

# Enhancing modern slavery prevention within the homelessness sector in the UK

June 2025

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*A report commissioned by the Independent Anti-Slavery Commissioner*



Independent  
Anti-Slavery  
Commissioner



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# About The Passage

Founded in 1980 by Cardinal Basil Hume and The Daughters of Charity of St Vincent de Paul, The Passage is based in the heart of Westminster in the UK. We provide practical support and a wide range of services to help transform the lives of people who are experiencing or at risk of homelessness.

We are guided by our Vincentian values and offer our clients the resources and solutions to prevent or end their homelessness for good, including routes to employment, benefits, stable accommodation and a pioneering Modern Slavery Service.

## Our vision

Our vision is of a society where homelessness no longer exists, and everyone has a place to call home.

## Our mission

- Prevent homelessness by intervening quickly before people reach the crisis point.
- End homelessness by providing innovative and tailor-made services that act with compassion and urgency.
- Advocate for those who feel they are not heard by amplifying their voice to bring about systemic change.

## Our values

- We assist people who are experiencing or at risk of homelessness, to realise their own potential and to transform their lives.
- We act with compassion and kindness.
- We are a voice for change and justice.
- We build relationships based on trust.
- We respect each other.
- We are straightforward in all our dealings.
- We believe in practical hands-on hard work.
- We collaborate across all sections of society.



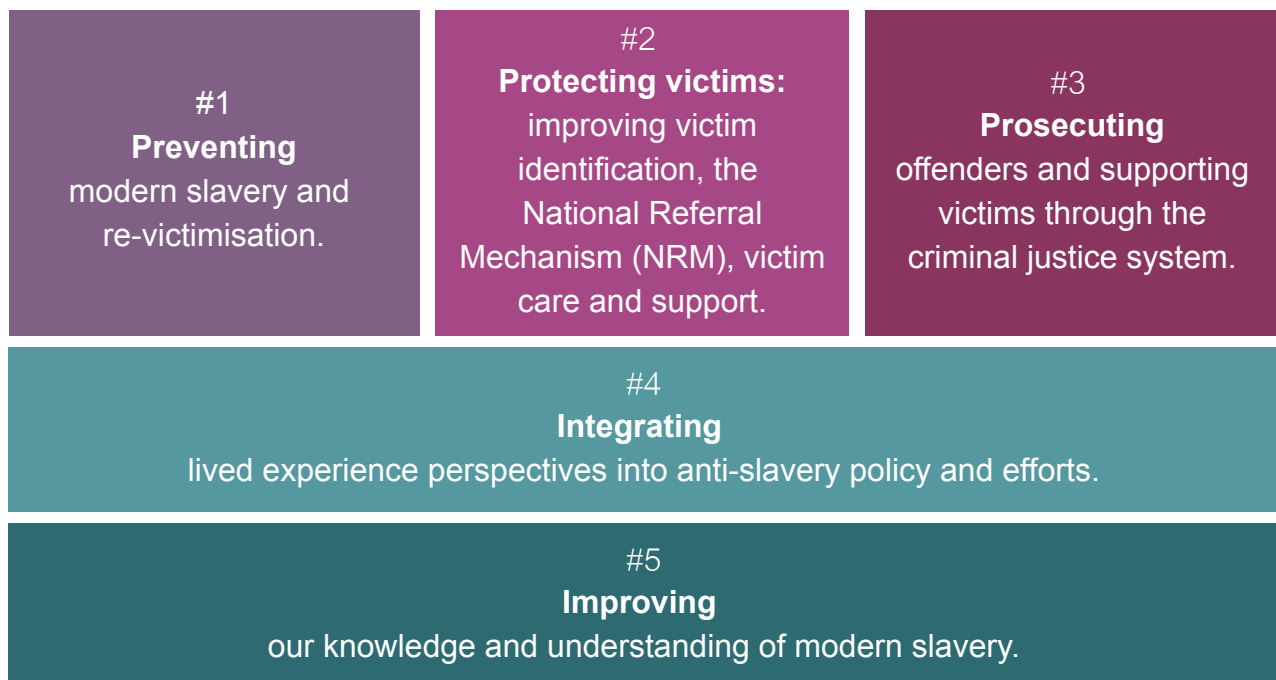
# About the Independent Anti-Slavery Commissioner

The Independent Anti-Slavery Commissioner is responsible for encouraging good practice sharing amongst all those with a role to play in tackling every aspect of modern slavery and human trafficking in the UK.<sup>1</sup>

The role is independent of government, allowing the Commissioner to scrutinise and report on the effectiveness of policies and actions taken to prevent exploitation, support and protect victims, and bring perpetrators to justice.

The Commissioner also supports the carrying out of research to improve our understanding of modern slavery and how it can best be tackled. The Commissioner works across the UK with government departments, public authorities, the sector, businesses, and law enforcement to pursue these goals.

The IASC 2024-2026 Strategic Plan outlines the core objectives for the Commissioner:



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# Acknowledgements

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Additionally, we are profoundly grateful to the focus groups and interviews, facilitated by The Passage and Migrant Help, whose members shared their lived experiences of modern slavery and homelessness. Their insights and heartfelt feedback were instrumental in shaping this project.

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Finally, we would like to acknowledge the following organisations for their support and collaboration:

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| Belfast and Lisburn Women's Aid  | Nottingham City Council  |
| Coventry Council   | Porchlight   |
| Crisis   | Royal Borough of Kensington and Chelsea                                |
| Diocese of London, Compassionate Communities   | Scottish Government, Criminal Justice Division, Human Trafficking Team |
| Flourish Northern Ireland  | St Basils  |
| Hestia   | Survivors of Human Trafficking in Scotland (SOHTIS)                    |
| Homeless Link  | The Clewer Initiative  |
| Home Office Modern Slavery Unit  | The Passage  |
| Hull Homelessness Community Project  | Unseen   |
| Human Trafficking Foundation   | UK Office of the Deputy Prime Minister                                 |
| Humber Modern Slavery Partnership  | Welsh Government, Fair Work Division                                   |
| Migrant Help   | West Midlands Anti-Slavery Network                                     |
| Ministry of Housing, Communities & Local Government, Homelessness & Rough Sleeping Directorate | West Midlands Combined Authority, Homelessness Taskforce               |
| Northern Ireland Department of Justice, Modern Slavery, and Child Exploitation Branch          | Westminster City Council   |

# Foreword from the Independent Anti-Slavery Commissioner and The Passage CEO

The Passage was the first organisation in the UK to identify the interlink between homelessness and modern slavery, responding with operational services on the ground and working at a strategic level, including with international partners, to identify solutions at a policy and systemic level.

Prevention is at the heart of everything The Passage does, and prevention is the first pillar of the Independent Anti-Slavery Commissioner's (IASC) Strategic Plan which outlines their work to combat modern slavery across the UK. This report was done in partnership between the two organisations. Its findings highlight the urgent need for a prevention-focused strategy to ensure that survivors of modern slavery do not fall into the hands of traffickers.

The report provides an overview of modern slavery prevention programmes within the homelessness sector across the UK. Examining programmes delivered by the third sector, strategies designed by local and combined authorities and the effectiveness of current legislative measures, good practice and areas for further development.

It is crucial that any policy development places survivors' voices at its heart, and this research project has done just that; ensuring that recommendations are grounded, effective and meaningful. This report emphasises the necessity and importance of co-production, as individuals with lived experience of trafficking and homelessness offer unique insights that can significantly enhance prevention programmes.

A truly collaborative approach was taken in producing this report, and we are extremely grateful to those who provided their expertise and insight, including co-producing the set of recommendations. By working with individuals with lived experience of modern slavery and sector professionals, and by bringing together representation from all the UK devolved government administrations, the report has formulated nine practical and actionable recommendations.

It is our hope that this will aid the building of capacity for preventing modern slavery occurring in the first instance, and support individuals affected by both modern slavery and homelessness more effectively.

The report also highlights the crucial role of collective action in enhancing prevention efforts. Cross-sector collaboration at local, regional, and national levels is essential to stop exploitation before it occurs and emphasises the importance of enhancing the prevention of modern slavery and homelessness through improved multi-agency collaboration at both national and local levels.

We achieve so much more when we work together rather than in isolation and this is true for government too. While the Home Office Action Plan on modern slavery is a step forward, it lacks a cross-departmental approach. It is indeed encouraging to see government beginning to explore taking a cross-departmental approach to preventing and addressing homelessness. However, we urgently need a comprehensive Modern Slavery Strategy that unites all government departments to effectively tackle modern slavery.

The pain and trauma of the survivors of modern slavery surely demands nothing less.



Mick Clarke  
Chief Executive of The Passage

A handwritten signature in black ink that reads "Mick Clarke".



Eleanor Lyons  
Independent Anti-Slavery Commissioner

A handwritten signature in black ink that reads "Eleanor Lyons".

# Voices of lived experience

We are sincerely grateful to everyone who took part in our focus groups and interviews, sharing their experiences with honesty and courage. Understanding how homelessness and modern slavery intersect begins with listening.

The following quotes offer a powerful glimpse into lived realities, highlighting how housing instability can increase vulnerability to exploitation and where existing support systems may fall short.

*"What's happened to me is why I'm homeless. If you are homeless, you're vulnerable, you're susceptible to being exploited, so one of the ways to minimise it is to minimise homelessness."*

*"When I slept rough people approached me, and I knew exactly what they were planning so I can protect myself because I've already gone through that, but some women wouldn't even think about it because they would think, it's the UK, London is a safe place. They would make some assumption that these things don't happen in the UK."*

*"What could be good is to bring this kind of education into schools, just make them aware that anyone can become [a victim of modern slavery] so kids grow up knowing this is a big risk and it's one you can't control because someone else is controlling you, so they can be more careful in every relationship and look out for red flags."*

*"I was living with a friend, but that friend asked me to move out. So, I found myself not having anywhere else to go. That's why I ended up being exploited."*

*"Modern slavery within the [homelessness] sector is not well known so probably to prevent it, you need to educate caseworkers more. [...] Even when you have people who have been in the homeless sector for 20 years, they don't know what to say [about modern slavery], so they don't make any comments because they don't know what is right or wrong. So, [we need] more education and training for the [homelessness] industry so they can be informed."*



# Executive summary

This report provides an overview of modern slavery prevention programmes within the UK homelessness sector.<sup>2</sup>

The Passage Modern Slavery Service's annual reports<sup>3</sup> demonstrate that individuals experiencing homelessness are especially susceptible to exploitation and trafficking - often before, during, and after receiving government support. This is also echoed in the IASC's Strategic Plan which identifies the interlinks between homelessness and exploitation.

The homelessness sector plays a vital role in identifying and supporting survivors of modern slavery and in preventing exploitation. Yet, there is a notable absence of research and guidance on which homelessness organisations and statutory agencies have implemented prevention projects, how effective they are, or how to establish them. Additionally, while it is encouraging that the Government is beginning to take steps towards a more joined-up, cross-departmental approach to this issue, there is still a long way to go to ensure a coordinated and effective response.

One practical step to help close this gap would be appointing dedicated Modern Slavery Coordinators<sup>4</sup> within local authorities. These coordinators can lead strategic efforts, promote best practice, and strengthen coordination across agencies, departments, and organisations. Even with the clear need for these roles, only 9 out of 339 local authorities in England and Wales currently have a specialist role.<sup>5</sup>

In 2024, the NRM – the UK's system for identifying and supporting victims of modern slavery – received 19,125 referrals.<sup>6</sup>

Despite housing being a critical factor in recovery and protection from modern slavery, the UK government does not track the housing status of survivors at any stage of their journey. Since 2018, The Passage's Modern Slavery Service has collected this data. Of the 204 survivors it supported in its first five years, 42% were homeless when they were first exploited.<sup>7</sup> This stark statistic highlights the link between homelessness and modern slavery, emphasising the need for prevention efforts that address both.

At the heart of this report is the question: What does modern slavery prevention within the homelessness sector mean? Our focus is on preventing modern slavery before it occurs.

