



Putting victims first: Renewing the UK's commitment to victims of trafficking and modern slavery

A manifesto for change

A decade on from the introduction of the Modern Slavery Act 2015, the landscape of modern slavery and human trafficking in the UK has altered beyond recognition.

As a coalition of modern slavery organisations supporting all identified adult survivors in the National Referral Mechanism since 2011, we are calling upon the Government to re-new the UK's approach to supporting victims of these serious and brutal crimes, ensuring the physical and psychological safety of victims is first priority.

Our recommendations, first published in June 2024, set out to not only deliver long-term transformational changes and improve the safety of victims of modern slavery and human trafficking, but also to ensure that victim-survivors are once again put first.

We welcome the decision to assign the brief for modern slavery to the Minister for Safeguarding and Violence Against Women and Girls, something we had called for in a previous iteration of this manifesto, prior to the 2024 election.

April 2025

SUMMARY

Recommendations

1. Repeal sections 22-29 of the Illegal Migration Act 2023, the Safety of Rwanda Act in its entirety, and sections 58-65 and 68-69 of the Nationality and Borders Act 2022.
2. Ensure no Public Order Disqualifications occur where potential victims have no legal representation through a review of the Modern Slavery Statutory Guidance.
3. Prioritise decisions on the people in the National Referral Mechanism who have waited the longest.
4. Adopt a multi-disciplinary approach complemented by mechanisms for government accountability.
5. Undertake a comprehensive review of the National Referral Mechanism (NRM).
6. Introduce the Right to Work for all survivors.
7. Conduct a thorough impact assessment into the legal aid crisis in the UK and invest in the legal aid infrastructure.
8. Ensure the lived experience of victims of human trafficking and modern slavery informs future policy.
9. Improve awareness and understanding of modern slavery, including through mandatory training for all statutory stakeholders.
10. Take steps to increase the number of prosecutions for perpetrators of human trafficking and modern slavery.



RECOMMENDATIONS



1. Repeal sections 22-29 of the Illegal Migration Act 2023, the Safety of Rwanda Act in its entirety, and sections 58-65 and 68-69 of the Nationality and Borders Act 2022.

We welcome the proposal to repeal Sections 22-28 of the Illegal Migration Act 2023, and the entirety of the Safety of Rwanda Act 2024, in the Border Security, Asylum and Immigration Bill.

These are steps in the right direction to protect vulnerable victims of modern slavery. We believe we can go further, and must additionally repeal section 29 of the Illegal Migration Act 2023, and sections 58-65 and 68-69 of the Nationality and Borders Act 2022.



2. Ensure no Public Order Disqualifications occur where potential victims have no legal representation through a review of the Modern Slavery Statutory Guidance.

Trauma-informed approaches must sit at the centre of the National Referral Mechanism, ensuring potential victims have access to the appropriate support and psychologically informed environments, and a disqualification from such an environment and support system cannot occur in the absence of legal representation. This will ensure potential victims remain appropriately supported and have a full awareness of their legal rights.

RECOMMENDATIONS



3. Prioritise decisions on the people in the National Referral Mechanism (NRM) who have waited the longest, and have had their lives in limbo for years.

We welcome Minister Phillips' announcement that 200 new decision makers will be recruited to address the NRM decision backlog.

Quality of decision-making must remain paramount. We commend the Home Office's progress in cutting the backlog by almost 40%, but this must not be at the expense of quality. We are seeing huge numbers of negative conclusive grounds decisions being positively overturned at reconsideration (68% in 2024), decisions being made in the absence of evidence requests to providers, and potential victims unable to apply for a reconsideration due to the new time limits.

We continue to call on the Government to issue decisions to those who have waited the longest, through the removal of all the current priority groups listed in Section 14.129 of the Modern Slavery Statutory Guidance. Any such prioritisation creates a hierarchy of victim types, and currently newly identified victims are disproportionately negatively affected.

By focusing efforts on those who have waited the longest, newly referred victims will be allowed time to address their essential needs and recovery.

We urge the government to grant all confirmed victims access to a minimum of 12 months of support, which can continue to be accessed after receipt of a positive conclusive grounds decision.



4. Adopt a multi-disciplinary approach complemented by mechanisms for government accountability.

To this end, reintroduce the Multi Agency Assurance Panels (removed from the Statutory guidance in December 2022) to ensure any negative conclusive grounds is duly considered through a safeguarding and human rights lens and recommit to the Modern Slavery Reference Group listed in Section 1.6 of the guidance (inclusive of DHSC, MoJ, NHS, Police, IASC, NGO etc).

The Modern Slavery Guidance should be amended to include no changes to the Statutory Guidance can take place without a reference group meeting, which must be given ten working days' notice before taking place, and all suggested changes and implementation must be scrutinised by an independent body such as the Independent Anti-Slavery Commissioner's office.



RECOMMENDATIONS



5. Undertake a comprehensive review of the National Referral Mechanism (NRM) and redesign what impactful and transformational support means.

