



# **THE PASSAGE ANTI-SLAVERY PROJECT 2018/2020**

Findings and Recommendations from the first two  
years of The Passage Anti-Slavery Project

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## Executive Summary

From the 1<sup>st</sup> of June 2018 to the 31<sup>st</sup> of May 2020, The Passage Anti-Slavery Project delivered, amongst others:

- The Passage Modern Slavery Protocol<sup>1</sup>
- Training to 366 staff members in the homelessness sector, totalling 109 hours.
- The Passage Modern Slavery Handbook<sup>2</sup>
- Specific entries related to modern slavery on CHAIN (the London database for rough sleepers)
- Modern Slavery Multi-Agency Case Conferences in partnership with Westminster City Council to provide better support to potential victims who accepted to enter the NRM. Since then, 13 MACC's were held for 10 potential victims.
- The Passage report 2019, *Responding to Modern Slavery in the Homelessness Sector*<sup>3</sup>
- The Passage Modern Slavery Conference 2019

During this period, the project also identified and directly supported 61 potential and confirmed victims of modern slavery including:

- **6 early preventions<sup>4</sup>**
- **14 potential victims who accepted to enter the NRM<sup>5</sup>**
- **35 potential victims who refused to enter the NRM**
- **2 people in the NRM**
- **4 people post-NRM**

56% of potential victims refused government support and 22% accepted to enter the NRM. 13 people who accepted to be referred to the NRM received positive reasonable grounds decision. One person has, since then, received positive conclusive grounds decision. At the time of writing one person is waiting for reasonable grounds decision.

66% of survivors were male, 31% were female and 3% were transgender.

The prevalent types of alleged exploitation were forced labour/labour exploitation (61%), sexual exploitation (16%) and domestic servitude (11%). 6% of cases involved historic child slavery.

Potential victims originated from 23 countries, the most prevalent being Romania (12, 20%), the UK (9, 15%), Poland (8, 13%), Brazil (4, 7%), Bulgaria (3, 5%), Ireland (3, 5%), Latvia (2, 3%) and Nigeria (2, 3%).

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<sup>1</sup> Available upon request.

<sup>2</sup> <https://passage.org.uk/wp-content/uploads/2019/12/The-Passage-Modern-Slavery-Handbook.pdf>

<sup>3</sup> [https://passage.org.uk/wp-content/uploads/2019/06/Responding-to-Modern-Slavery-in-the-Homelessness-Sector\\_report-2019.pdf](https://passage.org.uk/wp-content/uploads/2019/06/Responding-to-Modern-Slavery-in-the-Homelessness-Sector_report-2019.pdf)

<sup>4</sup> By "early prevention" we mean cases in which our clients told us they were offered jobs that to us seemed dubious and in which The Passage staff had preventative conversations with them about modern slavery and exploitation.

<sup>5</sup> NRM: National Referral Mechanism (the government system to identify and support victims of modern slavery).

Based on our two-year experience, The Passage proposes the following recommendations:

**Recommendation 1** - Housing for potential victims of modern slavery who are homeless in London and wish to stay in London during government support is one of the biggest challenges we face. The homeless sector should work closely with the anti-slavery sector to address this issue. The Passage is and will keep on working with key partners on this matter.

**Recommendation 2** - Local authorities play a central role as regards to housing and safeguarding. Therefore, Central Government should provide further funding to bed spaces and specialist support staff. The Passage is committed to keep on supporting lobbying key partners such as the Independent Anti-Slavery Commissioner, Anti-Slavery International and Human Trafficking Foundation.

**Recommendation 3** - Gaps in victim care show inconsistent governmental and non-governmental multi-agency support. Research should be done to clearly demonstrate where these gaps reside and how to address them. The Passage is working with other agencies on various pieces of work.

**Recommendation 4** - Modern Slavery Navigators should be in place to support vulnerable adults. The Passage will pilot the Navigators' project in Westminster in partnership with Westminster City Council and will provide an independent evaluation report on the impact of the project.

**Recommendation 5** - Potential victims of modern slavery should have free access to legal advice before entering the NRM. The Passage is working with ATLEU and Anti-Slavery International to better understand the need of pre-NRM legal counsel.

The Passage Anti-Slavery Project has now become a permanent service. The next steps for The Passage will be to launch our Navigators project and share our learnings with the wider sector, and indeed our learnings with other major cities across Europe that are undoubtedly experiencing the same issues with regard to modern slavery within their homelessness communities.

The Passage believes in systemic change and playing our role in bringing that change about. In the field of modern slavery and homelessness we have much to share and look forward to continuing to work with many agencies to share that learning, enabling all to better support victims of modern slavery, and indeed prevent this crime from taking place in the first place.

## Introduction

This report depicts The Passage Anti-Slavery Project's first two years, from June 2018 to June 2020.

The first section of the report describes the project's objectives, the steering group which guided the project and its main key achievements. The achievements are related to the original goals of the project and to the recommendations of The Passage previous reports.

The second section presents The Passage findings on the support provided to potential and confirmed victims of modern slavery during this two-year period. This section includes a description and summary of findings of the Modern Slavery Multi-Agency Case Conferences pilot project in Westminster.

The third section describes a Modern Slavery Navigators pilot project in the homelessness sector in partnership with Westminster City Council. It also addresses the challenges during the Covid 19 outbreak.

Finally, a set of recommendations are proposed based on The Passage experience.

The aim of the report is to share our findings and recommendations to help take steps to address gaps and areas of development in victim support pathways specific to homeless people and rough sleepers, and also highlight positive partnerships that have and are being developed to provide immediate support when a potential victim is identified that could be replicated.

## 1. The Passage Anti-Slavery Project

In 2016, The Passage was asked by the Independent Anti-Slavery Commissioner to investigate the links between modern slavery and homelessness. The report, *Understanding and Responding to Modern Slavery in the Homelessness Sector (2017)*<sup>6</sup> demonstrates that homeless people and rough sleepers are being targeted by traffickers and corrupt employers: they are approached for work in the informal and black economy and are then held in exploitative and slave-like conditions across the UK. Following the publication, The Passage was funded by London Housing Foundation to create the role of an Anti-Slavery Coordinator to implement the recommendations of the report.

