



No way out and no way home:

**Modern slavery and homelessness in
England, Wales and Northern Ireland**

Published by Crisis as part of Project TILI

Sam Parker | May 2021

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Crisis
Together
we will end
homelessness

“”

Everybody has the right to be treated with dignity. Yet through Crisis’ services we hear of people experiencing homelessness who have faced exploitation – forced to take part in sex work, work as a live-in servant or take part in crippling manual labour, working all hours of the day for little to no money, scared and feeling there is no way out. No-one should be forced to live like this.

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List of acronyms used

CEE	Central and Eastern Europe
CHAIN	Combined Homelessness and Information Network
ECAT	European Convention on Human Trafficking
EEA	European Economic Area
EU	European Union
ESOL	English to Speakers of Other Languages
CG	Conclusive grounds (a decision made as part of the NRM process)
GLAA	Gangmasters and Labour Abuse Authority
H-CLIC	Homelessness Case Level Information Classification
NRM	National Referral Mechanism
PRS	Private Rented Sector
PTSD	Post-Traumatic Stress Disorder
RG	Reasonable grounds (a decision made as part of the NRM process)
TILI	Train, Identify, Learn, Intelligence (multi-agency project investigating how homelessness and modern slavery affect women)
UK	United Kingdom

Foreword

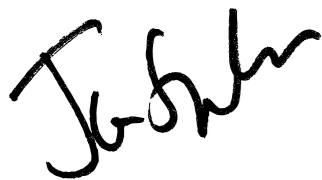
Everybody has the right to be treated with dignity. Yet through Crisis' services we hear of people experiencing homelessness who have faced exploitation – forced to take part in sex work, work as a live-in servant or take part in crippling manual labour, working all hours of the day for little to no money, scared and feeling there is no way out. No-one should be forced to live like this.

Until now, the links between homelessness and modern slavery have been mostly anecdotal with very little research in this area. This report provides us with the clear evidence to show how the two drive one another and more importantly, what we need to do to prevent them both and end the cycle of people trapped in dangerous and isolating circumstances.

The report found that a staggering two thirds of the survivors stayed in accommodation provided by their perpetrators during their exploitation, and a similar proportion were already homeless when they were recruited. There cannot be a clearer demonstration that housing and homelessness are central to modern slavery: all people who are exploited are put at risk of homelessness, and everyone who is homeless is at risk of exploitation.

As this research shows, we need the Home Office to address the clear issues with the government's modern slavery support system, the National Referral Mechanism. This must include further investigation into the reasons that survivors don't want to be referred, and offer an alternative means of support for people who don't want to engage with the system.

We also need to see the Westminster Government passing the Modern Slavery (Victim Support) Bill as soon as possible, ensuring survivors are entitled to at least 12 months of tailored support, including a safe long-term home, once they're officially recognised as a victim. It's time we properly recognise the link between modern slavery and homelessness, and take action to break the cycle.



Jon Sparkes
Chief Executive

Summary

To date, evidence of a link between modern slavery and homelessness has mostly been anecdotal or small-scale. This report is the first of its kind in the UK and looks at data on 331 people who have experienced modern slavery and homelessness.

Modern slavery is when people are forced by others into a situation that they cannot leave so that these perpetrators can exploit them for profit. Modern slavery and homelessness can interact in complex ways. Someone can be forced into homelessness as a result of being exploited, and equally people who experience homelessness can be more exposed to exploitation.

The data presented here was collected as part of the multi-agency Project TILI¹ and comes from 20 data sources from 14 different organisations operating in England, Wales and Northern Ireland. Project TILI focuses primarily on how modern slavery and homelessness are experienced by women, however, the project collected data about people of any gender and so the report seeks to understand the gendered aspects of these two issues. It also includes a set of policy and practice recommendations to ensure that people who experience homelessness are prevented from experiencing the trauma of modern slavery, and that those who have faced this trauma do not experience the further distress and injustice that is homelessness.

Key findings

- Survivors were most commonly British, followed Albanian, Romania, Nigerian and Polish, and between the ages of 18 and 44.
- The data suggest a deep link between

homelessness and modern slavery. Survivors in the database were mostly in informal living arrangements like rough sleeping or sofa surfing when they were recruited into modern slavery showing a large number of people experiencing homelessness were forced into exploitative situations. However, nearly two thirds (65%) of people were living in accommodation linked to their exploitation whilst it was ongoing and are often then forced into homelessness when the exploitation stops.

- There are gendered aspects of exploitation. Women experienced sexual exploitation and domestic servitude most often, whereas men experienced labour exploitation and forced criminality most often. Most people who were criminally exploited were British. Most people who were exploited for labour were from Central and Eastern Europe (within the EEA/EU), and most people who were forced into domestic servitude from Africa or Asia. People from all parts of the world experienced sexual exploitation.
- Three quarters of the people in the Project TILI database had two or more support needs. Substance abuse was most prevalent amongst people who were forced into criminal activity. Mental health issues were most prevalent in people who experienced sexual exploitation or domestic servitude, who were mostly women.
- Less than half of homeless survivors of modern slavery² were referred into the government's support system, the National Referral Mechanism (NRM) and therefore not officially recognised as a victim of modern slavery by the government. Nearly half explicitly refused to be referred to

¹ Project TILI (Train, Identify, Learn, Intelligence) is a partnership between key charities working in the fields of domestic abuse, modern slavery, homelessness and housing, and is funded by the Tampon Tax Fund. The delivery partners of the project are Crisis, Hestia (England), Bawso (Wales), Women's Aid Belfast & Lisburn (Northern Ireland), and Shared Lives Plus. The project seeks to use a combination of training for frontline staff to identify survivors, data collection, and learning from best practice in supporting women who've experienced modern slavery and homelessness to better understand how these two issues affect women and how best to support them.

² Due to the practicalities of collecting this data, it is partial and not every data field is complete for every survivor. Therefore, this sentence could read "Less than half of homeless survivors *for whom we have this data*", as could all other statistics presented here. The number n of people each figure includes is quoted throughout the main body of the report.

this support. The data can say for certain that 8 percent of people were officially recognised as a victim of modern slavery by the government, although this could actually be as high as 37 percent given the people whose eventual NRM outcome is unknown.

- People with EU/EEA citizenship most often refused support from the NRM, whereas people seeking asylum most often accepted it. This indicates the NRM did not present as a suitable avenue of support for these homeless survivors of modern slavery, which is concerning because alternative means of support are not guaranteed by the Modern Slavery Act. It also highlights a complex relationship between the NRM and the immigration and asylum system. Whilst some preferred not to engage with the NRM, people with uncertain immigration status more often engaged with the NRM than those who are EU/EEA citizens.
- Only a fifth (17%) of survivors whose NRM support had ended had secured suitable permanent accommodation upon exiting, with a fifth still homeless and at risk of re-exploitation. Most people who refused an NRM referral remained homeless and at risk of re-exploitation.

Recommendations for national government

- The Home Office should collect and publish information on whether a person has experienced homelessness when an NRM referral is made, and when they exit from NRM support.
- Further research should be commissioned into the scale of non-engagement with the NRM, and the reasons that people refuse to be referred.
- The Home Office and Ministry for Housing, Communities and Local Government should develop alternative means of funded local support for survivors who do not want to be referred to the NRM.
- The Government should ensure that the Modern Slavery (Victim Support) Bill, which entitles survivors to at least 12 months of tailored support following a positive conclusive ground decision, is passed as soon as possible.

Recommendations for local government

- Statutory data collection on homelessness should include data about modern slavery when a household approaches a local authority for assistance.
- There are many barriers to safe reconnections support to help a survivor return to another country. Local authorities should only provide reconnections support with the person's fully informed consent, where support will be available to them in the country they are returning to, and where there is no chance of re-trafficking occurring.

Recommendations for third sector organisations

- Homelessness, housing, sex work and other organisations who work with adults at risk of exploitation should embed data collection on modern day slavery into their usual practice.
- Housing-led solutions should be employed by organisations and local authorities who support survivors of modern slavery to move people quickly from unsuitable temporary accommodation to permanent affordable housing options. This should include increased use of PRS access schemes and Housing First for people with complex support needs.
- Homelessness, housing, sex work and other organisations who work with adults at risk of exploitation should ensure their staff have access to good quality training on modern slavery and homelessness.



1 Introduction

1 Introduction

Modern slavery is an abhorrent crime that exploits a universal need – the need to work in order to sustain oneself. When social structures deny people access to a stable income, and therefore the ability to sustain themselves, they can become forced to resort to more dangerous ways of providing for themselves that lead to them being exploited.

There is a wealth of anecdotal evidence residing amongst frontline staff of Crisis and other organisations across the UK that suggests that there is a link between modern slavery and one of these structural factors: homelessness. This link has also been documented in the research of organisations like The Passage³, Hestia⁴, and others.^{5,6} However, so far there have been few attempts to turn this wealth of evidence into a national picture. The Home Office is responsible for the government’s statutory support system for victims⁷ of modern slavery, the National Referral Mechanism (NRM). This means that it is also a major source of statistical reporting on modern slavery, but the NRM does not collect or report data on homelessness.

Project TILI is a partnership project between Crisis, Hestia, Bawso, Women’s Aid Belfast and Lisburn, and Shared Lives. Over the last two years, the project has sought to understand the links between modern day slavery and homelessness, to learn how these issues affect women, and to develop best practice in supporting homeless women who’ve experienced modern slavery in England, Wales and Northern Ireland⁸. It works towards this aim by utilising the unique vantage point of frontline

staff to build up a big picture of the link between these two issues. From March 2020 to March 2021, Project TILI has offered free training to frontline staff at homelessness, housing, sex work and domestic abuse charities across England, Wales and Northern Ireland on identifying survivors of modern slavery. Once organisations have received this training, they contribute data to the project’s database, with the aim of building up a robust dataset about people who’ve experienced homelessness and modern slavery, so that the links between these two issues can be better understood.

Whilst this report may shed some new light on the links between modern slavery and homelessness, it is just as much hoped that the data collected by Project TILI and presented here will strengthen the evidentiary basis for claims already arising from the hard work of others in this space, and add further weight to their calls for change. A common recommendation from reports into modern slavery and homelessness over the last few years has been the need for more robust data. There is still a lot left to uncover, but this report goes some way towards filling that gap.

1.2 Modern slavery and support for survivors

Modern slavery is when people are forced by others into a situation that they cannot leave so that these perpetrators can exploit them for profit. It can take many forms – including labour exploitation (such as

in car washes, nail bars, agricultural or construction work), sexual exploitation, domestic servitude, and forced criminality (cannabis cultivation, forced begging, or ‘cuckooing’, where a person’s house is taken over to sell drugs from). Perpetrators use a variety of methods of control which may not involve physical confinement. These can include confiscation of bank cards or IDs, threats of being reported to the police or immigration enforcement, withholding supply of drugs or alcohol for people with substance abuse issues, debt bondage, and threats of violence. The complex interaction of modern slavery’s methods of control with other problems means that using a perspective which considers multiple disadvantage is important.

The government’s statutory support for survivors of modern slavery is called the National Referral Mechanism, usually abbreviated to the NRM. To receive support from the NRM, a survivor must be referred into the system. Survivors cannot self-refer; referrals can only be made by a designated number of organisations. These include government bodies like the police, local authorities, Home Office, Immigration Enforcement, Border Force and the Gangmasters and Labour Abuse Authority (GLAA); and also some third sector organisations.⁹ In 2020, referrals were made for 5,087 adults and 5,852 children. A survivor must give their consent for a referral to happen. If they do not, the first responder can submit what is called a “Duty to Notify” referral which notifies the Home Office that a potential victim was identified, but that they did not consent to a referral.

Once a referral has been made, the next step is a ‘reasonable grounds’ decision. This decision should be made within five working days of the referral.

A positive decision means that it is decided that there is a reasonable possibility that someone is a victim of modern slavery, and this entitles the person to at least 45 days of support during a ‘recovery and reflection period’. Support delivered through the NRM may include access to relevant legal advice, accommodation, protection, independent emotional and practical help.

