

Human

Trafficking

Foundation

The Key Issue: Housing for Survivors of Modern Slavery



**An overview of the housing
landscape for survivors of
modern slavery and exploration
of a Whole Housing Approach**

THE KEY ISSUE: HOUSING FOR SURVIVORS OF MODERN SLAVERY

An overview of the housing landscape for survivors of modern slavery and exploration of a Whole Housing Approach

Published:

October 2023

ACKNOWLEDGEMENTS

Thank you to Commonweal Housing Trust for your funding, guidance and support of this report. The Human Trafficking Foundation is grateful to Standing Together Against Domestic Abuse for enabling exploration of the Whole Housing Approach. Thank you to members of the Lived Experience Advisory Panel for your expert insights and to all partners who engaged in the consultation for this report, including members of the National Network Coordinators' Forum and the Anti-Slavery London Working Group, frontline staff from accommodation providers, professionals from domestic abuse organisations, government departments and various local authorities across the country.

Front cover photo:

FabioBalbi - iStockphoto

CONTENTS

	<i>Page</i>
Foreword	4
Glossary	5
Introduction	7
Methodology	8
Context	9
The Housing Landscape for Survivors of Modern Slavery	12
• Emergency Accommodation	14
• Temporary Accommodation	16
• Long-Term Accommodation	20
Challenges with Accommodation	21
• Location	21
• Stability	22
• Suitability	23
• Personal Agency	24
• Accountability	24
• Challenges for Local Authorities	25
Whole Housing Approach	26
• Overview	26
• Benefits of the Whole Housing Approach	28
• Limitations of the Whole Housing Approach	30
• Creating a Whole Housing Approach for Modern Slavery	30
Recommendations	32
Summary of Recommendations	38
Conclusion	39

FOREWORD

Having permanent housing means you can now have a sense of identity and belonging, a place to feel safe from everything and everyone in the world. A set of keys means freedom from not having someone tell you when to go out or come back home. A place where you can put your unique touch to suit you. For a survivor to have permanent housing is a step towards long-term wellness, hope and achievement.

We talk a lot about justice. Housing is justice. Even after escape from exploitation, being moved between different accommodation is still someone else being in control.

What is your address? Where's your proof of address? What about your previous addresses? These are some of the questions that come up time and time again. We go around in these cycles, homeless/ intentionally homeless/ not homeless/ local connections, 'this isn't a housing issue' or 'this is a housing issue'. It's tiring.

Having a safe place and an address after so long changes everything.

Simple things like registering with a GP, having a place for correspondence, having a discharge address from the hospital, the ability to open a bank account. Whilst these are the practical elements to it, more than anything, it's about having a 'safe' place. A place where you can sleep, cook, dance, read, have fresh bedding and feel valued and warm. Somewhere you can unpack, so you don't have to live out of a suitcase or get ready to move on. Somewhere you can just breathe.

People think that housing and accommodation is a given, but it really is not – the feeling of not knowing where you will end up is scary. It can be applications,

waiting, politics between housing officers, all while your belongings are in a black bin liner and all you want is a place to rest with a lock on the door. True recovery only starts when you know you will have a safe place to start that process.

Adequate housing is not just a human right it's also a social and cultural right. It's striking how many survivors have found access to adequate housing such a huge issue. This can set back healing from their trauma. A good home is the starting point of stability and security. Having a key to safe accommodation is more than something to unlock the door; it can unlock future dreams.



Lived Experience Advisory Panel

The Lived Experience Advisory Panel (LEAP) ensures the expertise of those with lived-experience is embedded in the work of the anti-trafficking sector. The LEAP is made up of independent consultants who co-work on commissioned projects and training requests.

GLOSSARY

HUMAN TRAFFICKING

Human trafficking is the transportation, harbouring or receipt of persons (Act), via deception threats or coercion (Means), for exploitation (Purpose). The Means does not need to be present to constitute child trafficking.

MODERN SLAVERY

Modern slavery is an umbrella term which encompasses human trafficking, slavery, servitude, and forced or compulsory labour.

NATIONAL REFERRAL MECHANISM (NRM)

The NRM is defined by the Modern Slavery Statutory Guidance as ‘the UK’s framework for identifying and supporting victims of modern slavery. It is one means of ensuring that adult victims receive the necessary support and assistance in the period immediately after their identification as a potential victim.’¹ Child victims of modern slavery must be referred to the NRM, whereas adult victims of modern slavery must give informed consent to be referred. A referral can only be made by a First Responder Organisation. For adult victims, the NRM provides support through the Modern Slavery Victim Care Contract (MSVCC).

FIRST RESPONDER ORGANISATION (FRO)

An organisation that is authorised to refer a potential victim of modern slavery into the National Referral Mechanism such as the police, local authorities, Gangmasters and Labour Abuse Authority, immigration authorities and specific charities.

MODERN SLAVERY VICTIM CARE CONTRACT (MSVCC)

The Home Office contract to provide care to adult victims of modern slavery in England and Wales to help meet their recovery needs. The contract is currently held by The Salvation Army and delivered by The Salvation Army and a number of specialist sub-contractors. The MSVCC includes access to safe accommodation (where needed), interpretation and translation services, financial support, help and advice through a support worker, healthcare, legal advice and transport to important appointments.²

COMPETENT AUTHORITIES

The Single Competent Authority and the Immigration Enforcement Competent Authority are teams within the Home Office and the decision-making bodies responsible for making the NRM reasonable grounds decisions and conclusive grounds decisions.

REASONABLE GROUNDS DECISION

The first-stage NRM decision made by the competent authorities as to whether the decision maker agrees there are reasonable grounds to believe, based on all available general and specific evidence but falling short of conclusive proof, that a person is a victim of modern slavery. A positive reasonable grounds decision, gives an adult access to support under the MSVCC.

CONCLUSIVE GROUNDS DECISION

The second-stage NRM decision made by the competent authorities as to whether, on the balance of probabilities, there are sufficient grounds to decide that the individual being considered is a victim of modern slavery.

¹ Home Office, [Modern Slavery: Statutory Guidance for England and Wales](#) (Version 3.4, July 2023)

² The Salvation Army, [New 2021 Victim Care Contract](#) (January 2021)

RECOVERY NEEDS ASSESSMENT (RNA)

The RNA is conducted after a positive conclusive grounds decision to allow support workers to work with victims in developing recommendations for support through the MSVCC or other services where they have ongoing recovery needs arising from their modern slavery experiences.

ABBREVIATIONS

- (CCR) Coordinated Community Response
- (DAHA) Domestic Abuse Housing Alliance
- (DLUHC) Department for Levelling Up, Housing and Communities
- (ECAT) European Convention on Action Against Trafficking in Human Beings
- (HMPPS) His Majesty's Prison and Probation Service
- (IDVA) Independent Domestic Violence Advocate
- (IMSA) Independent Modern Slavery Advocate
- (LHA) Local Housing Allowance
- (MACC) Multi-Agency Case Conference
- (MSVCC) Modern Slavery Victim Care Contract
- (NRM) National Referral Mechanism
- (NRPF) No Recourse to Public Funds
- (WHA) Whole Housing Approach

Note on Language

This report will use the term 'survivor' to refer to individuals who have experienced human trafficking or modern slavery. While the term 'victim' is often used as it clearly indicates that an individual who has experienced human trafficking or modern slavery is a victim of crime, those who are no longer being exploited may find the term 'victim' limiting and potentially disempowering. In instances where the term 'victim' is used, this will be in reference to the National Referral Mechanism, for example using the term 'potential victim', as used in the Modern Slavery Statutory Guidance, to describe the point of entering the NRM.

INTRODUCTION

Housing and modern slavery are inextricably linked. During the experience of exploitation, both privacy and home are often denied; in many cases, spaces that facilitate abuse are where survivors are forced to reside, offering no respite from the exploitation they face. For this reason, escaping modern slavery often means risking homelessness or destitution.

The quality of recovery progress relies on access to safe and appropriate accommodation.³ However, challenges persist with both accessing this accommodation and the suitability of the accommodation on offer. An absence of accommodation options can be a driver for survivors to remain with, or return to, their perpetrator when the alternative is risking homelessness. For those individuals in accommodation that is unsuitable or insecure, this can have a negative impact on mental health and overall recovery.⁴

Accommodation should be a place of sanctuary from exploitation and hope for a different future, free from exploitation and abuse. Without adequate, long-term housing options alongside access to services and wrap-around support, a survivor's recovery journey can be impeded as they are left in a transitional state between exploitation and regaining autonomy.

This report aims to raise the profile of the housing injustice that both British and foreign national survivors of modern slavery experience in England and Wales and examines whether the Whole Housing Approach (WHA) to domestic abuse could be used as a framework to provide solutions to improve housing options for survivors of modern slavery. It offers recommendations for changes in policy and for considering a

whole system response that encompasses multiple key agencies to address gaps in housing practice and learn from the response to domestic abuse to achieve better long-term outcomes for survivors.

There are pockets of innovative practice in the response to housing for survivors of modern slavery and this report highlights some of these. It also seeks to explore best practice outside of the modern slavery sector, by recognising there are challenges in accessing accommodation for survivors of other crimes too; specifically looking to domestic abuse in this instance for learning that can be replicated for modern slavery.

The Whole Housing Approach (WHA) is a framework for addressing the housing and safety needs of survivors of domestic abuse in a local area, that acknowledges that wrap-around support and suitable accommodation must be delivered in tandem for a survivor's recovery. The model brings together under one umbrella all the main housing tenure types alongside the housing options and support initiatives needed to help people to either maintain or access safe and stable housing. It equips key agencies responsible for housing survivors with the knowledge on how to best support an individual find a safe home and mobilises both social and private landlords to do so.

³ Organisation for Security and Co-operation in Europe, [National Referral Mechanisms: A Practical Handbook](#) (January 2022)

⁴ Human Trafficking Foundation, [The Slavery and Trafficking Care Standards](#) (October 2018)

Whilst comparisons between the response to modern slavery and domestic abuse will be drawn in this report, it must be acknowledged that for survivors of domestic abuse, access to support services to aid recovery is not dependent on a two-staged decision-making process in which the Home Office assesses their credibility as a victim of a crime, like in the case of modern slavery. One of the major differences in the support available for survivors of domestic abuse and survivors of modern slavery is the Modern Slavery Victim Care Contract (MSVCC), which means support for survivors of modern slavery is centralised and provided through a national

scheme. There are pros and cons to both approaches; whilst support is available for adult victims of modern slavery who receive a positive reasonable grounds decision within the NRM, a centralised system of support can lead to disengagement on a local level. For domestic abuse, as there is not a national government contract in the same sense, the support available may be less standardised, although the commissioning is stronger on a local level, with specific funding for tier one local authorities to support survivors and their children residing in refuges and other safe accommodation provided through the Domestic Abuse Act 2021.^{5, 6}

METHODOLOGY

This report was made possible due to the generous funding and support from Commonweal Housing and draws upon consultations with Standing Together Against Domestic Abuse who deliver the Whole Housing Approach for survivors of domestic abuse, the expert knowledge of the Lived Experience Advisory Panel (LEAP) and interviews and discussions with key stakeholders; including local authority representatives, NGOs that work with or accommodate survivors of modern slavery and Coordinators of Anti-Slavery Partnerships from The National Network Coordinators' Forum. The report was also produced on the basis of the findings from a housing roundtable conducted by the Human Trafficking Foundation in 2021, which identified both the challenges of securing housing for survivors and began the consideration of alternative avenues. A desk-based review of existing literature also informs the findings exhibited in the report. This report is not an academic study and therefore would welcome a full assessment of the housing need for survivors. Data on housing for survivors of modern slavery is not widely available or centrally recorded and so further consideration should be given to addressing this, alongside analysis of existing data.

