

Anti-Slavery Lived Experience Advisory Panel Summit

IMMIGRATION AND ASYLUM BILL

“

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INFORMED BY EXPERIENCE.
SHAPING A JUST RESPONSE



Foreword by Eleanor Lyons, Independent Anti-Slavery Commissioner

The Immigration and Asylum Bill ('the Bill') was introduced to Parliament in June 2026.¹ Part 5 of the Bill makes significant reforms to the modern slavery support system in the UK.

I asked my Lived Experience Advisory Panel which is formed of representatives from 15 Panels across the UK what they thought about this legislation. I would like to thank every survivor of trafficking who attend this Summit for sharing their expertise so we can all understand the impact of the Bill and would also like to extend my gratitude to the Human Trafficking Foundation for facilitating the Summit.

The test for this Bill, as laid out so powerfully by a representative on the day was: *"Does it make it better for survivors and does it make it easier to identify and support survivors?"* If the answer is no, Parliament must think again.

Those who took part in this Summit were clear that the draft Bill does not meet that test. They outlined how the Bill will make disclosure harder, support less secure, and recovery more fragile. Representatives challenged the premise that the modern slavery system is being misused in a way that justifies measures which could deny protection to the people the system was created to serve. They questioned why the focus of the Bill was on making victims lives harder rather than holding the perpetrators of crime to account.

We also spoke about measures they welcomed in the Bill. This includes advocacy for child victims of trafficking and the rollout of devolved decision-making pilots for children. Survivors also welcomed the proposed changes to enhance transparency in supply chains – but want these measures to go further to reflect our international partners' laws.

This report below outlines in detail survivors' insights from the Summit. The voices of survivors should not sit at the margins of legislation on modern slavery. There is no clear evidence that survivors have been consulted by the Home Office on the contents of this Bill before it was introduced. This is a gap.

The challenge now is for Government and Parliament to listen to what survivors have said, alongside evidence-based research into human trafficking to ensure that any reform of the modern slavery system protects survivors, improves identification and helps bring perpetrators to justice. A rolling brief on the IASC position on the Bill can be found [here](#).

With thanks to the 15 Lived Experience Panels for their contributions:

Anti-Trafficking and Labour Exploitation Unit (ATLEU) Changemakers

Modern Slavery Policy and Evidence Centre (MSPEC) Lived Experience Advisory Panel

Trafficking Awareness Raising Alliance (TARA) Advisory Group

ECPAT Youth Advisory Group

Hope for Justice Survivor Leadership Council

Unseen Survivor Consultants Group

Hestia Empowered Voices Forum

Migrant Help Modern Slavery LEAPs

The West Midlands Anti-Slavery Network VOICE

Voice of Domestic Workers

Sophie Heys Foundation CREW

Helen Bamber Foundation Ambassadors

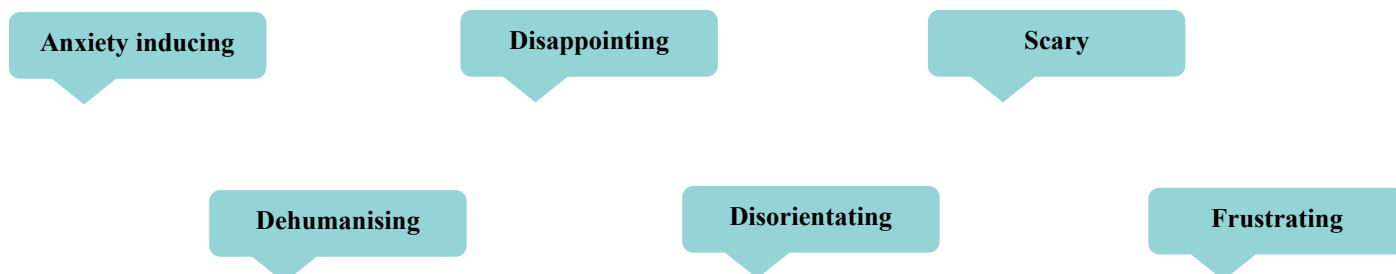
Ella's

Migrants at Work

Hope at Home Guest Voices

The Immigration and Asylum Bill

When asked to share their general response to the Bill, representatives at the Summit expressed grave concerns. The draft legislation was described as:



It was further stated that, as drafted, the Bill:

- **Harms survivors and helps perpetrators.**

"One thing that the Government must keep coming back to is that if this Bill is made law tomorrow: does it make it better for survivors and does it make it easier to identify and support survivors? That is the standard that we should keep coming back to."

