

The Voice of British Survivors of Modern Slavery

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A Post-Event Report Summary of the
Experience and Challenges that British Child
and Young Adult Survivors Face in the UK



Human Trafficking Foundation

The Voice of British Survivors of Modern Slavery Post-Event Report Summary



With input from Karen, Emily and Sarah, alongside the Independent Anti-Slavery Commissioner, Snowdrop, SPACE, The Salvation Army, Sarah Champion MP and Professor Susan Edwards.

With special thanks to Emily and Karen for initiating this important discussion and thanks to both again and to Sarah for providing a powerful voice to British survivors

Published:

May 2021

Front cover photo:

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The below is a summary of the concerns, experiences and recommendations made during the Human Trafficking Foundation' (HTF's) Online Forum, held in partnership with British survivors Emily and Karen, on 25 January 2021

Introduction

British survivors of modern day slavery are not being adequately listened to or heard in the antislavery sector, let alone across the UK. Yet they are the now the largest cohort in the Government's annual modern slavery referral data. This evasion has to change and we must allow the voices of British survivors and their families to lead the way.

When Covid-19 began in early 2020, the Human Trafficking Foundation (HTF) began a series of monthly online forums initially looking at the sector's response to covid. Then, in the summer, HTF began broadening the forums to examine other subject areas.

In the autumn of 2020, two survivor advocates, Emily and Karen, got in touch with the Human Trafficking Foundation about the lack of British survivor voices and together it was decided that we would co-create an agenda and forum to look at the specific challenges that British survivors face.

On 25 January, HTF, in partnership with British Anti-Slavery Advocates and Survivors, Karen and Emily, held an Online Forum: The Voice of British Survivors of Human Trafficking. Two hundred and fifty people from within the antislavery sector attended and it was agreed with the Home Office that the next step would be for some of the speakers and the Home Office to meet. A date is yet to be confirmed at point of publication.

Background

In 2019, 2,836 British nationals were referred to the National Referral Mechanism (NRM) – this amounted to 26% of all referrals, and involved mostly children.

In 2020, the overall numbers were almost the same as 2019 (there were in total 10,613.) However the number of British referrals continued to rise with 34% (3,560) of all cases involving British nationals.

Survivors' experiences

Karen

- Karen was sexually exploited around the country, and was criminalised for this, as a child. She was fined as a child for being a 'prostitute', with no means of paying the fine.
- As her parents weren't to blame, the blame was placed on Karen, which she internalised.
- She went to the police as an adult and they didn't identify her as victim of modern slavery and didn't know what the National Referral Mechanism (NRM) was.
- As an adult, however, she has now recently entered into the NRM.
- She had roughly forty convictions, and thought the NRM would help have them cleared, but her criminalisation was never addressed in the NRM.
- In the NRM, she was told that she wasn't entitled to legal aid, as she wasn't seeking asylum. She was told she wasn't entitled to compensation as there was no criminal investigation. She didn't receive any subsistence initially because British victims were initially excluded from receiving this.
- In the RNA (the NRM's recovery needs assessment process where victims can apply to stay in NRM support, after they receive a positive conclusive grounds decision) she learned that she should have been entitled to NRM subsistence payments, but once in the RNA entitlement to it is needs-based, and as she was self-funded she was told she wasn't entitled to payments as she was British and instead could receive benefits.
- She's now on her eighth RNA, which means she's had several exit dates during the pandemic. Each RNA loses two sessions with her support worker - it takes upto a session to complete the form and another to collate the evidence, resulting in two sessions lost, which could have been used for support with her caseworker. In the end she lost four months of support completing these RNAs.
- Because she was being denied subsistence payments, she had to rely on the HTF emergency fund and food banks.
- If Karen exits the NRM, there are no support agencies where she lives, so she would be left in a vulnerable position.
- She feels like she has been exploited and treated like a commodity by the NRM – which again she feels took away her autonomy and made her feel powerless.
- She said that her needs haven't been met at all by the RNA.

Emily

- Emily was trafficked from 11-20 years old, and suffered criminal and sexual exploitation.
- She was failed by the police, teachers and local authorities at various times when they repeatedly came in to contact with her.
- For example, she was found numerous times in drug houses and known paedophiles' homes by her youth worker, and was missing over 126 times from school and it was never picked up on. She also sold and took drugs with her youth worker and police officers.
- As an adult, in 2019, she was referred into the NRM by a first responder who did not know how to make a referral and didn't have the training or confidence to fill out the form correctly.