The Passage Anti-Slavery Project started in June 2018 aiming at making the homelessness sector resilient to modern slavery with three main outputs: training staff and raising awareness among the homeless population; data recording; and strategic partnerships for victim support. The impact was clear: The Passage is identifying an increasing number of potential victims of modern slavery who are homeless. However, this led to the observation of gaps in victim support provided by the Government (the National Referral Mechanism, or NRM).

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<sup>6</sup> <https://passage.org.uk/wp-content/uploads/2020/05/understanding-and-responding-to-modern-slavery-within-the-homelessness-sector.pdf>

To overcome the challenges faced by both victims and frontline staff, The Passage created multi-agency case conferences (MACC), a pilot project in partnership with Westminster City Council and the NHS Central London Homeless Team. The pilot project demonstrated the need to work in collaboration with local authorities and other stakeholders (i.e. the Met police) to provide appropriate support to complex cases until the victim goes to government-funded safe houses.

The Anti-Slavery Project clearly demonstrates that homeless people are particularly vulnerable to exploitation and modern slavery, but it also highlights the difficulty for a homeless person to navigate through lengthy and complicated support pathways until receiving government support. Hence, the project evolved from prevention of modern slavery to protection of victims of this crime who are homeless. The Passage anti-slavery project won the second prize of the London Homelessness Awards 2019.

## The Passage Anti-Slavery Steering Group

The Passage Anti-Slavery Steering Group provides a platform for strategic partners to oversee the progress and direction of The Passage's ongoing project to tackle modern slavery within the homeless sector. Group members are invited to provide advice, direction and relevant expertise as regards to the prevention of modern slavery and the protection of the homeless population to this crime.

The role of the Passage Anti-Slavery Steering Group is:

- To ensure the project is aligned with the members' organisational strategies;
- To ensure the project makes good use of assets (i.e. information resources, network of contacts, training delivery);
- To assist in the sound and robust management of the project;
- To approve or reject changes to the project with a high impact on timelines and budget;
- To assess the project progress and provide opinion and advice on specific technical areas of the project;
- To provide advice and guidance on current affairs as regards to modern slavery and homelessness;
- To make recommendations to the project manager (the Anti-Slavery Coordinator); and
- To review and approve final project deliverables.

The members of the Steering Group are representatives of Homeless Link, London Housing Foundation, the Independent Anti-Slavery Commissioner's Office, Metropolitan Police Force - Modern Slavery Partnership Team and Greater London Authority. The group meets quarterly.

## Implementation of the Recommendations from The Passage Report (2017)

### Training and awareness raising

From October 2018 to January 2020, training on modern slavery was delivered to 91 Passage staff members (including volunteers) and to 275 staff members from other organisations in the homelessness sector. In total, 109 hours were dedicated to training. A training package was produced which included slides, short films (produced by Unchosen), a handbook for the homelessness sector<sup>7</sup> and exercises. In addition, The Passage created a Modern Slavery Protocol which is being shared and used by other organisations (i.e. Stop The Traffik, May 2020). The Passage shares all our information material on our website ([passage.org.uk/publications](https://passage.org.uk/publications)) and supports other agencies to provide training.

Two webinars were produced and delivered by Homeless Link (06/05/2019)<sup>8</sup> and by Public Health England supported by the West Midlands Anti-Slavery Network and MSPTU (16/10/2019)<sup>9</sup>.

Presentations on modern slavery were delivered to over 1000 people in England.

The Passage also delivered its first annual Modern Slavery Conference in June 2019.

The impact of internal training is reflected on the increased number of identifications by The Passage staff. The same may be claimed about training delivered to external organisations as the following quote demonstrates:

*'Just thought I would let you know that following the session it made me more confident in recognising indicators...subsequently a Roma beggar who has been present in Birmingham City for a few years has now been safeguarded and we are awaiting a result from the NRM.'*

Police officer from West Midlands Police, 19 March 2020.

### Data gathering and sharing

Monitoring tools were created to gather key information about homeless people identified as potential and confirmed victims of modern slavery. Data entries include gender, nationality, age, types of alleged exploitation, location of recruitment, location of exploitation and location of identification. Information gathered also includes the safeguarding measures taken, while respecting the desired outcomes of our clients, i.e. NRM, no NRM, emergency or temporary accommodation, assisted voluntary return, etc.

<sup>7</sup> <https://passage.org.uk/wp-content/uploads/2019/12/The-Passage-Modern-Slavery-Handbook.pdf>

<sup>8</sup> <https://www.homeless.org.uk/modern-slavery-webinar>

<sup>9</sup> <https://policingslavery.co.uk/meeting-the-challenge/modern-slavery-webinars/>

The first report, entitled, *Responding to Modern Slavery within the Homelessness Sector* (2019)<sup>10</sup> was launched at The Passage Modern Slavery Conference 2019. The report was widely shared and presented at various events nationwide.

Monitoring reports are produced to demonstrate the impact of training and the Multi-Agency Case Conferences pilot project, described further below.

The Passage also worked with Greater London Authority and St Mungo's to insert new entries related to modern slavery on CHAIN, a multi-agency database recording information about people sleeping rough and the wider street population in London.

## Strategic partnerships

Working in partnership is key to combat the crime of modern slavery and to provide adequate support to victims. The Passage is currently working with various partners and stakeholders not only to share our experience and learn from other agencies, but also to create pilot projects to understand what support can and should be provided to vulnerable adults who fall prey to traffickers and exploiters.

In addition to The Passage Modern Slavery Steering Group members, The Passage is a member of the Independent Anti-Slavery Commissioner's Advisory Board, the Clewer Initiative's Advisory Board, the Bishop of London Modern Slavery Steering Group and the Modern Slavery and Exploitation Partnership and Communities for the London Boroughs of Westminster, Hammersmith & Fulham, and Kensington & Chelsea.

