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Andrea Sutcliffe CBE
Chief Executive and Registrar
Nursing and Midwifery Council
23 Portland Place
London
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Dear Andrea,

I am writing to you about the provision of adequate training for nurses and midwives in the area of Modern Slavery Human Trafficking (MSHT).

MSHT is an egregious violation of men, women and children for the purposes of forced labour, sexual exploitation, forced marriage, domestic servitude, organ harvesting and forced criminal activities, including county lines. There is no accurate way of estimating how many people are living and experiencing MSHT within the UK. However, the National Crime Agency suggest “tens of thousands”¹, the Home Office estimated “10,000-13,000”² in 2012 and the Global Slavery Index estimate 136,000³. That would mean 2 per 1000 individuals.

There is an increasing amount of research which documents the severe impact of MSHT on the physical and mental health of victims and survivors, but we also know this is not limited to an individual. MSHT is a public health issue⁴, stemming from poverty and inequality, whilst self-perpetuating and contributing to detrimental social determinants of health. This country needs to address MSHT from a public health and healthcare perspective in order to tackle this crime in a person-centered, holistic and effective way.

Our health service needs an effective and coordinated response to MSHT. Some studies suggest as many as 68% of victims present to healthcare settings when they are experiencing exploitation, with just over half of those being seen by emergency/urgent care practitioners⁵.

Despite this, healthcare professionals do not feel they have the knowledge and confidence to know what to do when they encounter someone who may be trafficked. In 2015, a survey of 782 NHS

¹ The Guardian, 2017 Tens of thousands of modern slavery victims in UK, NCA says.

<https://www.theguardian.com/world/2017/aug/10/modern-slavery-uk-nca-human-trafficking-prostitution>

²HM Government. *Modern Slavery Strategy*. [online] London, 2014: Open Government Licence v3.0. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/383764/Modern_Slavery_Strategy_FINAL_DEC2015.pdf [Accessed 30 Jun. 2019]

³ Global Slavery Index. *Country Data | Global Slavery Index*. [online] 2018. Available at:

<https://www.globalslaveryindex.org/2018/data/country-data/united-kingdom/> [Accessed 23 Jan. 2019].

⁴ Such E, Laurent C, Salway S. 2017. Modern Slavery and Public Health, Public Health England.

<https://www.gov.uk/government/publications/modern-slavery-and-public-health/modern-slavery-and-public-health> (last accessed 1 February 2018).

⁵ [J Health Care Poor Underserved](#). 2016;27(3):1220-33. doi: 10.1353/hpu.2016.0131

healthcare professionals found that 95.3% percent were unaware of the scale or extent of MSHT in the UK. One in eight healthcare professionals said they know or strongly suspect they have come in to contact with a victim (one in five in maternity services), yet 78.3% reported that they had insufficient training to assist trafficked people. Importantly, 86.8% reported lacking knowledge of the questions to ask to identify potential victims⁶. This research highlights a serious knowledge and confidence gap amongst frontline clinicians, who may be the only individuals encountering trafficked victims at their most vulnerable. Crucial opportunities to intervene and offer safety and choice are being missed.

“Safeguarding Children and Young People: Roles and Competencies for Healthcare Staff”, an intercollegiate document, established that “forced marriage, modern slavery and grooming and exploitation”, “county lines” and “child trafficking (internal and external)” are considered core competencies for all levels of safeguarding expected of all healthcare staff⁷. The “Adult Safeguarding: Roles and Competencies for Health Care Staff” intercollegiate document also identifies modern slavery as a form of abuse⁸.

Having reviewed your current [Standards of Proficiency for Midwives](#), I was pleased to see the specific reference to modern slavery and human trafficking, as well as the inclusion of exploitation and abuse more widely. It would be beneficial for this to also be reflected within your Standards of Proficiency for [Registered Nurses](#), [Nursing Associates](#) and [Standards for Post-Registration](#) in recognition of the wide range of health professionals that may come into contact with a potential victim of MSHT.