⁵ Domestic Abuse Act 2021

⁶ Home Office, [Local authority support for victims of domestic abuse \(2022\)](#)

CONTEXT

UK'S HOUSING CRISIS

This report identifies the housing issues experienced by survivors of modern slavery and the need to reform processes to improve access to safe accommodation. However, the barriers to stable housing addressed in the report exist within the wider context of the UK's housing crisis. Shelter estimates that 17.5 million people have been affected by the UK's housing crisis, living in overcrowded, dangerous, unstable or unaffordable housing.⁷ The UK has seen stark increases in rent costs across the private rented sector, long waiting lists for social housing due to a lack of stock and soaring levels of homelessness.

This report offers recommendations that could be implemented within the context of the housing crisis. To alleviate the wider issues presented in this report, central government must prioritise building more social housing to address deepening issues of homelessness and families left in limbo on waiting lists and in temporary housing.

ILLEGAL MIGRATION ACT

This report was written as the Illegal Migration Bill passed through parliament but before the whole Act came into effect and therefore before the impact has been fully understood. However, the likely effect this legislation will have on the ability of survivors of modern slavery, without secure immigration status in the UK, to access accommodation cannot be underestimated. The Illegal Migration Act 2023⁸ means that anyone who enters the UK via irregular means can be subject to detention and removal, irrespective of if they

were trafficked to the UK or came to seek asylum. It also disappplies modern slavery protection and support for this cohort of individuals except in certain circumstances. This is likely to prevent survivors coming forward as they will not be able to access support under the Modern Slavery Victim Care Contract (MSVCC) and will be subject to removal. Threats of deportation that traffickers use to keep victims in exploitation are likely to be realised under this Act. If victims do escape, they will not be able to seek asylum in the UK, have no access to support under the MSVCC and there will likely be limited consideration of their trauma when they are detained or housed ahead of removal. Furthermore, the Act extends the public order disqualification introduced under the Nationality and Borders Act 2022 to include foreign nationals with any length of custodial sentence, preventing them from receiving protection or support.⁹ This is despite the high volume of survivors of criminal exploitation who are forced to commit crimes under duress.¹⁰ With regards specifically to accommodation, it is unclear what the Illegal Migration Act will mean operationally but it is likely that survivors of modern slavery who arrived via irregular means will not be entitled to MSVCC safe house provision, asylum accommodation or local authority housing, leaving them in an insecure position and undermining their recovery.

CHILDREN

This report focuses on addressing the gaps in housing provision for survivors of modern slavery who are aged 18 years or over. Local authorities' children's services have a statutory responsibility to ensure all victims and survivors of modern slavery

⁷ Shelter, [Denied The Right to A Safe Home](#) (May 2021)

⁸ [Illegal Migration Act 2023](#)

⁹ [Nationality and Borders Act 2022](#)

¹⁰ Home Office, [Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, Quarter 1 2023 – January to March](#) (May 2023)

under the age of 18 are appropriately accommodated.¹¹ However, it must be noted that there are unique challenges in the provision of accommodation for child victims and for children who are at risk of exploitation, which fall out of scope of this report but require acknowledgement. For example, children who are unaccompanied and seeking asylum are currently housed in Home Office run hotel accommodation, outside of the child welfare system and unsuitable for unaccompanied children as they are not adequately safeguarded, often go missing and are at high risk of trafficking.¹² In one Home Office run hotel in Brighton, 137 unaccompanied children have been reported missing and many of these children have not yet been found.¹³ Furthermore, age-disputed children deemed to be 18 or over may be placed in asylum accommodation with unknown adults, putting them at risk. In addition, children who live with family and have experienced non-familial exploitation often face barriers in escaping their exploitation due to challenges around rehousing an entire family and there are additional concerns relating to children when they turn eighteen and are deemed to be adults, and risk falling through gaps in support and accommodation.

WHAT CONSTITUTES APPROPRIATE AND SECURE ACCOMMODATION?

Throughout the desk-based research and partner conversations conducted for this report, reference was made to safe, appropriate and secure accommodation. It is notable that there does not appear to be a universally agreed definition for what is meant by these terms.

Article 12 of the European Convention on Action Against Trafficking (ECAT), which sets out the UK's obligations, outlines the need to provide survivors with 'appropriate and secure accommodation'.¹⁴ Whilst there is no specific definition or measurement of appropriate and secure, the ECAT Explanatory Report observes that the type of appropriate accommodation is dependent on the survivor's individual circumstances and advises that safehouses are 'especially suitable' as they can react to emergencies, provide security measures and qualified staff.¹⁵

In the accommodation standards for the Modern Slavery Victim Care Contract, survivors must be housed in accommodation that is safe, habitable, fit for purpose (appropriate) and correctly equipped.¹⁶ The examples described under Safe Accommodation refer to basic standards, such as no gas leaks or flooding, rather than specific safety requirements for survivors of trafficking, such as safety from their trafficker or re-exploitation. The Organisation for Security and Cooperation in Europe (OSCE) NRM Practical Handbook states the 'provision of safe and appropriate accommodation for victims of trafficking [...] is integral to ensuring victims' safety from re-trafficking, maintaining their consistent contact with essential services, supporting their sustained recovery and therefore their gradual social inclusion and financial independence'.¹⁷

Some partners find the lack of agreed definition helpful as it allows flexibility and what is appropriate accommodation for one survivor may not be the same for another. Others suggested it makes it hard to enforce a high standard of housing

¹¹ Department for Education, [Care of unaccompanied migrant children and child victims of modern slavery Statutory guidance for local authorities](#) (November 2017)

¹² Every Child Protected Against Trafficking, [Home Office announcement on use of hotels for unaccompanied children](#) (September 2022)

¹³ [Brighton and Hove Children Safeguarding Partnership, Statement – UASC Scrutiny Paper](#) (February 2023)

¹⁴ [Council of Europe Convention on Action Against Trafficking in Human Beings](#) (May 2005)

¹⁵ Council of Europe, [Council of Europe Convention on Action against Trafficking in Human Beings and its Explanatory Report](#) (2005)

¹⁶ Home Office, [2020 Modern Slavery Victim Care Contract Schedule 2.3](#)

¹⁷ Organisation for Security and Co-operation in Europe, [National Referral Mechanisms: A Practical Handbook](#) (January 2022)

options or challenge a provider's claim that accommodation is appropriate if a survivor does not deem it to be so. For example, The HMPPS Modern Slavery Prisoner Needs Assessment refers to prison accommodation for survivors of modern slavery as 'appropriate and secure'¹⁸, which may not always be the case. Many survivors live in accommodation outside of the Care Quality Commission inspection framework (discussed later in the report) and rely on the advocacy of legal professionals or support workers in order to be moved out of accommodation they deem to be inappropriate or insecure, which is often lengthy and can be traumatic.

The Modern Slavery Core Outcome Set (MSCOS), produced with those with lived experience of modern slavery, identified secure and safe housing as one of the fundamental needs for survivor recovery, wellbeing and integration.¹⁹ Housing was ranked in the MSCOS study as a higher priority than 'safety from any trafficker or other abuser' as the two are intertwined; housing is a fundamental component for safety. This report will look to both the Slavery and Trafficking Survivor Care Standards chapter on the provision of safe accommodation and the MSCOS study descriptor as benchmarks of evaluating housing options for survivors to consider whether they constitute safe and stable accommodation in the absence of an agreed upon definition.²⁰

“Survivors should live in a place they can call home, where they feel safe and secure, can exercise freedom and independence, and live without suffering, abuse, or exploitation. Housing should offer private personal space, be hygienic, have enough peace to be able to rest and sleep, and preclude worries about being evicted. Key outcome features include: safehouse accommodation being gender-sensitive, allowing for the proper investigation of complaints, having cooking and cleaning facilities, not being overcrowded, and being a place where survivors feel respected.”

- MSCOS study descriptor.²¹

¹⁸ HM Prison & Probation Service, [Modern slavery prisoner needs assessment 1.0](#) (October 2022)

¹⁹ Modern Slavery Core Outcome Set, [Secure and Suitable Housing](#).

²⁰ Human Trafficking Foundation, [The Slavery and Trafficking Care Standards](#) (October 2018)

²¹ Modern Slavery Core Outcome Set, [Secure and Suitable Housing](#)

THE HOUSING LANDSCAPE FOR SURVIVORS OF MODERN SLAVERY

The National Referral Mechanism (NRM) is the government’s framework for identifying victims of modern slavery and was introduced in 2009 to fulfil the government’s obligations under the European Convention on Action Against Trafficking (ECAT). Adults must consent to be referred to the NRM and it is a designated First Responder Organisation, such as the police, local authority, immigration authorities or specialist charities, which make the referral. Upon receiving the referral form, the Competent Authorities within the Home Office have five days to decide whether there are ‘reasonable grounds’ to suspect an individual is a victim of modern slavery. After receiving a positive reasonable grounds decision, an adult survivor will be entitled to support under

the Modern Slavery Victim Care Contract (MSVCC) during a minimum 30 day ‘reflection and recovery’ period. Following this, a secondary decision is made by the Competent Authorities which determines whether there are ‘conclusive grounds’ to believe the individual is a victim of modern slavery. With a positive conclusive grounds decision, a victim will be eligible for a period of ‘move on’ support to bridge the shift to services outside of the MSVCC and a Recovery Needs Assessment (RNA) will be undertaken to assess their ongoing needs in relation to their trafficking experience. In practice, the ‘reflection and recovery’ period before a conclusive grounds decision is markedly longer than 30 days. In 2022, the average timeframe was 543 days.²²

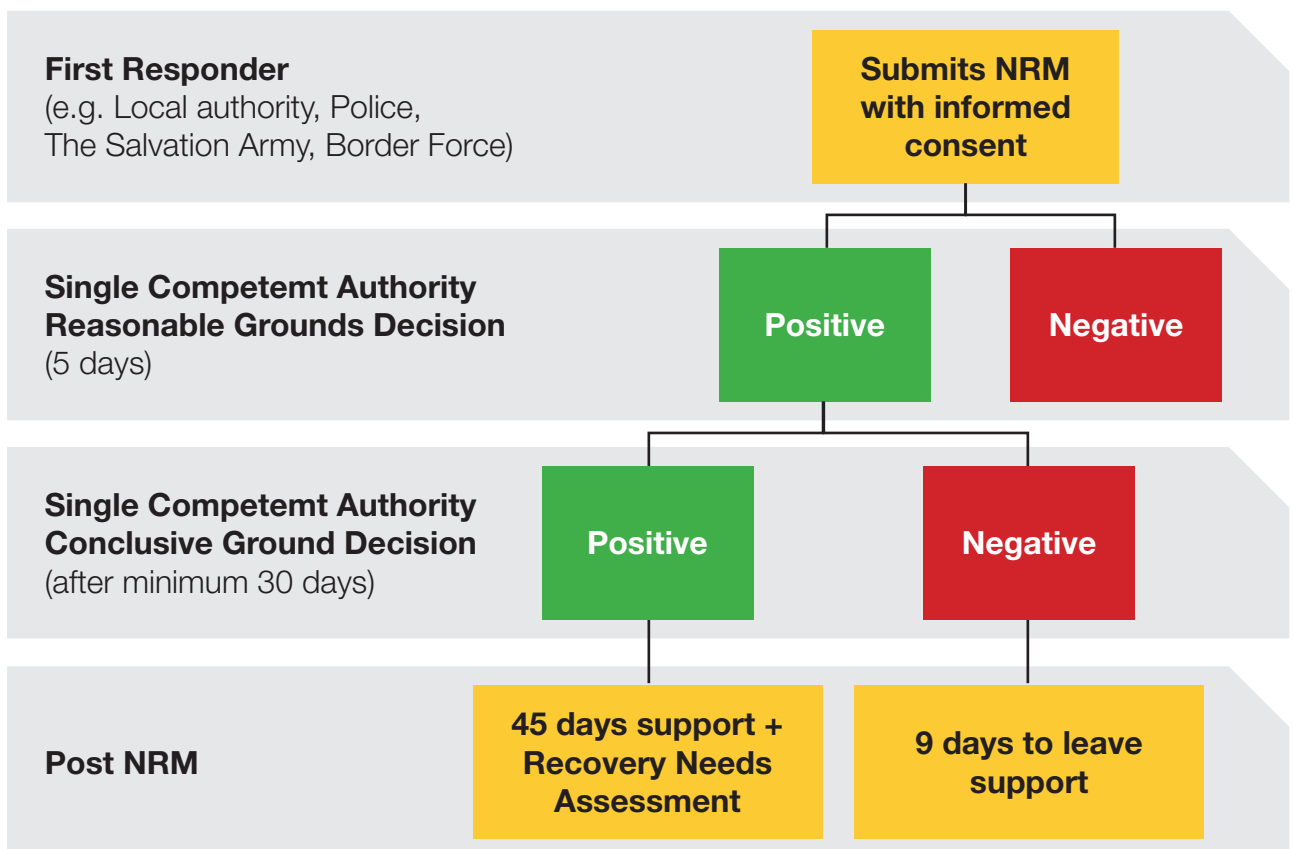


Diagram showing NRM process

²² Home Office, Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2022 (March 2023)