As regards to emergency support pre-NRM, The Passage created multi-agency case conferences for potential victims who want to enter the NRM in partnership with Westminster City Council and the NHS Homeless Team. The Passage also signed a Memorandum of Understanding with Bakhita House (a Caritas' safe house for women in London) and with Olallo House (the only safe house that accepts male potential victims of modern slavery in London belonging to St John's Hospitallers).

The Passage formed a Victoria Anti-Slavery Hub with members of British Transport Police, the Met Police, the Romanian Embassy, Westminster City Council and SOS Westminster. The hub intends to share observed exploitation trends in the area to create targeted awareness campaigns in the area.

In addition, many statutory and non-statutory agencies work on a daily basis with us.

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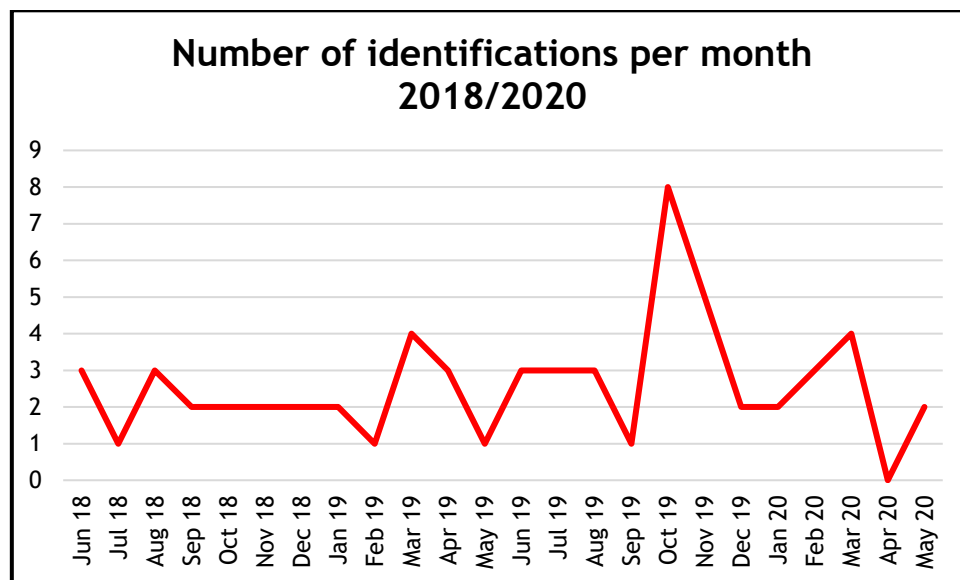
<sup>10</sup> [https://passage.org.uk/wp-content/uploads/2019/06/Responding-to-Modern-Slavery-in-the-Homelessness-Sector\\_report-2019.pdf](https://passage.org.uk/wp-content/uploads/2019/06/Responding-to-Modern-Slavery-in-the-Homelessness-Sector_report-2019.pdf)



## 2. Responding to modern slavery at The Passage: two years in review

From the beginning of the project (June 2018) until the end of May 2020, there were 63 incidents related to modern slavery and exploitation. Note that we initially count 63 incidents including a bank card found at the Resource Centre and support to a solicitor to get emergency accommodation for his client. These two entries are not counted in the demographics of the individuals supported directly by The Passage. Therefore, for demographic statistics purposes we count only the 61 clients we supported directly.

Until Covid-19 government lockdown, The Passage was identifying, on average, 2 potential victims per month, with three peaks: March and April 2019, October and November 2019 and March 2020. The number of identifications slightly increased in the summer (3 per month). The reason for these peaks may be linked to holiday times leading to increased travelling and seasonal work, but also to the anti-slavery month (October) in which more awareness information is available to victims.



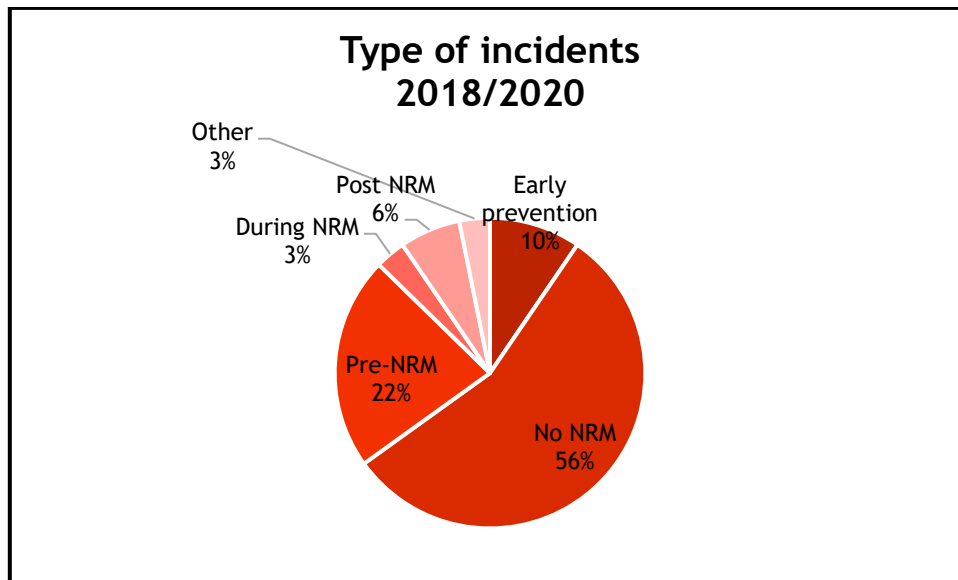
Source: The Passage 2020

The lack of identifications in April 2020 is due to the Covid-19 outbreak which led to the partial closure of The Passage Resource Centre.

The 63 incidents included:

- **1 bank card belonged to a victim of modern slavery** who had been in a safe house in the previous years. This person was never a Passage client.
- **1 referral by a solicitor for emergency housing.** Another charity took the case as their service was more appropriate.
- **6 early preventions:** 3 successful and 3 unsuccessful. The three clients who went for jobs came back to The Passage and confirmed they had been deceived. Two were supported with assisted voluntary return to their countries of origin.