Under the terms of the Modern Slavery Act of 2015, I am charged with encouraging good practice in the prevention, detection, and investigation of slavery offences, and the identification of victims⁹. My first [strategic plan](#) was laid before Parliament in October 2019 and I have prioritised the care and support of victims. Herein lies a crucial opportunity to do so. It is a stated goal of NHS England to support staff in accessing training on how to identify and safeguard victims of MSHT¹⁰. Indeed, the duty to safeguard all adults and children is enshrined in the General Medical Council’s statutory guidance, “Good Medical Practice”, upon which all medical education in the United Kingdom is based¹¹.

Following consultation with NHS safeguarding leads and experts in the field, both clinical and within academia, this office has identified a key opportunity for Royal Colleges and the professional bodies who are responsible for setting the requirements for education to take the lead in the efforts to safeguard patients against MSHT with all its deleterious consequences. We propose that the

⁶Oram S, Hemmings S, Abas M et al. Provider Responses Treatment and Care for Trafficked People. Department of Health, 2016. <https://www.kcl.ac.uk/ioppn/depts/hspr/research/CEPH/wmh/assets/PROTECTReport.pdf>. (last accessed 5 February 2018).

⁷ The Royal College of Nursing. (2019). *Safeguarding Children and Young People: Roles and Competencies for Healthcare Staff | Royal College of Nursing*. [online] Available at: <https://www.rcn.org.uk/professional-development/publications/pub-007366> [Accessed 18 Oct. 2019].

⁸ The Royal College of Nursing (2018). *Adult Safeguarding: Roles and Competencies for Healthcare Staff | Royal College of Nursing*. [online] Available at: <https://www.rcn.org.uk/-/media/royal-college-ofnursing/documents/publications/2018/august/pdf-007069.pdf?la=en> [Accessed 18 Oct. 2019].

⁹ Legislation.gov.uk. (2019). Modern Slavery Act 2015. Charter 30, Part 4, Independent Anti-Slavery Commissioner. [online] Available at: <http://www.legislation.gov.uk/ukpga/2015/30/part/4/enacted> [Accessed 18 Oct. 2019]

¹⁰ NHS England (2019). *NHS England » NHS England slavery and human trafficking statement*. [online] England.nhs.uk. Available at: <https://www.england.nhs.uk/safeguarding/slavery-human-trafficking-statement/> [Accessed 18 Oct. 2019]

¹¹ General Medical Council (2019). *Good Medical Practice. Domain 2: Safety and quality*. [online] Available at: <https://www.gmc-uk.org/ethical-guidance/ethical-guidance-for-doctors/good-medical-practice/domain-2----safety-and-quality#paragraph-24> [Accessed 18 Oct. 2019].

inclusion of reference to MSHT across all of your Professional Standards, in the context of both children and adults, would help to equip nurses, midwives and nursing associates to safeguard this vulnerable patient population.

I am therefore writing to urge you to include reference to MSHT more widely across your Professional Standards to strengthen the excellent work that has already been undertaken to raise awareness among nurses and midwives, including the development of the [Modern Slavery Wheel](#) and [Modern Slavery and Trafficking: Guidance for Nurses and Midwives](#). I would also encourage you to include the concept of trauma-informed care¹² within your curriculum. This is a generic approach to the care of any vulnerable patient as a strengths-based framework grounded in an understanding of and responsiveness to the impact of trauma that emphasises physical, psychological, and emotional safety for everyone, and that creates opportunities for survivors to rebuild a sense of control and empowerment.

Finally, I would also like to take the opportunity to highlight the [Training Framework for the Identification, Care and Support of Victims and Survivors of Modern Slavery and Human Trafficking](#) published by Skills for Care at the end of last year which aims to establish clear standards for those involved in identifying and supporting victims of MSHT.

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.

Sincerely,



Independent Anti-Slavery Commissioner

¹² Hopper, E. K., Bassuk, E. L., & Olivet, J. (2010). Shelter from the storm: Trauma-informed care in homelessness services settings. *The Open Health Services and Policy Journal*, 3(2), 80-100