This takes two forms:

- Universal prevention: tackling root causes of modern slavery like poverty, homelessness and limited access to work, education or healthcare – typically led by local or combined authorities.
- Targeted prevention: Focused support for communities at higher risk of exploitation, trafficking, and modern slavery – often led by charities and grassroots groups. For example, this can include outreach sessions to raise awareness of modern slavery among people experiencing homelessness.

By reviewing programmes delivered by the third sector, strategies designed by local and combined authorities and the effectiveness of current legislative measures, our report has identified good practice and areas for further development. Notably, only 42% of the 14 prevention initiatives reviewed actually tackled modern slavery before it occurs, and only 58% were informed by individuals with lived experience of modern slavery.

Collaborating with individuals who have lived experience of modern slavery and sector professionals, we have formulated nine practical and actionable recommendations (p.46) to build capacity for preventing modern slavery and to support individuals affected by both modern slavery and homelessness more effectively.

Our report highlights the crucial role of cross-sector collaboration at local, regional, and national levels to stop exploitation before it occurs. Additionally, the report emphasises the necessity and importance of co-production. Individuals with lived experience of trafficking and homelessness offer unique insights that can significantly enhance prevention programmes.

In the report, we examine past and present evidence from governments and community-led organisations, including from the devolved nations, working to prevent both homelessness and modern slavery. We offer background and context, drawing on a public health definition of prevention<sup>8</sup> that emphasises minimising risk before any harm takes place.

The methodology section (p.18) outlines the research approach and notes key limitations that influenced the scope of the findings.

# Key insights

Valuable insights from people with lived experience of homelessness and/or modern slavery, alongside professionals, have directly informed our final recommendations. Participants highlighted the need for early education on exploitation, survivor involvement in prevention efforts, and the critical role of housing in safeguarding.

They also identified systemic issues – such as knowledge gaps among housing professionals, siloed services, limited visibility of effective initiatives, and a lack of sustained investment – that hinder proactive prevention and support:

## Education is key

Risks of exploitation should be addressed early because educating about exploitation, manipulation and boundaries from a young age empowers people to recognise harmful dynamics, resist deceptive offers and internalise the lasting importance of consent and personal safety.

*“I think [prevention] should start at schools because educating a child when they’re young about what exploitation is and what it looks like is very important. Especially for young children, both girls and boys. Because when somebody’s exploiting you, they bring in something that you don’t have and make it look interesting, like they’re offering you something golden. It starts with teaching children about boundaries. It’s like my son; he’s three now and he went to nursery on Tuesday. We were teaching him about ‘no’. If it’s a ‘no’, it’s a ‘no’. So, every time he sees a cross with a red sign, it’s like ‘no’. They always remember what they’re taught at a very young age.”*

*- Participant with lived experience of modern slavery, 13 March '25*

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## Survivor involvement

Individuals with lived experience expressed a desire to contribute to outreach and prevention projects as part of their recovery.

*“Creating [outreach prevention projects] with [people with lived experience of modern slavery] would be ideal because they have walked the path of homelessness.”*

*- Participant with lived experience of modern slavery and homelessness, 13 March '25*

## Siloed systems

Departmental silos within local and regional authorities hinder effective collaboration and coproduction.

*"I don't want the safeguarding people involved because I don't want to get into trouble."*  
- Participant with lived experience of modern slavery, 13 March '25

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## Housing as a gateway

Even brief periods of homelessness can significantly limit access to stable and regulated employment.

*"They just think, okay, she's mentally abused, she won't be able to manage a team here. People see you as a damaged good."*  
- Participant with lived experience of modern slavery and homelessness, 15 January '25

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## Knowledge gaps

Housing professionals often lack understanding of modern slavery and how it manifests in their work. For example, some local authorities unknowingly place survivors of modern slavery in housing situations that expose them to further exploitation, due to a lack of awareness of trafficking risks within the private rental sector.

*"There is a lack of understanding of modern slavery by housing authorities".*  
- Staff participant, 24 February '25

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## Limited visibility

The voluntary sector runs a small number of prevention initiatives that address both modern slavery and homelessness. These efforts often go unrecognised, despite their positive impact.

*"There's a lot of good work that does happen, but nobody knows about it. There are pockets of best practice and knowledge and experience around the country that none of us are tapping into".*  
- Staff participant, 11 February 2025

## Lack of systemic investment

Many prevention efforts depend on the passion of individual project leads rather than consistent, dedicated funding and guidance.

*"It's down to capacity. We are a small team. We have a very high case load. In an ideal world, we'd be doing that [preventing exploitation before it occurs] already".*

*- Staff participant, 27 February '25*

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## Reactive, not proactive

Most current prevention work focuses on mitigating further harm after exploitation has occurred, rather than stopping it before it begins.

*"I think when we talk about prevention, I think largely that's looking at preventing further harm, so preventing re-exploitation".*

*- Staff participant, 27 February '25*

# Terminology

## Modern slavery and human trafficking

The terms "modern slavery" and "human trafficking" are used differently across the UK. In England and Wales, modern slavery is the preferred term, while in Scotland and Northern Ireland, human trafficking is more commonly used. Legally, modern slavery serves as an umbrella term that encompasses a range of severe forms of exploitation, including human trafficking.

It refers to situations where individuals are coerced, deceived, or forced into exploitative conditions for personal or commercial gain. This includes practices such as forced labour, debt bondage, domestic servitude, and other forms of involuntary servitude. Human trafficking, a key component of modern slavery, involves the recruitment, transportation, transfer, harbouring, or receipt of persons through force, fraud, or coercion for the purpose of exploitation.

## Homelessness

Homelessness is often narrowly associated with rough sleeping, but in reality, it encompasses a much broader spectrum of insecure housing. This report recognises that homelessness includes not only those sleeping on the streets, but also individuals living in unstable, unsuitable or temporary accommodation.

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## Homelessness sector

Refers to the full range of stakeholders involved in supporting individuals who are experiencing or at risk of homelessness. This includes the Ministry of Housing, Communities and Local Government (MHCLG) in England, as well as the devolved administration in Scotland and Wales, and Northern Ireland Housing Executive. It also encompasses local authorities (including housing teams and homelessness services), and third-sector stakeholders such as homelessness charities, voluntary organisations and grassroots community groups.

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## Survivor, victim and person with lived experience

This report uses the terms “survivor,” “victim,” and “person with lived experience” to describe individuals who have experienced modern slavery and homelessness. Each term is context-dependent and highlights different aspects of a person’s experience:

- Survivor emphasises strength, resilience, and recovery. It is commonly used in contexts focused on empowerment and rehabilitation.
- Victim highlights the harm, injustice, and need for protection. This term is typically used in legal and advocacy settings to reinforce rights and entitlements.
- Person with lived experience is a more neutral, inclusive term, often used in research and policy to centre the expertise and insight of those directly affected.

The choice of terminology throughout this report reflects its relevance to the surrounding context, while aiming to respect the dignity and agency of the individuals it describes.

# Introduction

*“When you don’t work and you don’t have a place [to live], you are prone to be exploited”.  
- Participant with lived experience of modern slavery and homelessness, 15 January ‘25*

Modern slavery is a widespread and complex issue that closely intersects with homelessness. People experiencing homelessness are particularly vulnerable to exploitation and trafficking due to their precarious circumstances, which traffickers exploit through coercion, deception, and false promises of shelter or employment. In addition, many survivors face homelessness not only after escaping exploitation, but also during recovery – while supported by the Modern Slavery Victim Care Contract – and upon exiting formal government assistance.<sup>9</sup>

This reality places the homelessness sector in a critical position for both identifying and supporting survivors and for leading effective prevention efforts. However, there remains a significant gap in research identifying which homelessness organisations and statutory agencies have implemented preventative modern slavery initiatives and how successful those efforts have been. Additionally, there is a notable lack of guidance from government agencies, anti-slavery organisations and homelessness service providers on how to design, establish, and sustain such initiatives. Despite these gaps, measurable solutions are possible which we discuss in this report.

In recent years, modern slavery has failed to secure sustained political commitment, often deprioritised in favour of more visible or politically expedient issues. Against this backdrop, this study begins to explore what is possible through universal and targeted prevention before harm occurs. Addressing this challenge calls for bold, creative, and inclusive thinking.

Locally, community-led and survivor-informed approaches can and should take the lead, offering innovative strategies that resist challenging global dynamics and prioritise human dignity. This report highlights the potential of these efforts and calls for collective movement to drive meaningful change across government, homelessness and housing services, law enforcement, healthcare, employment regulation and education, making prevention everyone’s business.

## Study aims and scope

The Independent Anti-Slavery Commissioner's Strategic Plan (Prevention)<sup>10</sup> highlights the importance of early intervention to protect vulnerable individuals at risk of exploitation, including the homeless population.

In support of this objective, The Passage was commissioned to examine modern slavery prevention initiatives within the homelessness sector.

This study provides an overview of these efforts at both local and regional levels. It reviews existing initiatives delivered by third-sector organisations, alongside strategies and delivery models developed by local and combined authorities.

By identifying examples of good practice and areas for improvement, the report offers actionable recommendations to strengthen the anti-slavery sector's capacity to prevent exploitation and support individuals affected by modern slavery and homelessness.

Crucially, the voices of those with lived and learned experience shape this work, ensuring that findings and recommendations are grounded in the realities of frontline practice and the lived experiences of those most affected.

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## Shifting the prevention paradigm

The UK's approach to modern slavery prevention is evolving. While the 2014 Modern Slavery Strategy focussed on disrupting offenders through a law enforcement lens, recent developments reflect a growing shift towards a public health approach. This emerging approach places greater emphasis on addressing systemic risk factors and placing individuals and their experiences at the heart of these efforts.

Recent research from the Modern Slavery Policy and Evidence Centre and others has helped reframe prevention as a proactive, continuous process aimed at reducing harm before it occurs. Although this signals meaningful progress, a fully embedded public health approach has yet to be realised and requires sustained cross-sector commitment.



Effective prevention must be grounded in comprehensive strategies that promote:

- Access to essential services
- Education and awareness
- Resilience and independence
- Disruption of exploitative systems
- Strong cross-sector partnerships

This evidence-based, inclusive approach is essential to addressing both modern slavery and homelessness in a meaningful and sustainable way.

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## The role of collaboration and early intervention

Prevention efforts are most effective when built on strong collaboration across sectors (i.e. homelessness, law enforcement, healthcare, employment and education).

Coordinated and integrated systems are needed to provide wraparound support, including housing, healthcare, legal aid and advocacy. Early intervention programmes are vital for identifying and supporting at-risk individuals before they reach crisis point.

Involving communities in the design and delivery of prevention strategies builds trust and empowers local responses.

These collaborative, grassroots efforts are key to improving outreach and delivering the support that people experiencing or at risk of homelessness most need.

# Background and context

*“[Traffickers] bring in something that you don’t have. If you really open your eyes and look at it, they’re trying to trap you. It’s important to let people know about exploitation [because] they actually don’t know they can be exploited.”*

*- Participant with lived experience of modern slavery and homelessness, 13 March ‘25*

Prevention is one of the “4 Ps” of the UK Modern Slavery Strategy 2014 (Pursue, Prevent, Protect, Prepare), which sought to strengthen the UK’s response to modern slavery. At the time of its launch by the Home Office, the prevention strand was primarily framed through a law enforcement lens, focusing on disrupting criminal networks and deterring offenders, rather than addressing the root causes and vulnerabilities that lead to exploitation:

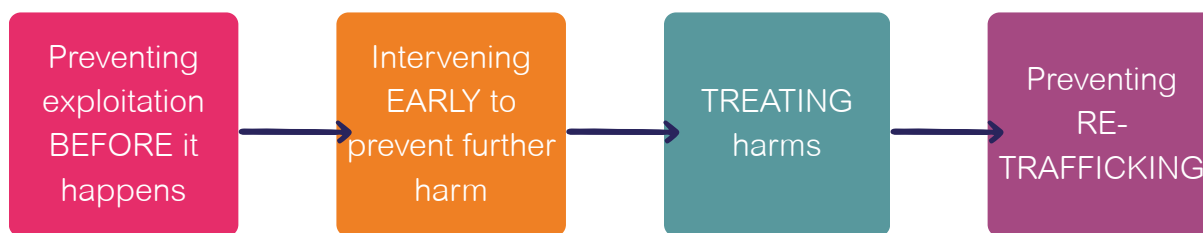
*“A key step is stopping people becoming involved in the first place, from those involved in organised crime groups to individual opportunistic offenders, as well as preventing and deterring offenders from continuing. We need to develop new techniques to prevent individuals being drawn into this type of criminality and deter those already involved from reoffending. We need to send a powerful message that anyone who does engage in modern slavery criminality will be pursued relentlessly and that the consequences will be severe.”<sup>11</sup>*

Prevention is understood by the anti-slavery sector through a public health lens, placing the potential victim or survivor at the centre of interventions. This approach addresses issues through a societal lens, emphasising collective action to improve population wellbeing and reduce risk. Grounded in data, research, and evidence-based practice, it seeks to identify root causes and develop effective, preventative interventions. A public health approach also relies on multi-agency collaboration, robust data collection, early intervention, and a focus on reducing inequalities that contribute to vulnerability.