The next step is a ‘conclusive grounds’ decision which should be made after the 45-day period has elapsed, although in practice, this decision can take much longer. In 2020, only 3,454 conclusive grounds decisions were made, although ten thousand people had been referred into the system, similar to 2019.¹⁰ The median number of days for a conclusive grounds decision to be made was 339.¹¹ A positive conclusive grounds decision means that it has been decided that someone is ‘more likely than not’ a victim of modern slavery. This previously entitled a survivor to only 14 further days of support, until the government announced in 2017 that this would be increased to 45 days after many in the sector argued that 14 days was inadequate and amounted to something of a ‘cliff edge’ for survivors.¹² Then, in 2019 a court case ruled that the 45-day limit too was unlawful and contrary to the European Convention on Human Trafficking (ECAT).¹³ The Home Office now states that people who’re officially recognised as victims are entitled to “a minimum of 45 days”¹⁴ of tailored support following a positive conclusive ground decision, but the average length of this support is unknown. People who receive a negative conclusive grounds decision are only entitled to a further nine days of support before they exit the system.

3 ‘Understanding and Responding to Modern Slavery within the Homelessness Sector’ (The Passage, 2017), https://passage.org.uk/wp-content/uploads/2019/06/Responding-to-Modern-Slavery-in-the-Homelessness-Sector_report-2019.pdf

4 ‘Underground Lives: Homelessness and Modern Slavery in London’ (Hestia, 2019), <https://www.hestia.org/Handlers/Download.ashx?IDMF=7c01ce39-fded-468f-bca3-6163ed16844e>

5 Hannah Flint, ‘Homeless People’s Experiences of False and Dangerous Job Offers in Greater Manchester’ (Stop The Traffik, 2019), <https://www.stopthetraffik.org/download/report-greater-manchester-homelessness-exploitation-survey/?wpdmdl=17862&refresh=607de812449e21618864146>

6 ‘Modern Slavery and Homelessness’ (Modern Slavery Helpline, 2019), <https://www.modernslaveryhelpline.org/uploads/20190627135914693.pdf>

7 ‘Victims’ is the terminology used by the Home Office, and therefore this report will use the term specifically in the context of the NRM. Otherwise, terms like ‘survivor’ will be preferred.

8 These three countries were decided in consultation with the funder, the Department for Culture, Media and Sport (the project was funded through the Tampon Tax Fund).

9 For a full list of first responder organisations, see: <https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales#first-responder-organisations>

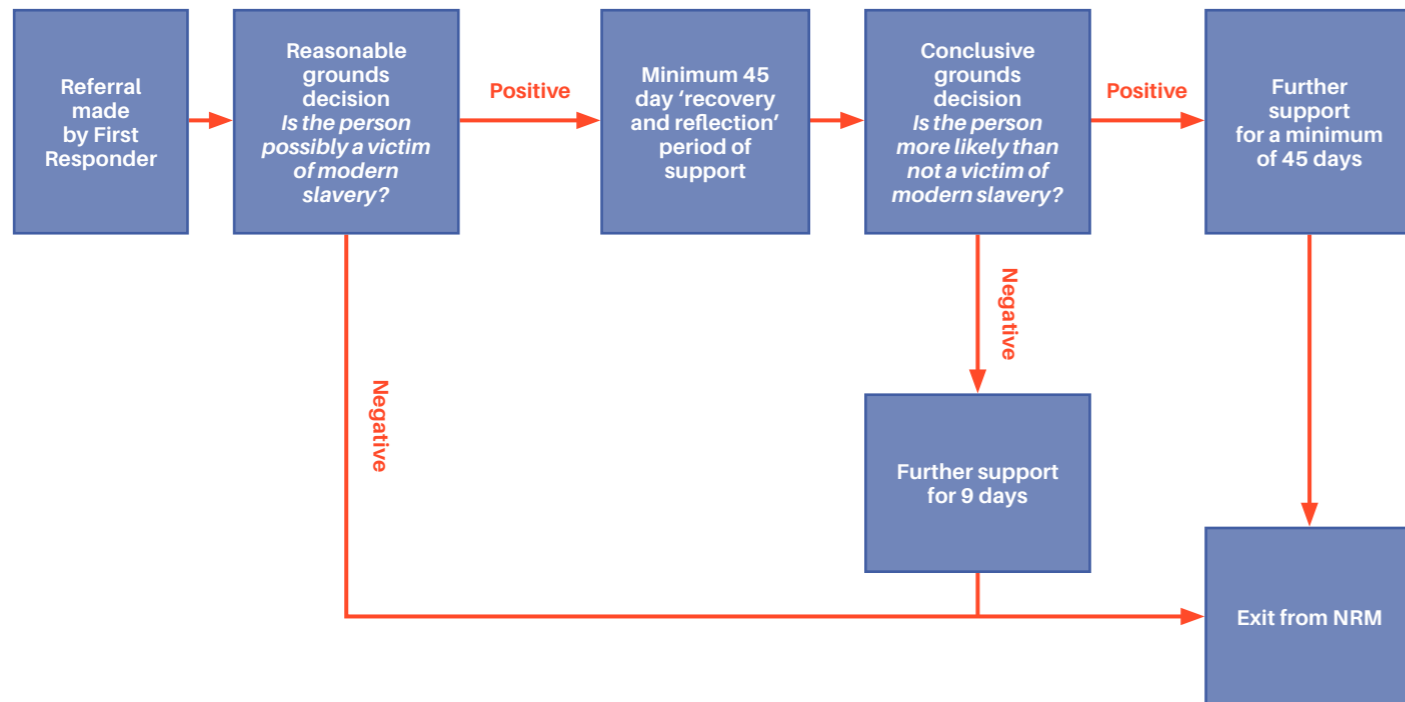
10 ‘Modern Slavery: National Referral Mechanism and Duty to Notify Statistics UK, End of Year Summary, 2020’ (The Home Office, 2021), 9, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/970995/modern-slavery-national-referral-mechanism-statistics-end-year-summary-2020-hosb0821.pdf

11 ‘Modern Slavery: National Referral Mechanism and Duty to Notify Statistics UK, End of Year Summary, 2020’, 10.

12 ‘Life Beyond the Safe House for Survivors of Modern Slavery in London’ (Human Trafficking Foundation, 2015), 23, <https://www.antislaverycommissioner.co.uk/media/1260/life-beyond-the-safe-house.pdf>

13 ‘Home Office Concedes Their 45 Day Policy Is Unlawful’, accessed 20 April 2021, [https://www.duncanlewis.co.uk/news/Home_Office_concedes_that_their_45_day_policy_for_providing_support_for_victims_of_trafficking_is_unsatisfactory_\(28_June_2019\).html](https://www.duncanlewis.co.uk/news/Home_Office_concedes_that_their_45_day_policy_for_providing_support_for_victims_of_trafficking_is_unsatisfactory_(28_June_2019).html)

14 ‘Recovery Needs Assessment’ (The Home Office, 2021), https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/953307/recovery-needs-assessment-v3.0-gov-uk.pdf

Figure 1 Diagram of pathways through the NRM

1.3 About Project TILI

Project TILI (Train, Identify, Learn, Intelligence) is a partnership between key charities working in the fields of domestic abuse, modern slavery, homelessness and housing, and is funded by the Tampon Tax Fund. The delivery partners of the project are Crisis, Hestia (England), Bawso (Wales), Women's Aid Belfast & Lisburn (Northern Ireland), and Shared Lives Plus. The project seeks to use a combination of: training for frontline staff to identify survivors, data collection, and learning from best practice in supporting women who've experienced modern slavery and homelessness to better understand how these two issues affect women and how best to support them. In achieving these aims, Project TILI has four sub-projects:

1. Free training for frontline staff of homelessness, housing and sex work organisation on identifying survivors of modern slavery, delivered by Hestia.
2. The development of a national database of people who've experienced modern slavery and homelessness, delivered by Crisis.

3. Post-NRM support for women who've experienced modern slavery and homelessness, delivered by Hestia in England, Bawso in Wales and Belfast and Lisburn Women's Aid in Northern Ireland (Bawso also offered Pre-NRM support, but were the only partner to do so).
4. Scoping and development work for an experimental hosting-based model of supported housing for women facing modern slavery and homeless, delivered by Shared Lives.

1.4 Data collection methodology

This report presents analysis of the data collected through sub-project 2, but this in turn draws heavily upon other parts of the project. Organisations that received the free training for frontline staff from sub-project 1 agreed in return to collect data for the project's national database. Many frontline staff involved in the project already possessed first-hand experience encountering exploitation of the people they support. The systematic training that was provided enabled staff to recognise this as modern slavery and subsequently support in collecting data,

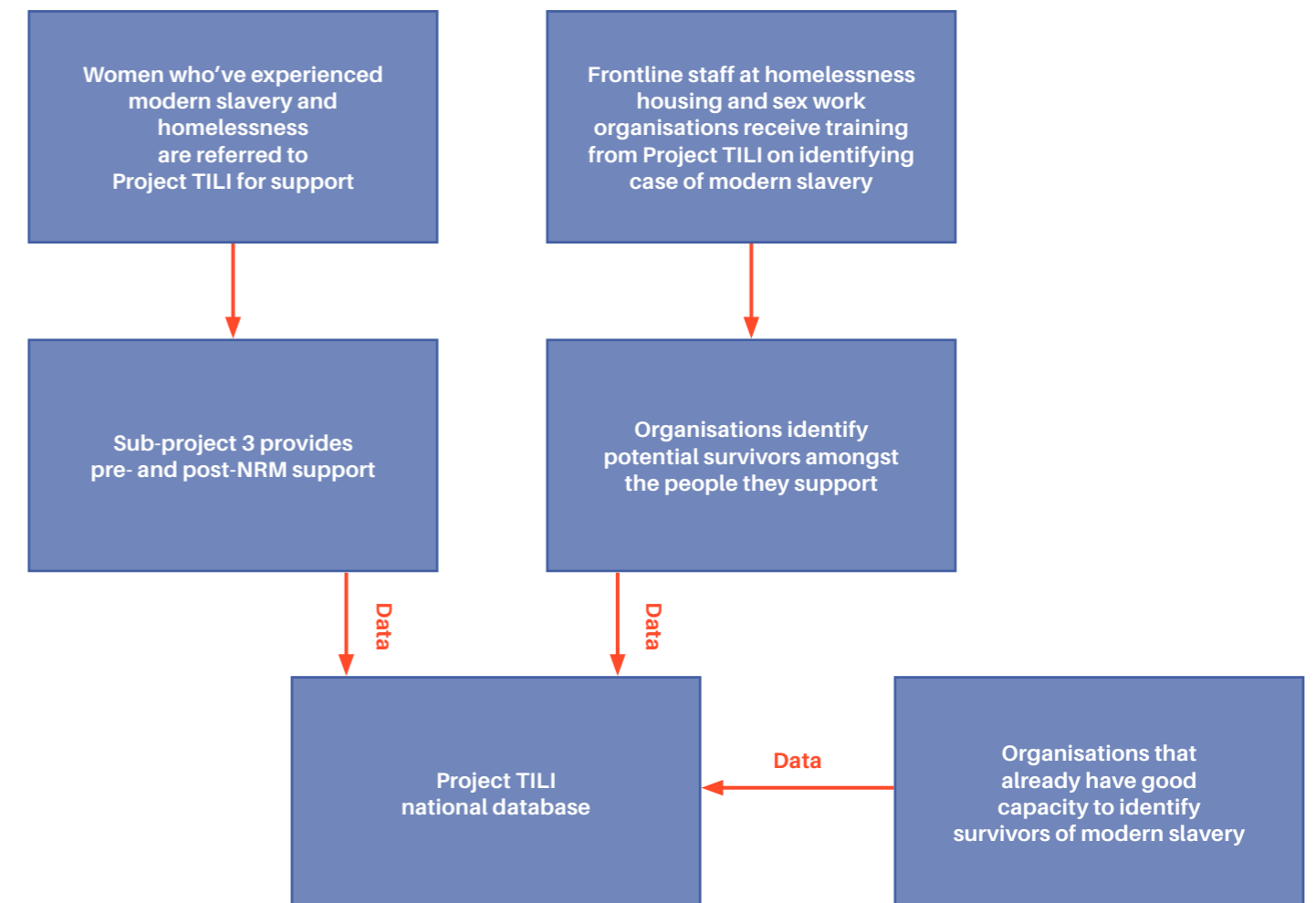
across England, Wales and Northern Ireland.

