staff has been seconded 80% of her time to support London with its response to Covid-19, and will stay in this role full time from September. The office is advertising for a part-time replacement to support on finance and HR.

One of the policy leads is due to move to the international lead post within the office once her replacement has been identified and we are part way through the recruitment for that post.

The office is currently hosting a 6-week paid intern.

The chair closed item 4.



5. Minutes and actions from communications sub-group (Katherine Lawson, IASC Communications Officer)

The Communications Officer provided an update on communications following the previous Advisory Panel meeting and a sub-group meeting held on communications on 12 May 2020.

Since these meetings, policies on media requests, what is published on the resources page, and on the contact us page have been rolled out for transparency and clarity. A publication scheme has also been published. The logo has been further re-worked.

Policy on research requests

Following the sub-group meeting, a drafted policy on research requests to the office has been updated. Member agreed the drafted text, which the Communications Officer will use to populate an online form for academics to use. The policy notes the Commissioner's aim to link up researchers working on similar areas, and highlights the work of the Modern Slavery Policy and Evidence Centre.

Update on independent evaluation

At the last Advisory Panel meeting, it was noted that the Commissioner is seeking a pro-bono partner to assess reach and impact of her communications. At the following sub-group meeting, Advisory Panel members suggested ways to improve communications outreach. It was also noted that the Communications Strategy and Procedure could be clearer on key messaging and aims.

The Communications Officer will be meeting with an independent communications expert to reflect on these issues and will report back to Advisory Panel members.

Re-drafted IASC logo

At the last Advisory Panel meeting, a new logo was shared. Further designs were shared ahead of the sub-group meeting. The consensus was for a design to include a mix of upper and lower case letters, and to incorporate a banner to anchor the logo. Further work has been undertaken to give the logo more personality and to ensure 'anti-slavery' stands out.

Panel members agreed on the re-drafted logo design. The chair closed item 5.

ACTION: IASC Communications Officer to upload research requests policy and roll-out new logo.

6. AOB and closing remarks

It was noted that the office and Advisory Panel are invited to the HTF and BASNET meeting. The chair closed the item and the meeting.

ACTION: IASC Communications Officer to forward information on the event to the Advisory Panel.