

Business Case for Survivor Advisory Council (SAC)

Purpose of a Survivor Advisory Council

Listening and responding to those with lived experience of modern slavery is critical to understanding how modern slavery and human trafficking are changing, which vulnerable groups may be being targeted, how criminals are exploiting these individuals, and how we can better identify and support victims (including in their experience of the criminal justice system). It can also provide insights for law enforcement in pursuing and prosecuting offenders.

The anti-trafficking sector is rightly making efforts to ensure that experts with lived experience are meaningfully involved within efforts to tackle the issues of modern slavery.

A national UK Survivor Advisory Council (SAC) would give those with lived experience and expertise a standing platform to share their insights with policymakers in the Home Office and across government in a structured capacity. The Council could help inform any policy development, legislation and statutory guidance with a bearing on tackling or preventing modern slavery over the long-term.

The Government currently has no structured lived experience advisory panel it can use to engage survivors in these areas. To the extent that it has engaged survivors of modern slavery to date, this has typically been through informal, ad-hoc engagement, for example officials attending one-off meetings with NGO-organised lived experience panels. The Home Office's only formal engagement with modern slavery survivors over recent years was a one-off, short-lived engagement early in 2024, organised through the Human Trafficking Foundation, to inform future support for victims of modern slavery. (See detailed case study in **Annex A**).

The Home Office could establish its own Advisory Council. As an independent body the Independent Anti-Slavery Commissioner is far better placed to establish and convene such a group. An IASC-branded and organised Council is far more likely to gain survivors' unfettered participation and the anti-slavery sector's buy-in, both pre-requisites to sustaining such a body over the medium-term.

As well as informing government policy and provision of support, the Council could inform work of the IASC, the Annual Reports, and IASC engagement with policymakers in the UK Government and Devolved Administrations (Scottish Government, Welsh Government and Northern Ireland Executive).

Why survivors are calling for a Survivor Advisory Council

A UK Survivor Advisory Council is something that has been called for continuously from those with lived experience of modern slavery. Throughout the IASC's engagement with survivors and in the consultation period of the IASC's Strategic Plan the UK's lack of Survivor Advisory Council was continuously raised as a concern and something that needs to change.

Those with lived experience spoke to the IASC team about how important it is was to improve *everyone's* knowledge and understanding of modern slavery. They spoke about how it is important for there to be knowledge of modern slavery in communities, to help prevent victims

from becoming exploited, to a wider big picture of national and international Governments understanding the issue.

Current lack of adequate UK Government engagement with survivors to inform its policies and guidance:

Establishing the Council would also address consistent domestic and international criticism of the adequacy of UK Government engagement with survivors in developing its policies.

Domestically, it was a key recommendation from the Windrush Lessons Learned Review (May 2020), led by Wendy Williams, that:

‘The Home Office should take steps to understand the groups and communities that its policies affect through improved engagement, social research, and by involving service users in designing its services.

*Having a dedicated Survivor Advisory Panel through which government officials could test policy and strategic proposals and guidance at an early stage would set a strong example to demonstrate that the Home Office is committed to addressing this recommendation’.*ⁱ

The Independent Commission of Aid Impact (ICAI) echoed the same sentiment in its October 2020 review of the UK’s approach to tackling modern slavery through aid programming. This recommended departments draw more systematically on survivor voices to develop effective programming reflecting lived experiences.ⁱⁱ

Internationally, in its most recent evaluation report on the UK (2021), the Council of Europe’s Group of Experts on Action against Trafficking in Human Beings (GRETA) recommended that the UK Government should involve ‘*survivor organisations in the design and delivery of assistance to victims of trafficking*’.ⁱⁱⁱ The Government’s response to this report noted the value that the UK Government places on embedding survivors in future policy and the value gained from engaging with survivors directly to better understand their needs and experiences of the NRM.^{iv}

Most recently, the US State Department recommended in its 2024 Trafficking in Persons Report on the United Kingdom, that the UK ‘*increase survivor engagement, including by establishing accessible mechanisms for receiving and providing compensation for survivor input when forming policies, programs, and trainings.*’^v

Alongside this, international counterparts in the OSCE, the US Ambassador-at-Large, and the New South Wales Australian IASC are also pushing the UK to establish a Survivor Advisory Council.

Domestic comparisons

Domestically, a number of lived experience groups have been established by NGOs or academia, particularly over the last five years, to elicit survivors’ lived experience to inform the activities of these organisations. However, none has a standing remit, nor direct mechanism, to provide structured survivor input to the development of UK policy, guidance and legislation or inform delivery of the IASC’s Strategic Plan.

Officials from the Home Office’s Modern Slavery Unit and police officers from the National Police Chiefs’ Council Modern Slavery and Organised Immigration Crime (MSOIC) Unit speak at and attend one-off ad hoc meetings with survivors in these fora. However, they do not so on a routine basis, nor do they typically help shape the agenda and formally capture insights learning to inform their work. The IASC believes that survivors should be routinely consulted.

For example, the Modern Slavery and Human Rights Policy and Evidence Centre (MSPEC)’s Lived Experience Advisory Panel (LEAP) has met fortnightly since 2022 to advise on the day-to-day work of the Centre.^{vi} Specifically, it has provided meaningful input to: MSPEC’s vision, Strategic Plan and priorities; overall research and policy impact programme; draft outputs supported or funded by MSPEC; initiatives designed to support people with lived experience; calls for funding; and the Centre’s partnerships with policymakers, business, researchers and civil society. Similarly, the Human Trafficking Foundation (HTF)’s Lived Experience Advisory Panel (LEAP) was established to embed the expertise of those with lived experience in the work of the anti-trafficking sector. Like MSPEC’s LEAP, it consists of independent consultants with lived experience of modern slavery. In HTF, these consultants co-work on commissioned projects and training requests from the sector to improve the response of First Responders and others, and provide expert advice on policy, research and guidance on supporting survivors of modern slavery.^{vii} Neither group, or any other group established by charities or academics in the anti-slavery sector, has regular, standing, structured input to UK Government policymakers.