- **35 clients refused to enter the NRM.**
- **2 clients during NRM support.**
- **4 clients post-NRM** (2 confirmed victims having received positive conclusive decision and two having received negative conclusive decision).
- **14 clients accepted to enter the NRM** (13 received positive reasonable grounds decisions and one has, since then, received a positive conclusive decision. The 14<sup>th</sup> person is waiting for a reasonable grounds decision at the time of this writing).



Source: The Passage 2020

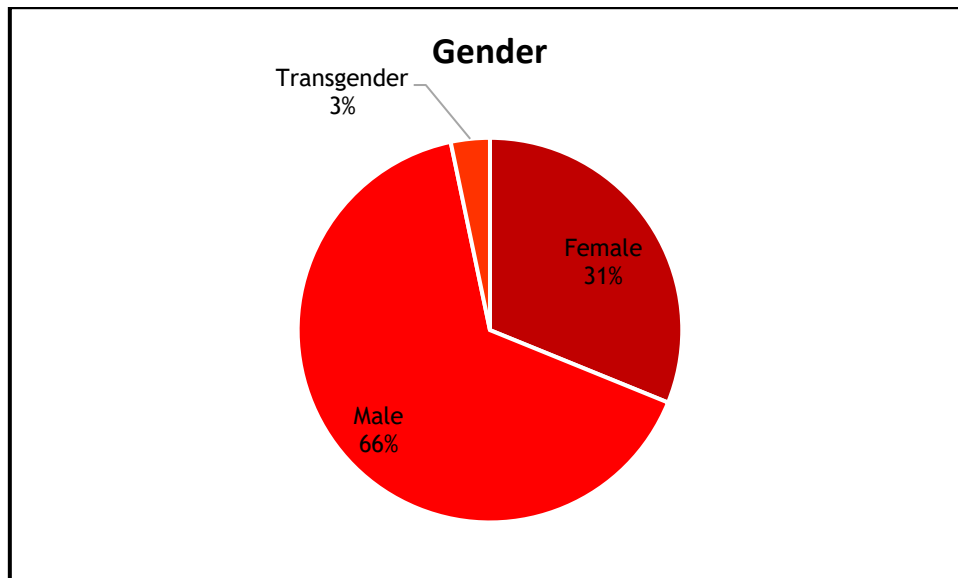
The clients who refused to enter the NRM received homelessness services such as:

- The Passage welfare support (primary needs, health and mental health support, temporary accommodation)
- Council housing
- Assisted voluntary return
- Reconnection
- Referral to specialised agencies (i.e. Home Office Forced Marriage Unit, agencies specialised in domestic abuse and/or drug rehabilitation)

Out of these 35 clients, 25 had no recourse to public funds.

It is interesting to highlight the fact that The Passage provided not only homelessness services and advocacy to two people who were receiving government support but also to two confirmed victims. This demonstrates gaps in government victim support that should be addressed. It is particularly worrying that the two confirmed victims needed housing support.

As previously observed<sup>11</sup>, the majority of victims identified are male. This may be because the majority of The Passage’s clients are also male. Out of 61 potential and confirmed victims of modern slavery supported by The Passage, 40 (66%) were male, 19 (31%) were female and 2 (3%) were transgender.



Source: The Passage 2020

Their age at the time of identification varies between 19 and 66 years old.

- Men: between 22 and 57 years old
- Women: between 19 and 66 years old
- Transgender: both were 19 years old

Alleged forms of exploitation include sexual exploitation, labour exploitation, domestic servitude, forced criminality, forced marriage, organ harvesting and child slavery. The most prevalent type of exploitation is forced labour/labour exploitation.

The forms of labour exploitation included work in farms, shops, restaurants, car washes, construction sites, massage parlours (cleaning and reception) and private houses (tarmacking, paving, roofing, cleaning).

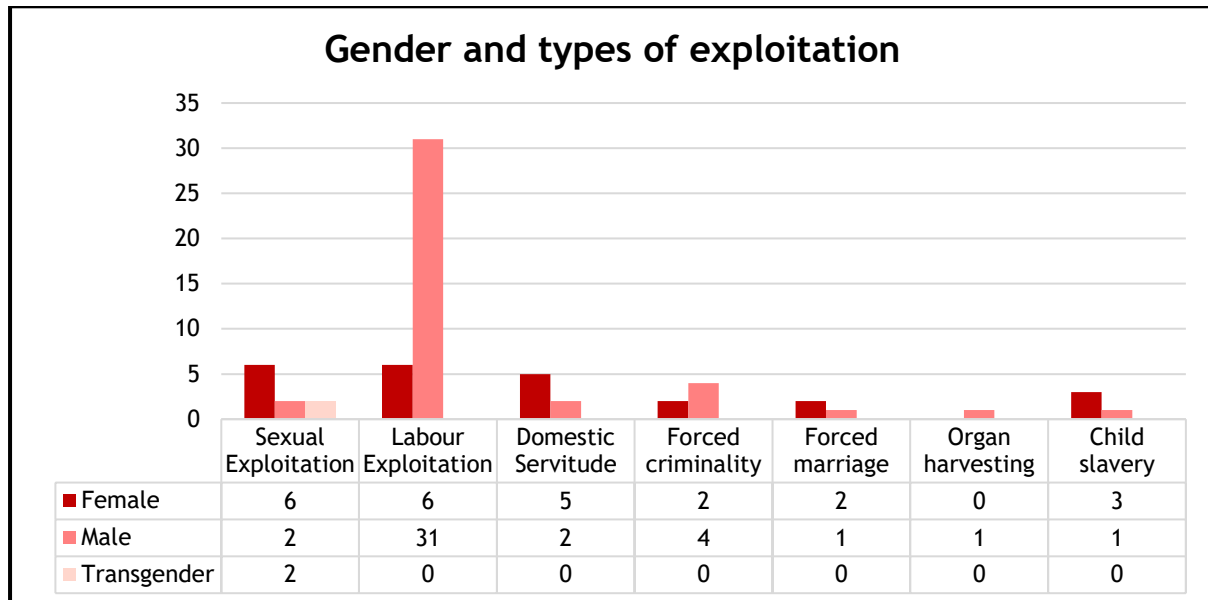
Forced criminality involved cuckooing, forced begging, theft, drug dealing and benefit fraud.