"I believe that this Bill will not bring any real change to stop slavery, but it will make it worse. It does not support the survivor but gives the safe and stronger hand to the perpetrator. Is one of the main reasons survivors stay silent."

- **Is not trauma informed.**

"This Bill does not consider the mental state of the victim or survivor and the compromised mental capacity that they are in when disclosing evidence. The legislation should be about survivor support and not the time frame."

"This Bill is inconsiderate of how genuine victims who have been through unimaginable traumatic and mentally exhausting immigration processes feel."

- **Wrongly prioritises speed over accuracy when processing referrals to the National Referral Mechanism (NRM).**

"Protecting the integrity of the system and protecting victims should not be competing goals. Done well, they reinforce one another. Done badly, it usually reflects a lack of understanding of how trauma presents itself."

"The Bill creates a system that is faster but not necessarily fairer. Speed should not come at the expense of proper assessment. One wrong decision can have serious consequences for someone seeking protection."

"The Bill makes the future feel uncertain for victims. The Bill should focus on long term recovery not just the short-term issue of dealing with someone quickly."

- **Is progressing through Parliament too quickly and lacks a sufficient evidence base.**

"The Bill has already passed through second reading in the House of Commons. I am worried by how fast it is progressing."

"This Bill is out of touch and it's uncertain how evidenced it is."

What is missing in the legislation?

Lived experience representatives reflected on alternate measures, provisions and actions to those found in the Bill. They discussed with the Commissioner what the Government ought to be focusing on to ensure better outcomes for survivors. The suggestions outlined below will be used to by the Commissioner to formulate proposals for the Government, both in response to the Bill and more broadly.

Trauma Informed Practice and Specialist Support

Representatives highlighted that trauma-informed practice is not currently applied consistently among professionals working with survivors through the NRM. This includes a lack of understanding of the impact of trauma by both statutory and non-statutory agencies. **Professionals should be informed about guidance, especially the Slavery and Trafficking Survivor Care Standards¹**, which covers important issues such as cultural awareness and competency. This guidance should form the basis of regular, meaningful training that amounts to more than a box-ticking exercise.

¹ Human Trafficking Foundation, Slavery & Trafficking Care Standards. Available at: <https://www.humantraffickingfoundation.org/-trafficking-survivor-care-standards>

Representatives emphasised that trauma-informed practice must go beyond the use of the term itself. **Professionals should understand how trauma, coercive control, memory, communication, disclosure and neurodiversity can affect how a survivor presents and recounts their experiences.** Differences in communication, eye contact, processing, emotional presentation or recall should not, in themselves, influence assessments of credibility.

It was observed that there was no standard training across First Responders, the people who can make referrals to the NRM, leading to a postcode lottery of support when it comes to identification and referral into support systems. **The introduction of a minimum level of trauma-informed training would reduce the disparities currently experienced across the system.** This is even more important as ‘credibility’ changes are being introduced in the Bill.

Several concerns were also raised about the number of times that individuals are required to recall and retell traumatic incidences to various professionals throughout their identification and support. The recalling of these experiences can be retraumatising. **Representatives recommended the creation of a centralised system which would allow survivors’ experiences to be properly recorded and documented,** and which could then be accessed by relevant supporting services.

Finally, representatives argued that **there needs to be greater access to specialist support throughout survivors’ recovery journey.** This includes access to interpreters to allow survivors to disclose in their first language and the provision of more mental health and psychiatry specialists to work with survivors during recovery.