This report adopts the definition and theoretical framework developed by previous research published by the Modern Slavery and Human Rights Policy and Evidence Centre at Oxford University.<sup>12</sup>

*“Prevention is an on-going process of avoiding and minimising exploitation and harm. This can be achieved by intervening before harm occurs, by intervening early and by treating harms. It also includes action to prevent re-exploitation and re-trafficking. Prevention includes enabling people to exercise choice over their lives and to thrive”.*

This synthesis uses the BETR Prevention Continuum:<sup>13</sup>



This process seeks to stop modern slavery before it occurs, reduce its impact and duration, mitigate lasting effects and prevent it from recurring.

All activities within this Prevention Continuum should be grounded in the five pathways of prevention:<sup>14</sup>

1. Access: to essential services
2. Literacy: development of knowledge through training and awareness
3. Power and control: building resilience
4. Deterrence and disruption: disrupting perpetrators
5. Partnership: coordination to achieve enhanced preventative interventions.

Effective prevention programmes should consider all these pathways and create comprehensive strategies grounded in strong principles. The twelve principles for modern slavery prevention programmes are designed to guide effective interventions and ensure they are impactful and ethical.

These principles<sup>15</sup> are:

1. Harm avoidance and primary prevention: Focus on preventing exploitation before it occurs, rather than just responding to it.
2. Harm minimisation and reduction: Intervene early to minimise harm and provide effective support to those at risk.
3. Promote wellbeing: Create opportunities for individuals to thrive, enhancing their overall well-being.
4. Whole systems approach: Develop a comprehensive strategy that involves collaboration among various stakeholders and sectors.
5. Ensure equity: Address disparities in access to services, ensuring that marginalised groups receive the support they need.
6. Trust building: Recognise that affected communities may distrust existing systems; tailor approaches to foster trust between service users and providers.
7. Cultural competence and gender sensitivity: Design services that are sensitive to the cultural backgrounds and experiences of affected individuals.

8. Community involvement: Engage with affected communities in the development of interventions, ensuring their voices are heard and respected.
9. Monitoring and evaluation: Implement robust systems for monitoring and evaluating the effectiveness of prevention efforts from the outset.
10. Clear Theory of Change:<sup>16</sup> Articulate how interventions are expected to work within the broader context of prevention.
11. Risk assessment: Assess potential risks associated with interventions and identify ways to mitigate them, adhering to the principle of “do no harm”.
12. Committed leadership: Ensure that prevention efforts are consistently led and supported by committed leadership across all levels.

These principles emphasise a proactive, inclusive, and evidence-based approach to preventing modern slavery, focusing on the needs and rights of vulnerable populations. By adhering to these guidelines, organisations can enhance their effectiveness in combating exploitation and modern slavery.

Specifically, preventative interventions need to focus on preventing harm from the outset and actively involve affected communities and individuals with lived experiences in designing prevention interventions.

Other research<sup>17</sup> shows the varied methods used by traffickers to recruit and control victims, highlighting that these tactics can differ significantly based on the victims' nationalities. This variation reflects the need for tailored prevention initiatives and responses to effectively combat modern slavery.

Indeed, various evaluations<sup>18</sup> highlight the need for information campaigns to target specific groups and advocate action rather than simply raising awareness.

# Methodology and limitations

This report explores interventions to prevent modern slavery among adults who experience or are at risk of homelessness in the UK.

There are three main components: a literature review, semi-structured interviews with statutory and non-statutory organisations, and focus groups with people with lived experience of modern slavery and/or homelessness.

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## Literature review

The literature review consisted of three phases to ensure a comprehensive analysis of modern slavery prevention. First, key academic studies and theoretical frameworks – such as the public health approach – were reviewed to build a solid foundation. Only sources that clearly defined prevention were included; studies focused only on victim support or law enforcement were excluded to keep the focus on proactive strategies.

The second phase looked at policies and strategies, including the UK Modern Slavery Strategy and Home Office reports. Only documents with clear prevention goals and links to homelessness were included.

The final phase examined real-world prevention projects to highlight effective practices and identify gaps. This included case studies from local authorities, charities, and frontline services, with a focus on initiatives showing measurable impact and innovation.

At every stage, materials were selected based on their relevance to prevention, usefulness for policy and practice, and potential to support long-term change.

## Interviews

Eighteen semi-structured interviews were conducted with organisations actively engaged in modern slavery prevention initiatives across the UK. These included third sector organisations, local authorities with established modern slavery strategies, combined authorities with homelessness taskforces, and devolved administrations.

The qualitative data was collected, processed, and analysed through direct engagement with the interview content, relying on careful reflection, pattern recognition, and thematic synthesis to extract key insights. The primary aim was to understand how these initiatives were designed and implemented, as well as how their impacts were evaluated.

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## Focus groups

Two focus groups were held with individuals who have lived experience of modern slavery and/or homelessness in England. Including the perspectives of survivors of modern slavery is essential, but the experiences of those who have faced homelessness – especially those who have encountered similar forms of abuse without being formally trafficked – also provide valuable insights.

The qualitative data was gathered, examined and interpreted through direct engagement with the interview content, using reflective analysis, pattern recognition and thematic synthesis to uncover nuanced perspectives, identify key trends and extract meaningful insights. This process also involved considering the implications of the findings for research and policy recommendations, ensuring that the analysis contributes to informed decision-making.

## Evaluation of prevention projects: analytical framework

In addition to the interviews and review of projects' documentation - such as impact strategies and evaluation reports - our analysis was guided by the public health approach to prevention<sup>19</sup> as outlined in various reports published by the Modern Slavery and Human Rights Policy and Evidence Centre.<sup>20</sup> We focused specifically on prevention before exploitation occurs.<sup>21</sup>

Fourteen projects and initiatives were reviewed: six from the anti-slavery sector, six from the homelessness sector, and two from the faith sector. Of these, two did not include a prevention component targeting the homelessness sector. As a result, twelve projects were included in the final analysis of modern slavery prevention within the homelessness context.

The analytical framework used is as follows:

### Preventing exploitation before it happens

Involves programmes, strategies, and initiatives designed to reduce risk factors. strategies from local and combined authorities.

### **Encourages protective factors that buffer people from exploitation, such as:**

- Promoting access to critical services
- Providing education on modern slavery to staff
- Providing education to people experiencing or at risk of homelessness
- Building awareness of personal risk factors
- Providing peer support
- Addressing laws and policies that maintain economic and social inequities.

### **Further analysis of the initiatives include:**

- Project description and clear statement of aims
- Final impact assessment
- Duration of the project
- Informed by people with lived experience
- Foster community networks to combat modern slavery
- Attention to language and cultural competency
- Creation of the project in partnership
- Project led to new partnerships
- Funders.

The analysis table is in Annex 1, with the anonymity of the organisations that delivered the projects maintained. To illustrate the third sector's commitment to prevent modern slavery, a description of each analysed project is provided in Annex 2. The report also includes a review of some exemplary strategies from local and combined authorities.

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## Recommendations panel

The report's recommendations were developed from the evidence review, qualitative research and input from participants with lived experience of modern slavery and/or homelessness as well as professionals. To further refine these recommendations, a panel of experts in policy and service provision from the four nations was convened, with support from the IASC.

This collaborative and inclusive approach ensured that the recommendations were survivor-led and based on multi-agency collaboration. Importantly, they reflect the devolved nature of housing policy across the UK, acknowledging the need for coordinated responses across multiple government departments and all four nations.

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## Scope limitations

This six-month study provides an overview of fourteen prevention projects delivered by third-sector organisations, and four strategies currently implemented by local and combined authorities. The aim of this research is not to deliver an exhaustive review of all local, combined, or devolved nation's approaches, but rather to offer a broad overview of current prevention methods within the homelessness sector.

Given the focused nature of this study and the limited time available to identify and engage participants, we decided to concentrate on specific areas. As a result, police-led prevention efforts, initiatives aimed at disrupting traffickers, and overseas supply chain interventions are not included in this report. These areas, while critical, are beyond the scope of our homelessness-focused study. Similarly, the prevention of modern slavery involving children, particularly in relation to county lines, is excluded, as it warrants a separate, dedicated study.



The focus on prevention before exploitation occurs was also driven by time constraints, prioritising upstream interventions that reduce vulnerability and disrupt exploitation mechanisms before individuals are harmed. However, it is equally critical to ensure rapid access to stable housing for those exiting the NRM, as delays in securing accommodation significantly heighten the risk of re-trafficking.

Without immediate and safe housing options, survivors remain exposed to coercion, destitution, and further cycles of exploitation, making timely support essential for long-term recovery and protection.

Although limited in scope, this initial review shines a light on key aspects of modern slavery prevention at both strategic and operational levels. It also uncovers important gaps and areas for further research.

While the contributions of many grassroots and charity-led initiatives may not be fully captured, the findings lay a solid foundation for future studies and represent a significant step towards a more comprehensive understanding of prevention across the UK.

# Evaluating practices and identifying gaps

Homelessness significantly increases vulnerability to exploitation, driven by factors such as unstable housing, financial insecurity, and limited access to essential services. Traffickers often exploit these conditions, using false promises of work or shelter to lure individuals into exploitative situations. In response, several initiatives across the UK have been developed to prevent modern slavery among people experiencing or at risk of homelessness.

This section begins by examining the approaches taken by the four UK nations to address modern slavery within the homelessness sector. It reviews relevant legislative and strategic measures, including the four Homelessness Codes of Guidance, which set out statutory duties; the Homelessness Prevention Bill, aimed at strengthening early intervention; and the Home Office Action Plan on Modern Slavery, which focuses on mitigating exploitation risks. Together, these measures offer a potential framework for tackling both homelessness and exploitation.

Next, it analyses the strategies developed by local and combined authorities to prevent modern slavery in their homelessness responses.

It concludes with an assessment of fourteen prevention initiatives focused on the intersection between homelessness and modern slavery.

# Relevant legislation and guidance

## Homelessness Codes of Guidance

The Homelessness Reduction Codes of Guidance across the four UK nations – England, Scotland, Wales and Northern Ireland – establish statutory responsibilities and best practices for preventing and addressing homelessness. Due to the devolved nature of housing policy, each nation has developed its own framework, reflecting its specific legislative priorities and strategic approaches. Despite these legislative frameworks, there are gaps in the integration of modern slavery elements within homelessness strategies across the devolved nations.

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### England

The Homelessness Reduction Code of Guidance for Local Authorities<sup>22</sup> in England differs from the Codes and Strategies in Scotland, Wales and Northern Ireland by specifically addressing the intersection of homelessness and modern slavery. It provides guidance on identifying and supporting individuals with lived experience of modern slavery who are already experiencing homelessness or are at risk of becoming homeless. While it emphasises the importance of recognising signs of modern slavery and providing appropriate support, it does not explicitly detail preventive measures to stop exploitation before it occurs.

Once identified, people with lived experience of modern slavery are entitled to a range of support services. The guidance outlines the responsibilities of local authorities to provide safe accommodation, access to healthcare, legal assistance, and psychological support.

While the Code does not explicitly focus on preventive measures, it highlights the importance of collaboration between local authorities and other organisations.