All cases of child slavery are historic, but two cases became adult slavery.

Most cases of sexual exploitation and domestic servitude relate to women while men mainly reported labour exploitation. Both transgender individuals were sexually exploited. Older women were deceived into domestic servitude while younger women (with one exception) were exploited sexually. Many cases of female domestic servitude had an element of sexual abuse.

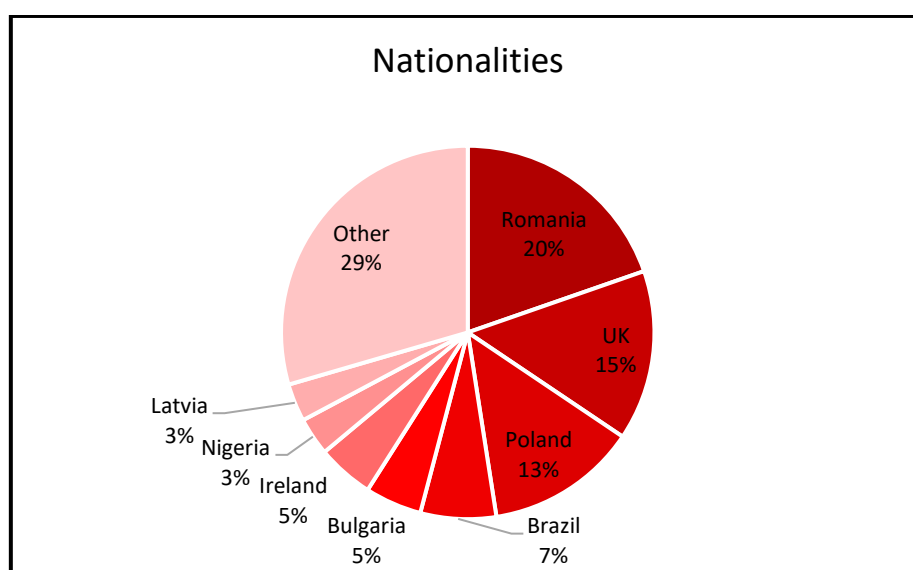
<sup>11</sup> Please refer to The Passage report, *Responding to Modern Slavery Within the Homelessness Sector*, 2019, *ibid*.

The following table and associated chart demonstrate the correlation between gender and types of exploitation. Note that many cases reported more than one type of exploitation. In addition, some people refused to report their full stories, therefore we cannot exclude that, for instance, some victims were sexually exploited and/or forced to commit crimes.



Source: The Passage 2020

The most prevalent countries of origin were Romania (12, 20%), the UK (9, 15%), Poland (8, 13%), Brazil (4, 7%), Bulgaria (3, 5%), Ireland (3, 5%), Latvia (2, 3%) and Nigeria (2, 3%). The other nationalities include Australia, Botswana, China, Ethiopia, Eritrea, Guinea, Iran, Italy, Jamaica, Latvia, Pakistan, Philippines, Saudi Arabia, Slovakia, Somalia, Sri Lanka, Sweden, Trinidad and Tobago and USA.



Source: The Passage 2020

Recruitment was in countries of origin (Botswana, Brazil, Bulgaria, Jamaica, Nigeria, Philippines, Poland, Slovakia, UK, USA) or in transit (Belgium, Denmark, Gabon, Libya) but also in the UK (Scotland and England, i.e. Aylesbury, Bedford, Birmingham, Lancaster, London, Stratford).

The locations of exploitation were mainly in the UK (Scotland, England and Wales) including London and Greater London, Somerset, Oxfordshire, West Midlands, Dover, Essex and West Yorkshire.

Some cases showed that exploitation started in the countries of origin (i.e. Brazil, Jamaica, Poland, Romania and USA). Other cases showed that exploitation started in a third country (Belgium, Libya, Greece, Spain).

The locations of identification were The Passage (including our Resource Centre, Passage House Assessment Centre and Newman Street Project), Victoria, London (by our Outreach team) the Eastern European Resource Centre, Westminster Magistrate Court and St Mary's Hospital.

Alleged abuse suffered and related trauma observed are as follows:

| Abuse suffered   | Mental health problems observed   |
|--|---|
| <ul style="list-style-type: none"> <li>Abuse over mental health vulnerability</li> <li>Deception</li> <li>Forced to take drugs or drink alcohol</li> <li>ID taken</li> <li>Little or no payment</li> <li>No freedom of movement</li> <li>Not given food or given just leftovers</li> <li>Physical violence</li> <li>Sexual abuse</li> <li>Threatens to life and to family</li> <li>Unsuitable imposed accommodation</li> <li>Verbal abuse</li> </ul> | <ul style="list-style-type: none"> <li>Depression and anxiety</li> <li>Emotional Unstable Personality Disorder</li> <li>Epilepsy from stress</li> <li>Fear</li> <li>Loss of memory</li> <li>Panic attacks</li> <li>Paranoia delusions</li> <li>Post-Traumatic Syndrome Disorder</li> <li>Psychosis</li> <li>Schizophrenia</li> <li>Self-harm</li> <li>Sleep trouble</li> <li>Substance misuse</li> <li>Suicide ideation and suicide attempts</li> </ul> |

### *Case study: Sylvia*

Sylvia presented to The Passage with complex mental health problems including memory loss. The Passage supported her for seven months with suitable accommodation (B&B then a hostel specialising in mental health support), primary services, social care and support, mental health support sessions, cooking and painting activities. The Passage also looked for her family at Sylvia's request.

