

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



Executive Summary

October 2023

EXECUTIVE SUMMARY

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. Having a key to safe accommodation is more than something to unlock the door; it can unlock future dreams.

– Lived Experience Advisory Panel

HOUSING LANDSCAPE FOR SURVIVORS OF MODERN SLAVERY

In many instances of modern slavery, victims reside at the place of exploitation, or their accommodation is provided by, or known to, the trafficker. For this reason, escaping modern slavery often means risking homelessness or destitution and, as such, housing and modern slavery are inextricably linked. Despite it being known as a key issue and requirement for recovery, housing options for survivors of modern slavery is an area that is notably under recorded and researched. This report is based on findings from consultations with a range of partners and explores the housing landscape for survivors of modern slavery and the challenges associated with this. Working within the confines of the housing crisis, it collates practical recommendations and asks whether learning from the Whole Housing Approach to domestic abuse can be adapted for the response to modern slavery.

Article 12 of the European Convention on Action Against Trafficking in Human Beings enshrines the right to safe and appropriate accommodation for survivors of modern slavery¹ and yet access to safe and appropriate housing is full of challenges.

There is a common misconception that the majority of adult survivors of modern slavery in the National Referral Mechanism (NRM) are housed in a safehouse under the Modern Slavery Victim Care Contract (MSVCC). In reality, this cohort only accounts for 13%, with the vast majority (87%) of adult survivors living in accommodation outside the MSVCC,² such as in asylum or social housing, in potentially precarious living situations with friends and family or placed in detention or prison.

Furthermore, the length of time survivors spend in an MSVCC support correlates to their living arrangements. From July 2021- June 2022, survivors in a MSVCC safehouse spent an average 284 days in service compared to an average of 626 days spent by survivors in outreach provision.³

Many of the tenure types held by survivors of modern slavery are temporary and do not provide the stability required for recovery. 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,⁴ survivors must have the option of safe, suitable accommodation, which 'preclude worries about being evicted'⁵ and must be not exited from the MSVCC support until stable long-term accommodation is secured. If survivors are not able to access appropriate housing, this recovery need has not been addressed and without this, a survivor's vulnerability to re-trafficking is high.

¹ Council of Europe Convention on Action Against Trafficking in Human Beings (May 2005)

² Human Trafficking Foundation, Data Request to The Salvation Army (September 2023)

³ The Salvation Army, *Supporting Survivors of Modern Slavery: Annual Report July 21- June 22* (October 2022)

⁴ Home Office, *Modern Slavery: Statutory Guidance for England and Wales* (Version 3.4, July 2023)

⁵ Modern Slavery Core Outcome Set, *Secure and Suitable Housing*

KEY FINDINGS:

- Since the Nationality and Borders Act 2022, there has been an increased requirement for survivors to provide evidence of their exploitation within a referral to the NRM, which has coincided with a 32% drop in positive reasonable grounds decisions.⁶ 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 exploitation. Despite this, the Government is yet to enact their 2017 commitment to create Pre-NRM Places of Safety.⁷
- There is a lack of clarity over whose duty it is to house survivors of modern slavery. In many cases, survivors will not be housed in MSVCC safe houses if they are eligible for local authority housing, 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.
- The Care Quality Commission inspection report observed that a key issue for survivors in MSVCC outreach support is ‘access to and quality of accommodation’ and yet MSVCC safehouses are the only accommodation in-scope for inspection.⁸
- Women are frequently placed in accommodation with mixed gender occupancies which can be re-traumatising, especially for 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.
- Location remains a challenge and 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 and a lack of understanding about the risks of re-trafficking.
- Between January and September 2022, 4,575 people seeking asylum were referred to the NRM.⁹ The majority are likely to receive MSVCC outreach support whilst they reside in asylum accommodation, which organisations have found to be unsuitable for survivors of modern slavery.¹⁰
- 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.

CONCLUSION: Recovery after exploitation requires stable accommodation that offers privacy, dignity, and the ability to build both peer support networks and a sense of community.¹¹ 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 clear pathways for survivors navigating the complex process of obtaining safe accommodation.

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. As such, it does not recommend the direct adoption of a Whole Housing Approach for modern slavery at this uncertain point in time. Instead it makes practical recommendations which go some way to addressing the challenges identified in the report and ensuring the approach to housing is centred on the individual survivor’s needs.

⁶ Home Office, Modern Slavery: [National Referral Mechanism and Duty to Notify statistics UK, Quarter 1 2023 – January to March](#) (May 2023)

⁷ Home Office, [Modern slavery victims to receive longer period of support](#) (October 2017)

⁸ Care Quality Commission, [Services for Survivors of Human Trafficking and Modern Slavery](#) (January 2023)

⁹ Home Office, [Annex: analysis of modern slavery NRM referrals from asylum, small boats and detention cohorts](#) (May 2023)

¹⁰ Hibiscus Initiatives, [Closed Doors](#) (2020)

¹¹ Modern Slavery Core Outcome Set (MSCOS) for Survivor Recovery, Wellbeing, and Integration

Summary of Recommendations

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| 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. |