

## The Human Trafficking Foundation's In-person Advisory Forum 22nd February 2023

### Sector Announcements

#### Justice & Care

Justice & Care is publishing a paper shining a spotlight on priority areas: cuckooing, prosecutions, supply chains and a focus on support for confirmed victims of modern slavery. Justice & Care is also encouraging individuals to go to CJS and apply for an award.

#### IOM

Working with University of Essex and Hibiscus on survivors of modern slavery who are in prisons, which is a blind spot in the understanding of modern slavery. Issues around the lack of legal advice for those in prison, delays in referral, FRs finding it hard to get into the prisons, issues relating to bail, bail address linked to exploitation. If anyone is interested in participating in the research get in touch with IOM, both those who work in prisons and individuals with lived experience.

#### The Vavengers

This organisation has built support and wellness hubs around the UK and consult organisations on how to best engage with communities impacted by FGM. FGM is identified to be linked with five other types of abuse. The Vavengers also called on the sector for more considered use of images to not perpetuate stereotypes of victims of trafficking.

#### Helen Bamber Foundation

Introducing the Modern Slavery Core Outcomes Set and the community of practice discussion forum across disciplines to raise awareness of existing frameworks, ideas and experience to create workable methods of support for survivors.

### Presentation from the Modern Slavery Unit (MSU)

Emerging and evolving priorities for the MSU under three strategic pillars:

- Prevention
- Enforcement
- Identification & Support

The MSU is looking at the criminal justice response to modern slavery, ensuring that police have the ability to target prosecutors through bespoke training and regional coordinators. The number of live police operations increased to 3,500 in January 2023. The MSU is working closely with the GLAA supporting on raids in carwashes and delivering trafficking and risk orders. One challenge within the criminal justice response is that the number of prosecutions is not increasing at the same rate as live operations.

International work for upstream prevention. Overseas programmes, delivering targeted campaigns for resilience support in Albania. In Vietnam the MSU's work enabled 600 individuals to find safer work. In Romania the MSU created a geotargeted campaign to encourage women at risk of 'lover boy' model of exploitation. Also looking at tackling forced labour in global supply chains.

Working closely with MS PEC to strengthen data analysis and ensure policy is based in reality.

Role of the IASC: acknowledging the delay the Home Sec is committed to the new round of hiring.

MSSIG stakeholder engagement: want to do more going forward for meaningful discussion.

NABA measures for survivors: enshrined the recovery period, offering protection from removal in the UK – average 531 days for receiving CG decision.

Bath faith disqualification – not a blanket rule and will be assessed on a case-to-case basis, decision makers will consider reasons for the gaps in evidence (considering trauma).

Changes simplify guidance to address cases when a referral is made with little evidence. Changes to the NRM form will support FRs to ask the right questions to support decisions. The MSU will be monitoring the impact of these changes.

Public order disqualification: only high harm individuals who pose a threat to the public will be considered for disqualification.

NRM 450% increase in referrals: created challenges on the system.

Child survivors of modern slavery: child decision making pilot currently running in 10 sites, and in the process of increasing this to a further 10 sites. Devolving the decision making around modern slavery to local authorities working within safeguarding structures aligning them to local support services. Guardianship service is now running in 2/3 of local authorities in England and Wales. Piloting changes (extending support after 18).

MSVCC 5 year contract delivering a needs based service due to end in 2026. Starting to consider what this will look like after this. Collaboration is on the agenda.

Changes to RG guidance hopes that this won't deter victims from coming forward in any settings. RG guidance reflects understanding that documents will not always be available. The MSU is focused on training to improve the quality of referral forms (NRM FR Hub).

Changes to the modern slavery strategy: given the recent guidance changes, need to ensure that the strategy is in line with ministers priorities. In the process of discussing next steps with ministers. Commitments in the first draft are still in line with what the Unit would like.

What steps will be taken to monitor those who don't meet new threshold for RG? Data on prevalence of RG and CG decisions will continue to be published quarterly.

NABA Clause 67: no update yet

FR responders to be aware of new changes for RG who will be responsible for the training? Toolkit and NRM hub will be a big part of this. FR forum will be held monthly, hoping it will be accessible to as many individuals as possible.