Government-funded support under the MSVCC is currently provided and facilitated by The Salvation Army and its sub-contractors and is intended to be temporary.²³ It is based on requirements set out in Article 12 of ECAT and includes accommodation; financial support and material assistance; translation and interpretation services; information on rights and services; medical treatment, assistance and counselling; assistance during criminal proceedings; access to the labour market, vocational training and education (provided they have an immigration status that permits this); access to legal representation and legal aid; pursuing compensation; travel to appointments; assistance to return to home country if not a UK national; and support in transitioning to alternative support services.²⁴

Currently, ahead of the Illegal Migration Act coming into effect, survivors of modern slavery are entitled to MSVCC support regardless of their immigration status and where and when the exploitation took place. 16,938 children and consenting adults were referred to the NRM in 2022, of these 7,670 adults received a positive reasonable grounds decision and were therefore entitled to support under the MSVCC.²⁵ Not all individuals found to be victims engaged with the MSVCC and in some cases of destitution, individuals were supported ahead of receiving their reasonable grounds decision.

Whilst in the NRM, all adult victims should have access to appropriate and secure accommodation.²⁶ The type of accommodation will differ depending on the individual's circumstances. For example, according to the Modern Slavery Statutory Guidance, an individual is likely to be housed in asylum accommodation or local authority housing if they are eligible, or may live with family or friends.²⁷ Therefore, the vast majority of adult survivors in the

NRM receive outreach support from the MSVCC.²⁸ In a minority of cases, survivors will be housed in an MSVCC safe house 'on a temporary basis, to help lift victims out of situations of exploitation' if the MSVCC risk assessment process determines it 'necessary' due to a threat to safety from traffickers, (or including, but not limited to if the individual is destitute, or requires a single occupancy room or single sex accommodation owing to their modern slavery experience). For these parenthesised concerns, the guidance states the MSVCC may 'not provide accommodation if an existing accommodation provider can provide alternative accommodation to address this need'; suggesting that despite being the type of accommodation considered 'especially suitable' in the ECAT explanatory report, in most cases, an MSVCC safehouse is provided once all other options have been explored.^{29, 30}

There is a common misconception that the majority of adult victims of modern slavery will be housed in an MSVCC safehouse, when in reality it is quite the opposite. In September 2023, 13% (1,000) adult survivors were in MSVCC accommodation. 87% (6,837) were receiving outreach support.³¹ Therefore, rather than discuss accommodation within the stages of the NRM – which would also exclude those individuals who do not consent to the NRM or, since recent legislation, are now ineligible for the MSVCC – the following sections examine challenges for survivors in accessing:

- **Emergency accommodation:** *Immediate accommodation when fleeing exploitation*
- **Temporary accommodation:** *Intermediate solution, which may last a long time but is not a permanent home*
- **Long-term accommodation:** *Stable and sustainable accommodation*

²³ Home Office, Modern Slavery: [Statutory Guidance for England and Wales \(Version 3.4, July 2023\)](#)

²⁴ *ibid*

²⁵ Home Office, [Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2022 \(March 2023\)](#)

²⁶ [Council of Europe Convention on Action Against Trafficking in Human Beings \(May 2005\)](#)

²⁷ Home Office, [Modern Slavery: Statutory Guidance for England and Wales \(Version 3.4, July 2023\)](#)

²⁸ HM Government, [2020 UK Annual Report on Modern Slavery \(October 2020\)](#)

²⁹ Home Office, Modern Slavery: [Statutory Guidance for England and Wales \(Version 3.4, July 2023\)](#)

³⁰ Council of Europe, [Council of Europe Convention on Action against Trafficking in Human Beings and its Explanatory Report \(2005\)](#)

³¹ Human Trafficking Foundation, [Data Request to The Salvation Army \(September 2023\)](#)

EMERGENCY ACCOMMODATION

In many instances of modern slavery, victims reside at the place of exploitation, or their accommodation is provided by, or known to, their trafficker. This means that escaping modern slavery often means fleeing accommodation. At this point, survivors may end up sleeping rough, stay with people who encouraged or helped their escape or, in many cases, rely on homelessness services and local authorities to provide emergency accommodation. Survivors may be given a bed for the night in homeless hostels or hotels. Whilst this ensures they do not sleep on the street, hostels can be unsuitable due to the communal nature of this type of accommodation and the complex needs or potential substance misuse of other residents, and is often unable to provide wrap-around support and stability when a survivor needs it most. A survivor may remain in emergency accommodation until they have been assessed by the local authority for temporary accommodation, or claim asylum and are offered initial accommodation by the Home Office.

If, on escaping modern slavery, a survivor meets a First Responder who is aware of their duties and offers a referral to the NRM to which the survivor consents, the survivor can access an MSVCC safehouse as emergency accommodation prior to a reasonable grounds decision if 'they are destitute or at risk of becoming destitute, not eligible for local authority support, or where the available local authority support is not suitable'.³² However this is only once a referral to the NRM has been made, and an individual needs to feel safe to be able to disclose their situation to the First Responder and begin the referral.

The immediate needs of survivors must be met before they can make an informed decision about entering the NRM to ensure

a clear understanding of the implications. There is also the need for pre-NRM legal advice, which is currently out of scope for legal aid for the majority of survivors and yet even more pertinent given recent legislation. Without it, survivors may give consent to enter the NRM without thorough consideration or full understanding especially if they are not offered alternative options of accommodation and support. As many survivors of modern slavery are either destitute or residing in unsafe accommodation at the point of escape or identification, securing emergency accommodation, pre-NRM, is essential.³³ Safe emergency accommodation gives survivors respite and space to think through their next steps to recovery and whether a referral to the NRM is the best course of action for them. The West Midlands Anti-Slavery Network's Safe Place addresses this gap in the national service provision and offers emergency accommodation for up to 10 days for male survivors immediately after exploitation or identification so they can make a decision as to whether to enter the NRM and have time to explore alternative options.

'Pre-NRM accommodation is a key issue, accommodation is required before a client goes into the contract, some go into B&Bs and disappear, lost before they are able to access the system.' – West Midlands Anti-Slavery Network

The Nationality and Borders Act 2022 has meant that emergency pre-NRM accommodation is more critical than ever, as it changed the statutory guidance to require First Responders to submit 'objective factors' in the referral to the NRM to prove that exploitation occurred before the individual can receive a positive reasonable grounds decision. Gathering objective factors, such as medical

³² *ibid*

³³ The Passage, *Modern Slavery Service Annual Report 2021/22* (2022)

assessments or eye-witness reports, takes time and requires space and reflection with a survivor to do so. The impact of these changes were observable; in the first quarter of 2023 only 58% of reasonable grounds decisions were positive, compared to 85% in the previous quarter.³⁴ Following a judicial review challenge, the Home Secretary agreed to revise parts of the guidance,³⁵ meaning it changed again from ‘a decision maker must base their decision based on objective factors’ to ‘a decision maker should consider... all the information available, including the victim’s account and any other relevant information that supports or undermines it’ but objective evidence ‘will be afforded greater weight in the balancing exercise than subjective testimony’.³⁶ Without suitable accommodation, survivors may receive a negative reasonable grounds decision and be excluded from support under the MSVCC because they have nowhere safe to start to piece together evidence of their experience.³⁷ Despite this even greater need for safe accommodation prior to entering the NRM, the commitment to the provision of pre-NRM ‘Places of Safety’ announced by the Government in 2017 as part of the NRM transformation and included in the 2020 MSVCC is yet to be implemented.^{38, 39}

Following emergency accommodation, survivors are often moved into temporary accommodation. This may be provided by the local authority, through asylum services, or provided by charities and for a survivor’s recovery, it is important there are no ‘risk gaps permitted in transition between accommodation’.⁴⁰

³⁴ Home Office, Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, Quarter 1 2023 – January to March (May 2023)

³⁵ Duncan Lewis, SSHD withdraws new evidential test for ‘Reasonable Grounds’ decisions in Modern Slavery Statutory Guidance (June 2023)

³⁶ Home Office, Modern Slavery: Statutory Guidance for England and Wales (Version 3.4, July 2023)

³⁷ The Human Trafficking Foundation, Impact of the Nationality and Borders Act: Changes to the Reasonable Grounds Threshold (May 2023)

³⁸ Home Office, Modern slavery victims to receive longer period of support (October 2017)

³⁹ Home Office, 2020 Modern Slavery Victim Care Contract Schedule 2.1

⁴⁰ Organisation for Security and Co-operation in Europe, National Referral Mechanisms: A Practical Handbook (January 2022)

TEMPORARY ACCOMMODATION

MSVCC SAFEHOUSES

Much like refuges set up to support survivors of domestic abuse, safehouses offer specialist accommodation and are specifically tailored for survivors of modern slavery. Enshrined under The European Convention on Action Against Trafficking in Human Beings (ECAT), ‘appropriate and secure accommodation’ is a critical component of support offered under the NRM, and safehouses function as a temporary space for immediate protection after an experience of exploitation.⁴¹

The Care Quality Commission (CQC) is commissioned by the Home Office to inspect all MSVCC safehouses and outreach support for suitability in line with the Modern Slavery and Trafficking Survivor Care Standards.⁴² Through this inspection regime, it ensures MSVCC safehouses are held to a high standard in order to meet the needs of survivors. The CQC 2021-2022 inspection found safehouses were run by dedicated staff who provided personalised support to the survivors in their care. The CQC recommended improvements to the assessment of risks, suitability and accessibility of the safehouse estate but were overall positive about the provision.⁴³

MSVCC safehouses are crucial for many survivors and often have the benefit of on-site support. Survivors with no recourse to public funds (NRPF) have limited entitlement to accommodation and so an MSVCC safehouse may be the only housing option available. The number of survivors in MSVCC safehouses is small, with this often being offered when no other accommodation is available or can meet the person’s needs. In September 2023, there were 1,011 bed spaces within The Salvation Army accommodation services, which is subject

to change according to demand.⁴⁴ Due to the cost of accommodation, the majority of safehouses are located outside of London and if there is a known risk of a trafficker, a survivor will be offered a safehouse in a new area. This means that individuals who are offered an MSVCC safehouse may decide not to move as it means leaving family, friends and communities. Similarly, the rules and regulations that exist to keep tenants safe, such as operating a no-guest policy, or keeping the address private, mean that they are not suitable for everyone and survivors who are given the option may still decide to choose outreach support instead.

