

## The Immigration and Asylum Bill

The Immigration and Asylum Bill entered the House of Commons on 30 June. Following its introduction, the Independent Anti-Slavery Commissioner is outlining measures in the Bill that affect victims of modern slavery and the impact they will have.

### Understanding modern slavery in the UK

- **In 2025 there were 23,411 potential victims of modern slavery identified in the UK – the largest nationality of which were UK nationals.** Only four claims were disqualified on the basis that they had been made knowingly in bad faith (dishonestly) – less than 0.02%.<sup>1</sup>
- **People cannot self-refer into the modern slavery system.** Only authorised First Responder organisations like the police, Border Force or local authorities can make a referral.
- **Potential victims of modern slavery in the UK receive care through the National Referral Mechanism (NRM).** The Home Office has five days to decide if there are ‘reasonable grounds’ that someone is a victim of modern slavery. After this there is a 30 day period for a ‘conclusive grounds’ decision. During this time victims can have access to a safehouse and support.
- **When a person is recognised to be a victim of modern slavery by the Government there is no right to remain in the UK.** As set out in Home Office guidance, a person will not qualify for temporary permission to stay (VTS) solely because a Competent Authority has confirmed that they are a victim of modern slavery.<sup>2</sup> In 2024, only 176 victims of modern slavery received a grant of VTS leave to assist with their recovery.<sup>3</sup>

### Is the system being ‘misused’?

- **Illegal immigration and modern slavery should not be conflated.** People smuggling is often characterised by a person paying an individual or crime group to help them enter the UK. Modern slavery and human trafficking are characterised by deception, coercion and when people are treated as commodities, the exploitation can continue long after someone arrives on our shores.
- **Successive Select Committees in the House of Commons and the Lords have found the evidence that the NRM is being misused ‘not compelling’.** The Home Affairs Select Committee when Chaired by Dame Diana Johnson MP found ‘the Home Office has failed to produce sufficient evidence to support its assertions of widespread abuse’. A small number of cases cannot be allowed to jeopardise effective use of the NRM, which provides invaluable

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<sup>1</sup> <https://www.gov.uk/government/statistics/modern-slavery-nrm-and-dtn-statistics-end-of-year-summary-2025/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-end-of-year-summary-2025>

<sup>2</sup> Home Office (2025) Temporary permission to stay: considerations for victims of human trafficking or slavery. Available at: <https://www.gov.uk/government/publications/temporary-permission-to-stay-for-victims-of-human-trafficking-and-slavery-caseworker-guidance/temporary-permission-to-stay-considerations-for-victims-of-human-trafficking-or-slavery-accessible#introduction>

<sup>3</sup> [Migrants and modern slavery protection in the UK - Migration Observatory](#)

support to victims of human trafficking, nor should the Government conflate victims of human trafficking with irregular migration. This was supported by other Select Committees too.<sup>4</sup>

- **Data published by the Home Office indicates that the number of people arriving on small boats entering the NRM is low.** Between 2018 and 2025, of the 187,778 small boat arrivals, only 14% were referred to the NRM.<sup>5</sup>

## What is a cause for concern in the Bill?

### *Introducing a duty to assess delayed, inaccurate or inconsistent information as damaging a person's credibility*

- **Victims of modern slavery have faced coercion, control and exploitation. They may not recognise the exploitation they have experienced and be scared to speak out.** Disclosure is rarely immediate and typically occurs only after a survivor feels safe, supported, and able to trust the person they are speaking to.<sup>6</sup> Survivors have also argued that there is a lack of clarity during the decision-making process that the individual is being assessed in interviews, as well as a belief that there would be further opportunities to tell their story.<sup>7</sup> Introducing a duty that sees delay or inaccuracy as “damaging” refuses to acknowledge the trauma, displacement and fear that victims experience.

### *Ending temporary permission to stay on a needs-basis*

- **Temporary permission to stay is an important part of a survivor's recovery process, allowing them to overcome physical and emotional trauma.** The Bill will remove the ability for a survivor to temporarily stay in the country purely on the basis that they are recovering from trafficking. Victims being removed whilst vulnerable and in need of physical or psychiatric attention and care risks recovery and exposes a victim to re-exploitation.