This collaborative approach involves working closely with the third sector, healthcare providers, law enforcement, and community groups to gather information and understand the support needs of vulnerable individuals. This unified framework can indirectly contribute to prevention by ensuring that at-risk individuals receive comprehensive support before they fall victim to exploitation.

For example, by providing stable housing and access to social services, local authorities can reduce the vulnerabilities that traffickers often exploit.

## Scotland

In Scotland, the Code of Guidance on Homelessness<sup>23</sup> emphasises the importance of assessing homelessness levels, offering free information and advice, and ensuring that people experiencing homelessness have access to temporary accommodation, advice, and assistance. The guidance also highlights the need to consider the best interests of children and encourages collaboration between local authorities and registered social landlords to enhance efforts to prevent homelessness. Like the English Code of Guidance, it provides comprehensive guidelines for local authorities to assist individuals threatened with or experiencing homelessness, which can indirectly help prevent exploitation by addressing vulnerabilities that may lead to modern slavery. However, the Code does not incorporate provisions related to modern slavery.

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## Wales

While the Welsh Code of Guidance for Local Authorities on the Allocation of Accommodation and Homelessness<sup>24</sup> does reference modern slavery and housing, it does not explicitly address the intersection of modern slavery and homelessness prevention. The guidance emphasises strategic planning, inter-agency collaboration, and comprehensive support to prevent homelessness, highlighting the importance of safe housing, legal advice, and access to services for vulnerable individuals and families. It also highlights the need for local authorities to work closely with various partners, including social landlords and support providers, to create a coordinated and effective response to homelessness.

The guidance mentions the Modern Slavery Act 2015 (in paragraphs 2.63–2.67) but does so primarily in the context of criminal offences and tenancy enforcement. Specifically, it notes that certain serious offences, including those related to modern slavery, can now be used as legal grounds for landlords or authorities to reclaim possession of a property due to severe anti-social behaviour.

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## Northern Ireland

Northern Ireland has a homelessness strategic framework called “Ending Homelessness Together” for 2022-2027.<sup>25</sup> This strategy provides a framework for addressing homelessness through prioritising prevention, providing appropriate accommodation and support, and helping individuals transition from homelessness into settled accommodation.

It also outlines duties for local authorities to prevent homelessness and support vulnerable individuals, with an emphasis on interagency collaboration. Like the Scottish Code of Guidance, this strategy does not encompass aspects of modern slavery.

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## UK legislative frameworks: gaps and opportunities

While all four nations have established mechanisms for early intervention and support to people experiencing homelessness, including survivors of modern slavery, there is no specific focus on preventing modern slavery in these legislative frameworks.

One key opportunity to address this gap lies in further involving housing providers and environmental health officers, particularly in relation to risks associated with Houses in Multiple Occupation (HMOs). These shared rental properties – occupied by multiple tenants who share facilities – can sometimes become sites of exploitation, where vulnerable individuals, including survivors of modern slavery, may face unsafe conditions, overcrowding, or coercion by unscrupulous landlords. Enhancing coordination with these stakeholders could improve enforcement and safeguarding, helping to prevent exploitation and ensure access to safe, stable housing.

More broadly, strengthening interagency cooperation and ensuring consistent implementation of modern slavery prevention measures across all regions could significantly improve the effectiveness of these legislative frameworks in addressing both homelessness and exploitation.

Alongside this, there is an urgent need for more robust training for frontline workers to identify signs of exploitation and provide appropriate support. The Home Office currently offers a single 45-minute e-learning session for First Responder Organisations,<sup>26</sup> including housing authorities. In addition, the Home Office webpage on modern slavery training<sup>27</sup> is outdated and some information, incorrect. Moreover, the resource focuses on enforcement over prevention, missing opportunities for upstream, systemic prevention, particularly in housing, social care, and employment, and would benefit from a stronger focus on safeguarding and survivor-centred support. This offering is insufficient to understand the complexity of modern slavery. To be truly effective, the training needs to be updated, made more accessible, and focused more strongly on prevention.

Additionally, enhanced data collection and analysis are required to understand the prevalence of modern slavery among homeless population to inform policy changes.

## Homelessness Prevention Bill (England, 2025)

The Homelessness Prevention Bill<sup>28</sup>, as introduced for its second reading at the House of Commons in March 2025, is designed to strengthen the duties of public bodies in England in preventing homelessness. A key provision is extending the period during which a person is considered threatened with homelessness from fifty-six days to six months. This change aims to provide earlier intervention and support to individuals at risk of losing their homes.

Local housing authorities are required to take specific actions to prevent homelessness, including providing mediation services, financial assistance, and support services tailored to the needs of individuals at risk of homelessness. Authorities must also maintain detailed records of the steps taken to prevent homelessness and the outcomes of these interventions, ensuring accountability and helping to assess the effectiveness of homelessness prevention measures.

The Bill encourages collaboration between public services (e.g. health services, social care, and other relevant agencies) to address homelessness but fails to consider modern slavery comprehensively. It lacks provisions for identifying or supporting victims of exploitation within homelessness prevention efforts.

Embedding modern slavery into homelessness strategies – through training, data collection, and a survivor-centred approach – would enable a more coordinated and effective response. The Bill presents a strategic moment to drive systemic change and protect those vulnerable to both homelessness and exploitation.

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## Home Office Action Plan on Modern Slavery

The Action Plan on Modern Slavery (2025)<sup>29</sup> is a Home Office-led document, which means it solely applies to England. However, it was developed with input from the devolved administrations in Scotland, Wales, and Northern Ireland, and includes provisions for collaboration across all four nations where appropriate. Each nation retains separate responsibilities for key areas such as health, education, housing and justice, so implementation and priorities may differ.<sup>30</sup>

The Action Plan outlines a series of strategic objectives under “Pillar One: Developing the Approach to Prevention”, with a focus on long-term, collaborative efforts to reduce the risk of exploitation. The plan emphasises partnership with civil society and key stakeholders, but its relevance to the homelessness and housing sector is undefined.

The Action Plan does not reference the specific role of homelessness services or local housing authorities in prevention efforts. This gap highlights the need to integrate one of the most critical frontline sectors into the national response, especially given the well-evidenced link between housing insecurity and exploitation.

The Plan's reliance on the Data and Evidence Working Group and the Modern Slavery Engagement Forum<sup>31</sup> is a promising development, offering mechanisms for cross-sector collaboration and informed decision-making. The success of these forums depends on consistent engagement, inclusive representation, and effective communication, particularly with stakeholders in the homelessness and housing sector, who are well-placed to identify early risks and intervene.

While the Action Plan lays a solid foundation for developing prevention strategies, its limited engagement with the homelessness and housing sector highlights areas for further consideration regarding integration, implementation, and the full realisation of its objectives.

It is important to highlight that this Action Plan was developed exclusively by the Modern Slavery Unit, rather than through a coordinated effort across government departments. This limitation highlights the Independent Anti-Slavery Commissioner's call for an updated UK Modern Slavery Strategy, one founded on multi-agency collaboration to ensure a more cohesive and comprehensive approach to tackling modern slavery.

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## Conclusion

The intersection of homelessness and modern slavery remains largely unaddressed in national and regional strategies across the UK. Currently, Chapter 25 of England's Homelessness Code of Guidance is the only policy document that directly addresses individuals with lived experience of modern slavery. While it highlights the importance of identification and support, it lacks a clear focus on prevention.

Homelessness strategies in Scotland and Northern Ireland currently make no reference to modern slavery, highlighting a significant policy gap.

In Wales, while the Homelessness Code of Guidance does mention the Modern Slavery Act 2015, it does so only in the context of serious criminal offences that may justify property repossession due to severe anti-social behaviour – rather than as part of a broader prevention or safeguarding strategy.

Similarly, while the Homelessness Prevention Bill strengthens early intervention for those at risk of homelessness, it does not address the specific risks of exploitation or propose measures to support individuals vulnerable to modern slavery.

Overall, despite some progress, there is still no cohesive UK-wide strategy linking homelessness prevention with modern slavery prevention. Addressing this intersection requires more explicit policy integration, targeted funding, and stronger coordination between housing, anti-slavery and community sectors.

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## Local and combined authorities' strategies

*“Local authorities should take modern slavery more seriously.”*

*- Staff participant, 24 February '25*

Local and combined authorities play a vital role in addressing modern slavery through policies and frontline initiatives. It is recognised that this landscape is changing with further devolution,<sup>32</sup> therefore, this study is a point in time recognition of current provision. Efforts often focus on crisis response - identifying and supporting individuals after exploitation has occurred - rather than on preventative action. These authorities typically assist survivors through housing support, access to services, and pathways into employment, while also contributing to the disruption of criminal networks.

As emphasised throughout this report, interagency collaboration is essential for effective prevention. Local authorities can enhance their impact by establishing local anti-slavery partnerships that enable the sharing of information, resources, and best practice. Regular interagency meetings, joint training programmes, and collaborative frameworks can strengthen coordination and promote a more unified, proactive approach to preventing exploitation.

Applied to the context of modern slavery and human trafficking, universal prevention aims to address the underlying drivers of exploitation, such as poverty, housing insecurity, and lack of access to education or employment. Rather than targeting specific at-risk groups, this approach seeks to create safer, more equitable environments for all; thereby reducing the conditions in which exploitation can thrive. It is recognised that this is a long-term plan but identification of steps to achieve this are available and achievable, as outlined below.



## Case studies

The following examples of good practice demonstrate what is possible when there is both ambition and effective coordination across services. They show how integrated, data-informed approaches can play a vital role in preventing homelessness and reducing vulnerability to modern slavery, highlighting the importance of cross-sector collaboration in building more resilient and protective systems.

### West Midlands Combined Authority Homelessness Taskforce

An example of good practice when considering universal prevention is the West-Midlands Combined Authority (WMCA) Homelessness Taskforce.<sup>33</sup> The Taskforce adopts a comprehensive approach to addressing homelessness by focusing on systemic issues that contribute to it. This involves identifying gaps in strategies, policies, procedures, laws, structures, systems, and relationships that either cause or fail to prevent homelessness.

Collaboration is key to their efforts, bringing together a wide range of stakeholders, including local authorities, public sector agencies, voluntary and community sector organisations, the business community, and members of the West Midlands Anti-Slavery Network. This collaborative effort ensures that diverse perspectives and resources are used effectively to tackle homelessness and modern slavery.

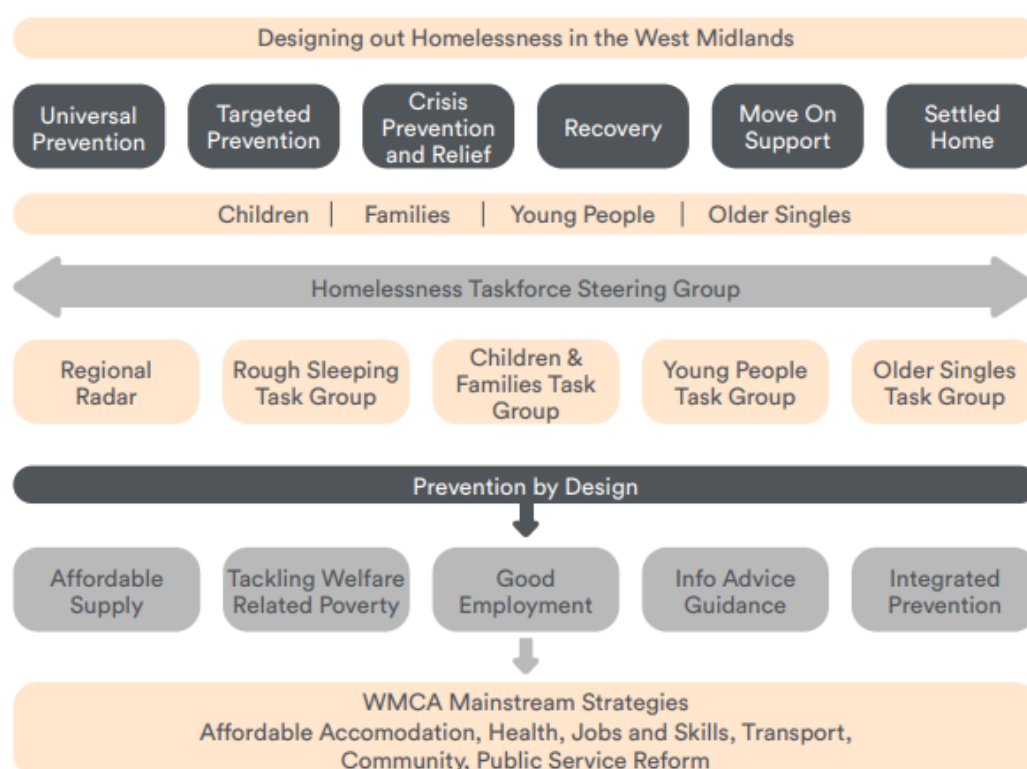
The Taskforce is committed to prevention, integrating it into all its work programmes. This includes promoting affordable housing, supporting welfare reforms, and improving access to work. They have developed innovative tools and resources, such as the Commitment to Collaborate (C2C) to Prevent and Relieve Homelessness Toolkit<sup>34</sup>, which provides practical guidance and resources for organisations, including those in the anti-slavery sector.