International comparisons

National expert advisory panels of survivors have successfully been established in other countries to inform modern slavery policy, for instance, in the U.S., Albania and internationally across the 57 members of the Organisation for Security and Co-operation in Europe (OSCE). The US model, a US Survivor Advisory Council on Human Trafficking (see Case Study below) established by law to provide formal input to policy, is widely seen as the most significant and world-leading. The UK could draw from lessons from its success, albeit establishing the SAC on a statutory footing is not IASC’s immediate priority, rather the focus should be on establishing the Council primarily.

Case Study: [US Survivor Advisory Council on Human Trafficking](#)

- Established by the Victims of Trafficking and Violence Protection Act (TVPA), signed into law by President Clinton in 2000. (The Act has bipartisan support, having been re-authorised by all subsequent Republican and Democrat administrations, most recently as the [Justice for Victims of Trafficking Act](#) (JVTA) 2015).
- A formal platform for trafficking survivors to advise and make recommendations on federal anti-trafficking policies to the President’s Interagency Task Force to Monitor and Combat Trafficking (comprising ~20 federal agencies).
- Required to have at least eight members, it currently has fourteen.
- Members serve for two years and can be re-appointed once for a second two-year term.

- The legislative provisions establishing the Council are broadly unchanged. The two biggest changes have been to introduce compensation for Council members and make the Council a permanent structure.
- Members are paid in line with government consultant rates and pay scales and compensated for travel over four hours.
- Independent support mechanism - The US Office to Monitor and Combat Trafficking in Persons (TiP Office) is the 'convener' to connect the Council with federal agencies, but an independent contractor (specialising in trauma-informed victim engagement) supports the Council. The US considers that this creates an important firewall between the TiP Office and the Council, as TiP is also a receiving agency of the Council's recommendations. The Council creates its own structure and appoints a chair, but the independent contractor convenes, scribes and helps to edit their reports. They also provide trauma-informed support to Council members as needed.
- The Council's first year was focused on strategic planning, report writing trips and training for Council members, meetings with federal agencies to ensure they understand their remits, and meetings with survivor communities,
- A key distinction between this US model and the initial proposal for the SAC, is that the SAC would be set up on a non-statutory basis, at least initially.

Draft Terms of Reference

- Purpose and scope: The Council would hear from and respond to members with lived experience of modern slavery to better understand how modern slavery and human trafficking are changing, which vulnerable groups may be being targeted, how criminals are exploiting these individuals, and how we can better identify and support victims (including in their experience of the criminal justice system). It would also aim to provide insights for law enforcement in pursuing and prosecuting offenders. The Council would be a remunerated panel, ethically delivered and trauma-informed in line with the best practice for engaging survivors.
- Convener: The Council would be convened by the Independent Anti-Slavery Commissioner.
- Best practice: The Council would seek to draw on best practice, established in formal OSCE Guidance on establishing and maintaining National Survivors of Trafficking Advisory Councils. ^{viii}
- Membership and appointment: The Council would consist of 10-15 members, with it advertised at the outset that the Commissioner would have final decision on all Council appointments. Appointments would be for a fixed term of two years, with members capable of being reappointed once, to serve a second two-year term. Following OSCE best practice, membership would be restricted to adults with a minimum of five years since their trafficking experience, to ensure they are able to engage at minimal risk of re-traumatisation.
- Link to the Modern Slavery Act 2015: To begin its vital role as quickly as possible, the SAC Council would be established on a non-statutory basis, at least initially. Should the

Government look in future to establish it on a statutory basis to formalise its consultative role in informing development of government policy and statutory guidance, the Council's terms of reference would be reviewed and re-agreed.

- If established with the approval and/or funding of UK Government, the Council would expect to its commitment to meaningful engagement in policymaking, consultation on legislation and statutory guidance and input to the delivery of the IASC's Strategic Plan. 'Meaningful engagement' has been defined as:

'respectful, dignified and equitable inclusion of individuals with lived experience in a range of processes and activities within an enabling environment [...] valuing lived experience as a form of expertise [...]'^x; and

'ensuring that people who are or have been impacted by an issue are involved in developing, implementing, and evaluating the effectiveness of strategies to address the issue.'^x

Note on terminology: While definitions vary, 'lived experience' is generally understood to be gained through direct, first-hand involvement in events, while 'learnt experience' is generally gained by other means, such as consulting others or independent research.

Chair: Members, once appointed, would determine their Chair who would work closely with the IASC's office and Home Office to reflect members' views on Council meeting agendas.

Remuneration, administration and other costs

Form of remuneration: The IASC has received widespread feedback from the UK's anti-slavery sector that paying lived experience experts with vouchers (e.g. a £50 voucher provided per session attended) would not be appropriate for a standing council of experts. So the IASC would only look to establish a SAC if members were paid a salary (or fee) for their time and expertise. This would require they have the right to work in the UK. This may limit applications to members more likely to be further along in their journey through the NRM and/or asylum system. However, we consider this acceptable, as no one group can or should be expected to reflect all of survivors' experiences, and those further along in their recovery are also more likely to be able to share their insights and experience at lower risk of re-traumatisation, consistent with OSCE best practice.