In addition, data gathered about the women who were supported as part of sub-project 3 was also fed into the database. Finally, organisations who had already developed knowledge and capabilities for identifying homeless survivors of modern slavery contributed data to the project outside of the training programme.

The data collected in this database is not an exhaustive list of all people who have experienced modern slavery and homelessness, and neither is it a representative sample of that population. There are several arbitrary factors that determine whether data about a particular survivor ends up in the database. They must be supported by an organisation which

contributes data to the database and which is able to identify them as a potential survivor. This person must consent to having their data recorded and shared, and the organisation must have the capacity to record the data and submit it to the project.

As a result, it is not always possible to tell whether certain trends can be explained by the selection of particular data sources, or because they represent a more general tendency amongst people who've experienced modern slavery and homelessness. Nonetheless, the data can still be drawn upon to make positive claims about the experience of a large number of survivors, and to corroborate claims made by others in the sector. From this analysis, this report will make concrete recommendations and signpost areas for future research.

Figure 2 Diagram showing flows of data into the Project TILI database

In total, 44 different data sources were established as part of the project. However, only 20 sources submitted some data in the end, due to either not identifying any potential survivors, not obtaining consent to collect data from the survivors, or because they lacked capacity to fulfil the data collection process. The makeup of these 20 sources is as follows:

- three Project TILI partners supporting female survivors: Hestia, Bawso and Belfast & Lisburn Women's Aid
- seven homelessness, housing or sex work organisations, plus seven Crisis Skylight centres, who all received training from Project TILI for their frontline staff
- three homelessness or modern slavery organisations who already had good capabilities for identifying potential homeless survivors of modern slavery.

In the end, 55 percent of the data came from the three organisations who already had good capabilities for identifying potential survivors, 30 percent from Project TILI partners supporting women survivors, and the remaining 15 percent from the 14 organisations who've had training from the project. Feedback from Project TILI training has been overwhelmingly positive with frontline staff reporting that they have been identifying more potential survivors.¹⁵ However, this suggests that training alone is not sufficient to enable good data collection: it is the organisations who had dedicated resources allocated to modern slavery and had already embedded data collection into their practice that were able to collect the majority of the data in this database.

The fact that a majority of the data came from small number of organisations introduces certain biases. For the 30 percent of data collected by TILI partners Hestia, Bawso and Belfast & Lisburn Women's Aid, who recorded data about the survivors that they supported through Project TILI, it is important to consider that these people are:

- all women
- almost all have a positive 'conclusive grounds' decision from the NRM as a criterion for receiving post-NRM support (although some pre-NRM support was also offered by Bawso)
- almost all people seeking asylum, with refugee status or with limited leave to remain.

In contrast, the 70 percent of data collected by external homelessness, housing or sex work organisations (both those who received training from the project, and those who didn't) is about people:

- of any gender
- who may or may not have been referred to the NRM
- who may not have received any pre or post-NRM specialist support
- of varied immigration status.

Whilst the database holds data for over 300 survivors of modern slavery, this data is incomplete for most people. Staff may not always know all the details of a someone's experience and may not want to ask invasive questions that could be re-traumatising. Survivors themselves may not recall all details of their experience due to their trauma. Lastly, if someone has been exploited, experienced homelessness, received support from the NRM and then possibly experienced homelessness again, it is very unlikely they were in contact with the same organisation throughout this journey, meaning some information is very difficult for staff to obtain. This means that the data about survivors collected by the project is partial, and the results presented in this report only pertain to the segment of survivors for whom particular data points exist. The number n of survivors whose data exists for a particular chart, table or diagram will be clearly shown throughout the report.



2 Demographics of survivors of modern slavery

¹⁵ Ruth Mason, Ruth Atkinson, and Ruth Stevenson, 'Interim Report: Evaluation of Project TILI' (AVA (Against Violence and Abuse), 2021), 30, https://www.crisis.org.uk/media/244995/project_tili_interim_evaluation_report_2021.pdf

2 Demographics of survivors of modern slavery

In total there is data for 331 survivors of modern slavery in the Project TILI database. Of those whose gender was recorded, 60 percent were women and 40 percent were men, with one person having no gender recorded. The higher proportion of women can be explained by the presence of a large quantity of data derived from support offered by Project TILI which was tailored specifically for women.

People experiencing exploitation were more likely to be younger, 55 percent of people were aged 34 and under and only 13 percent were aged 55 and above.

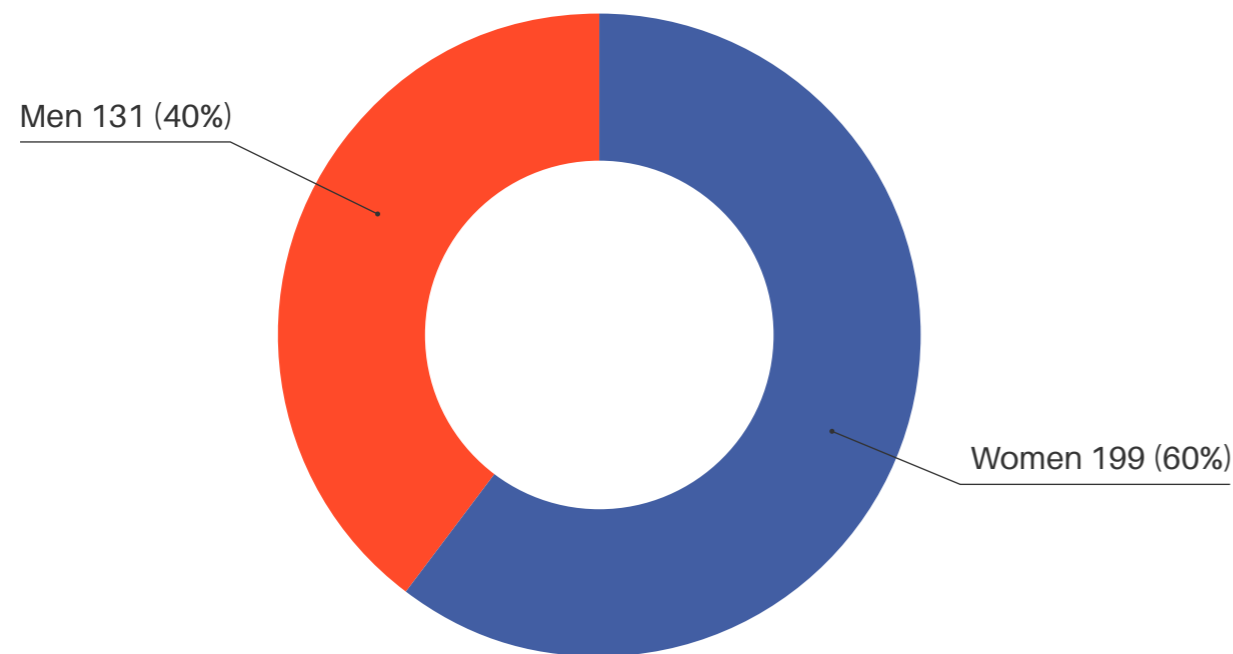
The most common nationality of survivors in the database was British (34%), followed by Albanian

(12%), Romanian (8%), Nigerian and Polish (7% each).

By way of comparison, the most common nationalities of adult survivors referred to the NRM were Albanian (26%), British (12%), Vietnamese (7%) Chinese (5%) and Sudanese (5%).¹⁶

For further comparison, in England around 84 percent of people owed a prevention or relief duty by their local authority (meaning they're either homeless or at risk of homelessness) are UK nationals, falling to 70 percent in London.¹⁷ Looking at rough sleeping data, in London in 2019/20¹⁸, 47 per cent of people who were recorded as sleeping rough in the capital were UK nationals and the governments annual

Figure 3 Gender of survivors in the TILI database (n=330)



¹⁶ 'Modern Slavery: National Referral Mechanism and Duty to Notify Statistics UK, End of Year Summary 2020: Data Tables' (The Home Office, 2021), <https://www.gov.uk/government/statistics/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-end-of-year-summary-2020>

¹⁷ 'Detailed Local Authority Level Tables: Financial Year 2019-20' (Ministry of Housing, Communities & Local Government, 2020), https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/923141/DetailedLA_2019-2020.xlsx

¹⁸ 'Chain Annual Report Greater London April 2019 - March 2020' (Greater London Authority, 2020).

Figure 4 Age brackets of survivors in the TILI database (n=325)

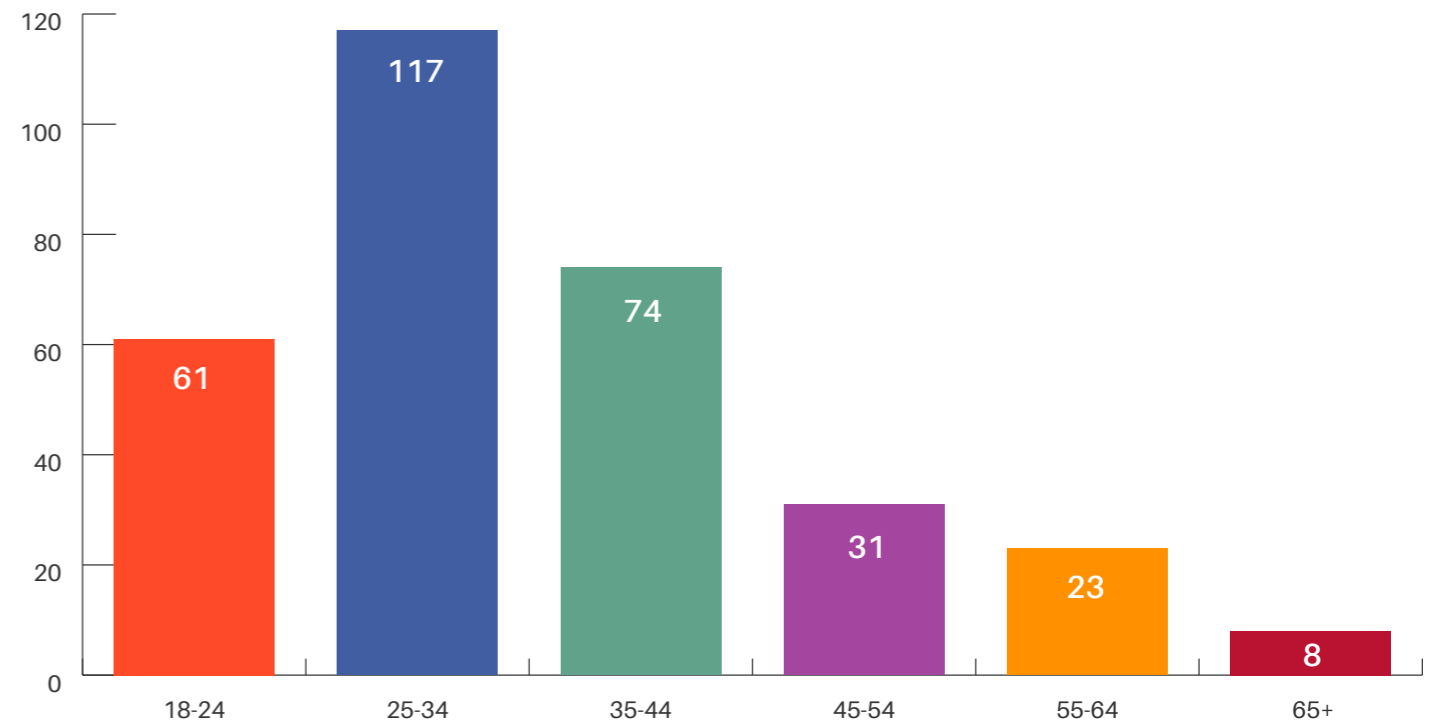


Figure 5 Most common countries of origin of survivors in the TILI database (n=330)