Proactive Policing, Accountability and Prosecutions

Representatives highlighted that the current system of policing and prosecution of traffickers does not always work. There had been mixed experiences of law enforcement but there was concern the current system can leave survivors to go un-identified and traffickers un-punished. Once again, the lack of consistent training was raised, with representatives expressing concern about the lack of specialist knowledge within some police forces and the defunding of specialist modern slavery police capabilities such as the Modern Slavery and Organised Immigration Crime Unit (MSOIC). **Implementing a standard level of training will ensure that police officers know who to contact and what to do if they encounter a potential trafficking case.**

Once perpetrators are identified, action should be taken to prevent them from carrying out further harm. The changes made in the Bill to Slavery and Trafficking Prevention and Risk Orders were seen as a positive step. Representatives highlighted the low levels of prosecutions and the lack of ramifications for exploiters in the UK and agreed that proactive steps needed to be taken to remedy the lack of legal action against traffickers.

Create Safe Visa Routes

Survivors highlighted issues relating to the Overseas Domestic Worker visa. Representatives called for **the Government to review and change the current visa to enable domestic workers to find alternative employment.** This would greatly reduce the risk of exploitation for those on the visa and help ensure that overseas domestic workers are able to work in safe, regulated, conditions.

Accessibility and Survivor Engagement

Representatives argued that the Bill and other legislation and guidance is often inaccessible to those most affected by it. Information is often communicated through technical legal language without detailed enough explanatory notes. As a result, survivors are left unable, either by accident or design, to meaningfully engage with the legislative process. **Future legislation and guidance should be written or explained in plain language, both during consultation stages and parliamentary stages.** This would allow for greater insight from those with lived experience of the issue.

Representatives called for the **Government to embed lived experience into the legislative process through the creation of a National Survivor Council to advise on legislation and guidance.** This would ensure survivors have a formal voice in the processes that affect them.

Clause by Clause

After sharing their impressions, representatives at the Summit had the opportunity to discuss the clauses in the Bill in detail. Clauses discussed were grouped into three themes on the day: identification and support; improved support for children; and improved tools for tackling exploitation.

Clause 36: Disclosure and Credibility

Clause 36 requires decision makers assessing referrals to the NRM to treat certain factors such as delayed disclosure, inconsistencies in the account, and similarity with other accounts, as automatically damaging to an individual's credibility.

Representatives expressed grave concerns about this clause, stating it is not trauma informed, does not consider the systemic barriers to disclosure and will be a measure that is used by traffickers to exploit people. This included:

- **Trauma affects memory, behaviour and disclosure**

Trauma shapes communication, memory and presentation of information. It leads to inconsistencies, gaps in memory, delayed disclosure, or confused details. These are typical trauma responses, not signs of dishonesty.

- **Barriers to disclosure: trust and system understanding**

Survivors at the point of identification often do not understand the system, their rights, or what information is needed from them. Disclosure happens once trust and safety are established, which takes time: "becoming safe" is different from "feeling safe." One survivor mentioned that it took two years to feel safe to come forward.

- **Fear of authorities and consequences**

Fear of deportation, imprisonment, or loss of support can lead to delay and inconsistency when recounting experiences. Mistrust of authorities compounds this, and traffickers exploit legal knowledge as a scare tactic and threaten victims with this information.

- **Fear of and loyalty to perpetrators**

Threats to survivors or their families and emotional ties to traffickers create powerful barriers to speaking out. It takes time for someone to feel safe enough to disclose their experience.

- **Impact of cultural and linguistic factors**

Cultural norms may discourage engagement with the police. Translation may further reduce the accuracy and detail of survivors' accounts and the language used during disclosure can influence what is remembered and communicated.

- **Shared or similar accounts are to be expected, not treated as suspicious**

People trafficked by the same exploiter or via the same route will naturally have similar experiences and accounts; treating such similarities as evidence that a disclosure lacks credibility risks protecting perpetrators and ignores the reality of trafficking.

Clause 37: Recovery Period to end on Making of Negative Conclusive Grounds Decision

Under current legislation, trafficking survivors are entitled to a period of support and protection called 'the recovery period' while a decision is made about their case. Clause 37 of the Bill, would end the recovery period as soon as a person receives a negative conclusive grounds decision, requiring them to leave support immediately.