Cost of salaries or fees:

There are different options for remunerating survivors.

The IASC could procure lived experience through a consultancy firm that would employ, pay and support its lived experience consults. The IASC quoted £1,000 (+VAT) per person, per day.

Home Office officials have suggested a comparison might be with the rates paid to the Government's Non-Executive Directors whom are currently paid approximately £10k per annum across-Government.

Whatever the Home Office chooses to fund it should reflect the expertise of survivors.

Expenses: In line with the expense policy employed under the Government's formal engagement with HTF earlier in 2024, members would be paid reasonable travel and internet

data expenses to attend any remote meetings. Such expenses are roughly estimated at £15k p.a. Members would be expected to cover the cost of any accommodation, meals, childcare or other expenses from their salary or fee.

Training and safeguarding: The costs for training and safeguarding would depend on the model by which members are recruited and paid, but are not anticipated to cost more than £10k p.a.

Support to administer the SAC: It is imperative the Council is well run to ensure regular communication and direction is provided. Similar groups have fallen apart where there has been inadequate leadership, organisation and support for contributors, for example with over half of the OSCE's International Survivors of Trafficking Advisory Group (ISTAC) resigning en masse in April 2024.^{xi} Whether administered directly by a member of the IASC's office, or by an NGO, we therefore expect there would need to be dedicated resource – a Lived Experience Manager – to provide the support structure for the SAC which would be resource-intensive run and coordinate engagement with survivors. This individual would also be responsible as Safeguarding Champion for maintaining and ensuring compliance with IASC and/or SAC Safeguarding Policy (see Annex B). This individual would organise meetings of the SAC, engage across government and the sector to determine its agenda, prepare for meaningful discussion, facilitate discussion and record insights provided (in line with agreed consent and data protection principles). They would also ensure SAC input genuinely informs government policy and support for victims.

Total annual costs would be relatively modest representing good value for taxpayers for the insights gained. Costs would comprise approximately £60k for salaries / fees to survivors (based on ten members, for one day every two months); £34k for dedicated resource to support the Council (£34k based on part time hire); £15k for minimal expenses; and £10k training and safeguarding costs.

Mechanism for establishing the SAC and remunerating members

There are two main operating models for how a potential UK SAC could be established, and its members recruited and remunerated: directly recruitment and employing members; or contracting an NGO to operate the SAC and recruit members on IASC's behalf.

Direct recruitment and employment

The IASC could lead direct recruitment to part-time, fixed-term roles, analogous to the Department's direct employment of part-time Non-Executive Directors. However, as the IASC is not a legal entity, such recruitment would need to comply with Civil Service recruitment principles, Home Office HR processes and survivors would ultimately be employed by the Home Office. Bespoke recruitment would be required, with input ideally sought from NGOs (if not those with lived experience themselves) to establish the criteria, application and interview process by which the best possible applicants could be selected. The IASC could use a number of tools (e.g. IASC newsletter, social media) and partners to advertise applications from survivor leaders, speak at domestic LEAPs to generate interest from their participants and offer a number of sessions where IASC could talk through what we hope participants can bring to this exercise. Successful applicants would then need to complete pre-employment checks and security clearance before they could be offered their roles.

The benefits of this approach would be that the IASC could specifically select the desired attributes or experience of members, and this route may provide the IASC with a greater degree of influence in setting the SAC's agenda and make it easier to share confidential policy proposals with members.

However, recruitment to the Civil Service would likely be resource-intensive for the IASC's small office and it would take a long time to recruit 10 members. Recent external recruitment to the IASC's office suggests recruitment could take anything up to 6-9 months, from funding being agreed. If, for example, funding for 2025/26 were secured in October 2024, it might plausibly be Spring or Summer 2025 before a standing council was fully established and meeting regularly. The biggest drawback to direct recruitment is that the Council would likely be seen as lacking independence from the Department which would be directly employing its members. This would contrast with the US model which has a deliberate 'firewall' between its Council and US policymakers (see case study).

Contracting an NGO to operate the Council on the IASC's behalf

The second model for establishing and remunerating the Council would be via the Department contracting with an NGO to run much of the Council's operation. The Home Office would need to work with the IASC to allow this to happen as quickly as possible. The IASC has already engaged with HO teams to ask for support and assistance.

The most significant benefits this approach are: an NGO would be able to draw upon their expertise in advertising for, recruiting and engaging survivors; they would likely have greater buy-in from the sector to this approach and attraction increased interest in participation; and the NGO assumes a lot of the responsibility and risks from engaging with such a group of survivors (e.g. around safeguarding, avoiding re-traumatisation and supporting survivors directly).

A direct award for under £10k to a pre-selected NGO may be possible without extensive tendering. Such an award could build on the approach and lessons MSU learned from engaging HTF to convene and facilitate survivor input to the future MSVCC (see detailed case study in Annex A). Whilst a contract at this value would not be enough to set up the SAC permanently, it may be the quickest and most feasible way to get a meeting of a SAC off the ground in 2024 or early 2025, initially establishing the SAC on a pilot basis until it can be established on a permanent basis (albeit possibly via a different NGO, depending on which organisation were awarded the successful tender).