### *Forced Labour in Supply Chains*

- **The Bill will strengthen the requirement on businesses and public bodies to be transparent about how they are addressing forced labour in their supply chains.** This is welcome but needs to go further. The UK has fallen behind our international partners and is becoming a dumping ground for forced labour goods. All of our G7 partners have either

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<sup>4</sup> Home Affairs Select Committee, *Human Trafficking*, Available at: <https://committees.parliament.uk/publications/42482/documents/211207/default/>, pp. 52-53. House of Lords [The Modern Slavery Act 2015: becoming world-leading again](#)

<sup>5</sup> Home Office <https://www.gov.uk/government/statistics/immigration-system-statistics-year-ending-march-2026/how-many-small-boat-arrivals-have-claimed-asylum-or-been-referred-to-the-national-referral-mechanism>

<sup>6</sup> Helen Bamber Foundation (2022) *Trauma-Informed Code of Conduct for the Identification and Support of Victims of Modern Slavery*. Available at: <https://www.helenbamber.org/resources/trauma-informed-code-conduct>

<sup>7</sup> Detention Taskforce (2026) *Barriers to disclosure: A survivor of trafficking's journey through the immigration process*. Available at:

<https://static1.squarespace.com/static/65537d22e3e15a7904032075/t/69aad0610dfdae60f0d62b2c/1772802145668/Barriers-to-Disclosure.pdf>

introduced or are close to introducing mandatory due diligence laws or import bans on goods made by forced labour, and the EU is doing both.<sup>8</sup>

- **The IASC has published [model legislation](#) which would create an obligation on businesses to conduct human rights due diligence and prevent human rights harms in their supply chains which was developed with FTSE 100 business and survivors.** The IASC's model legislation would also ban the imports of goods made by forced labour.
- **Public polling by IASC shows overwhelming public backing strengthening requirements to end forced labour in supply chains.** 80% want the Government to block the import of goods made from forced labour and 76% want companies to face fines or penalties if they fail to prevent labour exploitation.<sup>9</sup>

## How is IASC bringing the survivor voice?

- **Unfortunately, there is no clear evidence that the Government has engaged survivors specifically on the contents of the Bill.** This means that the Bill is making substantial changes to victim identification and care without consulting the group that it most impacts.
- **In absence of Government consulting survivors, IASC is holding a Survivor Summit to ensure that survivor voices are factored into Government's decision-making.** Bringing together members of multiple Lived Experience Advisory Panels, the Summit will provide a platform for survivors to speak directly about what this legislation means not only to their rights and protections but to how they feel living as a survivor in the UK at this time.

## What do we welcome in the Bill?

### *Increased support for children*

- **The Bill will allow reasonable and conclusive grounds decisions for children to be made by local authorities who have a more holistic understanding of children's needs.** This has been successfully piloted and has demonstrated stronger identification and support where local authority partners such as social care workers can contribute to decision-making.
- **Additionally, the Bill introduces increased specialist support for child victims of trafficking.** The Bill will legislate for Independent Child Trafficking Guardians for all children, enabling children to access specialist support in relation to being trafficked even

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<sup>8</sup> The EU has two major complementary frameworks to combat forced labour: the Corporate Sustainability Due Diligence Directive (CSDDD), which mandates that large companies identify and mitigate human rights risks across their operations, and the Forced Labour Regulation (FLR), which imposes an outright ban on importing or exporting goods made with forced labour. The United States strictly bans the importation of goods made wholly or in part with forced labour. This is enforced through Section 307 of the Tariff Act of 1930 and the Uyghur Forced Labour Prevention Act (UFLPA), which together impose an outright prohibition and carry supply chain tracing requirements.

<sup>9</sup> Strengthening the UK's Forced Labour and Human Rights Legislative Framework, IASC, December 2025, [link](#).

before a reasonable grounds decision is made. This is a positive step in increasing care for vulnerable children.

*Slavery and Trafficking Risk Orders and Slavery and Trafficking Prevention Orders*

- **The Bill will enhance law enforcement’s powers to prevent traffickers from further dangerous activity.** Slavery and Trafficking Risk Orders (STROs) and Slavery and Trafficking Prevention Orders (STPOs) can be powerful tools in disrupting and blocking a perpetrator from committing further harms. However, the Orders are used rarely by law enforcement. Any amendment to improve ease of access and use of the powers is welcome by the IASC.

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