SAFEHOUSE ACCOMMODATION OUTSIDE OF THE MSVCC

Outside of MSVCC provisions, there are NGOs offering specialist safehouses and accommodation options, created in order to address the gaps in the accommodation available for survivors of modern slavery at all stages of their recovery journey. Many offer various levels of support and can be accessed without a positive decision from the NRM. Each has their own application process and criteria and are often dependent on signposting or referrals from other organisations. Hope at Home’s research review identified eight organisations outside of the MSVCC advertising within the region of fifty accommodation spaces for survivors in England and Wales.⁴⁵ The majority of these house women only, with the West Midlands Safe Place as the only male safehouse outside of the MSVCC, suggesting a gap in safehouse accommodation for men, who made up 78% of all referrals into the NRM in 2022.⁴⁶ Transgender and non-binary survivors may have additional accommodation support needs, which must be considered, and may risk exclusion on the

⁴¹ Council of Europe Convention on Action Against Trafficking in Human Beings (May 2005)

⁴² Human Trafficking Foundation, *The Slavery and Trafficking Care Standards* (October 2018)

⁴³ Care Quality Commission, *Services for Survivors of Human Trafficking and Modern Slavery* (January 2023)

⁴⁴ Human Trafficking Foundation Data Request to The Salvation Army (September 2023)

⁴⁵ Hope at Home and University of Nottingham’s Rights Lab, *Where Will I Live?* (August 2022)

⁴⁶ Home Office, *Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2022* (March 2023)

basis of gender or risks to safety if housed in shared accommodation. Some non-NRM safehouses have no or limited provision for survivors with no recourse to public funds (NRPF) due to the challenges of finding funders who will cover these bedspaces. Furthermore, safehouses are often not adapted for physical disabilities, meaning disabled survivors may have to rely on accommodation provided through the local authority, which may not address their needs relating to the experience of modern slavery.

MSVCC safehouses and specialist modern slavery accommodation are a lifeline for many survivors but are intended to be temporary and offer only part of the picture when evaluating the current landscape of housing options. The CQC inspection report observed that a key issue for survivors in MSVCC outreach support is 'access to and quality of accommodation.'⁴⁷ Despite this, the CQC has no remit to monitor how appropriate the provision of housing is outside of MSVCC safehouses. Interestingly, the length of time survivors spend in MSVCC support correlates to whether or not they are in an MSVCC safehouse or in outreach support. Survivors in an MSVCC safehouse spent an average of 284 days in service compared to an average of 626 days spent by survivors in outreach provision.⁴⁸

LOCAL AUTHORITY HOUSING

For those individuals with regularised immigration status eligible for local authority housing, they will likely need to apply at some point in their recovery journey irrespective of whether they have entered the NRM and which stage of the process they are. The Housing Act 1996, Care Act 2014 and Localism Act 2011 set out the statutory duties for local authorities to provide accommodation for those who require it, based on set eligibility criteria. Local authorities have a duty to consider

all the possible accommodation options for survivors of modern slavery on a case-by-case basis taking into account their specific circumstances and needs.⁴⁹

When receiving a homelessness application, local authorities can make inquiries into whether the person has a 'local connection' to the area they have applied to, meaning they should have lived for at least 6 months in the area during the previous 12 months, or for 3 years during the previous 5 year period. Where there is no local connection, the local authority can refer the person to another authority where they have a local connection, unless they would be at risk of violence or domestic abuse there.⁵⁰ Whilst this automatically exempts survivors of domestic abuse from the local connection criteria, survivors of modern slavery must prove they are fleeing violence or are at risk of re-trafficking when making a homelessness application in an area they are not connected to.

Across the UK there are lengthy delays on waiting lists for social housing: with two year waits the norm in some areas.⁵¹ As there is such high demand, there are set criteria people have to meet to be considered in 'priority need'. Survivors of modern slavery are also not explicitly referred to as 'priority need' for housing like survivors of domestic abuse have been since 2021, and instead an assessment of vulnerability is required before an individual is deemed a priority for housing and often their entitlements can be open to interpretation. In May 2020, the then Independent Anti-Slavery Commissioner Dame Sara Thornton wrote to the Minister for Safeguarding to encourage the government to extend the automatic grant of priority need status for victims of domestic abuse to victims of modern slavery but there was no commitment to this.^{52,53}

⁴⁷ Care Quality Commission, [Services for Survivors of Human Trafficking and Modern Slavery](#) (January 2023)

⁴⁸ The Salvation Army, [Supporting Survivors of Modern Slavery: Annual Report July 21- June 22](#) (October 2022)

⁴⁹ Department for Levelling Up, Housing and Communities, [Homelessness Code of Guidance for Local Authorities](#) (May 2023)

⁵⁰ *ibid*

⁵¹ Big Issue, [Revealed: At least 30,000 people have waited 10 years for social housing](#) (July 2022)

⁵² Independent Anti-Slavery Commissioner, [Letter to the Minister for Safeguarding](#) (May 2020)

⁵³ Minister for Safeguarding, [Reply to the Independent Anti-Slavery Commissioner](#) (July 2020)

ASYLUM ACCOMMODATION

If a person claims asylum and has nowhere to live, 'initial accommodation' is provided by the Home Office; often in a hostel or a hotel and increasingly other forms of emergency accommodation. Individuals may stay here for a number of months before being moved to new 'dispersal' accommodation elsewhere in the country under Section 95 Immigration and Asylum Act 1996. The Home Office is responsible for providing this and individuals have no choice as to where or how they are housed. When a person receives their refugee status, they are now only given seven days to find new accommodation, leaving people at risk of homelessness or precarious living situations.⁵⁴ Between January and September 2022, 4,575 people seeking asylum were referred to the NRM.⁵⁵ Asylum accommodation is not required to provide trauma-informed shelter and does not offer similar wrap-around support to safehouses, although those in the NRM are still entitled to outreach support.

If a survivor of modern slavery is in the NRM and already being housed in an MSVCC safehouse when they claim asylum, an Asylum Needs-Based Assessment will be undertaken to determine whether they should be moved to asylum accommodation or if they have specialist needs that can only be met in an MSVCC safehouse. The contract states that this decision can be rejected by the Home Office and a survivor should be transferred to asylum accommodation if it is clear their needs can be met there.⁵⁶

Poor responses to serious safeguarding issues in asylum accommodation are described by the British Red Cross as 'systemic' and concerns are consistently raised on the suitability of asylum

accommodation for survivors of modern slavery, as this is often a flat or a shared house, which in many instances is inappropriate and unsafe and has a serious, negative impact on mental health and wellbeing.⁵⁷

PRIVATE RENTED ACCOMMODATION

Many survivors of modern slavery do not have the financial means, references or a guarantor to enter the private rented sector and, as many survivors of modern slavery do not have the right to work, gaining the independence and financial stability to enter the private rented sector remains a challenge. Data on the number of survivors of modern slavery in the private rented sector is limited but it was identified as the third most common tenure type following exit from MSVCC support.⁵⁸ Similar to survivors of domestic abuse, survivors of modern slavery are restricted by the lack of private rented properties that are affordable on Local Housing Allowance (LHA) rates if they have recourse to public funds and are eligible for these benefits. However, changes were introduced to the Shared Accommodation Rate in October 2022 to ensure survivors of modern slavery under the age of 35 and living alone receive the higher one-bedroom LHA rate to improve access to suitable accommodation in the private rented sector.⁵⁹

IMMIGRATION DETENTION

Previously, survivors of modern slavery were only held in immigration detention in exceptional circumstances, but this changed under the Adults at Risk policy and survivors now have to evidence the harm detention would cause in order to make a case to be released.⁶⁰ 1,611 people in immigration detention were referred

⁵⁴ Refugee Council, [Thousands of new refugees face destitution](#) (2023)

⁵⁵ Home Office, [Annex: analysis of modern slavery NRM referrals from asylum, small boats and detention cohorts](#) (May 2023)

⁵⁶ Home Office, [2020 Modern Slavery Victim Care Contract Schedule 2.1](#)

⁵⁷ British Red Cross, [Far from A Home](#) (April 2021)

⁵⁸ The Salvation Army, [Supporting Survivors of Modern Slavery: Annual Report July 21-June 22](#) (October 2022)

⁵⁹ Department for Levelling Up, Housing and Communities, [Ending Rough Sleeping for Good](#) (September 2022)

⁶⁰ Home Office, [Management of adults at risk in immigration detention](#) (December 2022)

into the NRM in 2021.⁶¹ Research by the Helen Bamber Foundation demonstrates that detainees experience a high level of anxiety, depression and post-traumatic stress disorder during and post detention.⁶² Furthermore, the Independent Chief Inspector of Borders and Immigration's inspection of adults at risk in immigration detention, found that Rule 35, which intends to identify and safeguard those in detention who are particularly vulnerable, was 'not working consistently or effectively.'⁶³ Being in detention treats people as immigration offenders first and survivors of modern slavery second and does not enable survivors of modern slavery to access their wider entitlements in the reflection and recovery period under ECAT. Women for Refugee Women found that by keeping survivors of modern slavery in detention, the Home Office is refusing to protect survivors of trafficking, and is deliberately inflicting further harm and distress on them.⁶⁴

PRISONS

Similarly, for survivors in the NRM in prison, access to entitlements such as a support worker, legal representation and mental health support is limited.⁶⁵ Much like in the cases of survivors in immigration detention, prisons do not meet the MSCOS descriptor for a safe, stable place to recover from abuse and exploitation. Survivors of modern slavery may also serve prison sentences because of crimes they are forced to commit under duress while being criminally exploited; a third of adults referred into the NRM reported they were forced to commit crimes during their experience of modern slavery.⁶⁶ Following a settlement of a judicial review claim brought by ATLEU, guidance was published in March 2023 for prison staff on their duties to support survivors of modern slavery who have been sentenced

and ensure needs are assessed and prison staff liaise with partner agencies.⁶⁷

FRIENDS AND FAMILY

A large cohort of survivors are supported by peer networks throughout their recovery journey, and it is clear from The Salvation Army data that staying with family or friends after exiting MSVCC support is common.⁶⁸ Whilst cohabiting with friends or family after a period of exploitation can be a supportive space for recovery, this cohort also accounts for survivors in informal temporary living situations that do not necessarily offer independent living, privacy or long-term stability. In some cases, living with friends and family could also account for 'sofa surfing' in unstable locations or situations that can become exploitative if the survivor feels they are indebted to the person providing accommodation. Survivors with NRPF may stay with friends and family due to limited alternatives available to them. Without the stability of one's own home and an over reliance on others to provide shelter there is a risk of vulnerability to further exploitation or abuse.

⁶¹ Helen Bamber Foundation, [Abuse by the System: Survivors of Trafficking in Immigration Detention](#) (October 2022)

⁶² Helen Bamber Foundation, [The Impact of Immigration Detention](#) (September 2022)

⁶³ Independent Chief Inspector of Borders and Immigration, [Third annual inspection of 'Adults at risk in immigration detention'](#) (January 2023)

⁶⁴ Women for Refugee Women, [From one hell to another](#) (2019)

⁶⁵ Anti Trafficking and Labour Exploitation Unit, [New modern slavery guidance for prison staff](#) (July 2022)

⁶⁶ Modern Slavery Policy and Evidence Centre, [People with lived experience of modern slavery in UK prisons](#) (November 2022)

⁶⁷ HM Prison and Probation Service, [Modern Slavery Guidance](#) (February 2023)

⁶⁸ The Salvation Army, [Supporting Survivors of Modern Slavery: Annual Report July 21-June 22](#) (October 2022)

LONG-TERM ACCOMMODATION

Whilst survivors of modern slavery may remain in any of these forms of accommodation for years and come to call them home, few of the options above constitute as long-term, stable accommodation and meet the MSCOS descriptor. Little is documented about survivors of modern slavery who own, or go on to buy, a house.

For both survivors with and without secure immigration status in the UK, a positive conclusive grounds decision from the NRM rarely means a widening of housing options. Whether or not they have been through the NRM, survivors who are British nationals or have residency continue to be eligible for local authority housing support if they meet the criteria, and for those without secure immigration status, an NRM decision does not automatically grant Leave to Remain in the UK so options remain limited to asylum support, returning to country of origin, informal housing arrangements with family or friends or shelter provided by NGOs.

The Salvation Army identified that of the 1,724 individuals who had moved on from the MSVCC support in 2021-22, 506 (29%) of survivors were living in either private accommodation, social housing provided by local authorities or NGO supported accommodation.⁶⁹ The highest proportion of survivors, 509 (30%) individuals, were in asylum support as they awaited a decision on their asylum claim. Others were in different potentially unstable housing arrangements, with 401 (23%) individuals living with family, friends or partners and 188 (11%) who had disengaged from support or deemed missing. Further individuals were identified as hospital patients, in prisons or had not secured accommodation. Many of these categories do not constitute secure

and stable housing as they are temporary arrangements, suggesting that for survivors of modern slavery post-NRM, when the support under the MSVCC stops, there is a high risk of hidden homelessness and transitory states of living.