Annex A – Case Study Home Office Victim Support 2025 Survivor Engagement project – to inform the successor to the Modern Slavery Victim Care Contract (MSVCC)

Scope of this Victim Support 2025 Survivor Engagement project

- To test and establish an approach to engaging survivors of modern slavery into policy development within the Modern Slavery Unit including principles of participation, integrating survivor voice where possible to effective positive change.
- To increase understanding around survivors needs to enable them to influence policy solutions and the requirements needed to create a collaborative space for survivors to share ideas and work alongside policy officials.
- To understand the survivor perspective to better enable the development of survivor centred services that are conducive to their recovery and deliver value for money for the government, by addressing challenges and concerns identified by survivors. This ensures that public money is utilised properly, delivering what can truly assist survivors of modern slavery in their recovery.
- To incorporate the survivor voice in determining the measures of success within a future adult support service, taking forward any feedback around the type and level of support provided to effect change, retaining aspects of support that is beneficial, and considering best practice and ideas for innovation.
- To understand the challenges identified in the current support model around partnership working with wider state services, data capture, consistency of support and the type and level of support needed, from the survivor perspective.
- To empower survivors in helping to shape policy and the future design of adult victim support based on what they have experienced.
- To ensure that the needs of survivors are valued and protected, through use of a trauma informed approach, with appropriate support and aftercare, ensuring that survivors feel respected with minimal risk to furthering their trauma.
- To address sector criticism on not engaging survivors and looking to embed this type of engagement in policy development going forward, recognising the positive impact and value this could have.

Methodology and mechanism for engaging survivors

- The Home Office awarded the Human Trafficking Foundation (HTF) a direct grant for work over a two-month period (to be complete by March 2024).
- The direct award was for a value from unit underspend, under a £10k threshold that would have required the Department to complete a lengthy process to prepare and hold a detailed tender for this work, and formally assess bids .

Indicative Statement of Home Office Requirements of the HTF

- Liaise with the Home Office to collectively decide on how best to engage survivors and in the selection of survivors based on the engagement sought by the Home Office. This will include being mindful of the cohorts of victims the NRM support, the types of exploitation experienced and the willingness of individuals to participate.
- Identify, select and enable 20-40 survivors to participate in engagement sessions with the Home Office on the topic of the ‘future model for adult victim support’ by the end of March 2024.^{xii}
- Liaise with the Home Office to agree dates for the engagement sessions, manage the cast list for the engagement sessions, ensuring a balanced number of survivors are able to attend each session.
- Liaise with the Home Office to finalise the design and delivery of the engagement sessions, to ensure the sessions can effectively be delivered by the contractor. Where individuals with lived experience can contribute to this process that would be preferable.
- Lead and independently manage the direct communication with survivors in a trauma-informed manner to enable them to participate in the engagement sessions.
- Establish a mechanism for ensuring that all individuals have provided informed consent to participate.
- Ensure legal data protection requirements are identified and adhered to.
- Manage and deliver the engagement sessions, including but not limited to: taking a trauma-informed approach to actively lead on introducing the session and facilitate the activities, guide the sessions to keep on course, prompt and support survivors with their contributions, and ensuring all attendees have the opportunity to participate in the discussions.
- Identify and support any safeguarding and wellbeing concerns, signposting to appropriate aftercare and share these concerns with the Home Office.
- Manage and directly deliver payment for: survivor time at the rate of the hourly Living Wage or appropriate and equivalent compensation, in line with employment regulation, and reasonable expenses for travel and/or data access, with a cap to be agreed with the Home Office. Any additional expenses must be pre-agreed with the Home Office.

Remuneration

- Pay: Survivors were managed and directly paid by HTF for their time in vouchers, the value broadly equivalent to the hourly Living Wage or appropriate and equivalent compensation (~£10 per hour), in line with employment regulations.
- Expenses: Participants were reimbursed for reasonable expenses incurred in travelling to and attending the sessions, with participants encouraged to take public transport where possible, but also reimbursed for travelling by private car where justified. No expenses were payable for private taxis, accommodation, or meals. Modest expenses (£5-£10 per participant) were also provided for data top-up, to enable participation at remote meetings.

Annex B – DRAFT IASC Safeguarding Policy

Notes on further developing this safeguarding policy

- This draft safeguarding policy draws heavily from the Modern Slavery PEC's Safeguarding Policy¹, acknowledged by Home Office officials to be amongst best practice within the anti-slavery sector. It needs to be reviewed further for its applicability and to tailor it further to the Independent Anti-Slavery Commissioner.
- We need to consider wider best practice for engaging survivors and how the SAC would follow this, including:
 - Handbook produced by **Dr Sian Oram of King's College London University** setting out the specifics needed in a trauma informed approach (as recommended by Home Office)
 - MS PEC best practice for Lived Experience Advisory Panels, which FCDO appears to have funded
- Consider whether the below adequately covers the role of:
 - Inclusive decision-making tools and participation
 - Support networks
 - Continuous feedback loops and touching base between meetings.

Purpose

The structure of this policy will be to cover six key elements of safeguarding: empowerment, prevention, proportionality, protection, partnership and accountability. The reasoning for doing so is to ensure that we have a holistic policy that works for both our staff members and those that we interact with who might be vulnerable.

The aim of this policy is to prevent harm, protect members of staff and those that we engage with and to understand accountability within the team. This policy covers the safeguarding of vulnerable adults only. Should the IASC start to engage with children (aged 18 and under), this policy will be reviewed.

Definitions

Safeguarding is defined as taking all reasonable means to prevent harm from occurring; to protect people, especially adults and children at risk, from that harm; and to respond appropriately when harm does occur. Within the IASC, we are at an increased risk of encountering adults at risk, including those who have lived experience of modern slavery. Our

¹ Modern Slavery PEC Safeguarding Policy, [link](#).

safeguarding duties may also extend to anyone directly affected by our research activities, this could include those carrying out research, engaging with our research outputs, submitting ideas to the research ideas form, or working with us in the Lived Experience Advisory Panel.