Currently individuals in the NRM await a decision which no longer holds promise of a safer future, and actually brings their support abruptly to an end, often with no recourse to public funds or right to stay despite receiving a positive conclusive grounds decision. To end the insecurity experienced by survivors under the current system, we ask policymakers to undertake a thorough assessment of the NRM, evaluating the benefit of a total overhaul of the framework, and consider redesigning what support victims truly need to achieve safety, hope and purpose. Any new framework needs to come with realistic time-bound targets from the government to reduce the time survivors are forced to remain in limbo as they await decisions.

We welcome the announcement of a consultation on victim identification. This review should include the first responder crisis and victims' access to support. The framework must work to support victims become independent and resilient. Victims want to work and do not want to be dependent on local authority support. To this end, we urge the government to systematically grant leave to stay to all victims recognised with a positive CG, with temporary access to public funds allowing them time to find employment.



6. Introduce the Right to Work for all survivors whilst they are in the National Referral Mechanism and beyond.

By giving survivors the right to work whilst in the NRM, they can be supported to develop viable and useful skills for their futures, empowering them in their life beyond crisis, preventing de-skilling of a very skilled population, whilst also contributing to the ongoing efforts to improve economic productivity in the UK and fulfil gaps in occupations such as those listed in the Immigration Salary List (previously Shortage Occupation List).

The individuals we support want to work, pay taxes and be less financially dependent on subsistence payments from the government.

We invite the government to consult the evaluations of the models in Australia, Canada, Portugal, Sweden (where right to work is granted to asylum seekers almost immediately) to assess its feasibility and economic benefits in the UK. We call for earlier access to the ISL scheme in a first instance, with a view to open access to work for all in the NRM in the long term.



RECOMMENDATIONS



7. Conduct a thorough impact assessment into the legal aid crisis in the UK and invest in the legal aid infrastructure to ensure all potential victims have access to the support they are entitled to.

Investing in the legal aid system to ensure all potential victims can access support is critical to ensuring the safety of victims. To do this effectively, policymakers must first assess the crisis of legal aid in the UK and assess how best to channel resources.

We welcome the Ministry of Justice's consultation considering an increase to civil legal aid fees rates in Housing and Immigration legal aid work specifically, but improving access must also be prioritised.



8. Ensure the lived experience of victims of human trafficking and modern slavery informs future policy by introducing a duty to collaborate and consult with survivors in the writing of secondary legislation.

This consultation should be meaningful, afforded the appropriate time to be undertaken, and survivors should be remunerated for their time. We invite the Government to consider adding individuals with lived experience to the Reference Group as outlined in Section 1.6 of the Modern Slavery Statutory guidance.

We welcome the IASC's commitment to introduce a Lived Experience Advisory Board to embed lived experience in policy. We hope this will enact meaningful change. Adequate training, remuneration, and transparency will be key.



9. Improve awareness and understanding of modern slavery, including through mandatory training for all statutory stakeholders.

Recent research shows disparagingly low levels of understanding of modern slavery and human trafficking among the British public. We must continue efforts to raise awareness and educate. Of the utmost importance, we must collectively make active efforts to decouple modern slavery and irregular migration, two distinct phenomena that have been conflated for too long.

High quality accredited training must be mandated of all statutory stakeholders, and the application of the training monitored. Training must also be mandated in secondary level schools.



RECOMMENDATIONS



10. Introduce more specialist police investigation teams to tackle traffickers, invest in victim navigators, and consult the Crown Prosecution Services (CPS) and relevant law enforcement bodies, to increase the number of prosecutions for perpetrators of human trafficking and modern slavery.

We welcome the Modern Slavery Unit's commitment to prosecutions, which we understand will be one of the key focuses of the Action Plan.

We also welcome the creation of specific offences for cuckooing and child criminal exploitation in the proposed Crime and Policing Bill 2025 which will help prosecute the criminals behind these offences.

Human trafficking and modern slavery remain low risk, high profit crimes. To address this, new guidelines and increased focus on prosecutions must be established with the CPS and law enforcement bodies, with the relevant investment in specialist teams and victim navigators, ensuring that the cycle of this highly organised crime is put to an end. Crucially, prosecution should not be contingent upon victims feeling compelled to help against their will, and therefore new guidance should not stipulate that helping the police be a condition for victims to be given the right to stay in the UK.



All members of the border security command and staff delivering the return and enforcement programme must receive trauma-informed and first responder training and exert caution and a safeguarding lens in their work, as they will come across victims.

Treating them with dignity and making them feel safe is of the utmost importance to get their support with prosecutions.

As seen from the McDonald's case of October 2024, the role of victim navigators has again proven essential in supporting criminal investigations and prosecutions, and we reiterate the call for more investment in this model and the view that continued strong care and support, combined with strong communication and transparency, will lead to more prosecutions.

We urge the Government to tackle this crime as a financial crime. To this end we must invest in more financial crime investigators in police forces, make stronger use of the Proceeds of Crime Act 2002, and ringfence exploiters' assets and reinvest them into modern slavery support and prevention programmes.



About the authors:

All the contributors are providers of support to victims under the Modern Slavery Victim Care Contract. This includes The Salvation Army and 12 other subcontractors. Together we form the collective of professionals who interact and engage with all potential adult victims in the National Referral Mechanism.

Since 2011, we have supported a total of 24,565 recovering survivors of modern slavery. We represent the views of the people we support, and are advocating for an environment that places psychological and physical safety of victims above all else.