- Once in the NRM, Emily was left without support for three months because, having made a request, had found that there were no native English-speaking workers available in the NRM sub contractor in her geographical area. She contacted another NGO outside the NRM, HTF, who helped to find her a case worker from another subcontractor in the NRM, but their organisation was over 200 miles away and so Emily has never met her caseworker face-to-face and has been unable to build a trusting relationship with them.
- Emily has had to navigate her own way through the NRM.
- She was initially told she was not entitled to legal help, counselling or face-to-face support and only managed to get legal help through an NGO.
- Furthermore, subsistence payments can take British survivors such as Emily, who has part-time work, over the legal aid threshold, making justice and compensation even harder to access from the people who failed her.
- She told the forum that she found that the NRM did not cater for British survivors' needs and said it needs to be changed. Instead she found navigating the process can cause yet another traumatising experience.
- She has received long-term support from an NGO that was outside the NRM called Snowdrop, which she said has been vital. She felt that this kind of long-term support needs to be available to all survivors. It shocks her that survivors can't access this support in most cases. This needs to be put in place.
- Before Snowdrop, she'd been in various NRM accommodation options, where support staff hadn't had trauma-informed training and their treatment of her was hugely detrimental to her recovery.
- Sarah says there is still a huge stigma that slavery doesn't happen to British survivors or that British cases are not on the same level as non-British cases. As a result, she had to fight to be seen, believed and accepted. She noted that this is incredibly dangerous as it stops victims coming forward. Sarah said that, had she known how much stigma and disbelief etc she would have faced in the NRM from professionals, she wouldn't have come forward, knowing what she knows now.
- She said British survivors also get caught in a Catch 22: "If we speak out, we can be labelled as troublemakers or ungrateful, but if we stay quiet we are forgotten and dismissed."
- Sarah spoke of how she's been labelled a liar, a 'prostitute', and that she asked for it. Or that she is using the term trafficking to cover her 'promiscuity'. Sarah said that these have come from professionals in the last seven years since being rescued, and is as a result of the fact she is British.
- Sarah was also expected to support herself more in the NRM because she was British. She feels that being British and articulate has been a hindrance to accessing support or sympathy. She was expected to navigate a lot of it by herself and it was assumed, incorrectly, that as a British person she would manage more easily.

Sarah

- Sarah is a British survivor of CSE. She met her traffickers aged 10 and wasn't rescued until she was almost 20.
- She had to fight to be believed and in order to be seen as a survivor by frontline workers in the sector, as well as by the public – she said that this acts as a huge barrier to coming forward.
- Sarah was failed by schools, foster carers, social workers and many others. Modern slavery never occurred to them. She said that she is now being failed post rescue, for these same reasons.
- She found that there is far less advocacy for British survivors, and they tend to get forgotten within the antislavery sector.

- Sarah found that after the NRM, she wasn't signposted to any support services as it was assumed that, because she was British, she would be fine, or would be able to find it herself.
- Sarah saw non-British survivors who had been rescued at the same time as her and had been in the same safe houses, who are still receiving support from professionals and still in touch with them, but she said that those same professional wouldn't even know her name or who she was.
- Awareness has radically improved, Sarah felt. But she said there was still a long way to go, particularly for British survivors. She feels far more training is needed in this area and the challenges British survivors face.
- Since her rescue she's had to have operations every year to try to fix the physical damage inflicted during her exploitation.
- She was moved ten times while in the NRM, often she didn't know where she was moving to and for how long, and felt like a burden on the system that failed to protect her from CSE.
- None of her traffickers have been prosecuted while her case was open. One of her main traffickers died and this was used as a reason to close the case as she was told he can't defend himself. She's never received compensation.

The Salvation Army (TSA) case study

TSA supported 'J' in the NRM, who had become addicted to drugs as a child, spent time in prison, became homeless and was then targeted by traffickers. They gave him drugs and then forced him to deal for them and challenge rival dealers and so it got to a point where his life was in danger. He tried to escape and they found him, so he went to the police. That was the first time he learned about modern slavery and the NRM.