Adults at risk

An adult at risk is a person “who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.” (Care Act 2014)

Person with lived experience of modern slavery

This encompasses anyone with lived experience of modern slavery, whether the individual has been through the National Referral Mechanism (NRM) or has not. The term person with lived experience is used as shorthand to represent those who identify as either victims or survivors (or both), and all three terms will be used as appropriate in this document.

Peer researchers

Peer researchers refers to people with lived experience who act as researchers on a piece of work. They may not have formal qualifications, such as a PhD.

Survivor leaders

Survivor leaders is a term used to refer to those who have exited exploitation and act as representatives to actively contribute to anti-slavery efforts.

Incident

For the purposes of this policy, an incident includes, but is not limited to, a disclosure made to a IASC staff member that the member of staff feels contains an element of risk of physical or mental harm to the individual making the disclosure, a member of staff or a third party.

For the purposes of this policy, we would not consider a discussion of a historic experience of modern slavery, where the individual is no longer in the situation and is not at risk to their physical or mental health as a disclosure. However, if such a discussion were to trigger a health issue (e.g., causing distress, mental health issues or a physical reaction) or were to cross a threshold by which the IASC needs to share details with a third party (see confidentiality), then this would be considered an incident.

An incident also includes any complaint made either by a member of staff at the IASC or by an external individual, made in relation to either a member of staff at the IASC or a member of the Lived Experience Advisory Panel. The complaint must be in relation to the individual’s work with the IASC. The complaint may be made to a member of staff at the IASC.

Empowerment

Empowerment covers both the empowerment of those that we work with and of our staff. Please note that, following the hiring of our Lived Experience Manager and Lived Experience Coordinator, and the establishment of the Lived Experience Advisory Panel, there will be members of staff who also have lived experience of modern slavery.

People with lived experience

As part of our core activities, we work to incorporate people with lived experience across all stages of our work. This work is captured across multiple policies including: the Lived Experience Advisory Panel Terms of Reference, partnership strategy, monitoring & evaluation strategy, equality, diversity & inclusion strategy, and research.

With regards to safeguarding activities that will support this work, we commit to:

- Ensuring that informed consent is given for any work that the IASC is undertaking where we decide there is an increased risk of harm (e.g. reading potentially sensitive funding applications or asking an adult at risk to write a blog for us), by sharing this policy with any adult at risk who we will work with, explaining the full process that we wish for them to engage with (either in writing or verbally, as appropriate for the individual we are working with). If you are unsure whether your activity constitutes an increased risk, contact the IASC Lived Experience Manager (see below). Consent shall be recorded in the consent form, see Annex 1.
- Listening to the voices of adults at risk and incorporating them in a reasonable and proportionate manner. This could include, but is not limited to, the research ideas form, facilitating involvement as peer researchers, testing funding call scopes, acting as panel members, acting as experts offering advice on funding or on outputs
- The right to remove yourself, where reasonably practical, from contributions (temporarily or permanently), without any disclosure required, without prejudice to any future work. Please note, this may not be possible in all cases, for example summaries taken from group discussions or blogs hosted by third parties.
- Not asking for stories of trauma or experiences of modern slavery, instead working with people with lived experience as experts. This means that the basis of our engagement with people with lived experience will be to request their expertise on the work of the IASC and to inform development of government policy. In any instance where there is a risk that experiences of modern slavery might be discussed, as far as possible, people with lived experience should be given prior notice.

Meeting rules

All staff and external attendees will adhere to the meeting rules in Annex 2. This will apply to all meetings being hosted by the IASC. Where meetings are being hosted externally, the IASC will send these meeting rules to external hosts ahead of meetings.

Prevention **[needs to be reviewed]**

The mission of the Modern Slavery PEC is to protect people from modern slavery through ensuring policies are grounded in evidence. Therefore, much of our research and work will be working towards this element of safeguarding. We commit to funding research in the area of prevention, as per our strategic delivery plan, and to reflect on this research as a team, incorporating learning from it into our practices, and this policy, as appropriate.

Incident response

There may be incidents (defined above) where an adult at risk who we interact with might be at an immediate risk of danger. While it is better to prevent harm earlier in the cycle, the following steps will be taken for an immediate risk.

If a disclosure of modern slavery is made to you during the course of your work, ensure that the safety of yourself and the adult at risk is first priority. Given the remote nature of much of our work, potential disclosures are likely to be made online. However, should a disclosure happen in person, and there appears to be an element of risk, the safety of the victim and the professional is the priority

Key principles for responding to an incident:

- Remain calm and offer reassurance that they have done the right thing in telling you.
- Listen attentively and assure them that you are taking their report seriously.
- Try to avoid interrupting the individual, making any conclusions or asking leading questions, let them explain the incident in their own words.
- Explain the IASC consent procedures, it is ok to pause and read out the section below to them
 - Do not promise confidentiality without explaining that there are situations in which we would be legally obliged to share information.
 - Explain that you are required to share this information internally, but can anonymise the incident, as far as possible, if preferred by the individual.
- Explain what you will do next, decide what to do based on what you feel comfortable with, if you are not sure, always contact the IASC Lived Experience Manager or a member of IASC Senior Leadership Team first.

If you need guidance or help, contact the IASC Lived Experience Manager and, if they are not available, or are not appropriate to contact (for example if the incident involves them), a member of the IASC Senior Leadership Team.