Additionally, the Taskforce aims to “Design out Homelessness” by addressing root causes and creating conditions for systems change, adding value to the work of partners and ensuring that prevention is built into new and emerging programmes.

The framework for addressing homelessness in the West Midlands is structured around various stages of intervention, including universal prevention; targeted prevention; crisis prevention and relief; recovery; move-on support; and a settled home.

A central Steering Group oversees the task groups, ensuring coordinated efforts. The framework integrates strategies like Affordable Supply, Tackling Welfare-Related Poverty, Good Employment, Information Advice Guidance, and Integrated Prevention. Additionally, mainstream strategies such as affordable accommodation, health, jobs and skills, community, and public service reform are included to provide comprehensive support and sustainable solutions for homelessness.

These factors make the WMCA Homelessness Taskforce a model of good practice in universal prevention, highlighting how a comprehensive, collaborative, and innovative approach can effectively address complex social issues. To illustrate this approach the Taskforce uses the following process flowchart:<sup>35</sup>



*West Midlands Combined Authority, Homelessness Taskforce:  
'Designing out homelessness'*

## Westminster City Council and the Royal Borough of Kensington and Chelsea

Another example of good practice is the joint strategy to combat modern slavery from Westminster City Council and the Royal Borough of Kensington and Chelsea<sup>36</sup>, which focuses on prevention through raising awareness, training frontline staff and community members, and fostering partnerships with agencies like law enforcement and local charities. They also engage with local communities to build trust, encourage reporting of suspicious activities, and implement internal policies that reduce the risk of exploitation, such as ethical procurement practices. These efforts intend to educate the public, identify victims, support them, and bring exploiters to justice.

Their Modern Slavery Strategy aims to have a “coordinated community response”:

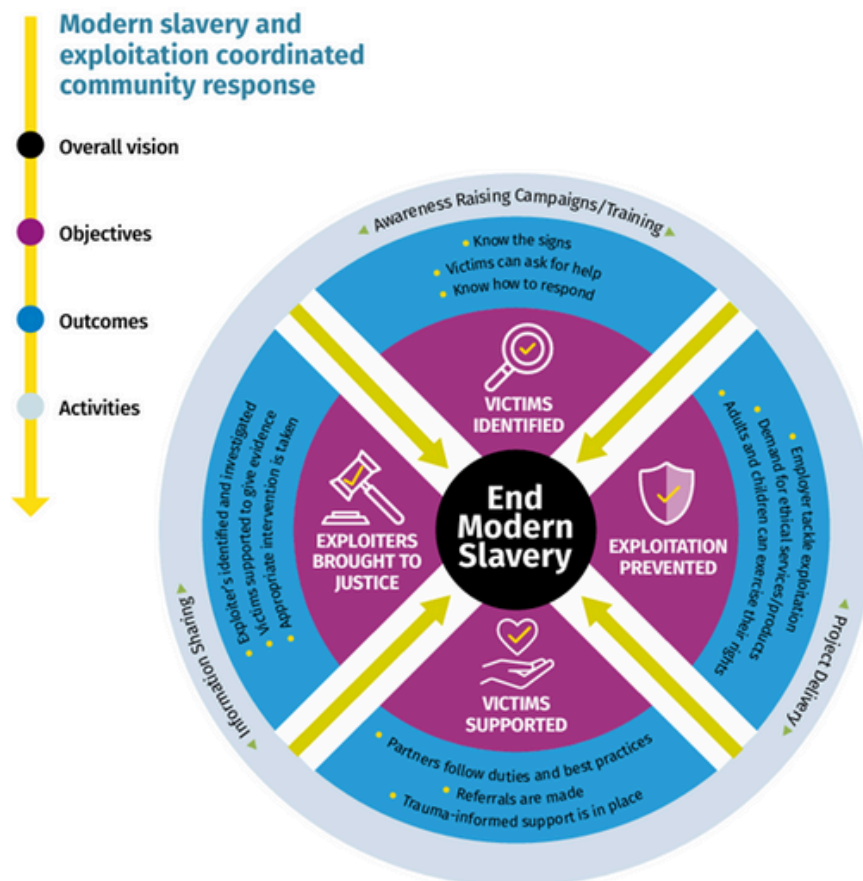
*“It requires us not only to respond appropriately within our own agencies, but also to work together with other organisations”.*<sup>37</sup>

Their Modern Slavery and Exploitation Coordinated Community Response framework offers a comprehensive, multi-agency approach to tackling modern slavery. It is built around four core objectives:

1. Identifying victims
2. Preventing exploitation
3. Supporting victims
4. Bringing exploiters to justice

These objectives are supported by key activities such as public awareness campaigns, professional training on recognising and responding to exploitation, making appropriate referrals, and ensuring services provide trauma-informed support. The framework also reinforces the importance of inter-agency collaboration, requiring all partners, including housing and homelessness agencies to fulfil their statutory duties and follow best practices.

At its core, the framework prioritises effective communication and coordinated action across sectors to achieve its overarching goal: the eradication of modern slavery.



*City of Westminster and the Royal Borough of Kensington and Chelsea. 2021. Ending Modern Slavery: Our Strategy for a Coordinated Community Response 2021-2026, p.10.*

The Westminster City Council and the Royal Borough of Kensington and Chelsea's Modern Slavery Strategy has shown positive outcomes.

The strategy has led to increased awareness and reporting of modern slavery cases, thanks to extensive training and community engagement efforts.

The coordinated approach involving multiple agencies has also improved the identification and support to people with lived experience of modern slavery, including those who decline to enter the NRM.

	2017	2018	2019	2020	2021	2022	2023	2024
<b>RBKC Adults</b>	0	1	1	3	0	9	4	17
<b>RBKC Children</b>	4	5	8	9	7	8	9	6
<b>RBKC DtN</b>	n/a	n/a	n/a	3	0	1	1	2
<b>RBKC Total</b>	4	6	9	12 (15)	7 (7)	17 (18)	13 (14)	23 (25)
<b>WCC Adults</b>	0	1	5	8	15	5	6	20
<b>WCC Children</b>	7	5	9	17	15	14	19	12
<b>Unknown</b>	0	0	1	2	2	0	0	0
<b>WCC DtN</b>	n/a	n/a	n/a	1	4	2	3	7
<b>WCC Total</b>	7	6	15	27 (28)	32 (36)	19 (21)	25 (28)	32 (39)

*Number of NRM referrals by Westminster City Council and the Royal Boroughs of Kensington and Chelsea<sup>38</sup>*

## Data gathering on housing and homelessness

An interesting aspect of the Westminster City Council and the Royal Borough of Kensington and Chelsea's strategy is its focus on data gathering and use. The Bi-Borough Modern Slavery and Exploitation Group, which includes the housing and homelessness sectors, contributes to this effort quarterly. They collect data on various factors, including housing status at the time of identification. Although this is a new data point and has not yet influenced policy change, it is expected to do so in the future.

In 2023, this partnership data informed a targeted prevention initiative led by Stop the Traffik. Using these data insights, the campaign developed tailored content on workers' rights for Romanian nationals, reaching over 54,000 Romanians via Meta platforms (Facebook and Instagram).

Targeting those who worked, lived or visited the three boroughs, the initiative sparked engagement, with nearly 3,000 individuals seeking more information and interacting with the content.<sup>39</sup> Similarly, once data reveals the number of survivors experiencing homelessness at the point of identification by a First Responder Organisation, the critical role of the homelessness sector in recognising signs and providing immediate support becomes more evident.

This example highlights the power of data-driven interventions and can strengthen the case for increased investment in the sector, ensuring it is equipped to act as a frontline safety net for those at risk of or escaping modern slavery.

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## Modern Slavery Coordinators

Modern Slavery Coordinators,<sup>4</sup> employed by those authorities where we identified good practice, are a useful means through which to direct prevention. Modern Slavery Coordinators are key specialists within local authorities, ensuring a cohesive and survivor-centred approach to modern slavery identification, support and prevention. They strategically coordinate responses across agencies, facilitate collaboration between local government, law enforcement, NGOs and frontline services.

They embed survivor-centred practices in policy and service delivery, enhance data collection and intelligence-sharing to improve identification and intervention. They also advocate for resource allocation to strengthen local prevention efforts. Currently only nine local authorities have this role. Local authorities should consider whether a designated coordinator role would be helpful to take forward their prevention agendas.

As the Human Trafficking Foundation notes:

*“The position of local authorities in our communities makes them an essential part of responding to modern slavery in the UK. This is recognised in the statutory obligations put on them by legislation such as the Modern Slavery Act (2015). Despite these vital duties, local authorities are not being given the requisite support to be able to respond effectively to modern slavery, which puts individuals and communities at risk”.<sup>40</sup>*

Research has shown that embedding Modern Slavery Coordinators within local authorities has led to improved identification of victims, more effective multi-agency collaboration, and the integration of modern slavery prevention into broader safeguarding frameworks. By fostering strategic partnerships and advocating for resource allocation, they have contributed to more sustainable and proactive interventions, ensuring that survivors receive timely and comprehensive assistance while reinforcing systemic efforts to disrupt exploitation networks.<sup>41</sup>

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## Challenges and obstacles

### Resources

Local and combined authorities face several challenges preventing modern slavery before it occurs. According to all participants working in local authorities<sup>42</sup>, resource constraints are a significant challenge, as limited funding and staffing can impede the ability of local authorities to effectively identify and support victims of modern slavery and those at risk of homelessness. This is especially pertinent to primary prevention efforts.

### Training

There is a critical need for continuous training for professionals involved in adult safeguarding and housing,<sup>43</sup> as many practitioners may lack the specific knowledge required to identify signs of modern slavery and respond appropriately. The inconsistent implementation of strategies and policies across different regions further exacerbates the issue leading to a postcode lottery of support and interventions. This leaves some individuals more vulnerable to exploitation.

Training delivered by the Home Office must be further developed and made universally accessible to all First Responder Organisations, including local housing authorities. This is essential to ensure a consistent, high-quality approach to identifying and supporting survivors of modern slavery across all sectors. The training should provide detailed, practical guidance on recognising key indicators of modern slavery in various settings, empowering frontline professionals to act with confidence and accuracy.

A strong focus on trauma-informed interviewing techniques is essential. Responders must be able to engage with survivors in a way that minimises re-traumatisation, fosters trust, and supports disclosure through compassionate and structured questioning techniques. Furthermore, the training must include comprehensive information on housing pathways, enabling responders to secure timely, appropriate accommodation that meets the specific needs of survivors.

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### Multi-agency working

Multi-agency collaboration for the purpose of a coordinated approach is emphasised as a key component of effective prevention, but the effectiveness of these partnerships can be hampered by inconsistent communication and coordination among stakeholders.<sup>44</sup> Furthermore, there is a need for more robust mechanisms to gather and use data on the housing status of survivors at the time of referral to the NRM, throughout their recovery period under the Modern Slavery Victim Care Contract and upon exiting government support to inform policy changes and evaluate the effectiveness of interventions.