These circumstances mirror the typology of British victims who TSA encounter. Many are exploited by county lines or cuckooing. Many have complex histories. In many cases, there is evidence of exploitation starting in care, but little or no continuity of support for child victims when they reach 18, and their situation can spiral into adulthood

Thankfully, J's experience of the NRM was positive. He describes how, "two people from The Salvation Army came to pick me up and drive me to a Salvation Army safe house, miles away. It was fantastic. From the moment I got there they were really welcoming. It's just a normal house. They told me, 'It's over and you're safe'. They settled me down and slowly helped me to rebuild my life. They deal with everything from bank accounts, benefits, counselling, and doctors. You feel like you're starting again. It's a chance to sort myself out away from everything else. I wish I'd known that there was help out there before things got so bad".

Challenges Raised

Perception and identification

- Emily and Sarah explained that there is still misunderstanding in councils when social workers come across British victims and there is lack of knowledge that British potential victims can be referred into the NRM.
- Sarah highlighted that there is a lack of understanding that in order to be a victim of modern slavery, you do not need necessarily to cross regional borders.
- Member of Parliament, Sarah Champion, said she is seeing a real gap with services not recognising those being exploited with disabilities.
- Karen spoke about the fact that huge numbers of British girls are still slipping through the gaps. In county lines cases the perpetrators and the male victims all have multiple girls they are exploiting and none of them are being picked up on at this point.
- Zoom chat: One NGO said that in their work they see far more public compassion towards women trafficked from overseas than for British born women trapped in exploitation. The British born women were perceived as having chosen this life and being less deserving of sympathy and assistance.

First Responders

- The Independent Anti-Slavery Commissioner (IASC) understands that there can be gaps in understanding among local authorities about what the NRM means in the context of children.
- Another speaker at the event, SPACE, noted that a referral by police is often seen as an investigation or recording, rather than an assessment of exploitation and support.
- Many first responders are telling parents that a referral decision is negative, when it is really just hinging on more information being submitted; and/or not advising families of how to challenge negative decisions or options to submit specialist input from NGOs such as SPACE, or submitting further representations.
- They also said that authorities are failing to give accurate information or advice about the process or information on victim entitlements to parents and victims.
- SPACE said that first responders (FRs) are expecting children and young people to engage with them or even confirm they are exploited in county lines cases, when FRs should rely on indicators instead, as children in criminal exploitation are unlikely to self-declare or identify their associates or perpetrators, or have positive associations with authorities due to grooming.

National Referral Mechanism (NRM)

Referrals

- After Rotherham, Sarah Champion MP found a great deal of learning had taken place. Yet when she asked First Responders (FRs) how many NRM referrals they had filled out, they still hadn't produced any. Their mistaken reason for failing to do so was because the victims they identified were British.
 - Many British victims are asking to not be referred into the NRM. The Commissioner (IASC) agrees that it is important for multi-agency partnerships and wider organisations to be thinking about the various options that are available for support, including non-NRM pathways for those who do not consent to this process.
 - SPACE said that British victims are often expected to self-declare as exploited to be entered into NRM, but due to successful grooming many British victims of criminal exploitation (CE) and sexual exploitation (CSE) don't see themselves as exploited. They also are sometimes made to feel that they must identify their perpetrators as part of the referral even though they are not required to do this and it could put them at risk.
 - SPACE explained that often nobody explains to survivors that if they're referred into the NRM that they don't have to say anything that would put them in danger.
 - SPACE had found that there are often poor referrals for British children because the first responder doesn't actually genuinely believe they are victims of modern slavery but is completing the referral simply to follow a tick box exercise.
- ### Support for adults in the NRM
- The Salvation Army highlighted that agencies and first responders need to identify British victims' needs from the start and not assume NRM support is the best fit for every situation. British victims in the NRM can be more discontent in safehouse accommodation than they are in outreach, which can lead to disruptive behaviour, meaning they are transferred around different safehouses.
 - Going into the NRM safehouse accommodation can mean survivors lose their homes, but often there is no other safe option as police don't have the capacity or willingness to engage with local authorities on other options.
 - The Independent Anti-Slavery Commissioner (IASC) noted that there can be a debate around whether the responsibility to support a potential victim in the NRM lies with the Victim Care Contract (VCC) in the NRM, or the local authority. Often issues can be resolved via advocacy work, but that is not always available to everyone and so there is a risk of harm in the meantime.
 - Once a client is referred into the NRM, social workers often step back and assume the job is done, and it can be difficult to get them to re-engage.
 - The British survivors speaking felt that there seems to be a different approach in support services. Sarah highlighted that there often seems to be stigma, or their cases are viewed as not being on the same level as non-British cases. British survivors can be expected to navigate their own support themselves in the belief they can manage better by themselves.
 - Sarah Champion MP noted that there were so many hoops to jump through for survivor to get a positive NRM decision, long-term support, access education, and overturn criminal convictions. They needed to be a "genius" to get the support required in this system.