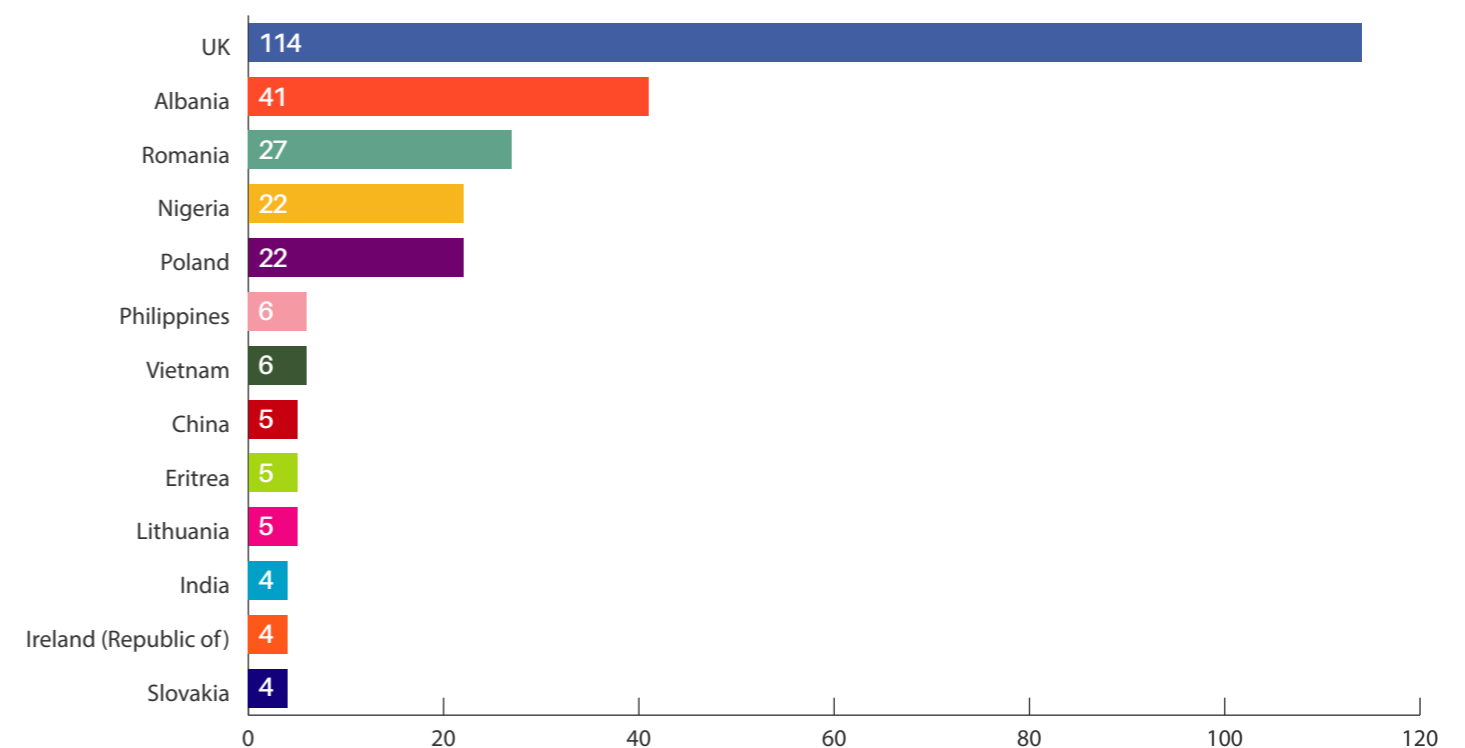
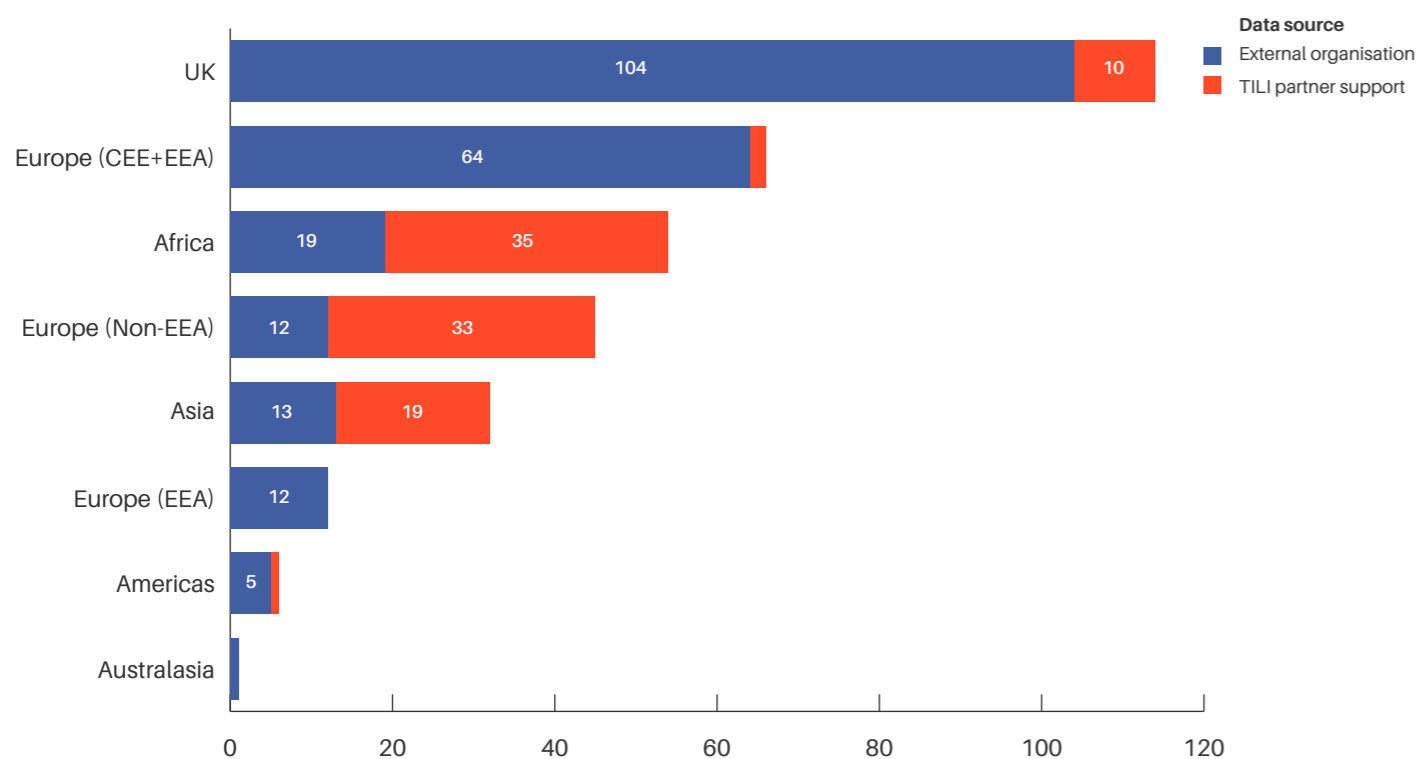


Figure 6 Region of origin of survivors in the TILI database, separated by data source
(n=330)



rough sleeping counts and estimates, 72 per cent of people rough sleeping on any given night in 2020 were UK nationals.¹⁹

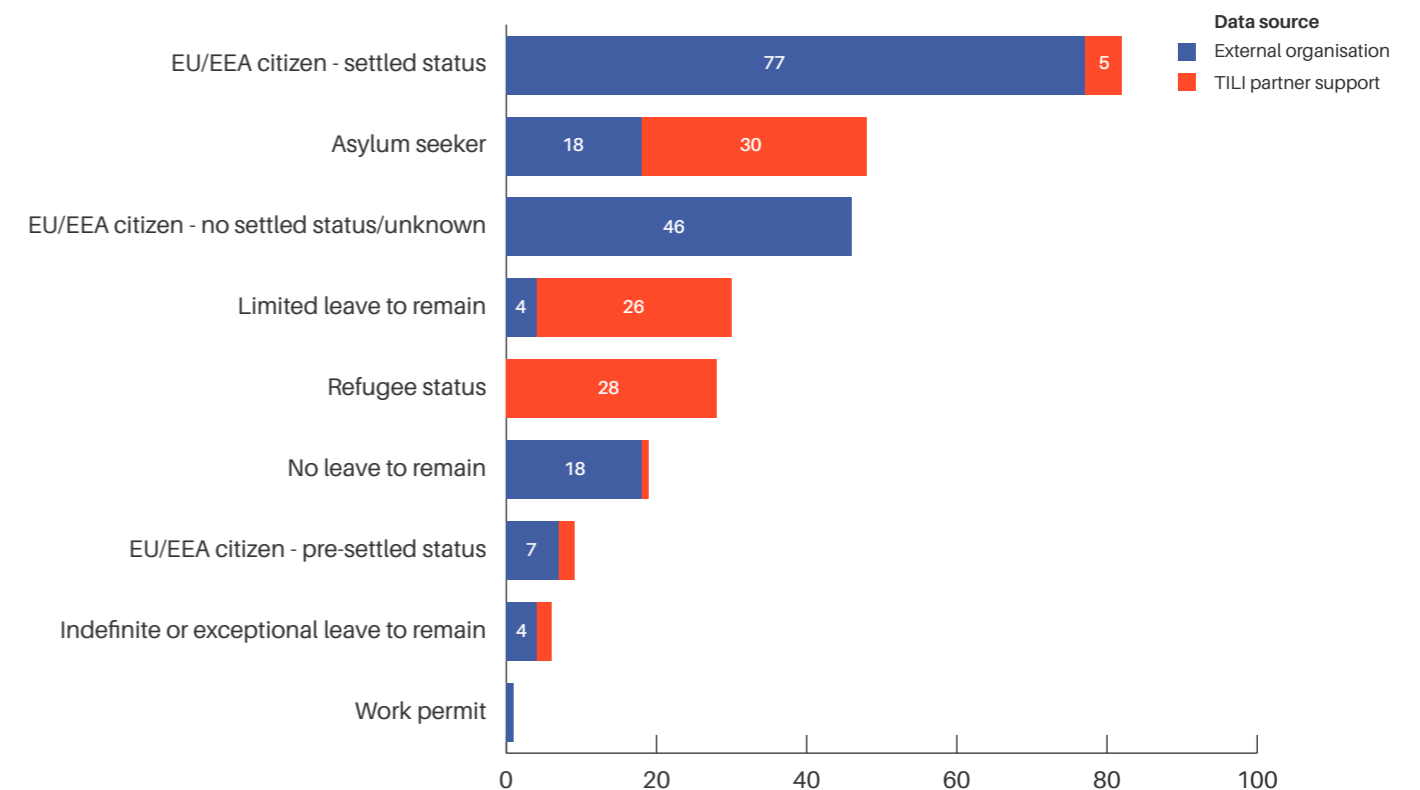
Compared to all people experiencing homelessness, there is a *greater* proportion of non-UK nationals in the Project TILI dataset. However, compared to all survivors of modern slavery (at least, those who are referred to the NRM), there is a *lower* proportion of non-UK nationals in the Project TILI dataset. This result would be consistent with homelessness and non-UK nationality both being factors which make people more exposed to exploitation. However, as the TILI dataset is not a representative sample, more research is needed to confirm this.

There was high diversity in the country of origin of survivors, with 51 different countries of origin in total. Here there is a strong correlation with data sources:

data derived from Project TILI support for women survivors (delivered by Hestia, Bawso, and Belfast & Lisburn Women's Aid) concerned more people from Africa, Asia, and Europe outside of the EEA.²⁰ Data which came from external homelessness, housing or sex work organisations was about more people from the UK, or Europe within the EEA (but also concerns a significant minority of people from other regions).