According to a participant,

*“We are caught in this chicken and egg situation where we don’t have data to substantiate the incidence of trafficking within the homelessness population in Scotland (so most people don’t really believe it’s an issue)”.*<sup>45</sup>

Addressing these gaps requires a coordinated approach that includes specialised training, consistent implementation of strategies, enhanced multi-agency collaboration, targeted prevention measures, and improved data collection and analysis. An updated UK Modern Slavery Strategy could tackle these issues.

Finally, while universal prevention focuses on addressing root causes and creating a safe environment for everyone, it may not adequately address specific vulnerabilities (for example, people with complex needs experiencing homelessness) which require more targeted and nuanced approaches.



## Third sector and community-led initiatives

*“There’s a lot of good work that does happen, but nobody knows about it. There are pockets of best practice and knowledge and experience around the country that none of us are tapping into”.*

*- Staff participant, 11 February ‘25.*

Local government authorities operate at a strategic level, delivering universal prevention through integrated services such as housing, social care, education, and employment support. Their broad statutory responsibilities position them to implement long-term, systemic interventions that address the root causes of both homelessness and modern slavery.

In contrast, charities and grassroots organisations often operate on limited and short-term funding cycles, which can constrain their ability to deliver sustained, scalable initiatives. However, their targeted, frontline interventions play a vital role in reaching high-risk populations, responding quickly to emerging needs, and filling service gaps that statutory bodies may overlook or lack capacity to address.

This distinction in roles highlights the importance of structured collaboration between local authorities and the third sector. An effective, holistic prevention model requires combining the strategic capacity of government with the agility and community reach of voluntary organisations.

Aligning priorities, sharing data and coordinating funding mechanisms are essential to ensuring continuity of support and maximising impact across sectors. For example, multi-agency panels, advisory boards with survivor representation and cross-sector working groups can serve as vehicles for shared decision-making; developing standardised but adaptable frameworks for cross-sector data-sharing ensures timely responses; and moving beyond rigid, short-term cycles to multi-year, flexible funding that enables charities to strategically plan and continuously improve their services according to need.

## Analysis of modern slavery prevention projects within the homelessness sector

The analysis of the modern slavery prevention projects, using the analytical framework detailed in the methodology section and described in Annex 1, reveals several key insights. A significant majority of the projects (92%) promote access to critical services and foster community networks to combat modern slavery.

Additionally, all projects provide modern slavery education to staff in the homelessness sector, highlighting a strong focus on equipping frontline workers with the necessary knowledge. However, only 67% of the projects extend this education to people experiencing homelessness, indicating a gap in direct outreach efforts.

While 83% of the projects build awareness of personal risk factors and have a duration longer than one year, only 42% tackle prevention before harm occurs and provide peer support. This suggests that more emphasis is needed on early intervention and peer-led initiatives.

Furthermore, only 25% of the projects tackle laws and policies that maintain economic and social inequities, pointing to an area that requires greater attention. The inclusion of impact assessments (67%) and survivor involvement (58%) also varies, indicating room for improvement in evaluation and survivor-centred approaches.

Overall, the projects demonstrate a mix of internal and external funding, with 42% relying on internal sources.

Analysis factors	Total %
Tackles prevention before harm occurs	42%
Promotes access to critical services	92%
Provides modern slavery education to staff in the homelessness sector	100%
Provides modern slavery education to people experiencing homelessness	67%
Builds awareness of personal risk factors	83%
Provides peer support	42%
Addresses laws and policies that maintain economic social inequities	25%
Includes a project description and clear statement of aims	75%
Includes impact assessments	67%
Duration of project longer than one year	83%
Informed by survivors	58%
Fosters community networks to combat modern slavery	92%
Is attentive to language	92%
Was created in partnership	58%
Created new partnerships	92%
Funding (internal/external)	42%

## Challenges and obstacles

This analysis identifies several challenges that limit the effectiveness and comprehensiveness of modern slavery prevention efforts within the homelessness sector.

### Inconsistent focus on primary prevention

There is a lack of consistency in how primary prevention – stopping exploitation before it occurs – is understood and implemented across projects. Many initiatives remain focused on crisis response (i.e. spot the signs and have a clear support pathway for survivors experiencing homelessness), missing key opportunities to reduce vulnerability at an earlier stage. Without a shared understanding and commitment to proactive prevention such as delivering informative outreach sessions about the methods of recruitment and control used by traffickers, vulnerable populations remain at risk.

A strategic shift toward embedding primary prevention across all interventions is essential to achieving long-term impact.

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### Gaps in peer support and structural reform

Few projects offer peer support (i.e. where individuals with shared lived experiences provide mutual aid, guidance and emotional support to one another) and even fewer address the structural drivers of exploitation, such as discriminatory policies or labour market inequalities<sup>46</sup>. Peer support provides critical emotional and practical guidance from those with lived experience, while structural reform targets the systemic conditions that allow exploitation to persist. Strengthening both elements is necessary for a more holistic and sustainable prevention strategy.

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### Limited evaluation and survivor involvement

There is a lack of consistent use of impact assessments and meaningful survivor involvement in project design and evaluation. Without these, organisations risk implementing interventions that are ineffective or misaligned with the needs of those they aim to support. Survivor-informed approaches ensure services are grounded in lived experience, while robust evaluation enables continuous improvement and accountability.

## Case study

An example of good practice is Survivors of Human Trafficking in Scotland (SOHTIS). This anti-slavery organisation supports people with lived experience of modern slavery in Scotland. Through Project Light,<sup>47</sup> SOHTIS has developed a comprehensive, human rights-based approach to identify and assist survivors, with a strong emphasis on the homeless population. Their initiatives include street outreach to connect with vulnerable individuals, training frontline workers to recognise signs of modern slavery and confidently report them, providing second-tier support for concerned frontline workers, victim advocacy to ensure safety and access to crisis support, prevention engagements to build resilience against recruitment, and safe repatriation services for those wishing to return to their home country.

In 2024, they established Scotland's first joint Homelessness and Anti-Human Trafficking staff position, further highlighting their dedication to preventing exploitation within the homeless community.

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## Looking forward

Our analysis of third sector and community-led projects highlights several opportunities to strengthen modern slavery prevention efforts, making them more effective and comprehensive.

Projects should prioritise primary prevention by actively shifting from reactive responses to proactive interventions that address risk before exploitation occurs and build resilience against it. This transition can be achieved by embedding preventive measures into the design and delivery of all programmes, such as early risk identification, community outreach with people with lived experience and pre-crisis support pathways.

Key actions include:

- Integrating risk screening tools into routine housing and support assessments to identify early signs of vulnerability.
- Expanding training for frontline staff to recognise subtle indicators of risk and understand referral pathways.
- Delivering targeted awareness campaigns to at-risk populations (e.g., rough sleepers, undocumented migrants, or individuals in insecure work) to help them recognise and avoid exploitative situations.
- Building stronger links with education, health, and employment services to identify and respond to risk earlier in the prevention continuum.

By embedding these approaches, modern slavery and homelessness projects can help ensure that individuals are supported upstream before they become victims of modern slavery. Projects should also increase the provision of peer support and actively engage in addressing systemic barriers, such as policies that perpetuate housing insecurity, labour exploitation, and immigration-related vulnerabilities.

To strengthen support systems for individuals affected by homelessness and/or modern slavery, projects can:

- Partner with specialist peer-led organisations to co-design and deliver support programmes that are trauma-informed and culturally appropriate.
- Formalise peer support roles within service delivery models, ensuring individuals with lived experience are supported, trained, and compensated for their contributions.
- Embed peer mentoring and navigation services to help service users access housing, legal assistance, healthcare, and employment.

In parallel, organisations should advocate for policy changes to tackle root causes of exploitation by using the data and evidence from the wider anti-slavery and homelessness sectors.

This can be achieved by integrating findings from both anti-slavery and homelessness services to highlight interlinked vulnerabilities, such as how housing insecurity heightens the risk of exploitation. Actionable recommendations should be grounded in survivors' testimonies, ensuring lived experience informs both policy and practice. These insights can be channelled into advisory panels, roundtables, and policy consultations, and used to identify and challenge legislative or systemic factors that perpetuate vulnerability.

By combining peer-led support with structural advocacy – addressing root causes like systemic inequality, legal barriers, and institutional gaps – projects can significantly enhance their relevance, reach, and long-term impact. This approach shifts the focus from short-term relief to sustainable, systemic prevention.

Lastly, projects should enhance their evaluation processes by including impact assessments and involving survivors in the design and evaluation of initiatives. Involving survivors ensures that their experiences and insights inform the projects, making them more relevant and effective. By adopting a survivor-centred approach and focusing on rigorous evaluation, projects can become more accountable and responsive to the needs of those they aim to serve.

# Conclusion

Preventing homelessness and modern slavery are deeply interconnected challenges that, when tackled together, can significantly reinforce one another. Stable housing reduces individuals' vulnerability to exploitation by providing a foundation for safety, autonomy, and access to essential services. Likewise, preventing modern slavery protects individuals from exploitative conditions that often result in homelessness, especially for those who exit trafficking situations without adequate support.

This report's application of the BETR Prevention Continuum<sup>48</sup> and related frameworks identifies several strategic levers that can be used to embed prevention more effectively within the homelessness sector. These include:

## Recognising vulnerability to exploitation

Individuals experiencing homelessness, particularly those seeking work or lacking legal protections, such as people with no recourse to public funds, are disproportionately at risk of trafficking and exploitation. Prevention strategies from central government, devolved administrations, local authorities and combined authorities must target these risk factors through coordinated, early intervention.

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## Advancing wraparound, cross-sector support

Effective prevention depends on coordinated systems that connect housing, health, employment, education, and legal services to address key gaps in survivor support, including stable housing, timely legal aid, comprehensive healthcare, education, and economic empowerment. Collaboration across statutory and non-statutory sectors, including local, regional, devolved, and central government, is essential to provide timely, person-centred support to those at risk.

## Promoting empowerment

Addressing structural drivers of vulnerability, such as discrimination, cognitive impairment<sup>49</sup>, substance misuse, housing instability, precarious work and inadequate legal protections, must accompany service delivery. Embedding a social justice approach ensures that prevention efforts uphold the dignity and agency of people facing multiple forms of exclusion.

This means recognising that exploitation is deeply rooted in systemic inequalities and actively working to dismantle these structural barriers. At its core, this approach ensures that individuals at risk of modern slavery - who often face multiple forms of exclusion owing to poverty, immigration status, disability, racial discrimination, or gender inequality - are not treated as passive recipients of assistance but as agents of change in their own lives. This includes advocating for reform using data-driven policymaking to better target resources and interventions.

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## Prioritising primary prevention

Preventative action must begin before harm occurs. This includes the expansion of early intervention programmes, public education campaigns, including in schools, and training for frontline professionals. Practical awareness efforts should inform at-risk individuals and professionals about:

- Manipulation tactics (e.g., traffickers posing as benefactors)
  - Recruitment techniques (e.g., false job offers, offers of accommodation)
  - Recruitment locations (e.g., supported accommodation, soup kitchens, parks, train stations, online platforms)
- 

## Implementing targeted outreach campaigns

Prevention strategies must be tailored to reach vulnerable groups within the homeless population, including Roma communities, LGBTQI+ individuals, young people, and undocumented migrants. Campaigns should be culturally competent and rights-based, providing clear information about risks and available support.



## Embedding community engagement and lived experience

Prevention efforts must go beyond reactive responses and aim to build the resilience of affected communities. For example, delivering outreach information sessions in places such as day centres, night shelters or asylum accommodation. Involving individuals with lived experience in the design and delivery of prevention programmes strengthen trust, relevance, and impact.

Community coproduction should be embedded as a core principle in all prevention projects planning within the voluntary sector or those commissioning services.

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## Strengthening monitoring and evaluation

To ensure accountability and continuous improvement, all interventions should be guided by a Theory of Change<sup>16</sup> and supported by robust monitoring systems. Regular data collection and evaluation are essential to assess progress, adapt activities, and ensure that outcomes align with prevention goals.

By integrating these strategic insights into practice, the homelessness sector can evolve from reactive support towards a proactive prevention model. This shift will not only help reduce the risk of modern slavery but also enhance long-term wellbeing and resilience for some of the UK's most vulnerable populations.