Corroborating this is the 2021 Crisis study of those who had experienced both modern slavery and homelessness.⁷⁰ Of the total 331 individuals in the study, one in five were still homeless once they had exited the NRM and more than four-fifths had not been able to secure long-term accommodation. A large volume of survivors are not able to access appropriate housing post-NRM meaning that this recovery need has not been addressed and without this, a survivor's vulnerability to re-trafficking is high.⁷¹ For the NRM to fulfil its intended purpose to act as a bridge out of exploitation and set adult victims on a pathway to rebuilding their lives, survivors must have the option of safe, suitable accommodation, which 'preclude worries about being evicted' and must not be exited from the MSVCC support until stable long-term accommodation is secured.⁷²

⁶⁹ The Salvation Army, [Supporting Survivors of Modern Slavery: Annual Report July 21- June 22](#) (October 2022)

⁷⁰ Crisis, [No Way Out and No Way Home: modern slavery and homelessness in England, Wales and Northern Ireland](#) (May 2021)

⁷¹ Human Trafficking Foundation, [Day 46: Is there Life after the Safe House for Survivors of Modern Slavery?](#) (October 2016)

⁷² Modern Slavery Core Outcome Set, [Secure and Suitable Housing](#)

CHALLENGES WITH ACCOMMODATION

‘We are replicating a journey where the person has no choice and no input into decisions made about themselves’
– The Snowdrop Project.

LOCATION

In cases of both modern slavery and domestic abuse, the location of accommodation is critical in terms of survivor safety and integration into community. This remains a challenge and, at all stages of the NRM and outside of the NRM, survivors of modern slavery face a dilemma of being placed in accommodation in the locality they were previously exploited, or far from their existing support networks and services. This is often compounded by the availability of safehouses, asylum accommodation and local authority housing stock.

The MSVCC Housing Standards requires accommodation to be suitably located for survivors to access statutory and other services and facilities on a day-to-day basis.⁷³ Despite this, survivors report issues with accommodation offered in rural areas without transportation links to ensure they can get to appointments, along with what they determined a lack of cultural consideration when they were moved to a rural area with no access to supermarkets selling familiar foods or local places of worship.

Case Study

‘We get survivors to independence but then there is nowhere to house them.’

Caritas Bakhita House is a safe temporary home in London sitting outside of the MSVCC, that supports women in their recovery from human trafficking through mentoring, financial and legal assistance and help in accessing accommodation. One survivor supported by Caritas Bakhita House was in employment and ready to move on into a more permanent living situation but could move out of the safehouse because there was nowhere in London that she could afford to move to. Her recovery needs mean she will always need support from Caritas Bakhita House due to the nature of her trafficking experience and she has a strong support network in London; because of this she is stuck, unable to move on to live independently.

For survivors of modern slavery eligible for local authority housing, a barrier to access is the local connection condition which requires individuals to have a six-month connection to the area. In many cases, a local connection would require a survivor to return to an area where they experienced exploitation, which would not

⁷³ Home Office, [2020 Modern Slavery Victim Care Contract Schedule 2.3](#)

be safe. In other cases, where it is safe for a survivor to remain in a locality, there are challenges in proving a local connection due to a lack of evidence owing to the informality of the housing arrangements during their exploitation. The risks of re-trafficking are still not widely understood by local authorities, despite the Homelessness Code of Guidance explicitly highlighting this, and can lead to survivors of modern slavery being housed in unsafe areas either in danger from their original trafficker or new exploiters within a community.⁷⁴ There are examples of British survivors being found by their traffickers, furthering risk of re-exploitation and harm to themselves and their family.⁷⁵

Unlike survivors of modern slavery, survivors of domestic abuse should not face this barrier as they are specifically exempt from proving local connection for homelessness assistance.⁷⁶ However, when relocation is necessary, this can cause complications for survivors of both forms of abuse. When local authorities deem it unsafe to house a survivor in their area, they frequently report issues with convincing another local authority of their duties when making a referral for relocation. Aware of similar issues for domestic abuse, in 2022 the Government ran a consultation to consider 'introducing regulations to enable victims of domestic abuse who need to move to another local authority district to escape domestic abuse to qualify for an allocation of social housing in the new area, and; how local authorities are making use of the existing legislation and guidance to support victims who wish to move within and across local authority boundaries.'⁷⁷

Case study

A local authority accepted housing responsibility for a young man with a positive conclusive grounds decision. The young man gave the council a list of areas he did not feel safe living as he knew criminal gangs linked to his exploitation operated there. The council offered him accommodation in one of these areas and when he objected, he was asked to prove he was at risk of re-trafficking. The council came from a position of distrust, despite his NRM positive conclusive grounds decision; and did not believe that the man was in danger of further exploitation. His solicitor provided data of criminal gangs from the same nationality operating in the area he was being offered housing but the council refused this as proof he would be re-trafficked. The man was placed in temporary accommodation to wait again for an outcome to determine his future.

STABILITY

'The gaps in housing mean that survivors experience real desperation before being housed.' - Lived Experience Advisory Panel Consultant

The instability of accommodation is also evident as a survivor can be relocated multiple times while in MSVCC safehouse provision, asylum accommodation or social housing even during their period of recovery in the NRM. Only once a tenancy is coming to an end in a safehouse or asylum accommodation can a survivor make a homeless application to the local authority which often means survivors are subjected to further moves as they are placed in temporary accommodation in the interim. It also means they face further uncertainty, not knowing where they are going to sleep;

⁷⁴ Department for Levelling Up, Housing and Communities, [Homelessness Code of Guidance for Local Authorities](#) (May 2023)

⁷⁵ Human Trafficking Foundation, [The Voice of British Survivors of Modern Slavery](#) (November 2021)

⁷⁶ Shelter, [Housing Rights of Domestic Abuse Survivors](#)

⁷⁷ Department for Levelling Up, Housing and Communities, [Local connection requirements for social housing for victims of domestic abuse](#) (February 2022)

in some cases, survivors have to leave a safehouse and present as homeless to the local authority with all their belongings in order to be considered for homelessness assistance. This can be damaging for mental health as survivors may remain in a continual state of 'stress and worry in anticipation of a further, imminent move' which severely risks the progress of their recovery journey.⁷⁸ It can also disrupt a survivor's access to vital services such as GPs, therapeutic support, schooling, and social networks. For those individuals in the NRM, their lives are on hold while they await a decision from the Home Office on their status as a victim of modern slavery and this uncertainty, coupled with a lack of stable accommodation can undermine the work of both the MSVCC support worker and therapeutic services as they help the individual in their recovery journey. Closer working between agencies, along with clear exit plans and smoother transitions between accommodation is needed.

*'Those who are left destitute or street homeless, who are residing in poor or unsafe accommodation or who are in transition between housing providers may be vulnerable to targeting by new perpetrators for abuse, exploitation, re-trafficking or other forms of further harm. They may also quickly lose faith in the systems and professionals who are there to help them, which can result in them becoming socially withdrawn and isolated, suffering mental health deterioration or losing contact with essential services.'*⁷⁹

- Slavery and Trafficking Survivor Care Standards

SUITABILITY

The standard of accommodation offered across tenure types is regularly raised as an area of concern that prevents survivors of modern slavery to live in dignity after exploitation; with issues such as mould, damp and lack of basic furnishings. The Human Trafficking Foundation's Emergency

Support Fund is available to help survivors with small one-off grants to meet their immediate needs when no other sources of funding are available. One in five of all applications received in 2022 were for essential items such as portable stoves, fridges and mattresses, which were not provided in their accommodation. The high volume of requests for basic items suggests that survivors can be placed in unequipped spaces, disempowered without financial means to cover the costs of these items.

Case Study

A support worker at the Snowdrop Project requested a grant from the Emergency Support Fund after their client was taken to hospital with deteriorating health and difficulty breathing as a direct result of her living conditions. After the support worker submitted several formal complaints to the local authority that the property was uninhabitable, an assessment was made of the property. When they removed the rotten bath panel, they found sitting water. The water had leaked under the flooring in the bathroom and sat against the adjoining bedroom wall where fungus had grown and spread. The client was not moved out of the property, and the support worker's only option was to request a grant to cover the costs of a dehumidifier for their client to alleviate her physical health conditions caused by the damp.

Hibiscus Initiatives' report found that asylum accommodation is unsuitable for survivors of modern slavery and, as it is not designed to provide safety and specialist support, cannot be considered safe accommodation for survivors of modern slavery. They observed that being placed in asylum accommodation suggests foreign national survivors 'are often treated as immigration cases first and as recognised victims with specific needs second'.⁸⁰

⁷⁸ Human Trafficking Foundation, [The Slavery and Trafficking Care Standards](#) (October 2018)

⁷⁹ Human Trafficking Foundation, [The Slavery and Trafficking Care Standards](#) (October 2018)

⁸⁰ Hibiscus Initiatives, [Closed Doors](#) (2020)

The use of mixed gender and shared accommodation is one of the largest issues faced by survivors with regards to the suitability of housing. The MSCOS description of secure and stable housing includes accommodation that is 'gender-sensitive'.⁸¹ Survivors placed in accommodation with mixed gender occupancies may be distressing for women, especially those who have experienced sexual exploitation. Local authority guidance currently does not enforce the need for single sex accommodation for survivors and there is a reliance for individuals, their MSVCC support worker or housing solicitor, (where they have them) to advocate for this in their homelessness application.

The CQC inspection report also raised that the majority of MSVCC safehouses are not adapted for survivors with disabilities, especially wheelchair users, so they may struggle to access specialist accommodation if they have mobility issues.⁸² A survivor described housing providers as having a narrow framework of understanding disability and corresponding accommodation needs. Closer working between the local authority and MSVCC sub-contractor can help in these instances as the council has responsibilities under the Care Act 2014, which should be paired with support under the MSVCC if the survivor consents to a referral to the NRM.

PERSONAL AGENCY

'You should be asked: is this accommodation safe?' – Lived Experience Advisory Panel Consultant

Receiving appropriate housing is often heavily reliant on the advocacy of support workers, Independent Modern Slavery Advocates (IMSAs) or solicitors to help navigate the complexities of the housing system and understand an individual's entitlements. The CQC reinforced the importance of frontline workers' advocacy

with housing issues, noting that for those in outreach services, support workers 'often liaised with landlords and housing providers on behalf of survivors to raise and speed up repairs, or escalate when there were serious safety or suitability concerns.'⁸³ If the individual is not in the NRM and does not have a MSVCC support worker or entitlements to legal aid, they are often left to advocate for themselves.

For survivors, securing accommodation can be disempowering, forcing reliance on support providers to ensure housing needs are met. Decisions about housing can be taken away from the survivor who is left out of the process, having no choice in what or where the accommodation is they are offered. Personal agency is even more restricted for survivors who do not have the right to work in the UK, and their opportunities to move into the private rented sector are limited. Perhaps due to a lack of options, professionals make decisions without consideration of what the survivor would want themselves. Survivors reported that even if housing is unsuitable, they are often not offered an alternative option and can be left with the message that they need to accept the accommodation as there is no alternative.

ACCOUNTABILITY

As local authorities' duties for modern slavery span across various legislation and guidance, there is a lack of clarity over whose duty it is to house survivors of modern slavery, despite attempts to address this through changes to the The Modern Slavery Statutory Guidance states that in many cases, survivors will not be housed in MSVCC safe houses if they qualify for local authority housing,⁸⁴ whereas local authorities often interpret the housing responsibility as belonging to The Salvation Army as they have the specific funding for supporting survivors in the NRM. Further transparency on the 'Needs-Based and Risk

⁸¹ Modern Slavery Core Outcome Set, [Secure and Suitable Housing](#)

⁸² Care Quality Commission, [Services for Survivors of Human Trafficking and Modern Slavery](#) (January 2023)

⁸³ *ibid*

⁸⁴ Home Office, [Modern Slavery: Statutory Guidance for England and Wales](#) (Version 3.4, July 2023)

assessment process' in which it is decided whether someone is eligible for an MSVCC safehouse, and sharing this decision with the survivor could help address the confusion; as could publishing the numbers of people in MSVCC safehouses compared to those receiving outreach support in alternative accommodation.