Representatives once again expressed concerns about the impact this clause could have on individuals including the risk of further harm and increased vulnerability to re-trafficking. This included:

- **Harm linked to removal of protection during appeals**

Individuals may look to appeal a negative conclusive grounds decision, and many appeals result in those decisions being overturned. Removing support immediately after a negative decision is issued may cause further harm, particularly where the decision is subsequently reversed. Support should remain in place until all appeal processes have been completed.

Clause 38: Public Order and Bad Faith Disqualifications

This clause distinguishes between public order and bad faith disqualifications and defines each one. It introduces a new public order disqualification on national security grounds. Notably, this won't apply to children with leave to remain or UK citizenship but unaccompanied asylum children can be excluded from NRM support on national security grounds.

Representatives expressed deep concern about this clause, stating that it will strengthen the hands of traffickers. They noted that it does not take into consideration the fact that convictions may be related to a person's exploitation, meaning people could be denied support as a result of having been trafficked. This included:

- **The Bill will strengthen the hands of traffickers**

Traffickers frequently tell the people they exploit that they will be punished if they escape and seek help, particularly where they have been involved in crime. This section of the Bill reaffirms this message: that coming forward is not safe and victims will not be protected.

- **Victims of criminal exploitation risk being overlooked**

Many survivors are forced to commit criminal activity as part of their exploitation. The extension of public order disqualifications will mean that many people are denied the support they need because they were exploited in the first place. This does nothing to break the cycle of exploitation and only serves perpetrators, not survivors.

- **Children will miss out on essential protections**

All children should receive support, regardless of their immigration status. NRM decisions should be based on need. This clause will mean that children may experience the same exploitation but only some will receive the support they need to recover and rebuild their lives. All children should be exempt from this clause, not just those with UK citizenship or leave to remain.

Clause 39: Temporary Permission to Stay in the UK

This clause will limit the circumstances in which an individual may be granted temporary permission to stay in the UK. It will remove the granting of leave for the means of receiving support to aid recovery. This leave will now only be granted to those if they are helping with a police investigation or seeking compensation.

Representatives pointed out that this clause risks undermining the recovery of survivors and reinforcing fears of removal from the UK that will be taken advantage of by traffickers.

Key points included:

- **Recovery is not linear**

Recovery requires consistent support and can take a long time. This will be undermined by removing an individual from the UK and separating them from their support systems and networks. This may expose a vulnerable person to re-exploitation, particularly if they are removed to their home country where the exploitation took place.

- **It will strengthen the hands of traffickers**

As noted above, traffickers use insecure immigration status to control people and threaten people with removal from the UK if they look for support. Removal of temporary permission to stay adds further weight to such claims and will result in more people remaining in exploitation and more traffickers profiting.

- **Support should not be incentivised**

Support should not be provided as an incentive. By limiting leave to remain to individuals seeking compensation or assisting criminal investigations, survivors are effectively required to provide something in return in order to continue their recovery. This puts the responsibility on the survivor rather than law enforcement agencies to secure justice.

Clause 35: Devolved Decision Making for children

This clause will enable the Home Office to roll out nationally a devolved decision-making pilot currently taking place across 27 local authorities in the UK. As a result, across the UK, it will be local decision makers who determine whether a child receives a positive or negative reasonable and conclusive grounds decision. This applies until 100 days before their 18th birthday. If a child is within 100 days of their 18th birthday, the decision will be made by the Single Competent Authority.

Representatives welcomed this change, noting that decision-making ought to be devolved to local decision makers and that the panels should include relevant statutory and non-statutory support services. However, representatives argued that this decision-making process should go further to support those transitioning into adulthood.

Key points included:

- **Local decision-making is best for young people**

Local decision-makers are well placed to ensure that relevant support services are represented within statutory bodies such as local authorities. However, the list of people able to participate on these panels should be extended to include organisations like schools, community groups, and relevant charities. This would ensure a wider range of safeguarding expertise and perspectives is represented, leading to better informed decision-making.

- **Devolved decision-making should be extended**

The impact of trauma and the disclosure of information do not run to a fixed timetable, and while someone may be exploited when they are young the information may not come to light until they are older. Transitional safeguarding must be considered and give young people transitioning to adulthood the same protections as those under the age of 18. There are too many support gaps when someone turns 18, and these need to be protected against.