# Recommendations

These recommendations, coproduced with individuals with lived experience of modern slavery and homelessness, provide actionable steps for policymakers, government, local authorities, and community organisations to strengthen prevention efforts at the intersection of homelessness and modern slavery.

**1** Strengthen multi-agency working across local areas to increase collaboration and prevent exploitation. Embedding multi-agency collaboration across local areas is essential to tackling homelessness and exploitation. Appointing Modern Slavery Coordinators within local authorities would bridge gaps between services and ensure a joined-up response. Additionally, including anti-slavery representatives in homelessness taskforces would ensure consistent, early responses to exploitation risks. These steps can significantly enhance the impact of homelessness legislative frameworks across all regions by addressing the complex realities of modern slavery.

**2** Empower community networks and leaders in local areas. This report demonstrates the power of local leaders in developing best practice in preventing exploitation and tackling homelessness including fostering community networks to identify signs and risk factors. Projects should continue to build and strengthen these networks, ensuring that communities are equipped to support and protect vulnerable individuals. The Independent Anti-Slavery Commissioner (IASC) will continue to support this best practice.

**3** Survivors should be included in all policy development to prevent modern slavery. Involving survivors in the design of prevention projects can improve their relevance and effectiveness. In addition, expand peer support programmes, which offer essential emotional and practical assistance to individuals affected by modern slavery. Collaborating with organisations that specialise in peer support can help integrate these services into prevention projects.

**4** Develop a UK-Wide framework for preventing modern slavery and homelessness. The Ministry of Housing, Communities and Local Government (MHCLG) and the devolved nations should work together to produce a modern slavery prevention guidance or framework for the homelessness and housing sectors that can be used by all devolved nations. This non-statutory toolkit would offer practical advice for the delivery of universal and targeted prevention initiatives. This guidance would be the product of coproduction with people with lived and learned experience as well as strategic leaders.

**5** Strengthen data on homelessness and modern slavery: Updating the NRM referral form. The UK Government should update the NRM referral form, ensuring it captures information about housing status at the time of identification. This enhancement will facilitate comprehensive data collection on the correlation between homelessness and modern slavery. The gathered data will provide insights into how homelessness affects survivors' physical and mental health, addiction issues, vulnerability to exploitation and re-exploitation, and their challenges in navigating support systems.

**6** Embedding homelessness in Modern Slavery Strategy development. The homelessness sector should be included in any development of government Action Plans and a Modern Slavery Strategy to ensure policy is developed that prevents increased exploitation occurring when people are homeless. This should include the identification and design of long-term interventions to prevent modern slavery (Home Office Modern Slavery Action Plan 2025, Action 1) by organising collaborative workshops between the Home Office Modern Slavery Unit, the Ministry of Housing, Communities and Local Government and the third sector.

**7** Enhance modern slavery training for housing authorities. The Home Office Modern Slavery Unit should lead cross-government efforts to enhance training for local housing authorities, reflecting their statutory duty under the Modern Slavery Act 2015 to identify and refer victims to the National Referral Mechanism (NRM). The Government's modern slavery training webpage must be revised with accurate links and contact details. Alongside this, its First Responder e-learning module should offer clear, comprehensive explanations of the National Referral Mechanism (NRM) and legal duties, practical guidance on recognising signs of exploitation, and survivor-informed content.

Training must also promote trauma-informed practice, safeguarding, cultural awareness, and non-discrimination, while emphasising the importance of multi-agency collaboration and data-driven policy development.

**8** Integrate education on exploitation risks from an early age. The Home Office Modern Slavery Unit should work collaboratively across government to address modern slavery risks within the context of homelessness prevention. This work should include targeted early intervention, to help people recognise and respond to exploitation, covering topics like personal boundaries, online safety, and seeking help, recognising that factors such as exclusion from education, family breakdown, and early signs of housing instability can significantly increase a young person's vulnerability to both exploitation and homelessness. Embedding this work within existing safeguarding and early help frameworks - through collaboration with education, housing, and children's services - will be critical to disrupting these risks before they occur.

**9** Strengthening legislative protections for survivors of exploitation who are homeless. This study recommends legislative amendments to both the Homelessness Prevention Bill and the Crime and Policing Bill (England, 2025). As highlighted in this report, the Homelessness Prevention Bill should explicitly recognise survivors of modern slavery and exploitation as a priority group, ensuring local authorities have a statutory duty to provide secure housing and trauma-informed support.

In parallel, an amendment to the Crime and Policing Bill should reflect the intersection between homelessness and criminal exploitation, reinforcing the need for law enforcement and support services to integrate safeguarding measures.

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Alongside this, further research is needed including a comparative analysis of all anti-slavery networks, combined authorities, and devolved nations to gain a regional understanding of their operations. This research should focus on identifying best practices, challenges, and the effectiveness of various initiatives.

By analysing the regional dynamics, we can better understand how these networks collaborate, share resources, and address modern slavery within the homelessness and housing sectors.

The insights gained will help in formulating targeted strategies to enhance support systems for survivors and improve the overall efficacy of anti-slavery efforts.

# Endnotes

<sup>1</sup> The role of the Independent Anti-Slavery Commissioner (IASC), its functions and powers were established in the landmark Modern Slavery Act 2015 (MSA).

<sup>2</sup> Note that the responsibility for homelessness falls under different government departments due to the devolved nature of housing policy in the UK.

<sup>3</sup> [The Passage Modern Slavery Service Annual Reports](#).

<sup>4</sup> The term Modern Slavery Coordinator (MSC) refers to a specialist role within local authorities dedicated to addressing modern slavery. This role may also be known as Modern Slavery Leads. Some local authorities have a Single Point of Contact (SPoC) for various forms of abuse, including modern slavery. However, SPoCs often have additional responsibilities, limiting their ability to focus exclusively on modern slavery.

<sup>5</sup> Human Trafficking Foundation. 2024. [London Modern Slavery Leads Annual Report 2024](#).

<sup>6</sup> Home Office. 2025. [Modern slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2024 - GOV.UK](#).

<sup>7</sup> The Passage. 2024. [Modern Slavery Service Five Year Report](#), p.29.

<sup>8</sup> The definition of prevention as framed by the public health approach is outlined in the section titled “Background and context”.

<sup>9</sup> The Modern Slavery Victim Care Contract (MSVCC) provides essential support for adult victims of modern slavery in England and Wales through the National Referral Mechanism (NRM). Managed by the Home Office and delivered by The Salvation Army, it offers secure accommodation, financial assistance, healthcare access, legal advice, and tailored recovery support.

<sup>10</sup> Independent Anti-Slavery Commissioner. 2025. [Independent Anti-Slavery Commissioner Strategic Plan 2024-2026](#), pp. 18-19.

<sup>11</sup> Home Office. 2014. [Modern Slavery Strategy](#), p.45.

<sup>12</sup> Such, E. et al. 2022. [Prevention of Adult Sexual and Labour Exploitation in the UK: What Does or Could Work?](#) Modern Slavery Policy and Evidence Centre, p.8.

<sup>13</sup> Such, E. et al. 2024. [The Prevention of Adult Exploitation and Trafficking: A Synthesis of Research Commissioned by the Modern Slavery and Human Rights Policy and Evidence Centre](#). Modern Slavery Policy and Evidence Centre, p.4.

<sup>14</sup> Such, E. et al. 2024. Ibid. p.5.

<sup>15</sup> Such, E. et al. 2022. Ibid. p.11.

<sup>16</sup> Theory of Change is a structured approach that outlines the steps needed to achieve a desired social impact, mapping how specific actions lead to meaningful change by identifying key assumptions, mechanisms, and measurable outcomes.

- <sup>17</sup> Unseen. 2022. [How to Prevent Modern Slavery](#).
- <sup>18</sup> Idris, I. 2017. '[Interventions to combat modern slavery](#)'. K4D.
- <sup>19</sup> Such, E. et al. 2021. [Refining a public health approach to modern slavery](#). The University of Sheffield, Independent Anti-Slavery Commissioner and Public Health England.
- <sup>20</sup> Such, E. et al. 2024. Such, E. et al. 2022.
- <sup>21</sup> See "Scope and Limitations" section.
- <sup>22</sup> Department for Levelling Up, Housing and Communities. 2024 (Version 0.22). [Homelessness Code of Guidance for Local Authorities](#).
- <sup>23</sup> Scottish Government. 2019. [Homelessness: Code of Guidance](#).
- <sup>24</sup> Welsh Government. 2016. [Code of Guidance for Local Authorities on the Allocation of Accommodation and Homelessness](#).
- <sup>25</sup> Northern Ireland Housing Executive. 2022. [Ending Homelessness Together. Homelessness Strategy 2022-27](#).
- <sup>26</sup> [20-056 - Home Office - Modern slavery](#).
- <sup>27</sup> [Modern slavery training: resource page - GOV.UK](#)
- <sup>28</sup> UK Parliament. 2025. [Homelessness Prevention Bill](#).
- <sup>29</sup> Home Office. 2025. [Action Plan on Modern Slavery](#). p.5-6.
- <sup>30</sup> For example, Scotland has its own Human Trafficking and Exploitation Strategy, which is currently being updated and includes prevention, identification, and support for victims. Wales implements the Wales Anti-Slavery Delivery Plan under the leadership of the Welsh Government's Anti-Slavery Coordinator. Northern Ireland follows its own Modern Slavery and Human Trafficking Strategy (2024–2027), tailored to its legislative and operational context.
- <sup>31</sup> The Data and Evidence Working Group, situated within the Home Office Modern Slavery Unit, focuses on refining research methodologies, improving data collection and ensuring evidence-based policymaking. The Modern Slavery Engagement Forum, also convened under the Modern Slavery Unit, brings together a diverse group of multi-disciplinary experts from across the anti-slavery sector and statutory services. This forum provides informed guidance on potential improvements to the identification, support, and care mechanisms available to victims of modern slavery.
- <sup>32</sup> Ministry of Housing, Communities and Local Government. 2014. [English Devolution White Paper](#).
- <sup>33</sup> [WMCA Homelessness Taskforce](#).
- <sup>34</sup> [Commitment to Collaborate](#).
- <sup>35</sup> Process flowchart shared during an interview with a staff participant on the 19 February 2025.
- <sup>36</sup> City of Westminster and the Royal Borough of Kensington and Chelsea. 2021. [Ending Modern Slavery: Our Strategy for a Coordinated Community Response 2021-2026](#).

<sup>37</sup> Ibid, p. 8.

<sup>38</sup> Data from the [National Referral Mechanism Statistics](#), facilitated by the Bi-Borough Modern Slavery and exploitation Operational Group Coordinator.

<sup>39</sup> Human Trafficking Foundation. 2024. [London Modern Slavery Leads Annual Report 2024](#).

<sup>40</sup> Human Trafficking Foundation. 2025. Acting Local: [The Need for Modern Slavery Coordinators in Local Authorities](#), p.17.

<sup>41</sup> Ibid.

<sup>42</sup> Interviews of 17 February 2025, 19 February 2025, 24 February 2025, and 27 February 2025.

<sup>43</sup> Interview of 24 February 2025.

<sup>44</sup> Interview of 19 February 2025.

<sup>45</sup> Recommendations panel member, 11 April 2025.

<sup>46</sup> Some examples: the [Illegal Migration Act 2023](#) introduces provisions that disqualify certain survivors of modern slavery from accessing the NRM if they are deemed to pose a public order risk (including those who have been coerced into criminal activities); policies restricting asylum seekers and survivors of modern slavery from working while awaiting decisions on their claims, which contributes to economic exclusion and dependency on state support; [No-Fault Evictions \(Section 21\)](#), which allows landlords to evict tenants without reason, creating instability in the private rental sector; or the Home Office [White Paper on Immigration](#) published in May 2025, which uses anti-migrant rhetoric.

<sup>47</sup> [Project Light - SOHTIS](#).

<sup>48</sup> Defined and explained in the section titled “Background and context”.

<sup>49</sup> University of Nottingham Rights Lab. 2024. Exploitation of Adults with Cognitive Impairment in England. [An Investigation into Evidence, Responses, and Policy Implications](#).