A lack of awareness of modern slavery and trauma-informed practice can result in housing assessors inadvertently leaving a survivor re-traumatised through probing questions while undertaking a lengthy housing assessment. For example, survivors must provide housing staff with their previous addresses linked to their trafficking experience, and are asked for details that they are unable to provide which can be distressing to explain. Even for those who have been through the NRM, local authority housing professionals often do not have the awareness of the significance of a positive conclusive grounds decision while determining vulnerability during assessments of survivors.⁸⁵ The Homelessness Code of Guidance suggests while undertaking an assessment staff should 'take into account advice from specialist agencies providing services to the applicant, such as their assigned support provider under the NRM' which demonstrates the need for multi-agency working between anti-trafficking support workers and housing authorities.⁸⁶ Additionally, a lack of training on modern slavery can mean that unless a survivor discloses they have experienced modern slavery, it may well not be identified by housing officers and their vulnerability and opportunity to refer for support missed.

CHALLENGES FOR LOCAL AUTHORITIES

It is important to recognise that local authorities supporting survivors of modern slavery are working within a challenging context of a lack of funding and limited housing stock, under pressure to house all those in an area that have a range of needs and vulnerabilities. If there is a safehouse within the area boundaries or a frontline anti-slavery NGO, firstly the local authority may not be aware of this, which limits joint working, but they may also see an increase in housing applications which can be a challenge given their lack of availability of social housing. Maintaining consistent understanding of statutory duties in the context of modern slavery across a housing team is often challenging, as professionals do not come across cases regularly. Moreover, high staff turnover means that if there are members of housing teams that are trained in modern slavery issues, there is no guarantee their skills will be a long-term resource. This creates a cycle: when local authorities are not trained or given the funding and resources to respond to modern slavery effectively, cases go unidentified. If cases of modern slavery go unidentified, the crime goes underreported, and therefore securing funding and training opportunities become a challenge.

⁸⁵ Hestia, *Underground Lives: Male Victims of Modern Slavery* (October 2018)

⁸⁶ Department for Levelling Up, Housing and Communities, *Homelessness Code of Guidance for Local Authorities* (May 2023)

WHOLE HOUSING APPROACH

The term survivor in this section refers to individuals who have experienced domestic abuse.

OVERVIEW

The Whole Housing Approach (WHA) pilot was established for survivors of domestic abuse in 2018 by the Domestic Abuse Housing Alliance (DAHA) alongside the National Housing and Domestic Abuse Policy and Practice Group, funded by the Department for Levelling Up, Housing, Communities (DLUHC). The WHA now operates in London, Cambridgeshire and Stockton-On-Tees in partnership between local authorities and national domestic abuse, housing and homelessness organisations who are brought together by a designated local WHA Coordinator. The WHA Coordinator ensures local partners such as domestic abuse specialists and local authority housing teams are working together to construct a tailored response which centres the needs of the survivor using relevant components of the model. This WHA partnership works through existing Coordinated Community Response (CCR) structures or Violence Against Women and Girls (VAWG) partnerships.⁸⁷

The WHA raises awareness of, and improves responses to, domestic abuse with all key housing services that play a vital role in meeting survivors' housing needs. It aims to establish a consistent set of bespoke housing options and initiatives in every locality in line with the core principles of the WHA, which gives survivors greater choice over their housing situation, whether that is to remain in their existing home or relocate to a new one.⁸⁸ The five principles of the WHA are:

- **Safety**
'All interventions and components must consider the safety needs of a survivor'.
- **Empowerment**
'Considers what survivors want to achieve..., and offers interventions based on this'.
- **Inclusivity**
'Services must work together to remove barriers so that all survivors can access support equally regardless of any protected characteristic or support need.'
- **Accountability**
'Every agency has a responsibility to respond to domestic abuse'.
- **Prevention**
'Services identify domestic abuse and intervene at the earliest opportunity to create meaningful outcomes.'⁸⁹

The WHA connects the five main tenure types (private rented, social housing, refuges, sheltered housing and privately owned) with the specific housing options, initiatives and domestic abuse support offered to survivors within these tenure types including Flexible Funding, Sanctuary Scheme, Managed Reciprocals, and Perpetrator Management. This is brought together in a coordinated community response with the support of domestic abuse services' advocacy to secure survivor's safe accommodation.⁹⁰ Multiple components of the WHA model can be delivered during an intervention to meet an individual's needs and create pathways to safety and stability.⁹¹

⁸⁷ Standing Together Against Domestic Abuse, [Whole Housing Approach Year 2 Report April 2019 to March 2021](#) (August 2021)

⁸⁸ DAHA Alliance, [Whole Housing Approach](#)

⁸⁹ DAHA Alliance, [Whole Housing Approach Toolkit](#)

⁹⁰ *ibid*

⁹¹ Standing Together Against Domestic Abuse, [Whole Housing Approach Evaluation Year 1 Report](#) (November 2020)

Diagram 2 'Whole housing Approach to domestic abuse'



The green circles represent the accommodation types for survivors of domestic abuse. The white circles represent the housing initiatives and support provision available to survivors of domestic abuse.⁹²

A key aspect of the WHA is the central coordination of the approach in a local area. A designated WHA Coordinator brings together stakeholders from the 12 components of the model to ensure a tailored response is put in place to secure safety and housing for the survivor.⁹³ The Coordinator also supports the local authority to meet the duties of the Domestic Abuse Act and to bridge communication gaps between agencies. The core components of the WHA are explored below:

Flexible Funding is designated financial support managed locally by a domestic abuse service to support survivors of domestic abuse to address the barriers to securing or retaining their accommodation. Flexible funding is administered quickly to

meet the immediate needs of survivors and could be used for example to cover the costs of transport, deposits or household essentials.⁹⁴ The idea of flexible funding is to function as a tool for support workers in a range of different contexts all to offer grants to support survivors' housing needs.

The Sanctuary Scheme facilitates survivors of domestic abuse to safely stay in their own properties in cases where the perpetrator is no longer living at the address; by installing heightened security measures and support such as additional doors and window locks. The Sanctuary Scheme alleviates further instability to a survivor's life that is caused by relocating such as the disruption to access to healthcare services, peer support networks and children's schools.

⁹² Whole Housing Approach to Domestic Abuse

⁹³ Standing Together Against Domestic Abuse, *Whole Housing Approach Year 2 Report April 2019 to March 2021* (August 2021)

⁹⁴ Standing Together Against Domestic Abuse, *Whole Housing Approach Evaluation Year 1 Report* (November 2020)

Managed Housing Reciprocals ensures that survivors of domestic abuse living in local authority accommodation, who need to move due to fear of safety, are able to relocate to another local authority property in a different area without losing their tenancy. Under the Cambridgeshire Whole Housing pilot, a reciprocal housing scheme was established in collaboration between the local authority and 16 housing providers, coordinated by Safer London, to facilitate the relocation of survivors. In the first year the scheme ensured four positive moves for survivors of domestic abuse.⁹⁵

Perpetrator Management includes schemes that encourage housing providers to take action against perpetrators of domestic abuse as a tenancy breach or as anti-social behaviour and develop programmes to support perpetrators to manage their behaviour.⁹⁶ Many housing providers include the perpetration of domestic abuse as a breach of tenancy, but often action is not taken by housing providers against the perpetrators.⁹⁷

Domestic Abuse Housing Alliance (DAHA) is a partnership between Standing Together and two housing providers, Peabody (London) and Gentoo (Sunderland), who created a training accreditation to raise the standard of the housing sector's response to domestic abuse.⁹⁸ The accreditation equips housing providers with the knowledge on how to best support a survivor of domestic abuse into safe accommodation. Training for professionals ensures survivors receive a consistent response irrespective of the department they come into contact with. Within the WHA, reciprocal training is delivered to all agencies involved in the housing response to domestic abuse in a local area, to ensure they are aware of their responsibilities to survivors. In the Cambridge and Peterborough combined authority, the Homelessness Team deliver

training for Independent Domestic Violence Advocates (IDVAs) on housing legislation and options, and those working in the domestic abuse services upskill housing teams on the nature of domestic abuse. This also enables survivors to be given a full range of options irrespective of the member of staff they come into contact with.

BENEFITS OF THE WHOLE HOUSING APPROACH

There are clear parallels in the need for safe housing in cases of domestic abuse and modern slavery. Relocation away from perpetrators is paramount, and this must be to a safe, trauma-informed environment which is conducive to recovery. Much like in cases of domestic abuse, survivors of modern slavery are highly susceptible to further harm if they are in unsafe accommodation that feel unstable or transitory, giving them little option but to return to their abuser or enter, new precarious situations of vulnerability.⁹⁹

The Whole Housing Approach acknowledges that there is not one solution to housing issues for survivors of domestic abuse and constructs a holistic response, recognising the advocacy, support and housing needs of survivors must be addressed in tandem for survivors to maintain tenancies, which is also critical in cases of modern slavery. The WHA is not an isolated system, instead it is a model that unites fractious housing support which is provided by a range of organisations. It encourages close multi-agency working by upskilling both domestic abuse specialists with expertise on accommodation options, and housing departments on the nature of domestic abuse, to ensure that a range of agencies share responsibility for survivors' welfare. The model allows for adaptability to local social housing stock and pre-existing governance structures, building on current

⁹⁵ Standing Together Against Domestic Abuse, [Whole Housing Approach Evaluation Year 1 Report](#) (November 2020)

⁹⁶ [Perpetrator Management Toolkit, DAHA Alliance](#)

⁹⁷ [Perpetrator Management Toolkit, DAHA Alliance](#)

⁹⁸ DAHA Alliance, [Accreditation for housing providers](#)

⁹⁹ Helen Bamber Foundation, [Response to the call for input on homelessness as a cause and a consequence of contemporary forms of slavery](#) (March 2023)

strategies that work to address issues of housing for survivors of domestic abuse, rather than reinventing the wheel.

A strength of the framework is that it is adaptable and looks for solutions within the limitations of available housing and considers all tenure types and components that may provide an individual with options for safe housing, depending on their situation and entitlements.

One of the core principles of the WHA is to empower survivors with agency and knowledge on housing options so they can advocate for themselves and make decisions on their accommodation needs. There are not always multiple housing options available, but the principles of the WHA model enable support workers and housing teams to work with the survivor to explore what their options are, asking what stable accommodation looks like to them in a location they would feel safe.

Domestic Abuse Act 2021

The key housing provisions introduced in the landmark Domestic Abuse Act 2021 are contained in both Part 4 and 7 of the Act. Part 4 sets out local authority's duty to provide 'accommodation-based support' to survivors of domestic abuse and their children in refuges or other safe housing and publish a strategy for providing such support. Part 7 details changes to homelessness legislation outlining that survivors of domestic abuse who are, or are about to be, homeless will be automatically considered to have 'priority need' for homelessness assistance, removing the requirement of a vulnerability assessment.¹⁰⁰ Part 7 also ensures that if a survivor has to leave their home to flee their perpetrator, they would be able to retain a secure lifetime local authority tenancy.

In the case of modern slavery, other than a duty to notify the Secretary of State about suspected victims and cooperate with the Independent Anti-Slavery Commissioner, the Modern Slavery Act 2015 does not set out further duties for local authorities. Instead, local authorities must piece together their various duties in the Modern Slavery Statutory Guidance, Homelessness Code of Guidance, Housing Act and Care Act among others, so identifying the housing entitlements for survivors of modern slavery may not always be as clear.