Eventually Sylvia recovered and was able to tell her story. She did not remember how she arrived in the UK. She only remembered she was in a church when two men offered her shelter and protection. They took her to a house and forced her to work in various restaurants as a cleaner. One of the men raped her. Then she was placed in a private house and forced to work as housekeeper. She was never paid and only given leftovers. More than a year later she fled the house and slept rough several nights until finding The Passage. Sylvia realised that she had been a victim of a serious crime and agreed to report to the police.

The Passage facilitated the interview with the Met police and she was referred to the NRM. The Passage provided specialised pre-NRM support for another three weeks until she was placed in a safe house.

Meanwhile The Passage found her daughter who had been looking for Sylvia the last two years. She immediately flew to London and was finally reunited with her mother.



Source: The Passage 2020. These are the hands of mother and daughter when they were reunited.

## Pilot project: modern slavery Multi-Agency Case Conferences

The Passage established a Multi-Agency Case Conference (MACC) approach to safeguarding potential victims of modern slavery, trafficking and exploitation, who are homeless, including people with no recourse to public funds (NRPF). The MACC pilot project started in November 2018 in partnership with Westminster City Council (Adult Safeguarding Team and Housing Team) and the NHS Central London Homeless Teams (Homeless Health Team and Joint Health Team), having an initial duration of one year<sup>12</sup>. The project explores help available to people at risk of violence and abuse (i.e. (re)trafficking and (re)exploitation) and tests the efficiency of the MACC approach as well as possible replication in other boroughs. By working in partnership with local authorities to support potential victims, we provide immediate homelessness relief and aim to prevent (re)trafficking and (re)exploitation.<sup>13</sup>

Westminster City Council Housing agreed that, in the context of this project, when a person is identified as a potential victim, they are automatically eligible and considered priority need to secure temporary accommodation until being placed in a government supported safe house, regardless of their immigration status. Homelessness relief and prevention duty is hence fulfilled.

It is important noting that MACCs only take place for cases where the individual wants to enter the NRM. Support for people refusing to enter the NRM is still a gap that needs to be addressed.

This project was nominated for the London Homelessness Awards 2019 and received the second prize.

### MACC pilot project findings

From November 2018 to March 2020 (until the Covid-19 outbreak), The Passage and Westminster City Council held **13 MACCs for 10 potential victims**.

- 8 MACCs led to positive reasonable grounds decision;
- 4 MACCs were held after the person had received positive reasonable grounds decision); and
- 3 potential victims required 2 MACCs per person.

|          |                                  |   |
|----------|----------------------------------|---|
| Client 1 | 2 MACCs (during NRM)             |   |
| Client 2 | 1 MACC (pre-NRM)                 | Positive RG                                   |
| Client 3 | 1 MACC (pre-NRM)                 | Positive RG                                   |
| Client 4 | 1 MACC (pre-NRM)                 | Positive RG                                   |
| Client 5 | 2 MACCs (pre-NRM and during NRM) | Positive RG                                   |
| Client 6 | 2 MACCs (pre-NRM and during NRM) | Positive RG then client withdrew from the NRM |
| Client 7 | 1 MACC (pre-NRM)                 | Positive RG                                   |
| Client 8 | 1 MACC (pre-NRM)                 | Positive RG                                   |
| Client 9 | 1 MACC (during NRM)              |   |
| Client10 | 1 MACC (pre-NRM)                 | Positive RG                                   |

<sup>12</sup> Note that the project has been extended until further notice.

<sup>13</sup> The full description of this project together with the safeguarding steps to support a victim are available upon request.

Other agencies that were included in the MACCs include the Metropolitan Police, Hestia, Anti-Slavery International and the Modern Slavery and Exploitation Partnership and Communities Coordinator for Westminster, Hammersmith & Fulham, and Kensington & Chelsea.

Regarding the MACCs held in pre-NRM time (8 potential victims), the periods between identification and moving to an NRM safe house differed from 13 days to 64 days.

| Potential victim consents to enter the NRM | MACC                      | NRM form sent by FR <sup>14</sup> | Positive RG decision | Relocation to NRM safe house | Total number of days of pre-NRM support   |
|--|---------------------------|-----------------------------------|----------------------|------------------------------|---|
| Day 1                                      | Day 2                     | Day 6 (Met Police)                | Day 14               | Day 13                       | 13  |
| Day 1                                      | Day 2                     | Day 1 (WCC Housing)               | Day 16               | Day 17                       | 17  |
| Day 1                                      | Day 2<br>MACC 2<br>Day 45 | Day 5 (WCC Housing)               | Day 19               | Day 64                       | 64<br>(until NRM outreach support but Passage still provides services <sup>15</sup> ) |
| Day 1                                      | Day 7                     | Day 17 (Met Police)               | Day 19               | Day 39                       | 39  |
| Day 1                                      | Day 5<br>MACC 2<br>Day 27 | Day 11 (WCC Adult Social Care)    | Day 15               | Withdrawal                   | 38 <sup>16</sup>  |
| Day 1                                      | Day 3 <sup>17</sup>       | Day 7 (WCC Housing)               | Day 14               | Day 21                       | 21  |
| Day 1                                      | Day 3                     | Day 2 (Met Police)                | Day 8                | Day 15                       | 15  |
| Day 1                                      | Day 2                     | Day 2 (Met Police)                | Day 8                | Day 21                       | 21  |

The MACC approach came into being due to challenges faced by The Passage in regard to supporting victims of modern slavery. For example, due to the time it was taking to find an available First Responder to refer the potential victim into the NRM, The Passage overspent on B&Bs as emergency accommodation. Also, there were concerns about safeguarding vulnerable adults who are not street savvy and therefore at risk of abuse in homeless day centres and night shelters. In other words, housing authorities and adult social care should be involved as soon as possible.

In addition, The Passage realised that it may be easier for a potential victim to talk about their traumatic experiences to a nurse or a doctor. Health agencies play a key role in unveiling risks (i.e. HIV, mental health problems, capacity to consent, etc.) Their knowledge of the cases is invaluable in finding appropriate emergency accommodation and for referrals to specialist support.