The immigration status of survivors in the database was also diverse. Here too, there is a noticeable difference between the two types of data source. Data derived from TILI partners' support was almost always about people either seeking asylum, with refugee status, or limited leave to remain. Data from external organisations was mostly about EEA citizens, and concerned people with a greater variety of immigration statuses.

Figure 7 Immigration statuses of survivors in the TILI database, separated by data source
(n=269)



¹⁹ 'Rough Sleeping Snapshot in England: Autumn 2020' (Ministry of Housing, Communities & Local Government, 2021), <https://www.gov.uk/government/statistics/rough-sleeping-snapshot-in-england-autumn-2020/rough-sleeping-snapshot-in-england-autumn-2020>

²⁰ Europe (CEE+EEA) encompasses countries which are both in the Central and Eastern Europe (CEE) region, and also in the European Economic Area (EEA). Albania, despite being in CEE, is classified as Europe (Non-EEA) as Albania is not in the EU. This distinction is made because of how EEA citizenship determines immigration status. See appendix for a full list of countries in each category.

3 Types of exploitation

3 Types of exploitation

This section looks at the nature of exploitation experienced by survivors in the Project TILI database, and how that exploitation correlates with other factors.

The most common type of exploitation was sexual exploitation (43% of cases), followed by labour exploitation (25%) and forced criminality (18%). There is a highly gendered aspect to the exploitation recorded here: the vast majority of domestic servitude, forced marriage and sexual exploitation was experienced by women, whereas the majority of forced criminality and labour exploitation was experienced by men. Of the 13 men who experienced sexual exploitation, nine were under the age of 18.

There were also some correlations with nationality. Almost everyone who was forced into criminality was British. People from Central and Eastern Europe (within the EEA) made up a large majority of survivors who experienced labour exploitation. People from Europe outside of the EEA where overwhelmingly Albanian survivors of sexual exploitation. Finally, domestic servitude was mostly experienced by people from Africa and Asia.

A majority of survivors in the database were primarily exploited in the UK (74%), but exploitation occurred in most other regions of the world too. When people are forced into homelessness, reconnection with their old local area can be part of their support. Research shows little evidence for the effectiveness of this approach domestically, whereas perspectives

Figure 8 Type of exploitation experienced by survivors in the database, separated by gender (n=323)

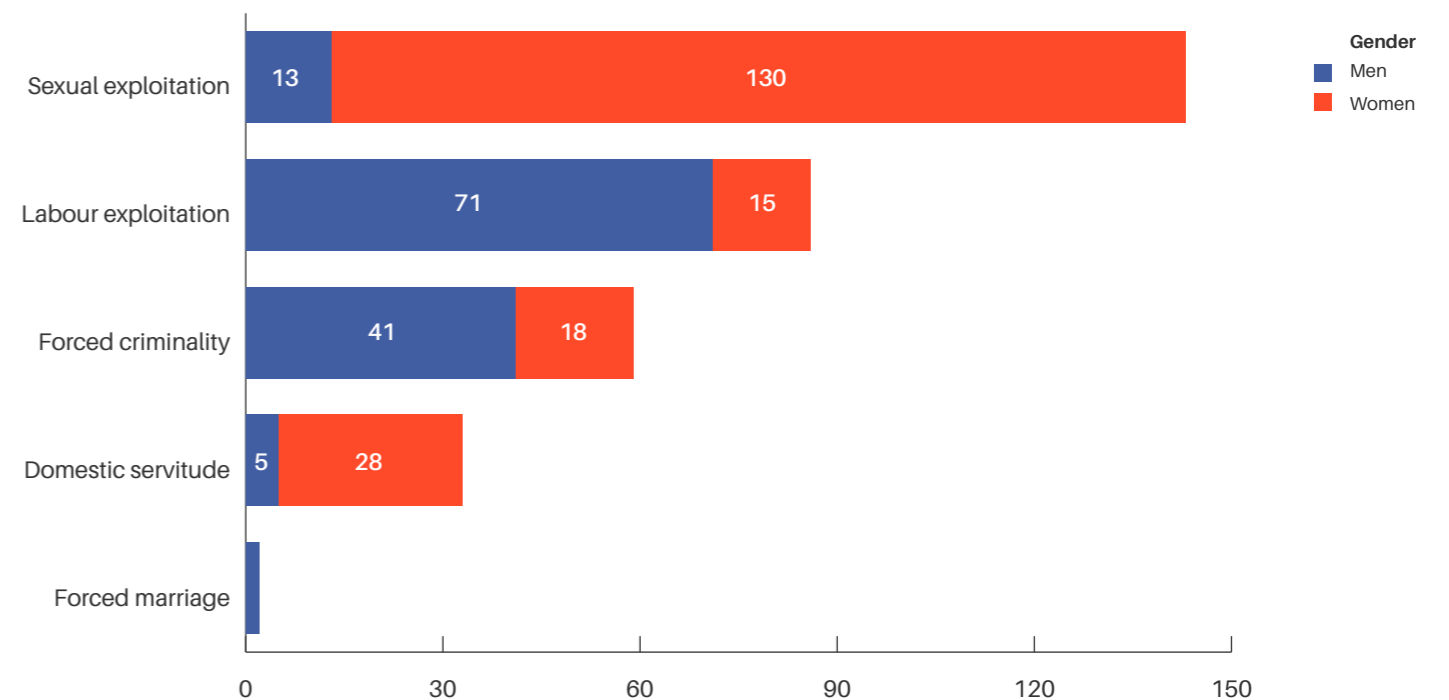


Figure 9 Percentage of survivors from different world regions who experienced different types of exploitation

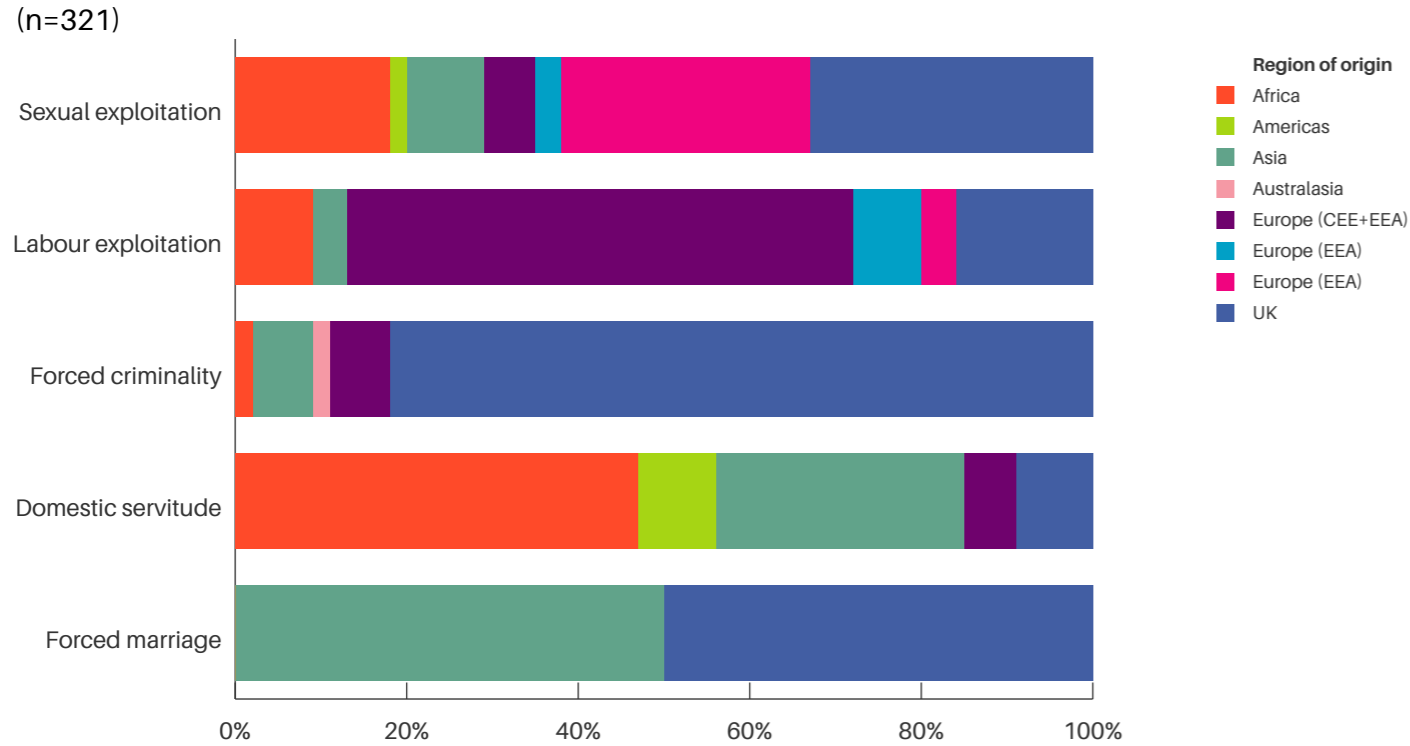
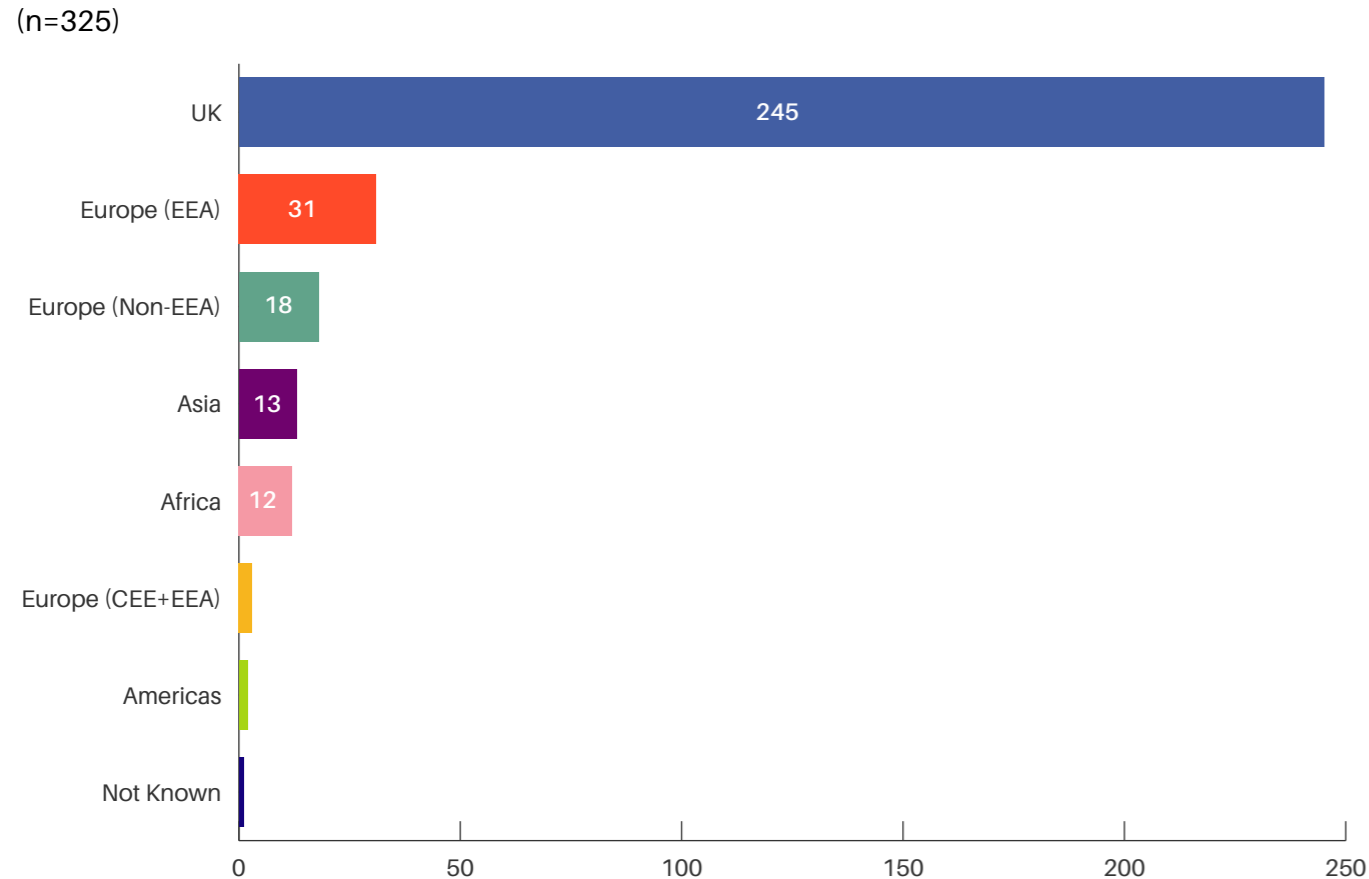


Figure 10 Region of the world where survivors were primarily exploited



on international reconnection are more mixed, especially when someone isn't eligible for support in the UK.²¹ However, this data shows that this

approach is further complicated when modern slavery has occurred, as reconnection could mean re-exposing a survivor to their traffickers.