- SPACE said that parents are expected to do the heavy lifting in terms of knowing and navigating the Modern Slavery Act, as many first responders themselves are not familiar with this legislation, in order to receive the necessary referral and support.
- British survivors were less likely to be signposted to other support services once their NRM support ends.
- Service provisions, services and support from social workers stops at 18 even if a child is in the midst of Child Criminal Exploitation (CCE) or sexual exploitation (CSE) or drug use etc. Only the parent is left to support the individual which SPACE said is made more problematic by the fact that CCE victims are commonly groomed against their parents from their early teens.
- SPACE said that these secure homes are an example of a lack of Contextual Safeguarding and are inappropriate for County Lines victims. These homes also accommodate other children who should equally not be placed there – for example, those with severe mental health concerns requiring Sectioning but who are unable to be accommodated in an appropriate setting.
- Unregulated children's accommodation is another huge problem – once you are over 16 you are usually placed in a bed and breakfast. Sarah Champion MP said that to describe this as part of the care system when no care is provided is shocking.

Outside the NRM

Support for children

- The IASC notes that thinking, practice and interventions to support children when the threat is extra-familial from outside the home is immature and underdeveloped when compared to other forms of child abuse and intra-familial harm.
- British survivors can wrongly seem not 'vulnerable' or in need of safeguarding or priority housing need because they can speak clearly, understand some of the processes etc.
- Sarah Champion MP said she had visited a secure children's unit and that it was essentially a prison. Boys and girls were all living in the same space. The boys were showing "a lot of aggression, understandably." Almost all the girls had been victims of CSE. Sarah asked, "How is this the right environment for children. What support are they getting?"
- The IASC pointed out that some UK nationals have a number of complex needs and vulnerabilities, including mental health issues and substance abuse addiction. The complexity of people's needs shows that the Care Act doesn't deal with adult victims very well as the threshold is extremely high, and there are challenges to applying for a Care Act assessment.
- SPACE said they are seeing no assessments of vulnerability due to a lack of resource, expertise and will. Those with ADHD or Autism, in particular, are being massively neglected.

Local authority support for adults

- The Salvation Army noted that the response by local authorities is still inconsistent, and this needs to be addressed centrally.
- The IASC pointed out that some UK nationals have a number of complex needs and vulnerabilities, including mental health issues and substance abuse addiction. The complexity of people's needs shows that the Care Act doesn't deal with adult victims very well as the threshold is extremely high, and there are challenges to applying for a Care Act assessment.
- SPACE said they are seeing no assessments of vulnerability due to a lack of resource, expertise and will. Those with ADHD or Autism, in particular, are being massively neglected.

Moving across regions

- The NGO Snowdrop has seen situations when people who haven't been moved far away from where they were exploited, are then identified by their trafficker. There are few systems in place to make these people safe, if they've been identified by someone from their trafficking experience, and to ensure a

rapid response. Whereas in contrast, in asylum accommodation, they are able to move people more quickly into a safer region, but currently there is nothing like this for example in local authority housing for British survivors.

- Snowdrop noted that for British survivors who have been trafficked to other countries and return to UK, there is recourse and entitlement to support, but there isn't entitlement to Personal Independence Payment (PIP) support (for physical or mental health) because they haven't been in the country for long enough. If you are a refugee, there is a loophole. If you are a victim of domestic abuse, there is a loophole. We need a 'loophole' for British survivors of modern slavery.
- Zoom chat attendee: In the experience of one attendee, there has been an ability to bypass the local connection test for British clients. The problem is that there is a delay in the local authority actioning this and ensuring the client is moved to a safe area. In the meantime, they are often left in a remote area in a hotel for weeks with no local support.