Data: analytical strategy looking at the gaps and the needs across the sector and Government to combine data sets. Really happy to have conversations around this. Collating CPS, police and HO data so we can tell what is going on.

Individuals may not always have information or hard copies of objective evidence: FR or someone else has seen the exploitation. Digital submission form: FR forum to consult hoping to get this done quite quickly.

Hand car washes: modern slavery prevention fund supporting this scheme, looking at the scale and nature of noncompliance across all sectors.

Transparency in supply chains: when parliamentary time allows

Deadline for NRM referral form submissions: can only be made online, business hours 10 – 4 can be submitted at any time but will be processed the next day. Welcome views on whether phone lines should be open longer. It is good for clarification to have timings about when it should be in to be submitted on that day. System should be able to identify duplicate referral forms.

Reforms for the NRM: average decision making is far too long, implementing NABA and make the system more effective and decisions in more timely way. Devolved pilots for decision making.

#### UASC in Hotels: Lauren Starkey, Love 146

Thousands of unaccompanied asylum-seeking children (UASC) going through hotels, hundreds have gone missing, and many haven't returned. Two-part vulnerability: children trafficked into the UK and are at risk of traffickers picking them up and the location of the hotel made public. Conditions within the hotels are dire. Children have been found across the country missing from the South Coast. Criminal gangs are ruthless.

Home Office policy is being used to keep children enslaved. Children are being told they will be sent back to Albania. Child trafficking is child abuse and needs to be separated from immigration concerns. Children being treated differently to children with status, not being looked after professionals

Love 146 is asking for the immediate end of hotels to accommodate children. The national transfer scheme needs to be taken away from the Home Office, this has to be separate for the function of immigration enforcement. Care for children belongs with the Department for Education.

There is a need for specialist funding for local authorities to get expert knowledge from NGOs on child trafficking. Stronger response is needed from the sector on the scapegoating of Albanians because no one is gaming the modern slavery system – the point of the modern slavery Act is to identify victims.

#### UASC in Hotels: Debbie Jones, Kent Police

Kent has a multi-agency working group between the council and police.

Between April – Sept 2022 198 children went missing. 50% of these remained missing by November 2022. Majority of these within the Southeast county (covering the Chanel coastline, Dover and Folkstone) hotels are the most common premises children went missing from, two key hotels.

90% male between 15 – 17, mostly Albanian children 130, 18 Afghani children others from Iran and figures have been consistent across the months. Children have been dispersed across the country found by the police many in London.

What happens when they go missing isn't well communicated. Identified 5 who were exploited forced to sell drugs or in cannabis cultivation. There is an Intelligence gap on what happens when they go missing and the degree of their exploitation and a need for an end to end review.

### UASC in Hotels: Audience Comments

What measures is the MSU taking with your colleagues working on asylum policy to inform them of trafficking risks to children? This is an interconnected issue, and the scale and difficulty of the challenge is clear.

UASC going missing is happening outside of our legislation on children, and there are concerns with the Home Office acting as corporate parent.

We need to be more outraged on what is happening, this treatment of migrant children is a gift to traffickers. The sector hasn't been cross enough about this issue of missing children. What more can we do?

### FRO Capacity Concerns: Avril Sharp, Kalayaan

Kalayaan made an Urgent Public Announcement on 30 January 2023 in which we highlighted and flagged our concerns about the pressures facing First Responder Organisations across the UK, and the real life implications it will have, and already has had, on survivors of trafficking and modern slavery. Pressures facing FRO in terms of capacity means the NRM is near breaking point. Called for more non-statutory organisations to be made into FROs and a transparent process on how to apply. Kalayaan noted that 20 migrant workers who have been trafficked have not been able to be referred into the NRM due to capacity issues.

The full speech can be found [here](#), along with the full [report](#).

### AOB

- Calls for improvement to stakeholder engagement with the Home Office
- Regulation of post-16-year support placements (support article 39)
- Launch of the Home Affairs Committee investigation: deadline for written submissions is the 17<sup>th</sup> of March
- Question around negative decisions based on objective factors for victims before changes came in.
- Concerns around survivors with criminal convictions