# Annex 1: Analysis framework

## Modern slavery prevention projects delivered by the voluntary sector: analytical framework

Analysis factors	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9	P 10	P 11	P 12	P 13	P 14
Tackles prevention before harm occurs	Y	N	Y	Y	N	N A	N	N A	N	Y	N	N	N	Y
Promotes access to critical services	Y	Y	Y	Y	Y	N A	Y	N A	Y	Y	Y	Y	Y	N
Provides modern slavery education to staff in the homelessness sector	Y	Y	Y	Y	N	N A	Y	N A	Y	Y	Y	Y	Y	Y
Provides modern slavery education to people experiencing homelessness	Y	Y	Y	Y	N	N A	Y	N A	N	Y	Y	N	N	Y
Builds awareness of personal risk factors	Y	Y	Y	Y	N	N A	Y	N A	Y	Y	N	Y	Y	Y
Provides peer support	N	N	Y	N	N	N A	Y	N A	N	Y	Y	Y	N	N
Addresses laws and policies that maintain economic social inequities	N	N	N	N	N	N A	Y	N A	N	N	Y	N	N	Y



Analysis factors	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9	P 10	P 11	P 12	P 13	P 14
Includes a project description and clear statement of aims	Y	Y	Y	Y	N	NA	N	NA	Y	Y	N	Y	Y	Y
Includes impact assessments	Y	N	Y	Y	N	NA	N	NA	Y	Y	N	Y	Y	Y
Duration of project longer than one year	Y	Y	Y	N	Y	NA	Y	NA	Y	Y	Y	Y	Y	N
Informed by survivors	N	N	Y	N	N	NA	Y	NA	Y	Y	Y	Y	Y	N
Fosters community networks to combat modern slavery	Y	Y	Y	Y	Y	NA	Y	NA	Y	N	Y	Y	Y	Y
Is attentive to language	Y	N	Y	Y	Y	NA	Y	NA	Y	Y	Y	Y	Y	Y
Was created in partnership	N	N	Y	Y	Y	NA	Y	NA	Y	N	N	N	Y	Y
Created new partnerships	Y	Y	Y	Y	N	NA	Y	NA	Y	Y	Y	Y	Y	Y
Funding (internal/ external)	I	I	E	E	I	NA	E	NA	E	E	I	I	E	E

**P:** Project

**Y:** Yes

**N:** No

**NA:** Not applicable - they did not deliver any prevention project targeting the homelessness sector

# Annex 2: Overview of the projects analysed in this study

The following list covers the modern slavery prevention initiatives targeting the homelessness sector analysed in this study. The list is presented in alphabetic order and is not in the same order as in the analytical framework to maintain anonymity.

## Belfast and Lisburn Women's Aid

This organisation supports women and children affected by domestic abuse and modern slavery in Belfast and Lisburn. The charity has a team of eight staff members who aid hundreds of women. The analysed project, Human Trafficking Project, is contracted by the Northern Ireland Department of Justice to support women and dependent children affected by human trafficking and modern slavery in Northern Ireland. Recently expanded to include after-care support for survivors who have received a decision on their trafficking claim, the project also focuses on prevention. It targets women at risk of homelessness, including sex workers, young women escaping domestic abuse and women with conclusive trafficking decisions who decline social housing after asylum accommodation. Through these initiatives, Belfast and Lisburn Women's Aid aims to prevent exploitation and provide comprehensive support to vulnerable women.

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## Crisis

Project TILI (Train, Identify, Learn, Intelligence) was a collaborative initiative led by Crisis in partnership with organisations such as Hestia, BAWSO, Belfast Women's Aid, and Shared Lives Plus. Launched in 2019 in England, Wales and Northern Ireland, the project aimed to understand the link between homelessness and modern slavery for women in the UK. Project TILI focused on data collection and the development of a model for identification, support, recovery, and integration.

By training frontline staff, enhancing identification methods, and gathering valuable data, the project sought to improve understanding of the intersection between these two issues. These efforts helped inform best practices and policy recommendations, ensuring that women escaping modern slavery received the essential support needed to achieve stability and independence.

## Diocese of London

The Diocese of London has been actively engaged in preventing modern slavery within the homelessness sector. Acknowledging the increased vulnerability of individuals experiencing homelessness to exploitation, the Diocese has implemented various initiatives to raise awareness and educate those in churches, particularly frontline workers and volunteers about the signs of modern slavery. Through their Compassionate Communities programme, the Diocese provides resources, training, and support to parishes and church communities, empowering them to identify and respond to potential cases of modern slavery. By fostering collaboration between churches, local authorities, and other stakeholders, the Diocese of London aims to create a safer environment for those at risk and contribute to the broader effort to eradicate modern slavery.

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## Flourish NI

Founded a decade ago in Northern Ireland, Flourish NI is dedicated to supporting survivors of modern slavery outside of the NRM. With a team of eleven committed staff members, the organisation provides vital assistance to help survivors rebuild their lives. Although Flourish NI does not operate safehouses, they focus on offering comprehensive support services, ensuring survivors have access to necessary resources, guidance, and advocacy to facilitate their recovery and integration into society. Additionally, Flourish NI places a strong emphasis on prevention by raising awareness and educating communities about the risks and signs of modern slavery. Through their dedicated efforts, they work to prevent exploitation and support survivors, making a significant impact in the fight against modern slavery.

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## Hestia

Hestia supports adults and children who have experienced crisis and trauma to find safety, hope and purpose. Since the establishment of its Modern Slavery Response service in 2011, Hestia has become the largest provider of such support in the country, operating ten safe houses and a pan-London outreach service. In addition to delivering safe housing and advocacy, Hestia places a significant emphasis on raising awareness about modern slavery within the homelessness sector. This is achieved through accredited training programmes for professionals and charitable organisations, equipping them with the requisite skills to identify and respond to exploitation. Hestia's comprehensive approach aims to disrupt the cycle of homelessness and exploitation, ensuring survivors receive the necessary support to rebuild their lives.

Their report, *Underground Lives: Homelessness and Modern Slavery in London*, offers a critical exploration of the intersection between homelessness and modern slavery, underscoring the imperative for enhanced support and multi-agency collaboration to effectively address this issue.

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## Homeless Link

Homeless Link is the national membership charity for frontline homelessness services. Their Modern Slavery and Human Trafficking Guidance for Homelessness Services was created in 2014 and updated in 2016, 2018, and 2022. The guidance aims to equip frontline staff with the knowledge and tools to identify and support survivors of modern slavery and human trafficking. It underscores the critical role of homelessness services in recognising signs of exploitation due to their direct contact with vulnerable individuals. The guidance includes practical resources, such as The Passage's Modern Slavery Toolkit.

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## Hull Homelessness Community Project

Established in 2009 in Kingston-Upon-Hull by a person with lived experience of homelessness, the project initially commenced as a soup kitchen but has since evolved to offer a comprehensive suite of services. These include a drop-in centre providing access to showers, laundry facilities, and computers, as well as housing support aimed at securing affordable accommodation. Additionally, the project provides mental health counselling and substance abuse treatment, addressing the multifaceted needs of the homeless population. A key focus of the project is prevention, achieved through collaborations with various organisations to tackle the root causes of homelessness and deliver holistic support to those in need. Furthermore, the Hull Homelessness Community Project actively engages in raising awareness about modern slavery, educating both the public and frontline workers on the identification and response to signs of exploitation.

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## Porchlight

This homelessness charity in Kent has a dedicated Modern Slavery Champion who focuses on raising awareness by educating colleagues and the broader community about the signs of modern slavery and human trafficking.

Responsibilities also include providing training sessions and resources to help others recognise and report potential cases, offering support and guidance to people with lived experience of modern slavery and homelessness to help them access necessary services and support networks, and collaborating with other organisations and local authorities to coordinate efforts and share best practices in tackling modern slavery. While Porchlight did not create a specific modern slavery prevention project, they provide essential training on modern slavery to the homelessness sector to mitigate harm.

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## SOHTIS

This anti-slavery organisation supports people with lived experience of modern slavery in Scotland. Through Project Light, SOHTIS has developed a comprehensive, human rights-based approach to identify and assist survivors, with a strong emphasis on the homeless population. Their initiatives include street outreach to connect with vulnerable individuals, training frontline workers to recognise signs of modern slavery and confidently report them, providing second-tier support for concerned frontline workers, victim advocacy to ensure safety and access to crisis support, prevention engagements to build resilience against recruitment, and safe repatriation services for those wishing to return to their home country.

In 2024, they established Scotland's first joint Homelessness and Anti-Human Trafficking staff position, further highlighting their dedication to preventing exploitation within the homeless community.

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## St Basils

St Basils is an organisation based in the West Midlands, dedicated to supporting young people experiencing homelessness. Their efforts to address modern slavery encompass a comprehensive approach that includes both prevention and intervention strategies. St Basils has established a modern slavery pathway, which involves training staff and volunteers to identify signs of exploitation and providing direct support to at-risk youth.

The organisation also engages in street outreach to connect with vulnerable individuals and implements an Outreach Navigation Service to bolster their response capabilities. By addressing the intersection of homelessness and modern slavery, St Basils aims to ensure that young people receive the necessary support to achieve stability and independence.

## The Clewer Initiative

This programme within the Church of England aims to raise awareness of modern slavery. Recognising the heightened vulnerability of individuals experiencing homelessness to exploitation, the initiative works to educate frontline workers, volunteers, and the broader community about the signs of modern slavery. By providing training, resources and support, The Clewer Initiative helps these groups identify and respond to potential cases of exploitation.

Additionally, the initiative leverages the extensive reach and influence of the faith community to raise awareness and foster a collective response to modern slavery. Through collaboration with churches and faith-based organisations, The Clewer Initiative amplifies its efforts to break the cycle of homelessness and exploitation, ensuring that those at risk receive the necessary support and protection.

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## The Passage

The Passage offers a Modern Slavery Service, but the prevention project analysed in this study, the Roma Employment Service Project, was delivered by The Passage's Employment and Training Team from 2022 to 2025. The project focussed on helping Roma individuals understand their rights and navigate the complexities of working in the UK, also conducting awareness sessions on exploitation risks and working rights.

The Passage empowers Roma individuals to achieve stability and independence, significantly reducing the risk of exploitation. The Roma Employment Service Project ran in partnerships with the St Mungo's Roma Rough Sleeping Service, whose aim is to prevent exploitation by providing Roma individuals with secure housing and access to essential services. The Mungo's team provide outreach to Roma individuals experiencing homelessness, train frontline workers to recognise signs of modern slavery, and offer second-tier support for concerned frontline workers.

As part of this service, a separate project under the Advice and Advocacy Team at the Passage offers culturally sensitive immigration support and assistance with the EU Settled Status Scheme to Roma individuals, reducing their vulnerability to forced labour or human trafficking.

## Unchosen

This anti-slavery charity from Bristol used films to raise awareness of modern slavery. Their campaign, Stay Safe from Slavery, ran from August 2017 to February 2018 in the Southwest of England. It focused on raising awareness of modern slavery and strengthening safeguards for vulnerable populations such as people experiencing homelessness, young people in care and care leavers, refugees, and asylum seekers. Unchosen created and delivered free toolkits, awareness events, and presentations to local authorities, the police, and frontline agencies. The toolkits included information for frontline workers and service users, such as spot-the-signs postcards, modern slavery handbooks, short films, posters, stickers, contact cards, working rights multi-language leaflets, and film packages. Events were organised in partnership with local agencies and featured film screenings and Q&A sessions with experts.

Additionally, Unchosen delivered charitable events for refugees and people experiencing homelessness.

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## Unseen

Based in Bristol, Unseen is a dedicated anti-slavery charity that contributes to preventing modern slavery. Their prevention initiatives focus on raising awareness and providing training to frontline workers, helping them recognise and respond to signs of exploitation. Unseen collaborates with various organisations to offer support services and resources aimed at reducing the vulnerability of individuals to modern slavery.

By implementing these proactive measures, Unseen strives to create a safer environment and prevent exploitation before it occurs, ensuring that those at risk receive the necessary support and protection.

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Everyone deserves a place to call home

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Dr Júlia Tomás

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Independent Anti-Slavery Commissioner*

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