Criminality and criminal exploitation (CE) cases

Contributions from the NGO, SPACE

- There is no willingness to view victims of CE as victims. In county lines cases, victims are often judged on behaviour and presentation. Yet the young adults and children have been groomed, and have been taught to feel hatred towards the police, and don't present as wanting to be 'saved'. The issue of victims having very little choice in becoming perpetrators is a rapidly growing issue and not being recognised or given any weight.
- The use of language by British victims of criminal exploitation can make their exploitation appear consensual and this is used as evidence that there is a lack of exploitation. There is a lack of understanding of the role brainwashing plays in county lines cases.

- The lack of evidence of exploitation is viewed as an absence of exploitation, e.g. in telecoms work (texts etc.)
- Boys are challenged by a gender bias, with perceptions of choice and that 'boys will be boys'. A boy's refusal to engage is interpreted as a choice towards a criminal lifestyle with little grasp of the push and pull factors.
- There is an expectation that a British victim should raise a Section 45 statutory defence plea themselves and there is very little professional curiosity, if at all, as to why they may not do so, beyond interpreting this as proof of 'guilt'. Yet a defence shouldn't need declaring in minors, and in adults, instead indicators should be picked up.
- Victims are facing problems opening bank accounts after being blacklisted by financial institutions during their CCE, which means they have no access to a job, debit card, loans etc further putting them at risk. Those recognised by the NRM as modern slavery victims should be assisted to reverse this blacklist.
- Homelessness is a big feature in (C)CE given the extra familial wedge created between the child and their family. It is often seen simply as a domestic issue or the child leaving home at 18.
- The UK still sees very few prosecutions in cases where victim disclosures are not forthcoming, due to a lack of will, resource and expertise. This is despite indicators obviating the need for victim input.
- We see very few male survivors from British CCE in the sector. This needs to be seen in the context of how long it has taken historic CSE victims to recognise their own exploitation (often decades.)

Contributions from Professor Susan Edwards

- Professor Edwards noted that young girls were being prosecuted for offences of prostitution in the 1990s and still have these details on record. To date, that legal fight to remove such information continues.

Proposals going forward¹

Survivor Voice

- Karen, Emily and Sarah all empathized the need for more survivor inclusion in Government/NGO/ police/council policy and guidance: We all need to listen to, believe and act on what survivors tell us, as they are the experts who can tell us how best to respond to this. What does this mean in practice? Ensuring Survivors are around the table when policy/guidance/service delivery is being created. Ensure survivors and their families are funded to do this. This is particularly necessary given the huge statutory knowledge gap as well as a disconnect between what happens in theory and practice.

Training

- Training for workers in the NRM, and first responders, needs to be created that specifically examines the experience and needs of British survivors.
- Training needs to move forward and bring survivor voices into this space and also consider appropriate pathways.

Schools

- There was a suggestion on the zoom that suspension and exclusion of children in schools should trigger a vulnerability assessment first and a range of multi-disciplinary action and consideration around the child.

- There was also a suggestion that both NRM and modern slavery awareness should be transformed into something schools aspire their students to have – with the suggestion of an accredited module they need to pass.

Housing and Accommodation

- The IASC asked if reciprocal housing arrangements between local authorities could be created, as is the case in domestic abuse, to assist in cases where survivors need to move to different local authority areas’.
- The IASC wrote to the minister to ask if the amendment to the Domestic Abuse Act 2021 could be extended to include victims of modern slavery. The response from the minister referenced the ongoing work between the Home Office’s Modern Slavery Unit and the Ministry for Housing, Communities and Local Government (MHCLG) in this area. Victims of modern slavery should be deemed as having priority need. We need the legislation to specifically mention victims of modern slavery, so that their rights aren’t left open to interpretation.
- She went on to note that the victim might have priority need, but it’s not explicit, and so there should be more detail of the needs of victims of modern slavery in the Homelessness Code of Guidance to increase the likelihood victims are properly supported.
- The Domestic Abuse Bill will be passed soon and it cites ‘a person with vulnerability’ and ‘special circumstances’;

¹ Please note the below proposals are from individual speakers and one recommendation is from an attendee and are not necessarily supported by all speakers who were on the panel.

but we don't know how these are defined. But we need, in the legislation, to specifically mention victims of modern slavery so their rights and entitlements are not open to interpretation.