Case study 1

Jozef* was forced into homelessness whilst living in Slovakia. One day, two men who said they knew his brother said that they could get him a fantastic job in England. They would sort everything out, Jozef only had to give them his passport so they could get him a plane ticket. Struggling to find decent work and feeling trapped in homelessness, Jozef agreed as he wanted his life to get better.

Jozef was taken to a town in the North West and told to work in a car wash for £35 a day, but he would only get £15, with the rest going to his boss. He had to share a three-bed house with seven other men. He knew he deserved better, but when he asked his boss refused and just kicked him out of the house. However, the boss's son knew of another car wash in the next town who needed more workers. Jozef had to provide for himself, so he went.

In this car wash, Jozef had to live on site. He had his own room and bathroom, but there was no key and other staff and clients could go inside whenever they wanted. He was forced to work 12 hours a day, seven days a week, for over a year and a half. One day, Jozef's boss said he wasn't happy with his work, and he had to leave. Despite

all his hard work, Jozef had no way to challenge this without support. He went to another town and stayed on the sofa of some friends but had to leave after a couple of weeks. He heard that there was a job in another nearby car wash. With no other options, he went to work there.

Jozef's new boss made him work over 12 hours a day without toilet breaks. He was supposed to earn £45 a day, but was only give £100 a week, with his boss taking the rest for himself. When Jozef tried to protest, he was violently beaten by his boss and three other men - he turned to the police for help, but they didn't investigate the car wash. By this point, Jozef had to resort to sleeping on the streets, occasionally sofa-surfing at a friend's house. The police hadn't helped him, so he had no choice but to keep working despite the abuse.

When Covid-19 hit, there were fewer and fewer customers. Jozef would turn up to work every day, only to be sent away after a few hours with no pay. He was eventually found by a street outreach team who put him in contact with homelessness organisations where he could get support to leave his homelessness behind.

** All names have been changed*

21 Peter Mackie, Sarah Johnsen, and Jenny Wood, 'Ending Rough Sleeping: What Works? An International Evidence Review' (Crisis, 2017), 89, <https://www.crisis.org.uk/ending-homelessness/homelessness-knowledge-hub/services-and-interventions/ending-rough-sleeping-what-works-an-international-evidence-review/>

4 Support needs of people who experience modern slavery and homelessness

4 Support needs of people who experience modern slavery and homelessness

The database also recorded the most important three support needs of survivors. The most common support needs are mental health issues, access to housing, substance abuse and financial problems.

Modern slavery can be examined through the lens of multiple disadvantage. Both from the data and wider research we know that social disadvantage exposes some people to exploitation more than others, and these structural factors are what perpetrators of exploitation capitalise on to control the people they exploit.

Three quarters of the people in the Project TILI database had two or more support needs (up to three could be recorded). The data could also show which support needs were likely to occur together: table 1 shows the percentage of people who had one particular support need (listed in the left-hand column) who also had another support need (listed along the top).

Most people (85%) who needed support with housing sustainment also experienced mental health issues. Half of people (50%) who needed support with an immigration or asylum claim also needed

Figure 11 Most common support needs by percentage of survivors (n=310)

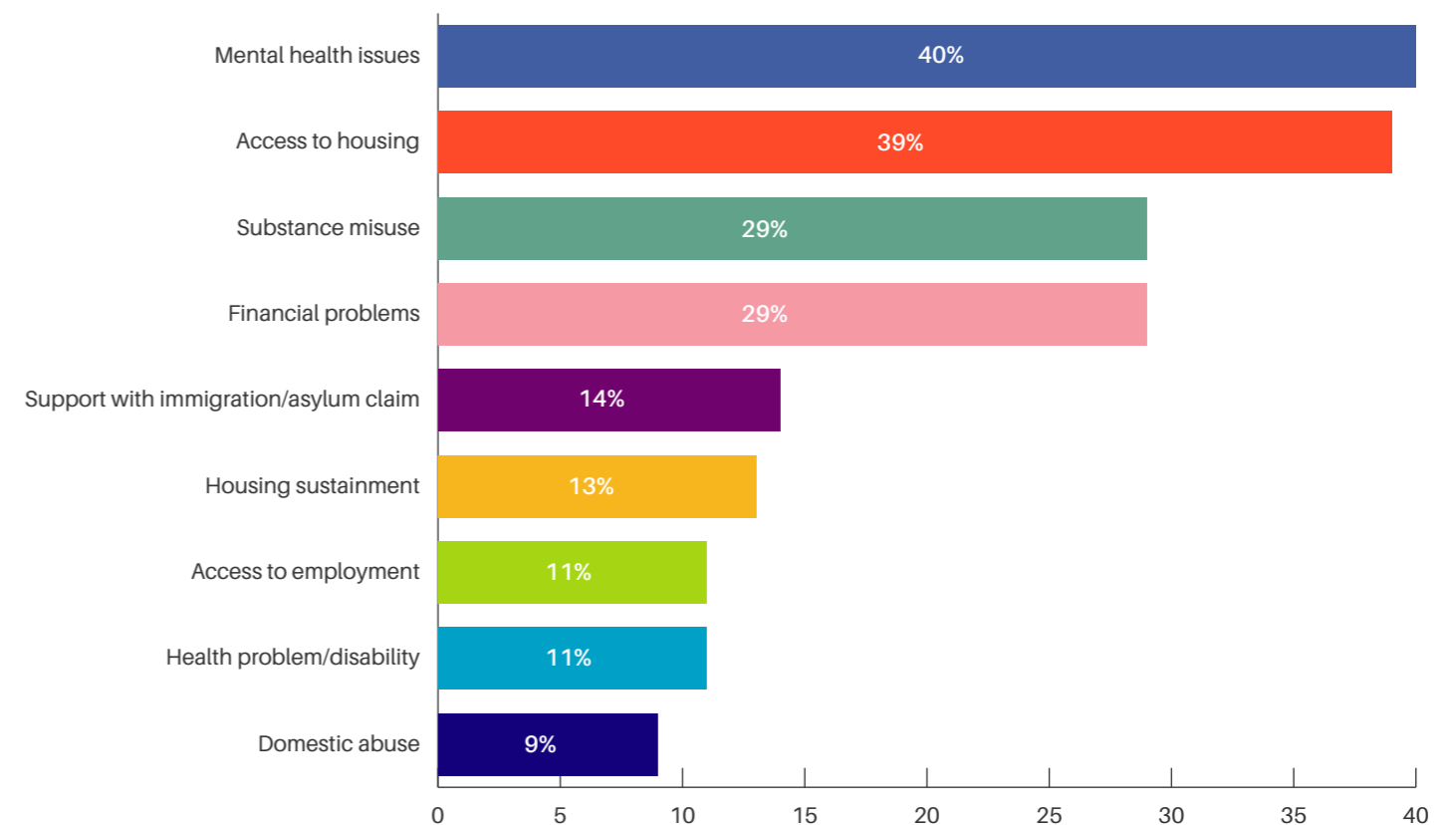


Figure 12 Number of support needs recorded for survivors
(n=310)

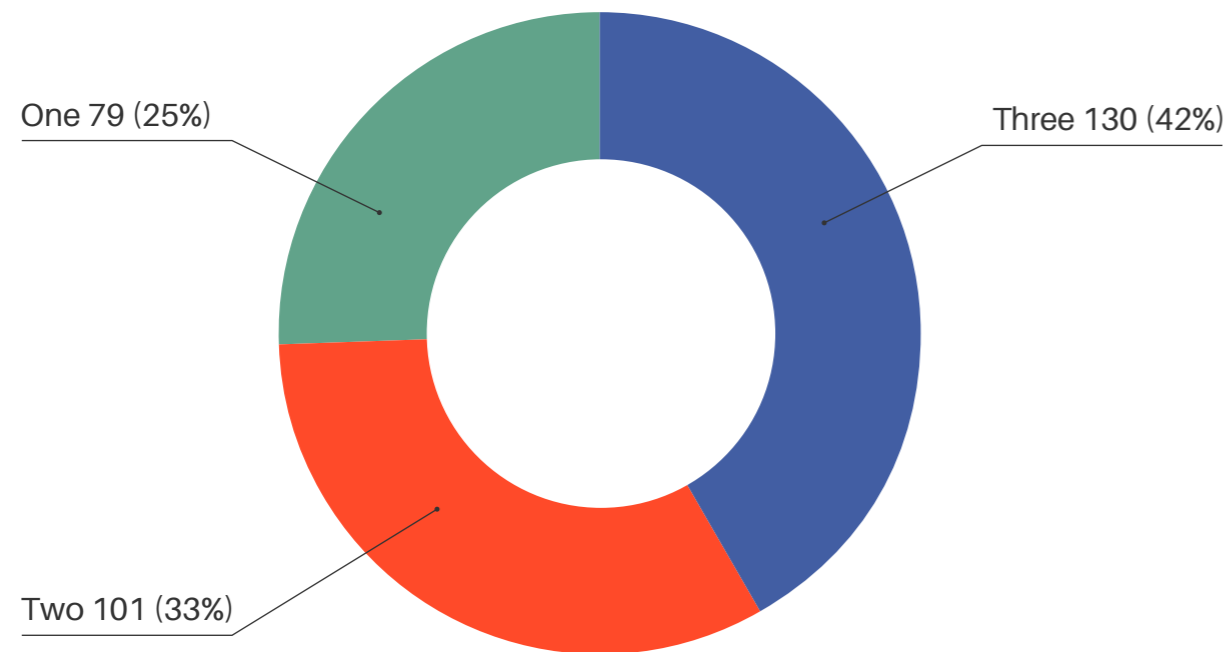


Table 1 Percentage of people who have one particular support need (left-hand side) who also had another support need (top row)

	Mental health issues	Access to housing	Drugs/alcohol issues	Financial issues	Immigration/asylum claim	Housing sustainment	Domestic abuse
Mental Health Issues		46%	16%	33%	10%	28%	6%
Access to housing	46%		5%	19%	17%	26%	2%
Drugs/Alcohol issues	22%	7%		31%	2%	0%	12%
Financial issues	47%	26%	32%		6%	11%	9%
Immigration/asylum claim	29%	50%	5%	12%		0%	0%
Housing sustainment	85%	78%	0%	25%	0%		0%
Domestic abuse	26%	11%	41%	30%	0%	0%	

support access housing. And nearly half of the people (46%) who needed support with accessing housing also had mental health issues.

The data can also show which support needs survivors of different types of exploitation tended to have:

- Substance abuse was most prevalent amongst people who were forced into criminal activity
- Mental health issues were most prevalent in people who experienced sexual exploitation or domestic servitude, who were mostly women
- Support to access housing was most prevalent amongst people who'd experienced domestic servitude, but also labour exploitation and sexual exploitation
- Financial problems were equally present amongst all types of exploitation

The statistics in this section come with some caveats. Staff were asked to list a survivor's three most important support needs, but this limit could mean some information is lost for people with very complex needs. Staff working in different organisations may be more attuned to certain support needs than others, depending on the type of support that organisation offers. Lastly, certain support needs might become subsumed into others. For example, only around a quarter of people who had a support need around domestic abuse or substance misuse were also recorded as having a mental health support need. It is difficult to imagine a scenario where things like domestic abuse or substance misuse don't also present severe mental health challenges, but staff may not have felt it necessary to list that as a separate support need.

