

Putting victims first: Renewing the UK commitment to the safety of victims of trafficking and modern slavery

MANIFESTO FOR THE FIRST 100 DAYS

Introduction:

Nearly a decade on from the introduction of the Modern Slavery Act 2015, the landscape of modern slavery and human trafficking in the UK has altered beyond recognition. As a coalition of modern slavery support providers working to support survivors since 2011, we are calling upon a future government to re-new the UK's approach to supporting victims of these serious and brutal crimes, ensuring the physical and psychological safety of victims is first priority.

This Manifesto sets out five practical and deliverable recommendations from Modern Slavery experts to be implemented within the first 100 days of a new government, to help significantly improve the safety of victims of modern slavery and human trafficking and limit costly and unproductive vetting procedures.

About the authors:

All the contributors are providers of support to victims under the Modern Slavery Victim Care Contract. This includes The Salvation Army and 12 other subcontractors. Together we form the collective of professionals who interact and engage with all potential adult victims in the National Referral Mechanism. Since 2011, we have supported a total of 21,824 recovering survivors of Modern Slavery. This puts us in a unique position to see how the sector has evolved over the last 13 years and how this has been experienced by survivors we support.

We represent the views of the people we support, and are advocating for an environment that places psychological and physical safety of victims above all else. We have drawn on our professional knowledge and expertise in both primary and secondary legislation to suggest **small changes**, that would have **significant impact** on supporting victims and reducing the cadence of this terrible crime in the UK.

RECOMMENDATIONS

1. Human Trafficking and Modern Slavery to return to the Minister for Safeguarding's brief, and not sit with the Minister for Immigration.
2. Suspend clauses 22-25 of the Illegal Migration Act 2023.
3. Prioritise decisions on the people in the National Referral Mechanism who have waited the longest.
4. Ensure no Public Order Disqualifications occur where potential victims have no legal representation through a review of the Modern Slavery Statutory Guidance.
5. Adopt a multi-disciplinary approach complemented by mechanisms for government accountability.



RECOMMENDATIONS



1. Human Trafficking and Modern Slavery to return to the Minister for Safeguarding's brief, and not sit with the Minister for Immigration, to prevent further conflation of these crimes with irregular immigration. Doing so will ensure we put the safety of victims first and recommit to treating modern slavery as an exploitation offence, and not an immigration offence.



2. Suspend clauses 22-25 of the Illegal Migration Act 2023, preventing any individual recognised as a potential victim of modern slavery from being subject to the disqualification and removal provisions of the Act. We call upon the Secretary of State to suspend clauses 22-25 of the Illegal Migration Act in the first 100 days of government. We would also urge the government to work collaboratively with experts to review all secondary legislation and statutory guidance affecting victims of modern slavery, arising from the Illegal Migration Act.



3. Prioritise decisions on the people in the National Referral Mechanism (NRM) who have waited the longest, and have had their lives in limbo for years, through the removal of all the current priority groups listed in Section 14.129 of the Modern Slavery Statutory Guidance. Any such prioritisation creates a hierarchy of victim types, and currently newly identified victims are disproportionately negatively affected by these prioritisations. All potential victims are equally deserving and in need of support in line with their ECAT entitlements. By focusing efforts on those who have waited the longest, newly referred victims will be allowed time to address their essential needs and recovery. Once the backlog is cleared, we urge the government to recommit to the timely submission of decisions for all and to grant all confirmed victims access to a minimum of 12 months of support, which can continue to be accessed after receipt of a positive conclusive grounds decision.



4. Ensure no Public Order Disqualifications occur where potential victims have no legal representation through a review of the Modern Slavery Statutory Guidance. Trauma-informed approaches must sit at the centre of the NRM, ensuring potential victims have access to the appropriate support and psychologically informed environments, and a disqualification from such an environment and support system cannot occur in the absence of legal representation. This will ensure potential victims remain appropriately supported and have a full awareness of their legal rights, helping to minimise further harms.



5. Adopt a multi-disciplinary approach complemented by mechanisms for government accountability. To this end, reintroduce the Multi Agency Assurance Panels (removed from the Statutory guidance in December 2022) to ensure any negative conclusive grounds is duly considered through a safeguarding and human rights lens and recommit to the Modern Slavery Reference Group listed in Section 1.6 of the guidance (inclusive of DHSC, MoJ, NHS, Police, IASC, NGO etc). The Modern Slavery Guidance should be amended to include no changes to the Statutory Guidance can take place without a reference group meeting, which must be given ten working days' notice before taking place, and all suggested changes and implementation must be scrutinised by an independent body such as the IASC's office.