- The Salvation Army explained that First Responder (FRs) need to assess and understand more about the background of each potential victim and their entitlements prior to making a referral to ensure they are housed in the most suitable accommodation.
- Snowdrop and the Commissioner felt we need to remove the local connection test in clear guidance for victims of modern slavery.
- The Government must make sure local authorities know to bypass geographical connections and must also be required to prioritise victims of modern slavery who have been moved to a safehouse in another region and need to be housed following an NRM decision. They should have an immediate right to a housing application.
- Snowdrop said that the new local authority where the victim is moved to, in order to be safely housed, should be obligated to deal with the new housing need and put together a housing plan and if necessary liaise with the previous local authority where they were moved from, if they can be rehoused or return. The aim should be to house survivors as quickly and as safely as possible.

Compensation

- There should be a fast-tracking process for Criminal Injuries Compensation Authority (CICA) compensation claims if the victim has a positive CG decision. At present, CICA advised Karen that there was a minimum of 18 months for them to process the claim so if that claim is disputed it risks taking years, subsequently causing years of delay for the survivor to rebuild their life.
- The UK needs to create a strategy with clearer guidance around criminal exploitation (CE) including creating one agreed definition of criminal exploitation.
- The IASC noted that the guidance Working Together to Safeguard Children statutory guidance doesn't deal with child exploitation and extra-familial harm sufficiently. We need to think more about how to support children when the threat is from outside the home—this is not as developed as the response to abuse within the home.
- The IASC suggested child sexual exploitation (CSE) and child criminal exploitation (CCE) cases should lead to immediate NRM referrals and S47 inquiries, which should trigger child protection processes. But currently we are not seeing that in every case.
- SPACE said that the NRM was set up with non-British children in mind. Local authorities should not act as effective corporate parents of county lines or CSE victims in the NRM when birth parents are present, and signify no risk. The NRM should have a duty to treat the British parents alongside the council as the corporate parents and so keep both of them informed of the NRM's outcomes.
- SPACE explained that currently British parents are not being included in work around the child. Children's Services should focus on protection and support, and guidance should recommend co-working with families.
- The NRM needs to provide a pathway to allow victims of modern slavery to access assistance to remove criminal records that were obtained under modern slavery duress.
- SPACE highlighted that there should also be assistance provided to ensure survivors are allowed to access financial institutions.
- She also felt that modern slavery victims need to be channelled down a support pathway and proactively assisted by councils into education and employment

Criminal Exploitation

- Services need to respond with direct intervention and contextual safeguarding instead of using a diversion approach which SPACE felt didn't work for young people in criminal exploitation.
- The Modern Slavery Act (MSA) is not retrospective and defendants may be recognised as victims of human trafficking but not have their alleged convictions retrospectively overturned i.e. as in the case *R v A* [2020] EWCA Crim 1408 where a child victim of trafficking was recognised as such by the NRM yet nonetheless their conviction was upheld.
- Professor Edwards recommended that the Government remove the past criminal records of women, who were prosecuted for prostitution when they were children, as we now recognise that they were victims of human trafficking, slavery, coercion and abuse.

Support in and outside the NRM

- Karen, Emily and Sarah all said that we must ensure support within the NRM is adequately catered to British survivors.
- Snowdrop highlighted that the guidance is unclear on whose responsibility it is to support British victims, with the NRM and local authorities regularly pointing at each other, forgetting that there is a vulnerable person needing immediate help (with SPACE noting that the victim, for example in criminal exploitation cases, in the meantime a becoming increasingly embedded in criminality, violence and danger and becoming an alpha-victim). There is a need for clearer legislation and guidance.
- Snowdrop said that we need to examine what systems and pathways need to be set up to ensure victims of trafficking can be safe if they are identified by their traffickers – something that is possibly a greater risk for British survivors. Snowdrop said that we presently see organisations and local authorities working in silos, often fighting over who

should house a survivor. Instead, we need to start seeing this as a shared responsibility. We need shared risk assessments and a shared safeguarding approach between agencies with individual needs of the victim assessed to ensure they are housed appropriately.