<sup>14</sup> FR: First Responder

<sup>15</sup> The Passage Immigration Solicitor

<sup>16</sup> The Passage provided homelessness services for another 2 ½ months until relocation to a more suitable agency.

<sup>17</sup> Note that MACC's on Day 3 are still held within 48 hours following the PV's consent to enter the NRM.



Indeed, the complexity of some cases require a multi-agency approach, and this is especially true for cases of modern slavery. The MACC approach helps to address the case from various perspectives (safeguarding, health, emergency accommodation) in one single meeting. It also provides important information to local authorities about criminal trends in their boroughs.

The MACC pilot project's results are overall positive. It demonstrates the need and benefits of working in partnership. This is true both for the agencies and for the potential victims. Frontline staff feel supported, agencies respond to their safeguarding and safety duties by providing care and support in a timely manner, and potential victims are rapidly taken off the streets therefore avoiding the risk of re-trafficking. Therefore, the MACC approach contributes to improving victim support provided at The Passage and by the local government until the potential victim moves to a state funded safe house.

A monitoring report has been produced by The Passage and is being evaluated by Westminster City Council.

### **3. Continuity of the Anti-Slavery Project in the Homelessness Sector**

#### **Pilot Project: Modern Slavery Navigators in the Homelessness Sector**

After raising awareness, The Passage Anti-Slavery Project led to increased reporting which is currently resulting in enhanced safeguarding and pro-active protection, while offering crime disruption opportunities in London Victoria.

The Passage experience shows that victims of modern slavery who are homeless are dealing with the challenges of street homelessness and dealing with the trauma from exploitation and abuse which often results in mental health problems and other complex emotional trauma. Victims of modern slavery and exploitation who sleep rough often lack capacity to make any decisions due to the traumatic experience they had been through. They need some time to rest and stabilise before being able to understand their options. However, it is sometimes unsuitable to place them in night shelters for homeless people and consequently, appropriate emergency accommodation is a priority.

The Passage, working closely with Westminster City Council have found that access to pre-NRM services can be challenging and even more so when the potential victim is homeless and destitute. In order to tackle this issue, Westminster Council and The Passage will be piloting a team of navigators (experts in both modern slavery and homelessness frontline support) to navigate through the victim's journey to support and recovery. This pilot project is funded by the Ministry of Housing, Communities & Local Government (MHCLG) for an initial period of one year. The findings from this pilot will be shared widely to inform how best to improve the detection of modern slavery within the homelessness sector, the systemic issues that need addressing and how best to tackle these.

## Supporting Victims of Modern Slavery during the Covid 19 Outbreak

Since Day Centres and Night Shelters shut in March 2020 due to the Coronavirus outbreak, there have been less opportunities for charities to recognise clients as victims of modern slavery. This has led to a sharp decrease of identification of potential victims of modern slavery who are homeless in Westminster. This situation is worrying and is likely to remain as it is for the coming months. And although modern slavery and exploitation is not decreasing, a new reality is emerging requiring different responses and creative support methods to reach and provide care to a population even more invisible than before. Therefore, the timing of The Passage's Navigator project, working in partnership with Westminster City Council and the MHCLG is fortuitous and needed more than ever.

Based on data from Stop The Traffik, there is a lot of unknowns at the moment. The number of cases of exploitation is rising globally under the increased demand for certain goods (hand gel, rubber gloves etc. plus exploitative conditions in warehouses responding to online orders)<sup>18</sup>. Serious organised crime groups will take advantage of the disruption and urgency these businesses are feeling, knowing that agencies and recruiters might potentially use shortcuts to speed up the recruitment process. These groups will potentially push forward victims of forced labour into these opportunities, as they know there will be reduced checks.

Nationally, in terms of industries we know to be high-risk for exploitation, recruitment for construction is down 67%<sup>19</sup> but UK supermarkets recruited for over 40,000 roles across their businesses, including warehouse, store, and delivery roles<sup>20</sup> and there is recruitment for 12,000 new roles within at-home care<sup>21</sup> and 70,000 within agriculture<sup>22</sup>. The danger is that due to the number of people who have lost their jobs or are getting no work on zero-hour contracts, there is an increase in vulnerability to exploitation and the surge in recruitment and decrease in labour regulatory checks runs the risk of workers' rights being overlooked.

According to Slave Free Alliance<sup>23</sup>, traffickers will not want to see any reduction in their illicit earnings due to their victims being made redundant, having symptoms of Covid 19 or becoming unwell. Victims may be threatened, by their traffickers not to disclose symptoms or to self-isolate and may be forced to continue presenting themselves at work to generate income.

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<sup>18</sup> <https://www.theguardian.com/global-development/2020/mar/12/vulnerable-prisoners-exploited-to-make-coronavirus-masks-and-hand-gel>

<sup>19</sup> <https://uk.finance.yahoo.com/news/coronavirus-uk-jobs-remote-online-home-firms-cut-hiring-105256244.html?guccounter=1>

<sup>20</sup> <https://www.bbc.co.uk/news/business-51976075>

<sup>21</sup> <https://www.theweek.co.uk/coronavirus/106808/the-sectors-still-recruiting-during-the-coronavirus-lockdown>

<sup>22</sup> <https://www.bbc.co.uk/news/uk-england-cambridgeshire-52019810>

<sup>23</sup> <https://www.slavefreealliance.org/modern-slavery-and-covid19-coronavirus/>

Based on information from Rahab (a charity that supports victims of sex work in London), sex work is moving online, making the identification of victims more difficult.<sup>24</sup>

Last but not least, the number of people in the UK that have escaped modern slavery is growing rapidly. Newly published figures reveal that in 2019, 10,627 people were referred into the NRM<sup>25</sup>. This is a 52% increase on the previous year and comes at a time when future support for survivors of modern slavery is in jeopardy. According to Unseen UK, more people could be competing for increasingly limited help.<sup>26</sup>

Therefore, we expect:

- An increase of labour and criminal exploitation;
- An increase of cybercrime and exploitation online (i.e. virtual sexual performances, pornography, child pornography);
- A decrease of identification of potential victims of modern slavery who are homeless and destitute due to the temporary closure of services such as Day Centres;
- A more varied homeless population which may now include people who could not afford rents, people who have lost their jobs and people who used to work on zero-hour contracts who are now vulnerable to exploitation;
- Rules on social distancing and lockdown mean we are increasingly using technology to connect. We need creative ways to keep on providing immediate and primary support until the victim is placed in a safe house without putting in danger frontline workers;
- A decrease of availability of emergency accommodation for victims newly identified as these spaces are either being used to house rough sleepers or are not safe due to social distancing measures;
- An increase of mental health issues linked to Covid 19 in addition to the trauma caused by the experience of exploitation and homelessness.