¹⁰⁰ Home Office, [Domestic Abuse Act 2021: overarching factsheet](#) (July 2022)

LIMITATIONS OF THE WHOLE HOUSING APPROACH

It must be acknowledged that the housing response to domestic abuse is not perfect, and the WHA model operates within a challenging environment of legislative limitations. Whilst progress has been made in terms of the housing requirements set out within the Domestic Abuse Act 2021, it can take time for changes to take effect; Solace Women's Aid report that half of frontline workers said the Act has not improved survivors' experience of making housing applications, despite now being identified as priority need for housing. The report also identifies that gatekeeping practices of housing officers remain, meaning that survivors continue to struggle to obtain local authority accommodation.¹⁰¹

Further, it is evident that the provisions of the Domestic Abuse Act mean that survivors of domestic abuse with no recourse to public funds are still marginalised in the support they are able to receive and face significant barriers to appropriate housing, and options are simply not available to them, much like in the context of modern slavery.¹⁰²

Moreover, many survivors of domestic abuse still face obstacles accessing suitable accommodation. For example, survivors of domestic abuse may not be able to access refuges if they have complex needs, or if they have male children over the age of 13, or if they have pets.¹⁰³ As with modern slavery, only once a tenancy ends within a refuge, can a survivor make a homeless application and they are often required to return to temporary housing in the interim which can lead to instability and vulnerability to further abuse.

Challenges are also seen in terms of the disparity in approaches across different local authorities based on both the housing stock available and the funding needed for a model such as the Whole

Housing Approach. Implementing a WHA is expensive, if not grant funded by a government department or charitable funder, and local authorities have to opt into this model, so often it is those who are already exceeding in their response to domestic abuse that are engaged. The WHA model cannot increase the accommodation options if these are already limited, and it operates within the confines of a housing crisis. However, what the approach does do is strengthen relationships between agencies who all have a responsibility to establish safety and security for survivors of domestic abuse, and in turn works with survivors to identify the best outcomes. It is these key principles that can be adopted to form a Whole Housing Approach to respond to the accommodation needs of modern slavery survivors.

CREATING A WHOLE HOUSING APPROACH FOR MODERN SLAVERY

Whilst a Whole Housing Approach cannot create housing options when these are not available, it can bring together a suite of support options alongside the tenancy types so that these can be considered by local authorities, support workers and survivors when deciding the next steps. Given the challenges with accommodation and the lack of clarity and consistency in housing provision, it is evident that an approach is needed which seeks to weave a thread throughout the tenancy types and provide clear routes to long-term stable accommodation.

However, it is also clear that there is groundwork which needs to be set before this approach is possible. This report was written in a transitory period, awaiting the impact of new legislation which diminishes support for survivors, and ahead of a new modern slavery victim care contract in 2025. As such, there are areas that need to be addressed first, alongside clarifying roles and responsibilities, funding local

¹⁰¹ Solace Women's Aid, [Priority Need For Housing For Survivors Of Domestic Abuse: One Year On](#) (2022)

¹⁰² Women's Aid, [Domestic Abuse Report 2020: The Hidden Housing Crisis](#) (June 2020)

¹⁰³ Shelter, [Refuges if you're at risk of domestic abuse](#) (December 2021)

authorities, and addressing barriers to safe accommodation in policy, before a Whole Housing Approach to modern slavery could be implemented. It is also not an approach that should be rushed; further consideration needs to be given to its incorporation into existing structures and processes so that it is an embedded approach across the country and does not run the risk of only being adopted in areas with funding or existing buy in.

The WHA for domestic abuse does not map neatly onto the response to modern slavery; for example, many survivors are required to live with their traffickers during their experience of exploitation but without tenancy rights, so much of the WHA provisions such as perpetrator management and sanctuary schemes that address the survivor's rights to a property are not applicable. Equally, the clarity on survivors of domestic abuse being priority need and not requiring a local connection, which are currently not specified for modern slavery, help to create smoother transitions and make the WHA for domestic abuse possible. Despite this, there is still learning that can be taken from the Whole Housing Approach to domestic abuse to make immediate improvements to the housing response to modern slavery.

The principles of the WHA and some of the support provisions, combined with existing good practice and processes from the anti-slavery sector, should be brought together in a toolkit for local authorities and MSVCC subcontractors, which work to centre the individual survivor's needs. Currently, good practice examples of housing responses to modern slavery are hidden in pockets across the country and the overall housing response is disjointed. A toolkit would combine good practice in one place and enable partners to learn from this and adopt elements locally based on budget and need.

One of the most important elements of the WHA for domestic abuse is the coordinated community response, where all agencies are

trained and work closely together to provide the most positive process for survivors. Steps have been taken to link MSVCC sub-contractors with local authorities but in many areas of the country the MSVCC operates separately, and, often due to a lack of awareness and resources within local authorities, support workers are regularly forced into a position of advocacy rather than collaborative partnership working with the council. Given the number of survivors housed outside of MSVCC safehouses, the temporary nature of MSVCC safehouses and a likely increase in people not accessing MSVCC support due to recent legislation, there is a clear requirement for joined up working between agencies with the survivor at the centre. The Local Government Association (LGA) guidance on good practice for local authorities' homelessness teams stresses the importance of external partnerships in addressing statutory duties to support modern slavery survivors¹⁰⁴ and formalising integrated working between housing teams and support workers is essential to ensure better outcomes for survivors.

¹⁰⁴ Local Government Association, [Supporting modern slavery victims: guidance and good practice for council homelessness services](#) (March 2022)

RECOMMENDATIONS

1 Places of Safety:

The Government should implement their commitment to provide pre-NRM Places of Safety to give survivors the opportunity to make informed decisions about entering the NRM and build rapport with First Responders ahead of a referral. The requirement for this has increased further given the change in threshold for the reasonable grounds decision and the rise in negative decisions which mean survivors are likely to miss out on support if information is not provided at the initial stage.

2 Suitability:

Whilst the Homelessness Code of Guidance states that accommodation may need to be gender-specific, the onus is often on the survivor, their advocate or solicitor to specify and make the case that this is required. The Homelessness Code of Guidance should be updated to require local authorities to offer gender-specific accommodation (if self-contained is not available) for survivors of modern slavery who are women, and local authorities should consider this within their procurement and commissioning strategies.

3 Local Connection:

The Government should consider how the findings from the consultation into local connection for survivors of domestic abuse, and any subsequent regulations or changes to guidance, can also be applied for survivors of modern slavery to support with relocation.

4 Priority Need:

The Government should extend the automatic grant of priority need status to include survivors of modern slavery. The Government should work with experts in housing and the anti-slavery sector to ensure that the definition has considered a range of situations, such as recognising that not all survivors consent to enter the NRM and therefore have no formal recognition of their victim status. This should be carefully considered in line with legislation and take into account a requirement for accommodation at all points in the NRM process.

5 Widening Inspection:

The Home Office commission the Care Quality Commission to inspect the MSVCC safehouse accommodation and outreach support. This helps to ensure a high standard of care and identify areas for improvement. Whilst the 2021-22 inspection report mentions issues with accommodation reported by survivors in outreach support, inspection of that accommodation was out of scope.¹⁰⁵ The inspection should be extended to include a random dip sample of other forms of accommodation resided in by survivors receiving MSVCC outreach support, including asylum accommodation, local authority accommodation and immigration detention to determine whether it meets the schedule 2.3 Accommodation Standards and the Trafficking Survivor Care Standards.

6 Transparency:

Conversations with partners throughout the research for this report highlighted the need for clarity in communication from the Home Office and The Salvation Army about the MSVCC safehouse provision. Misconceptions persist about the responsibility to house survivors of modern slavery and transparency around the needs assessment and how MSVCC safehouses are allocated may help alleviate this. Survivors should receive written copies of needs assessments and decisions about accommodation, including decisions not to accommodate in safe houses, at the time they are made. This will help survivors to understand those decisions and seek legal advice if required. The Salvation Army should publish the number of survivors in MSVCC safehouses and the number of survivors receiving outreach support in alternative accommodation to support with transparency.

7 Modern Slavery Leads

Only a handful of local authorities in England and Wales have funded a designated role to coordinate the local authority's response to modern slavery. Therefore, a Whole Housing Approach Coordinator, such as in the domestic abuse model, would be limited in their capacity and instead, government funding should be provided for each local authority to put a Modern Slavery Lead in place.

A Modern Slavery Lead would be responsible for developing their council's response to modern slavery by creating referral pathways and protocols, establishing multi-agency boards to share intelligence and responsibility and ensuring First Responders are trained and aware of their statutory duties. They would be able to provide guidance on complex modern slavery cases to housing teams and bridge communication gaps between local

safehouses and local authority departments. MSVCC subcontractors could contact the Modern Slavery Lead to ensure housing teams know when a survivor is going to be exiting a safehouse or asylum support and will be presenting as homeless to support with exit plans and transition. A Modern Slavery Lead that works closely with local MSVCC subcontractors would also mean support workers are aware of the length of waiting lists for social housing. This shift towards transparency would enable professionals to provide survivors with realistic expectations and time frames on the accommodation available.

The Local Government Association considers 'funding and/or staffing identified to lead/undertake modern slavery work' as early progress for a council's response to modern slavery and yet the majority of councils do not have this in place.¹⁰⁶ A designated Modern Slavery Lead would be able to bring together the multiple teams involved in an individual's case in the local authority such as housing and safeguarding to ensure cross-department communication and wider partners such as police, NHS and any NGOs, which would also help to provide opportunity for identifying further information to include in a NRM referral. The local authorities currently with a Modern Slavery Lead in place can be exemplified as best practice in responding to modern slavery.

Further, owing to the changes brought about in the Nationality and Borders Act and Illegal Migration Act, fewer survivors will be able to access MSVCC support. Legislative changes mean that it's likely far more responsibility will be placed on local authorities and NGOs outside of the MSVCC to house and support survivors; not only foreign national survivors who have entered the UK via irregular means, but a wider cohort of survivors subject to the disqualification clauses or unable to provide the evidence required for a reasonable grounds decision. It is therefore vital that local authorities and wider partners are equipped to fill gaps in support and provide appropriate services for people who are still

¹⁰⁶ Local Government Association, [Council modern slavery maturity matrix](#) (November 2022)

survivors of modern slavery, even if they do not have a positive NRM decision.

In the interim, ahead of funding for a Modern Slavery Lead for each local authority, every council should be required in statutory guidance to identify Single Points of Contact (SPOCs) in the safeguarding, housing, community safety and licensing teams to fill the gap and work collaboratively with local partners to ensure smooth transitions for survivors.

8 Flexible Funding

The use of flexible funding in the Whole Housing Approach for domestic abuse should be replicated for cases of modern slavery to alleviate the barriers that survivors experience in accessing suitable housing. The Home Office is currently exploring the future model of adult victim support for when the MSVCC comes to an end in June 2025 and this future model should include a flexible funding pot, operated and controlled by the prime contractor. This would enable support workers to better respond to the individual needs of a survivor and cover the costs of rent deposits, moving costs or essential items and support during transitional periods. Flexible funding could also offer a lifeline for survivors with NRPF where limited options are available and would also be of great benefit to furnishing a property to ensure it is habitable, addressing issues around the standard of housing provided to survivors of modern slavery.

9 Reciprocal Training

One of the key principles of the WHA for domestic abuse is the sharing of training between agencies responsible for survivors and the DAHA accreditation offers housing providers a training framework for best practice in working with survivors of domestic abuse. This ensures that whichever agency a survivor comes into contact with, they are provided consistent accurate information

and there is awareness between agencies of each other's roles and responsibilities; leading to greater understanding and closer working. This sharing of knowledge between agencies, essential to the WHA for domestic abuse, must also be central to a whole system response to the housing issues faced by survivors of modern slavery.