- The IASC highlighted that many British survivors are choosing not to be referred into the NRM. She said that we need to think about what the non-NRM pathways are and different ways we can support people. We need clear published guidance to councils on the challenges British survivors may face, why they are likely to need continued safeguarding and support, even without having Care Act eligibility, to ensure recovery and protect them from further exploitation.
- The Salvation Army emphasized that first responders need to ensure survivors are aware of the NRM and its provisions before being referred.
- Subsistence rates should be 'passported' and not included in assessing legal aid applications.
- We need to create more first responders within the specialist NGO sector, and not keep relying on stretched police and councils. Furthermore, for example, in County Lines cases, SPACE felt that there was a conflict of interest, to refer, for some statutory first responders.
- The Home Office and MHCLG need to examine what long-term support needs look like and how can we create a system that provides this.
- Snowdrop said a positive conclusive grounds decision in the NRM should entitle all British survivors who have been exploited abroad with access to Personal Independence Payment (PIP) support.

Twenty Key Recommendations

The NRM has been under review for seven years and while the number of British survivors identified rises, there has been limited improvement in long-term support options and the criminalisation of British victims continues.

The Human Trafficking Foundation (HTF) has pulled together twenty key recommendations², from our panel of expert speakers, that HTF feels are needed to tackle the inadequate level of care, support and identification of child and young adult British survivors in the UK.

National Referral Mechanism, NRM (Home Office)

1. Support within the NRM must better cater to British survivors while also improving its service to non-British survivors.
 2. The Home Office should create training for workers in the NRM and first responders that includes and specifically examines the experience and needs of British survivors.
 3. Child sexual exploitation (CSE) and child criminal exploitation (CCE) cases should lead to immediate NRM referrals and S47 inquiries, which should trigger child protection.
 4. The NRM needs to provide a pathway to allow victims of modern slavery to access assistance to remove criminal records that were obtained under modern slavery duress.
 5. A positive conclusive grounds decision should entitle all British survivors who have been exploited abroad with access to Personal Independence Payment (PIP) support.
 6. Subsistence rates should be 'passported' and not included in assessing legal aid applications.
 7. There should be a fast-tracking process for Criminal Injuries Compensation Authority (CICA) compensation claims if the victim has a positive conclusive grounds decision.
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First responders (Home Office)

8. First Responders need to assess and understand more about the background of each potential victim and their entitlements prior to making a referral to ensure they are housed in the most suitable accommodation.
 9. We need to create more first responders within the specialist NGO sector.
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²Please note the below proposals are from individual speakers and are not necessarily supported by all speakers from the panel.

Local authorities (and Ministry for Housing, Communities and Local Government, MHCLG)

- 10.** Victims of modern slavery should be deemed as having priority need and this needs to be included in legislation as well as the Homelessness Code of Guidance.
 - 11.** Create reciprocal housing arrangements between local authorities.
 - 12.** Remove the local connection test in clear guidance for victims of MDS.
 - 13.** The new local authority where the victim is moved to, in order to be safely housed, should be obligated to deal with the new housing need and put together a housing plan and if necessary liaise with the previous local authority.
 - 14.** Local authorities should not act as sole corporate parents of county lines or child sexual exploitation (CSE) victims when birth parents are present and signify no risk.
 - 15.** Children's Services should focus on protection and support, and guidance should recommend co-working with families who have a parental role.
 - 16.** The Home Office and MHCLG need to co-create clear published guidance to councils on the challenges British survivors may face, why they are likely to need continued safeguarding and support, even without having Care Act eligibility, to ensure recovery and protect them from further exploitation.
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Schools (Department for Education)

- 17.** Suspension and exclusion of children in schools should trigger a vulnerability assessment
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Ministry of Justice

- 18.** The Government should remove past criminal records of those who were prosecuted for example for prostitution when they were children under 18, as we now recognise they were victims of trafficking slavery coercion fear and abuse.
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Cross-departmental and agency actions

- 19.** There needs to be more survivor inclusion in Government/NGO/ police/council policy and guidance.
 - 20.** The Home Office and Department for Education need to create a criminal exploitation strategy with clearer guidance including creating one agreed definition of criminal exploitation, which prioritises direct intervention and a contextual safeguarding approach.
 - 21.** First responders, National Referral Mechanism (NRM) agencies and local authorities need to develop a system of shared risk assessments and a shared safeguarding approach between agencies (i.e. between the NRM victim care provider and the local authority).
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Human

Trafficking

Foundation

Blackfriars Settlement
1 Rushworth Street
London
SE1 0RB