It can be distressing to hear about people's experiences of trauma. If you need advice or support, please reach out to the IASC Lived Experience manager or members of IASC Senior Leadership Team. The Home Office runs an Employee Assistance Programme, a service that provides confidential help at any time. This is a completely confidential service and can be contacted via [\[add Home Office details\]](#).

Consent

As an organisation, we have a common law duty of confidentiality. This means that, when someone shares personal information with us in confidence, we must not disclose this externally without legal authority or justification. This duty still applies even if an individual is vulnerable, and mental capacity to make decisions should be assumed. In practice this means that, in order to share confidential information externally, you should need one of the following bases:

- 1) Express consent (an individual must have capacity to give consent, meaning that they understand what they have consented to, ideally using the consent form in Annex 1)
- 2) Where reporting the information is necessary to safeguard the individual, or others, or is in the public interest
- 3) Where there is a legal duty to do so, for example a court order.

If you feel that reporting the incident might be necessary, first speak to the individual to see if they consent to this. If they do not consent, explore their reasons and explain what your concern is and why you think it's important that the information is shared. If they do not provide consent, but you think that the disclosure might fall into the second category, you must immediately contact the IASC Lived Experience Manager and/or a member of the IASC Senior Leadership Team as a solid justification will be required, and we might be required to seek legal advice.

If you have to share personal information, you must inform the individual of the information you are reporting, and explain why and to who you are sharing this information. Any information that is disclosed must be kept to a minimum to achieve the necessary purpose (e.g. do not include superfluous details)

Immediate threat of danger/significant harm

Before taking action, read the section above on consent.

In the UK - contact the police on 999

Overseas – if the contact is overseas but their disclosure relates to information that relates to criminal activity in the UK, contact the police on 999. If the activity is taking place overseas, advise the individual contacts their local legal enforcement agency as a matter of urgency.

Following the incident, please follow the referral process, below.

No immediate threat of danger/significant harm

Before taking action, read the section above on consent.

Contact the Lived Experience Manager and/or a member of the IASC Senior Leadership Team (should the incident include the IASC Lived Experience Manager) to discuss the next steps as per the referral process, below. There are a number of options that can be taken:

- Non-urgent police number 101
- Crimestoppers: 0800 555 111
- Modern Slavery helpline: 0800 0121 700

Following the incident, please follow the referral process, below.

Referral process

Where an incident has occurred, this must be referred on to the IASC Lived Experience Manager. If the incident includes the champion, the incident must be referred to a member of IASC the Senior Leadership Team. See the full steps for referrals below.

Proportionality

All safeguarding actions will be proportionate to the level of risk and responsive to the needs and feedback of people with lived experience. As the primary engagement with potentially

vulnerable people will be engaging them as experts in the field, we should be aware of our conduct in relation to the individual, but also that they might raise safeguarding incidents that are external to their role with the IASC. We will review the proportionality of the steps being taken upon hiring the Lived Experience Manager.

Should we enter a situation where we are engaging with someone with lived experience in relation to their experience of exploitation, this will be raised with the IASC Lived Experience Manager and IASC Senior Leadership Team, to ensure that the approach, response and safeguards are proportionate. Decisions and responses will be recorded in the incident log to ensure consistency over time.

Protection

We will support and represent those with lived experience of modern slavery. This includes involving them in our work and may include involving them in our research. As far as is possible, we will protect those working on our research by:

- Setting out a safeguarding plan with regards to discrete research to set out how IASC researcher and staff will work with those with lived experience.
- Only refer on a person with lived experience to a research project where we know the project has ethical approval and has made appropriate safeguarding considerations
- Include warnings where there is sensitive or potentially distressing content in our outputs, including documentation circulated internally, as well as external outputs, limiting this as far as is possible and practical,
- Preserve the anonymity of people with lived experience who engage with us in line with individual preferences and to the extent feasible, for example, by offering the option to remove full names, use pseudonyms, or keep cameras off during online meetings.

Partnership [needs to be reviewed]

We will work in partnership with other experts in the area of modern slavery to continuously improve our work and approach. This might include, reading and discussing IASC work, taking part in external workshops, listening to talks, seeking out and learning from established good practice or inviting experts to comment on policies and proposals. We will feed this information back to the team and aim to set an example of best practice in the sector.

We will establish a Working Group of survivor-led and survivor-engaged organisations, who will guide and advise the Modern Slavery PEC in our survivor engagement work, enabling that work to draw on a breadth of experience and expertise from across the anti-slavery sector.

We will create a section on our website that sets out how and why we are working with people with lived experiences, the safeguards that we have in place, and any resources that we use to enable participation.

Accountability

Referral processes [needs to be reviewed]

When a safeguarding incident arises, the following process should take place:

- 1) Write up of the incident and action taken (e.g. advice given, actions taken), ensuring that the report covers the areas of the incident log (Annex 3)
- 2) Inform the IASC Lived Experience Manager or, if the incident includes them, inform a member of the IASC Senior Leadership Team
 - a. [needs to be reviewed] If you feel there is not anyone to contact within the Modern Slavery PEC, please contact Pete Bond (Chief Operating Officer, BIICL), if you do not feel it is appropriate to contact anyone from within BIICL, please contact Andrew Wallis from Unseen UK (a.wallis@unseenuk.org) who will act as an independent facilitator.
- 3) IASC Lived Experience Manager or IASC Senior Leadership Team, will update the incident log
- 4) If urgent, alert the Operations Director immediately, if the incident concerns the Operations Director, alert Pete Bond (Chief Operating Officer, BIICL)
- 5) Safeguarding Champions or Senior Leadership Team to follow up if additional steps need to be taken
- 6) Safeguarding Champions to report on the incident log on a quarterly basis to the Senior Leadership Team

Incident log [needs to be reviewed]

The safeguarding champions will be responsible for maintaining the safeguarding section within the incident log and shall report this to Senior Leadership Team on a quarterly basis and to Senior Management Board on an annual basis. Should a serious incident arise, this will be brought to the attention of Senior Leadership Team at their next meeting.