5 Role of the National Referral Mechanism

5 Role of the National Referral Mechanism

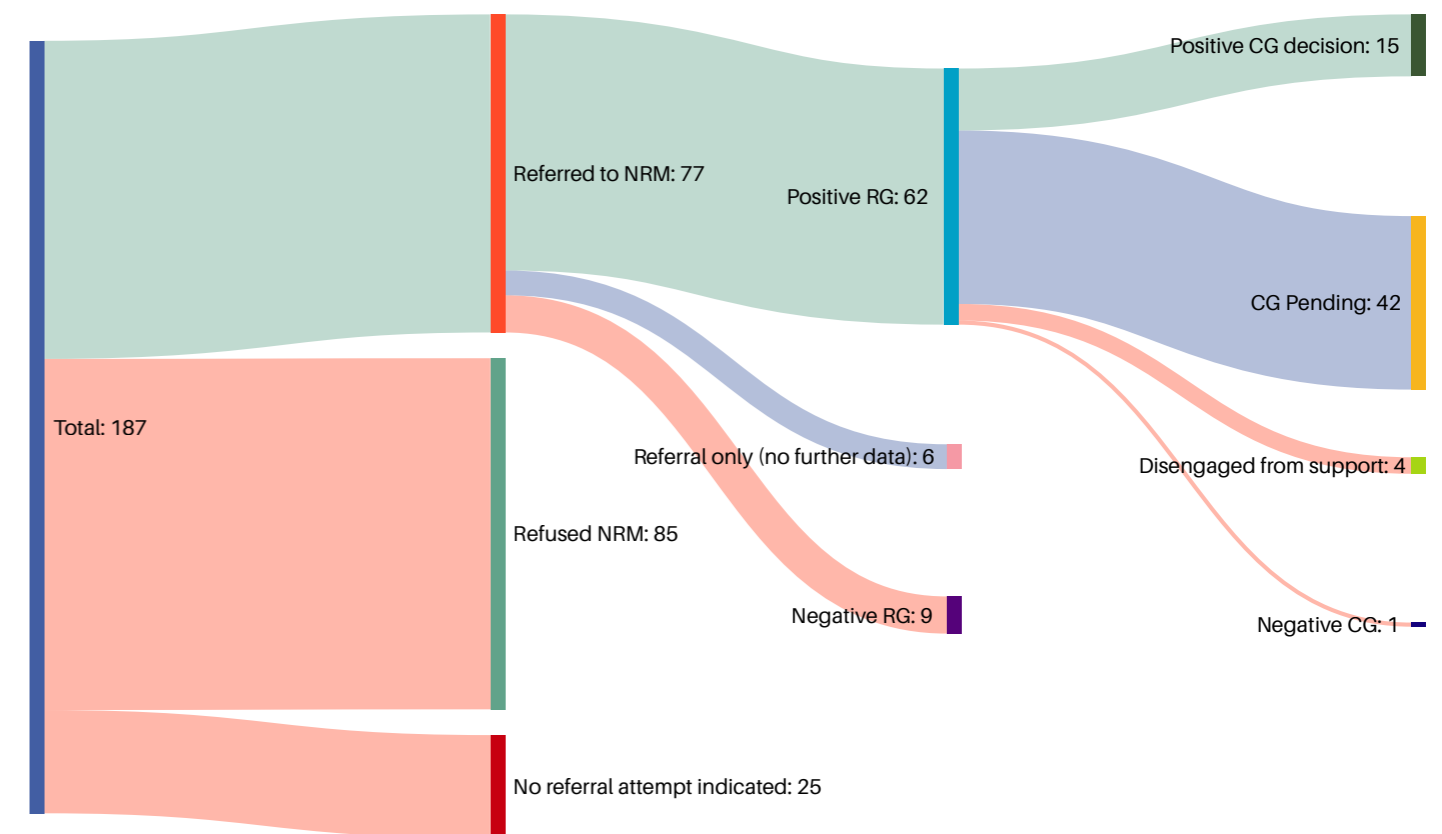
The National Referral Mechanism (NRM) is the government’s statutory support for survivors of modern slavery (see section 1.2 for a full explanation). The Project TILI database collected data on whether people who experience modern slavery and homeless were referred to the NRM, and the outcomes of their engagement with it.

The survivor must also to give their consent to a referral. Once within the NRM, a survivor will receive a ‘reasonable grounds’ (RG) decision, followed by a ‘conclusive ground’ (CG) decision which affects the continuation of their support, but they can also decline the support or disengage at any point during this process.

A potential survivor must be referred into the NRM by a ‘first responder’, who must come from a designated organisation that can make referrals.

The following diagram shows how survivors in our database experienced the NRM²². It should be read from left to right, and shows at each stage whether or

Figure 13 Diagram of the numbers of survivors who take different pathways through the NRM (n=187)



²² The data in this section excludes data derived from TILI support for women survivors. Most of this support was post-NRM support, and as such a criterion for receiving the support was having received a positive conclusive grounds decision. This means it would skew the results. Instead, only data from homelessness, housing or sex work organisations external to the project is considered here. As before, other cases are excluded if they lack the relevant data.

not survivors continued along the NRM process, and if possible the reason for their exit.

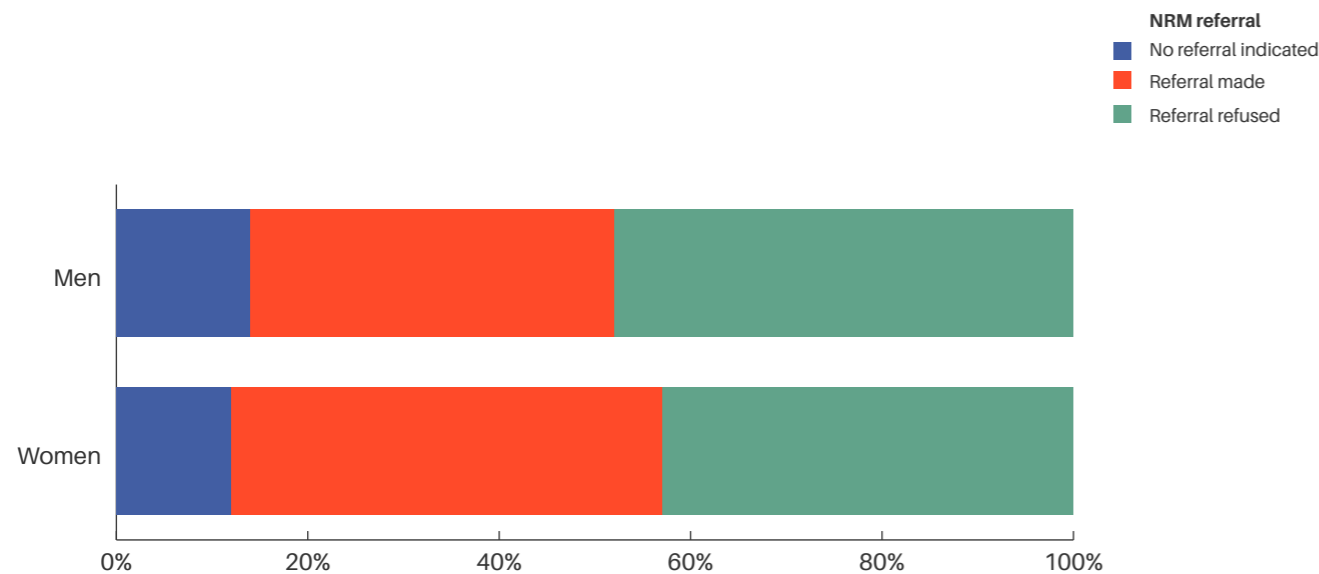
The majority of survivors (for whom the project has these data points) were not referred to the NRM in the first place. For 85 people, this is because they refused (i.e. did not give their consent) to be referred. For 25 people, there is no indication that an attempt was made to refer them.

Of the 77 survivors who were referred to the NRM, nine received a negative RG decision, and for six there is no data about what happened after the referral. This could be because the organisation submitting this data did not continue to support the person once they started being supported through the NRM.

There were 62 survivors who received a positive RG decision. Of these, 15 went on to receive a positive CG decision, 42 had not yet received a decision when the data was submitted (or the decision was unknown to the member of staff), one had a negative CG decision and four people had disengaged from the support.

This means that of the 187 people who've experienced modern slavery and homelessness

Figure 14 Percentage of men and women referred to NRM (n=186)



23 Júlia Tomás, 'Responding to Modern Slavery and Exploitation within the Homelessness Sector' (The Passage, 2019), 13, https://passage.org.uk/wp-content/uploads/2019/06/Responding-to-Modern-Slavery-in-the-Homelessness-Sector_report-2019.pdf

considered here, the data can say for certain that 14 (8%) were officially recognised as a victim of modern slavery by the government, although that number is likely higher: it could be as high as 63 (37%) given the people whose eventual outcome is unknown. In any case, over half (59%) were not referred to the NRM in the first place.

Nearly half of survivors (45%) actively did not want to be referred to the NRM. This means that the NRM did not present as a suitable avenue of support for these homeless survivors of modern slavery, which is concerning because alternative means of support are not guaranteed by the Modern Slavery Act.

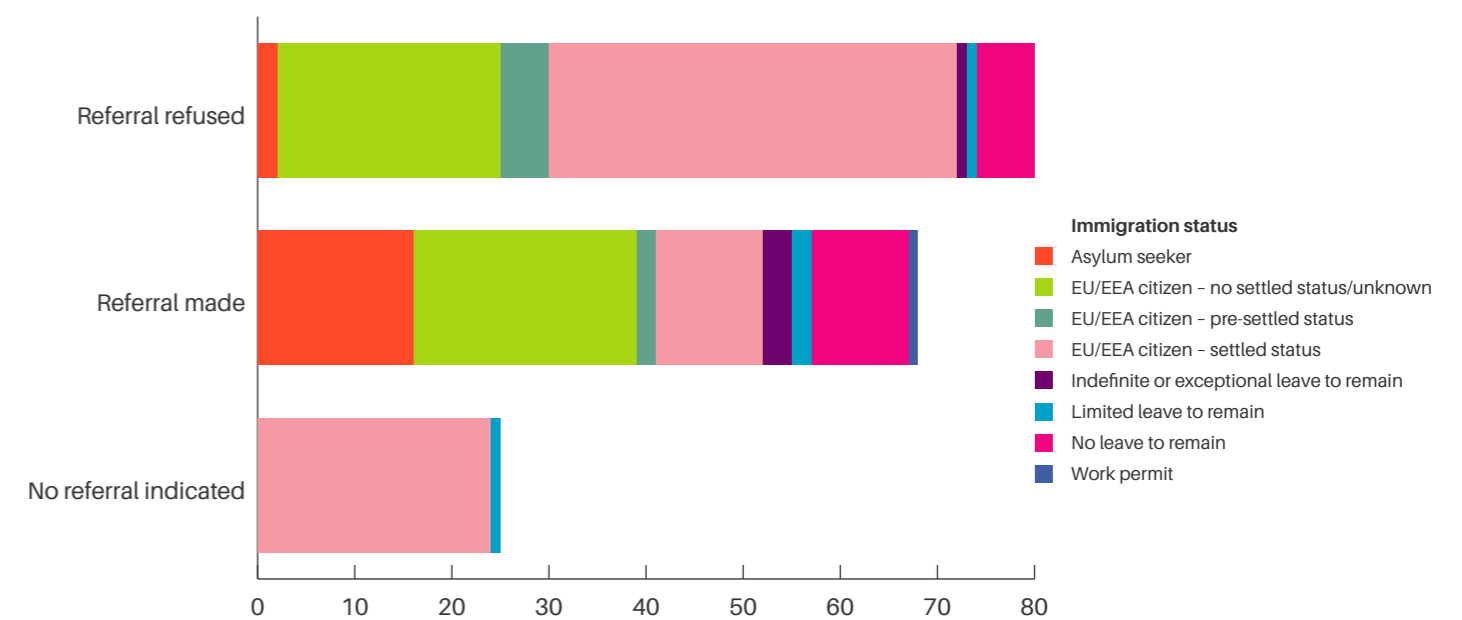
The data collected by Project TILI does not capture reasons for refusing NRM support. However, well-documented and overlapping phenomena in the homelessness and modern slavery sectors can suggest some possible reasons. Some homeless survivors, especially those experiencing multiple disadvantage, may not have found previous support or interventions to end their homelessness helpful, and therefore don't trust the NRM to meet their needs. Some see NRM support as only taking place over a short period that will not guarantee protection and social reinsertion.²³ Other survivors may not self-

identify as 'victims' as such and so don't feel they need support from the NRM.²⁴