Clause 40 – 42: Independent Child Trafficking Guardians (ICTGs)

ICTGs are specialists who support local authorities to support and care for trafficked children. This clause will put ICTGs into law and will enable the service to be rolled out across the country. It would also allow a guardian to be assigned to a child even before an official decision has been made about whether they are a victim of modern slavery.

Representatives expressed support for the work done by ICTGs and agreed their expansion of this service across the UK would benefit children across the UK. However, important questions were flagged about exactly how ICTGs will be rolled out and how data about the national expansion of this service would be gathered.

Key points included:

- **Importance of accountability**

There must be clear guidance setting out who is responsible for each element of a child's support. ICTGs and local authorities need to work in tandem with clear communication to ensure effective ongoing support. There are high numbers of missing children in the UK who have been trafficked; it is important that these cases are resolved, and that further children do not fall through gaps.

- **Full national expansion required to end postcode lottery of support**

At present there is a postcode lottery of support for trafficking victims across the UK, which includes children. The expansion of ICTGs needs to be properly monitored to ensure that all areas of the UK are supporting children to an acceptable standard. Proper data gathering is important to enable continuous improvement of the programme.

- **Expansion of the ICTG programme to 25 for care leavers**

Care leavers rightly have enhanced support to the age of 25, care leavers who are victims of exploitation should have access to an ICTG beyond their 18th birthday to the age of 25.

Clauses 25 – 34: Slavery and Trafficking Risk and Prevention Orders

Courts can already place restrictions on someone if there is a risk they may commit modern slavery or trafficking offences. These orders can restrict things like travel, phone or internet use, and contact with certain people. The Bill will allow for these orders to be applied by police forces regardless of conviction; to be applicable across multiple locations outside of a police force's jurisdiction; to include the use of electronic monitoring; and require the individual to report their whereabouts or activities to someone named in the order.

Representatives were supportive of the changes proposed in the Bill. However, they argued that there needs to be accompanying provisions to ensure that police forces properly use the tools available to them, including risk and prevention orders. Currently there is too little understanding within statutory bodies across the UK about how to respond to modern slavery cases to prevent exploitation.

Key points included:

- **Consistency needed between policy and implementation**

More robust prevention and risk orders are helpful, but only if used properly by police forces. There is often a discrepancy between what is meant to be happening according to agreed policy and guidance, and what is actually happening across the UK. The use of these orders needs to be monitored by government, and appropriate training given to ensure they are used when necessary.

- **Police work needs to be better coordinated across nations and borders**

Stronger cooperation is required between police forces across borders, including Scotland and England. Differing laws can mean that cases fall between cracks and perpetrators escape justice. Clear delegation of responsibility and support between police forces is essential.

- **Improved communication between police and survivors**

Police and law enforcement agencies need to ensure that communication with survivors is empathetic and trauma-informed. Many survivors report being approached with suspicion, and the national discourse conflating immigration abuses and modern slavery means survivors are required to prove that they are a victim. Support should be person-focused, and start from a position of belief, not scepticism.

Clauses 44 – 49: Transparency in Supply Chains

Under the Modern Slavery Act 2015, large companies are required to publish a modern slavery statement each year setting out what steps they have taken to make sure exploitation is not happening in their supply chain. The Bill would widen this requirement to public authorities as well as private businesses, make reporting on certain topics compulsory and introduce fines for late reporting.

Representatives agreed that it was essential that any reporting requirements be accompanied by a proper method of enforcement, but that reporting alone is not enough and companies need to be held responsible for exploitation in their supply chains. They argued that the requirement to report should be extended beyond large organisations and include small- and medium-sized organisations as well.

Key points included:

- **Move beyond reporting to businesses taking action**

Reporting must not be the end point. There needs to be a requirement on companies to address actual harms in supply chains and subsequent action being taken when companies do not tackle harms. Smaller organisations should also be required to act to and proper guidance should be issued to support implementation.

- **The UK cannot claim to be tackling forced labour if allowing goods made by forced labour into the UK**

By accepting products made by forced labour into the UK, the Government is tacitly allowing the abuse and exploitation of people, including children, in other countries. The Government must have stricter import controls and collaborate with international partners to close loopholes for bad actors looking to circumvent the rules.