Review

This policy will be reviewed following the hiring of the IASC Lived Experience Manager, to ensure the elements on survivor engagement are appropriate. Following this, the policy will be reviewed and updated annually, this review will be led by IASC Lived Experience Manager and any updates will be brought to a team meeting to ratify.

Annex C – Consent form to contribute or participate in the Survivor Advisory Council

Consent to participation in activities where there is an increased risk of harm (e.g. discussing potentially sensitive or triggering experiences) with the IASC must be given in writing, by participants reading, signing and returning this form.

The IASC does not currently engage with survivors under the age of 16. Should this change, a new consent form will be developed with additional considerations.

Activity details (to be completed ahead of date):

Date/time of activity	
Location (including online)	
Type of activity, including details on what the participants will be doing	

Participant details (to be completed by/with the participant):

Name	
Phone number (optional)	
Email	

Additional support:

Is there any additional support that the IASC can provide to facilitate your participation in this activity (e.g. additional reading time due to a learning difficulty)?	
If the activity is in person, are there any accessibility requirements that we should be made aware of?	
Is there anything else that you would like to make us aware of ahead of the activity?	

I consent to:

Participation in the above activity

Independent
Anti-Slavery
Commissioner

IASC keeping a record of my participation via this form

Name (Print)

Signature

Date

DRAFT

Annex D – Draft Meeting rules of the Survivor Advisory Council

The Independent Anti-Slavery Commissioner will undertake the following steps to ensure that meetings with survivors are a safe and productive space.

Prior to meetings, the following will be sent to attendees, it will also be repeated by the meeting organiser:

“Please be aware that there may be people in attendance at this meeting who have lived experience of modern slavery. There is no requirement to disclose any experiences during this meeting, but please be mindful that statements might be made which disclose personal narratives of modern slavery”.

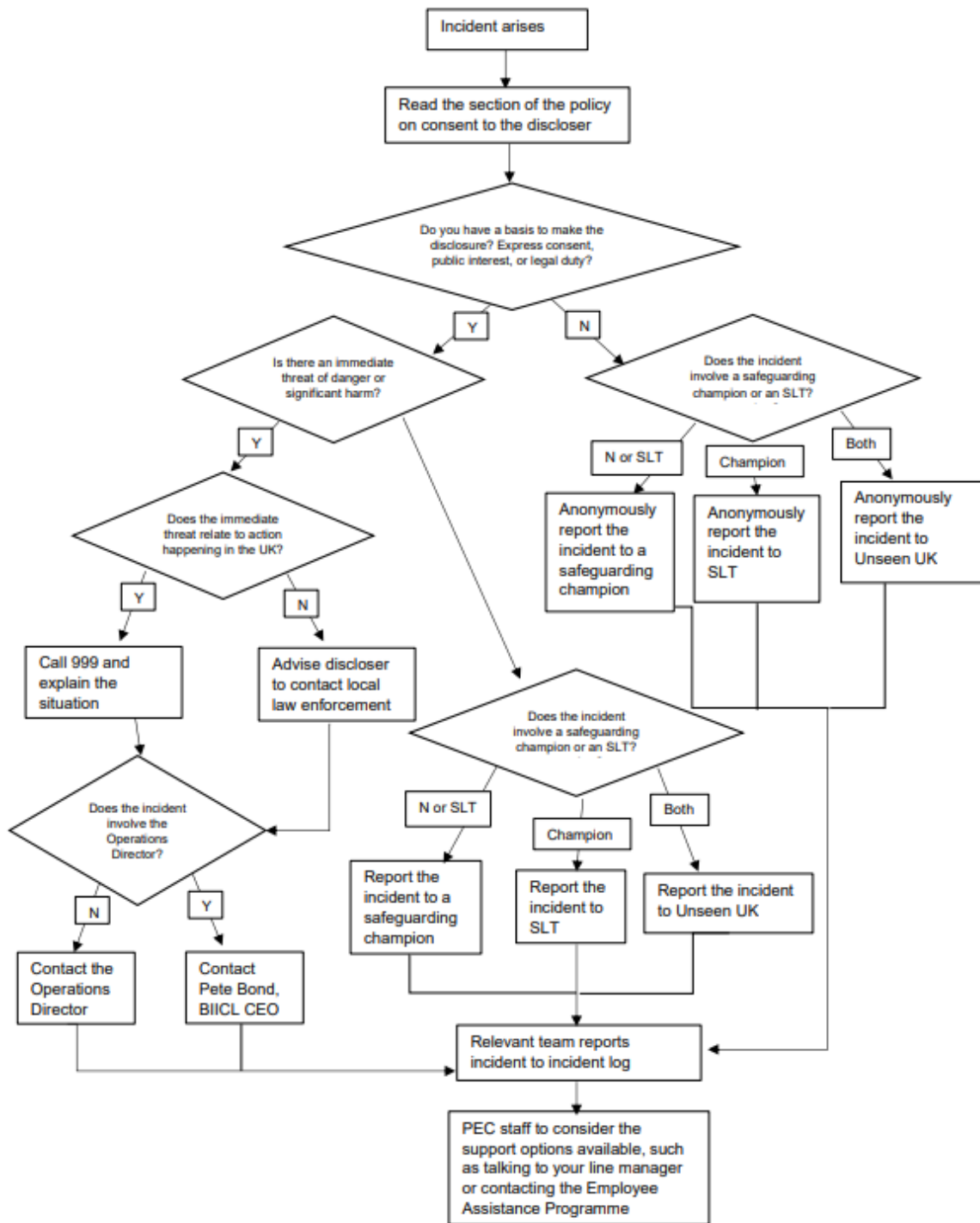
We ask that all attendees:

- Are sensitive and respectful, listening to all points of view made in discussion and responding to these and any disclosures respectfully.
- Do not ask any participants for details of their experience of modern slavery. Disclosure is not necessary to participate in any of the Independent Anti-Slavery Commissioner’s work.
- Respect individuals’ wishes in the use of terminology. At the Independent Anti-Slavery Commissioner’s office, we use the terms “survivors” and “people with lived experience”. We try to avoid using “they” as this ‘others’ individuals experiences. Please try to use this terminology in discussions.
- Respect individuals’ right to anonymity. Some attendees might feel more comfortable keeping their camera off and using an anonymous screen name. Please ensure that these individuals are still included as part of conversations.
- Ensure they take breaks and protect their own mental health. Discussions of modern slavery can include upsetting and distressing topics. All attendees at meetings have the right to remove themselves, either temporarily or permanently should they need to.

Annex 3 – sample incident log

Incident number	Incident log completed by	Member of PEC staff reporting incident	Date of incident	Description of incident	People involved (using anonymous if consent is given to being named)	Consent form completed by external participants involved?	Immediate actions taken	Follow up actions taken
1	Name of Safeguarding Champion or SLT member	Name	Date that the incident happened (e.g. the date of the discussion, if the discussion pertained to past events, include this in the description of the incident)	Outline of what happened (e.g. in a discussion regarding a research call, a member of the Lived Experience Advisory Panel left panel meeting due to distress at subject matter being discussed)	Only name individuals if they give consent	Was the consent form completed before this activity y/n. if n then explain why	E.g. meeting paused, everyone given five minute break then meeting resumed without the Expert by Experience panel member	E.g. Safeguarding champion contacted, debrief meeting organised with committee member

Annex 4 – Flow Chart – actions to be taken when an incident occurs



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- ⁱ *Windrush Lessons Learned Review*, Wendy Williams, March 2020, [link](#). Recommendation 8: ‘*The Home Office should take steps to understand the groups and communities that its policies affect through improved engagement, social research, and by involving service users in designing its services. In doing this, ministers should make clear that they expect officials to seek out a diverse range of voices and prioritise community-focused policy by engaging with communities, civil society and the public. The Windrush volunteer programme should provide a model to develop how the department engages with communities in future. The same applies to how it involves its staff in feeding back their information and knowledge from this engagement to improve policy and the service to the public*’.
- ⁱⁱ *The UK’s approach to tackling modern slavery through the aid programme*, Independent Commission for Aid Impact, October 2020, [link](#).
- ⁱⁱⁱ *Evaluation Report United Kingdom. Third evaluation round. Access to justice and effective remedies for victims of trafficking in human beings*, Council of Europe’s Group of Experts on Action against Trafficking in Human Beings, 2021, [link](#).
- ^{iv} *Ibid.*, pg. 107. The Government’s response noted: ‘*We already include survivor voice and are committed to embedding survivors in future policy. We recognise the vital role survivors have in tackling modern slavery. We work with the Care Quality Commission to deliver an independent inspection regime across the MSVCC. As part of this work, survivors are given the opportunity to provide feedback on the quality of the support services they receive. Additionally we have recently undertaken a piece of work to engage with survivors directly to better understand their recovery needs and experiences of the NRM.*’
- ^v US State Department Trafficking-in-Persons Report 2024 (United Kingdom), 2024, [link](#). Prioritised recommendation: ‘*Increase survivor engagement, including by establishing accessible mechanisms for receiving and providing compensation for survivor input when forming policies, programs, and trainings.*’
- ^{vi} Modern Slavery and Human Rights Policy and Evidence Centre (MSPEC) Lived Experience Advisory Panel (LEAP), 2024, [link](#).
- ^{vii} Human Trafficking Foundation (HTF) Lived Experience Advisory Panel (LEAP), 2024, [link](#).
- ^{viii} Guidance on establishing and maintaining National Survivors of Trafficking Advisory Councils (NSTACs), Office for Democratic Institutions and Human Rights (ODIHR) within the Organisation for Security and Co-operation in Europe (OSCE), 2024, [link](#).
- ^{ix} Definition of Meaningful engagement of people with lived experience of noncommunicable diseases and mental health and neurological condition, World Health Organisation (WHO), May 2023, [link](#).
- ^x Meaningful Engagement of People with Lived Experience: A framework and assessment for increasing lived experience leadership across the spectrum of engagement. C. Ash (National Survivor Network Cast, Washington, DC) and Sophie Otiende (Global Fund to End Modern Slavery), 2023, [link](#).
- ^{xi} *LinkedIn post covering an article on ISTAC members resignations*, [link](#).
- ^{xii} The Human Trafficking Foundation (HTF) convened eight groups of survivors comprised of different demographics and at different points within their recovery and process through the UK National Referral Mechanism (NRM), as set out in the Home Office’s Statement of Requirements, as agreed with HTF.