In addition to training that should be made mandatory for statutory First Responders, reciprocal training for MSVCC sub-contractors and local authority housing teams would add an additional layer of knowledge and help strengthen the understanding and joint working between agencies. Coordinated through anti-slavery partnerships or the Modern Slavery Leads once in post, experienced staff within MSVCC sub-contractors should provide training to housing teams within the local authority so they develop greater awareness of modern slavery, the NRM, suitability requirements for survivors and the risks of re-trafficking, along with a trauma-informed approach and clarity on the role of the MSVCC. This will help to ensure the prevention of further exploitation and harm, as housing officers would be better equipped to consider risks of re-trafficking and vulnerability as relocation options are explored with the survivor. Further, a more expansive understanding of navigating the requirement for a local connection in the context of modern slavery would be achieved. In return, local authority housing teams should deliver training for support workers to ensure they are aware of housing legislation, eligibility criteria and how duties are enacted within the specific local authority. Reciprocal training would lead to a greater understanding of the role of the local authority and the MSVCC and a strengthening of the relationships between agencies. Wider regional shared learning workshops should be facilitated by anti-slavery partnerships (in regions where they operate) and SPOCs, to develop partnerships between key agencies, such as housing associations, and to provide space for reciprocal training for housing staff and modern slavery specialist services.

10 Further Research

Housing and modern slavery is an extremely broad area and this report was only able to scratch the surface of this subject. Further research is required, along with a full assessment of the housing need for survivors of modern slavery and analysis of existing national data into the housing outcomes for all survivors of modern slavery. Data on housing for survivors of modern slavery is not widely available or centrally recorded and so further consideration should be given to this. Areas not explored in this report include the responsibility of landlords and the role of housing associations and specifically requiring further exploration is the transition between accommodation, such as the need to present as homeless, and the traumatic impact the uncertainty of this process can have.

11 Best Practice Toolkit

Funding should be sought by a coalition of multi-agency organisations to develop a toolkit of best practice housing responses to modern slavery to address some of the issues raised in this report. Examples of best practice, both from the Whole Housing Approach to domestic abuse and from existing work in the anti-slavery sector, that should be considered for inclusion in the toolkit are outlined below:

SURVIVOR FOCUSED APPROACH

Central to the WHA model is ensuring a survivor-centred approach, working alongside a survivor to understand their individual requirements for accommodation and to move towards securing long term stability. The best practice toolkit should equip professionals with the resources

to ensure survivors have the knowledge of what housing options are available to them, so that whilst completing housing applications and constructing support plans, the survivor is able to take an informed lead and are empowered to regain autonomy over their journey. When considering housing applications for local authority housing, survivors should be asked directly on the types of accommodation that may be unsuitable for them, as it is often the case that survivors would not know what information is necessary to provide, as they are unaware of the type of accommodation being offered. These elements of directly asking survivors about their needs and wishes, ensuring survivors are informed on the accommodation options they are eligible for, and providing transparency on the housing stock or safehouse eligibility and written decisions should be included within the toolkit to cement a survivor-focused approach.

EMERGENCY BED PROTOCOL

Until the Pre-NRM Places of Safety are in place, local authorities can include the provision of an Emergency Bed Protocol for survivors of modern slavery, to provide accommodation for a minimum period regardless of local connection or recourse to public funds. This emergency bed protocol guarantees a certain number of bed spaces are available for survivors of modern slavery when required. Councils in Humberside have developed emergency bed protocols for survivors of modern slavery, as have local authorities in other areas.¹⁰⁷ Once provided with emergency accommodation, priority should be given to finding onward housing for the survivor.¹⁰⁸

TRUSTED ASSESSOR MODEL

The Trusted Housing Assessor Model, implemented by Sheffield City Council and being piloted in three London Boroughs, means that frontline support workers are

¹⁰⁷ Local Government Association, [Humberside emergency bed protocol](#) (February 2022)

¹⁰⁸ Local Government Association, [Supporting modern slavery victims through homelessness services at Westminster City Council](#) (February 2022)

able to complete housing applications with the survivor instead of this being done by a member of a local authority's housing team; imbedding close partnership working between local authorities and anti-trafficking NGOs.¹⁰⁹ This model prevents instances where a survivor must re-tell their experience of exploitation to an unknown individual in a housing team as instead their support worker completes the application with them, further establishing consistency and safety in the delivery of support they receive in their recovery. The support worker knows much of the information required for the housing assessment, creating a streamlined process that reduces the risk of re-traumatisation.

CO-LOCATED WORKING

Learning from the response to domestic abuse, the model of co-located working could be replicated to address the needs of modern slavery survivors and takes co-working one step further. Co-located working serves to strengthen relationships between agencies that have responsibilities to support and house survivors of modern slavery. This is the next step in agencies understanding each other's roles and closing gaps, creating a more seamless approach for survivors as they are not passed between organisations. Co-location would need to ensure survivor privacy and require informed consent from survivors before data is shared, for example by a charity to a local authority. For charities, the benefit is having a local authority First Responder onsite, able to make referrals, both to the NRM but also to safeguarding and relevant departments and the local authority benefits from the charity's expertise.

HOUSING RECIPROCAL

Managed reciprocal schemes prioritise the safety of a survivor of crime in their local area and are a key component of the WHA to domestic abuse. Safer London coordinates a housing reciprocal across London for individuals affected by domestic abuse, violence against women and girls, hate crime,

exploitation, trafficking, stalking and serious youth violence. Under the Pan London Housing Reciprocal, affected individuals can be moved from one social housing property to another within the county, alleviating the prevailing local connection issues survivors often experience and ensure the relocation away from sites of exploitation and abuse no longer suitable for that individual.¹¹⁰ In 2021 the then Independent Anti-Slavery Commissioner raised reciprocal housing arrangements as a possible solution to assist in cases where survivors need to move between location.¹¹¹ While this option may not be applicable for as many survivors of modern slavery as domestic abuse, for British survivors who have experienced exploitation in their home in cases of cuckooing for example, this could support with a smooth transition to a new safe area.

MULTI-AGENCY CASE CONFERENCES (MACC)

There are several good practice examples, such as Nottingham City Council and the Welsh Government, where areas have adapted the domestic abuse Multi-Agency Risk Assessment Conference (MARAC) model for modern slavery. The Passage homeless charity, in partnership with Westminster City Council, brings together relevant agencies and local authority teams (Adult Social Care and Rough Sleeping Teams) at a Multi-Agency Case Conference (MACC) to safeguard and establish pathways and action plans to support survivors of modern slavery at the initial identification stage. Within a MACC, the needs and risks of the individual are discussed and a plan to ensure their safety is created.¹¹² The Passage's MACC model means all agencies that are responsible for the safeguarding of a survivor are working together to ensure best outcomes for the individual, who is then immediately placed in secure temporary respite accommodation, so they are able to consider their options before entering the NRM. If an individual is not eligible for support under the

¹⁰⁹ Local Government Association, [Sheffield City Council trusted assessor scheme](#) (May 2022)

¹¹⁰ Safer London, [Pan London Housing Reciprocal](#)

¹¹¹ Human Trafficking Foundation, [The Voice of British Survivors of Modern Slavery](#) (November 2021)

¹¹² The Passage, [Modern Slavery Multi-Agency Case Conferences](#) (December 2022)

MSVCC or does not consent to entering the NRM, multi-agency case conferences can work to ensure that there is still a pathway to continued support and secure accommodation in place. Local authorities could consider either developing their own MACC with partners, or adapting or expanding existing MARACs, community safety or exploitation panels or case conferences for this purpose.

INDEPENDENT MODERN SLAVERY ADVOCATES

The MSVCC remains invaluable for survivors of modern slavery but if an adult decides not to enter the NRM or is ineligible for support due to changes brought in under the Nationality and Borders Act and Illegal Migration Act, they will no longer have access to a support worker or subsistence rates, no matter what accommodation they are in. This is one reason why Independent Modern Slavery Advocates, similar to Independent Domestic Abuse Advocates, are so vital and should be included within the toolkit when the IMSA model is rolled out.¹¹³ It is these Advocates, in the absence of, or in addition to, support workers who can help survivors to navigate various systems and access their entitlements.

TRANSITIONAL SAFEGUARDING

Whilst this report has only explored the housing injustice for adult survivors of modern slavery, implementing approaches in the toolkit could also benefit young people as they turn 18. Often, children face a cliff-edge in support as on their eighteenth birthday they are considered an adult and vulnerable to further exploitation due to the gaps in provision between Children's Services and Adult Social Care. The multi-agency working championed in the Whole Housing Approach to domestic abuse enables the sharing of information and responsibilities required to ensure housing needs for individuals during this transitional period can be addressed.

¹¹³ Hope for Justice, [IMSA Model Development Project](#) (June 2023)

Summary of Recommendations

- 1** The Government should enact their 2017 commitment to implement Places of Safety pre-NRM accommodation and ensure this is accessible to all survivors.
- 2** The Homelessness Guidance should be updated to require local authorities to offer gender-specific accommodation (if self-contained is not available) for survivors of modern slavery who are women, and local authorities should consider this within their procurement and commissioning strategies.
- 3** The Government should consider how the findings from the consultation into local connection for survivors of domestic abuse, and any subsequent regulations or changes to guidance, can also be applied for survivors of modern slavery to support with relocation.
- 4** The Government should extend the automatic grant of priority need status to include survivors of modern slavery.
- 5** The CQC inspection of support provided under the MSVCC should be extended to include a random dip sample of accommodation resided in by survivors receiving outreach support.
- 6** The Home Office and The Salvation Army should be clear in their communication about how MSVCC safehouses are allocated, provide written copies of risk assessments and decisions about accommodation to survivors and publish data on the numbers of people in MSVCC safehouses and outreach support.
- 7** The Government should fund a Modern Slavery Lead role for each local authority. In the interim, the statutory guidance should be updated to require each local authority to identify modern slavery SPOCs.
- 8** The Government should include flexible funding, operated by the prime contractor, as part of the new victim care contract in 2025 to alleviate financial barriers to accessing housing.
- 9** Anti-Slavery Partnerships and Modern Slavery SPOCs should support the delivery of reciprocal training between MSVCC subcontractors and local authority housing teams.
- 10** Further research should be undertaken to strengthen the evidence base for modern slavery and housing.
- 11** A coalition of multi-agency organisations should seek funding to develop a toolkit for local authorities to showcase best practice housing responses to modern slavery that they can enact locally.

CONCLUSION

Recovery after the experience of exploitation requires stable accommodation that offers privacy, dignity, and the ability to build both peer support networks and a sense of community.¹¹⁴ Without safe and secure accommodation in place alongside wrap-around support, survivors continue to be at high risk of homelessness, re-traumatisation and re-trafficking. It is essential to provide options and clear pathways for survivors navigating the complex process of obtaining safe accommodation.

This is a monumental time for anti-trafficking in the UK with adverse legislative changes introduced through the Nationality and Borders Act 2022 and the Illegal Migration Act 2023, which will increase the number of survivors excluded from vital support, further driving modern slavery underground. It remains to be seen how far reaching the impact of this legislation will be and responses will need to be adapted accordingly. Whilst this report does not recommend the direct adoption of a Whole Housing Approach for modern slavery at this uncertain point in time, it is clear that the response to domestic abuse is more advanced and there is benefit in close working between the two sectors and a sharing of best practice and learning rather than recreating solutions from scratch. The Coordinated Community Response central to the Whole Housing Approach can be utilised as a way of strengthening relationships between agencies and addressing the multiple systems survivors may be navigating to provide consistency and stability.

Looking ahead to the 2025 Victim Care Contract, now is the time for the government to prioritise housing. This report goes some way within a limiting context to considering policy and practice changes that would help bridge the gaps between housing and the specialist support services that must work in tandem throughout a survivor's journey into sustained recovery, ensuring a holistic view to meeting the needs of survivors.

¹¹⁴ Modern Slavery Core Outcome Set (MSCOS) for Survivor Recovery, Wellbeing, and Integration

Living on the streets, a struggle each day,
No place to rest, nowhere to stay.
But amidst the hardship, strength will arise,
Community support, love that never dies.

A cozy abode, where memories are made,
A place of comfort that will never fade.
With walls that embrace, and a roof that's secure,
Home is a sanctuary, where love endures.

No shelter to shield from the cold night air,
No refuge to find solace and care.
But in this struggle, resilience will rise,
Together we'll find a haven, where hope never dies.

Having a home is vital, let me explain,
It provides shelter from sun, wind, and rain.
A place to rest, to feel secure and warm,
A sanctuary where dreams can take form.

Emily, Lived Experience Advisory Panel

Human

Trafficking

Foundation