The Modern Slavery Navigators pilot project intends to address these challenges in the following ways:

- Ensure new key workers including volunteers and new care support systems are informed on modern slavery and receive online training packages.
- Ensure Covid 19 guidance is available and translated to reflect the languages of potential victims.
- Follow anti-domestic violence guidelines to identify victims and provide immediate support.

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<sup>24</sup> Human Trafficking Foundation Covid 19 Forum on the 8<sup>th</sup> of April 2020.

<sup>25</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/876646/national-referral-mechanism-statistics-uk-end-of-year-summary-2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/876646/national-referral-mechanism-statistics-uk-end-of-year-summary-2019.pdf)

<sup>26</sup> <https://www.unseenuk.org/news/95>

- Adapt the original demographic mapping (on homeless people who are or have been victims of modern slavery and exploitation) to the current situation under the Covid 19 outbreak.
- Partnership with the Ministry of Housing Rough Sleepers Taskforce under Covid 19 and make sure the issue is taken into consideration.
- Create partnerships with the organisations (i.e. hotels) which accommodate rough sleepers during the outbreak.
- Partnership with train stations and coach stations once they open (as we expect a significant number of arrivals to work in the agricultural sector).

## Conclusion

Since June 2018 much has been done to identify, safeguard and protect victims of modern slavery within the homeless population, but much more has still to be done.

This report does not address current gaps in victim support. It intends to be objective as regards to the projects original aims and findings related to potential victims identified and supported by The Passage. However, it is worth noting that, in The Passage experience, there is a lack of care provision and support continuity between agencies. There is also a need for emergency accommodation before the potential victim is placed in a government funded safe house.

The Passage is committed to keep on working in partnership with other agencies and to follow best practice while providing creative ideas to tackle modern slavery under the Covid 19 outbreak in the homelessness sector.

The next steps for The Passage will be to launch our Navigators project and share our learnings with the wider sector, and indeed our learnings with other major cities across Europe that are undoubtedly experiencing the same issues with regard to modern slavery within their homelessness communities.

The Passage believes in systemic change and playing our role in bringing that change about. In the field of modern slavery and homelessness we have much to share and look forward to continuing to work with many agencies to share that learning, enabling all to better support victims of modern slavery, and indeed prevent this crime from taking place in the first place.

## Recommendations

Based on our two-year experience, The Passage proposes the following recommendations:

**Recommendation 1** - Housing for potential victims of modern slavery who are homeless in London and wish to stay in London during government support is one of the biggest challenges we face. The homeless sector should work closely with the anti-slavery sector to address this issue. The Passage is, and will keep on, working with key partners on this matter.

**Recommendation 2** - Local authorities play a central role as regards to housing and safeguarding. Therefore, Central Government should provide further funding to bed spaces and specialist support staff. The Passage is committed to keep on supporting lobbying key partners such as the Independent Anti-Slavery Commissioner, Anti-Slavery International and Human Trafficking Foundation.

**Recommendation 3** - Gaps in victim care show inconsistent governmental and non-governmental multi-agency support. Research should be done to clearly demonstrate where these gaps reside and how to address them. The Passage is working with other agencies on various pieces of work.

**Recommendation 4** - Modern Slavery Navigators should be in place to support vulnerable adults. The Passage will pilot the Navigators' project in Westminster in partnership with Westminster City Council and will provide an independent evaluation report on the impact of the project.

**Recommendation 5** - Potential victims of modern slavery should have free access to legal advice before entering the NRM. The Passage is working with ATLEU and Anti-Slavery International to better understand the need of pre-NRM legal counsel.

## Acknowledgements

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| Anti-Slavery International   | Landsec   |
| ATLEU  | London Diocese  |
| Caritas (Bakhita House)  | London Housing Foundation                                     |
| Central London Community<br>Healthcare NHS Trust, Homeless<br>Services | Ministry of Housing, Communities &<br>Local Government        |
| Central Specialist Crime (Metropolitan<br>Police Service)              | Modern Slavery Helpline                                       |
| Church of England - Clewer Initiative                                  | Modern Slavery Police Transformation                          |
| Connections at St Martin   | Modern Slavery Strategy<br>Implementation Group               |
| Crisis   | National Anti-Trafficking and Modern<br>Slavery Network       |
| Eastern European Resource Centre                                       | National Crime Agency   |
| Gangmasters and Labour Abuse<br>Authority                              | Pennington's Manches Charitable<br>Foundation                 |
| Greater London Authority   | Rahab   |
| Hertfordshire Modern Slavery<br>Partnership                            | Santa Marta Group   |
| Hestia   | St John of God Hospitaller Services<br>(Olallo House)         |
| Homeless Link  | St Mungo's  |
| Hope for Justice   | Stop the Traffik  |
| Human Trafficking Foundation   | The Salvation Army  |
| Independent Anti-Slavery<br>Commissioner's Office                      | Wales Anti-Slavery Leadership                                 |
| International Organisation for<br>Migration                            | West Midlands Anti-Slavery Network                            |
| Jewish Social Action Forum   | West Yorkshire Anti-Trafficking and<br>Modern Slavery Network |
| Kevin Hyland OBE (Council of Europe,<br>GRETA)                         | Westminster City Council                                      |

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