Survivors may fear recrimination from their traffickers if they disclose details of their exploitation,²⁵ and for others who have a general distrust of the authorities themselves, entering a government-run system coldly described as a 'mechanism' might be an unattractive prospect. In particular, as the data in this report has shown, many survivors of modern slavery are involved in criminal activity as part of their exploitation, and many have uncertain immigration status (especially if they have been trafficked into the UK). A modern slavery system run by the Home Office may carry with it the threat of criminal or

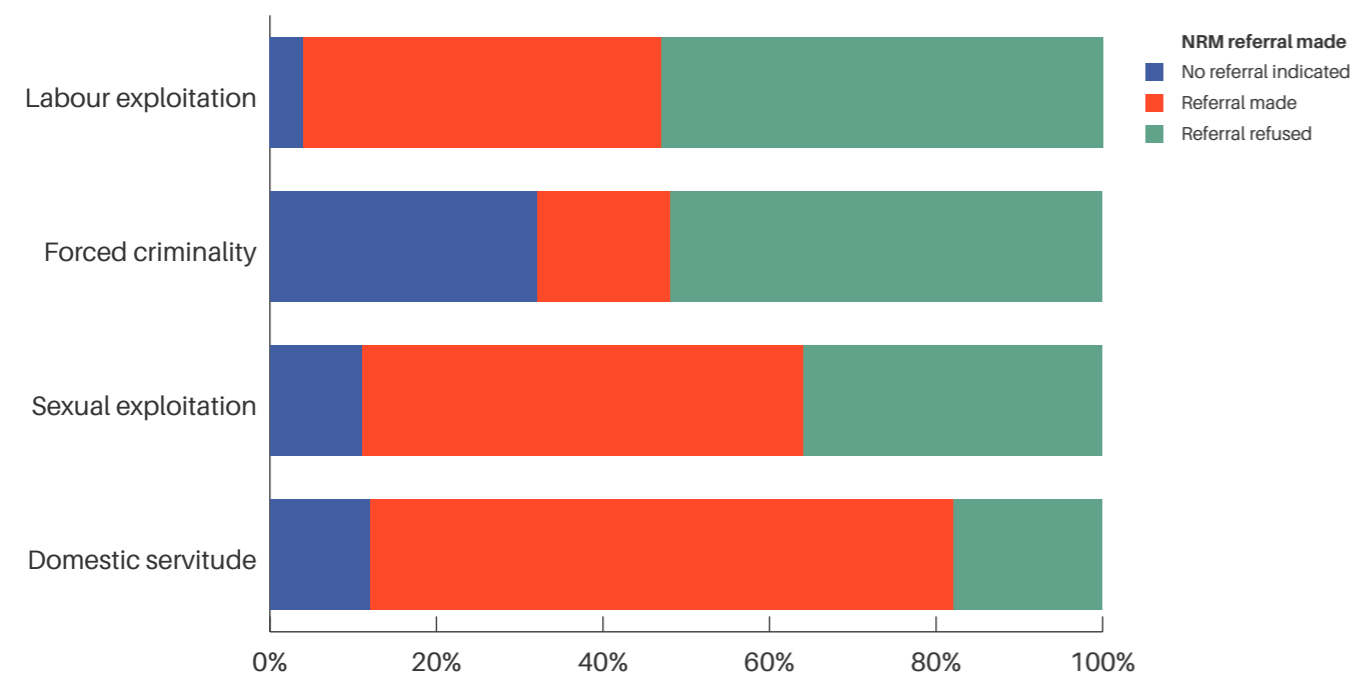
immigration enforcement.²⁶ Recent statements made by the Home Office about changes to the NRM talk about the need to clamp down on "child rapists, people who threaten national security and failed asylum seekers" who are abusing and clogging up the modern slavery system, taking away support from "genuine victims".²⁷ The new guidance makes it easier for the government to detain potential victims of modern slavery by removing their 'at risk' status and requiring a higher burden of proof that immigration detention would be harmful to them.²⁸ These new reforms, oriented around this criminal/'genuine victim' binary, seem likely to exacerbate fears of enforcement, as do new Home Office powers to deport rough sleepers.²⁹

Figure 15 Referrals to NRM separated by immigration status (n=173)



24 'Understanding and Responding to Modern Slavery within the Homelessness Sector', 14.
 25 Tomás, 'Responding to Modern Slavery and Exploitation within the Homelessness Sector', 13.
 26 'First Steps to Safety? The Role of Reception Centres in Supporting People out of Exploitation' (British Red Cross, 2020), 25-27, <https://www.redcross.org.uk/about-us/what-we-do/we-speak-up-for-change/human-trafficking-and-slavery/early-support-for-survivors-of-trafficking>
 27 The Home Office and Priti Patel, 'Alarming Rise of Abuse within Modern Slavery System', GOV.UK, accessed 24 April 2021, <https://www.gov.uk/government/news/alarming-rise-of-abuse-within-modern-slavery-system>
 28 Felix Forbes, 'Modern Slavery Victims Face Detention Thanks to "stealthy" Legal Change, Charities Say', Sky News, accessed 10 May 2021, <https://news.sky.com/story/modern-slavery-victims-face-detention-thanks-to-stealthy-legal-change-charities-say-12254943>
 29 Aaron Walawalker and Mark Townsend, 'Home Office: New Deportation Law May Discriminate against Ethnic Minorities', The Guardian, 4 April 2021, sec. UK news, <http://www.theguardian.com/uk-news/2021/apr/04/home-office-new-deportation-law-may-discriminate-against-ethnic-minorities>

Figure 16 Proportion of referrals made for people of different exploitation type
(n=181)



Whilst it is not possible to tell the reasons for refusing NRM support from the data collected by this project, the data can show which other factors correlate with refusal. The proportion of men and women who refused an NRM referral is very similar, although slightly higher for men.

People who refused to be referred to the NRM were almost all EU/EEA citizens. In fact, in the project's data, people experiencing homelessness who are EU/EEA citizens more often than not refused an NRM referral. Those with no leave to remain slightly more often accepted a referral than refused it, but people seeking asylum mostly accepted a referral. This highlights a complex relationship of the NRM with the immigration and asylum system. Whilst some preferred not to engage with the NRM, people with uncertain immigration status more often engaged with the NRM than those who are EU/EEA citizens.

Some of the Home Office's statistics also hint at the complexities of this relationship. In 2019,³⁰ the percentage of conclusive grounds decisions that were positive was 98 percent for UK nationals, falling to 88 percent for EU nationals and 74 percent for non-EEA nationals. Weighting each group for the number of entries into the NRM via a positive reasonable grounds decision, around twice as many conclusive grounds decisions were made for UK nationals compared to EU nationals, and five times more than non-EEA nationals, suggesting that nationality and immigration status affects the speed of decision making as well as likelihood of positive decision.³¹

Whilst a positive conclusive grounds decision does not guarantee refugee status, it can be helpful to an asylum claim. However, in some cases, someone will be recognised as a victim of modern slavery only to

30 The Home Office did not make this information available in 2020

31 'National Referral Mechanism Statistics UK: End of Year Summary 2019: Data Tables Second Edition' (The Home Office, 2020), <https://www.gov.uk/government/statistics/national-referral-mechanism-statistics-uk-end-of-year-summary-2019> Table 28

have their asylum claim rejected, which in turn has a negative impact on mental health that can seriously jeopardise a survivor's recovery. Furthermore, there is a risk that a negative conclusive grounds decision could harm a claim, evidenced by the Home Office's rhetoric about the system being 'abused' by 'failed asylum seekers'. Aside from the bearing on the asylum decision itself, another likely factor is that for people with no recourse to public funds, the NRM may be one of the only ways to access any kind of support, whereas those who can access public support and benefits may not feel they need the NRM so much. The difference in the way that people with different immigration statuses engage with the NRM suggests that the modern slavery system might sometimes be functioning as an anabranch of the overall asylum system in practice, and that this drives engagement with the NRM as much as the hope that it will provide the support needed to recover from exploitation.

"I think a lot of the ladies, a lot of the stresses they face is that they have their positive conclusive grounds decision from the Home Office... They say we believe you are a victim, but it doesn't mean you can be in the UK. So then we wait months and months for their asylum decision, which often comes back as negative, and then we have to go through the asylum appeal."³²

- Project TILI support delivery partner

Lastly, the data can show how survivors who experienced different types of exploitation engaged with the NRM. People forced into criminal activity had the lowest number of referrals, possibly due to fears of police enforcement, and people who experienced labour exploitation more often than not refused a referral. On the other side, people who experienced sexual exploitation or domestic servitude were more likely to accept a referral. It is hard to say how much this is because of the specific nature of these types of exploitation, or because in the TILI data those experiencing sexual exploitation or domestic servitude are more likely to be non-EEA nationals.

Case Study 2

Chen* arrived in the UK with a tourist visa, but lost all of her documents and money. She got a job as a cleaner to earn money to return home but was tricked and forced into prostitution. Chen managed to escape the exploiters and reported everything to the police. She entered the NRM and received a positive conclusive grounds decision; however, her asylum claim was refused.

When Chen joined Project TILI, she was extremely upset because the police case against her exploiters had been closed due to insufficient evidence. With support from her Project TILI caseworker, she was able to access legal advice and find a criminal solicitor to pursue a Criminal Injuries Compensation Award.

As a result of her exploitation, Chen has been diagnosed with severe depression and anxiety, and also had PTSD symptoms. When Chen was referred to Project TILI she was extremely introverted and fearful to ask for support. Her caseworker supported her to build trust and to make her feel emotionally safe. She now feels confident enough to call her caseworker when she needs help and she feels in control of making her own choices. Chen still requires a lot of support in order to be independent, but she has positive plans to start English to Speakers of Other Languages (ESOL) classes and meet with a befriending volunteer.

*All names have been changed

32 Mason, Atkinson, and Stevenson, 'Interim Report: Evaluation of Project TILI', 65.

6 Homelessness and modern slavery

6 Homelessness and modern slavery

Modern slavery and homelessness can interact in complex ways. Someone can be forced into homelessness as a result of being exploited, and equally people who experience homelessness can be more exposed to exploitation. A home might cease to be a home if it becomes a site of exploitation, even if someone doesn't feel able to leave it. Furthermore, recovery from modern slavery might involve several moves between refuges, safe houses, temporary accommodation and government provided asylum accommodation. The Project TILI database recorded the living situation of survivors at points relative to their exploitation, and relative to their experience with the NRM if they were referred to it.

The point just before someone begins to be exploited – that is, the point at which they are 'recruited' or coerced into an exploitative situation

– is crucial for understanding how people experiencing homelessness are exposed to exploitation. For the survivors in the TILI database, the most common living situations at recruitment were rough sleeping and sofa surfing. In general, people that were exploited were most often in transient, informal living situations. Certain living situations also coincided with certain types of exploitation. For example, people, who were sleeping rough were more often exposed to labour exploitation. People who were renting privately were more often forced into criminality, possibly through 'cuckooing', where a person is forced to let their house be used for drug dealing. People who were sofa surfing more often experienced domestic servitude and sexual exploitation. Some of these patterns can be partly explained by the gendered nature of different forms of homelessness – amongst

Figure 17 Most common living situations of survivors immediately before exploitation, separated by exploitation type

(n=200)

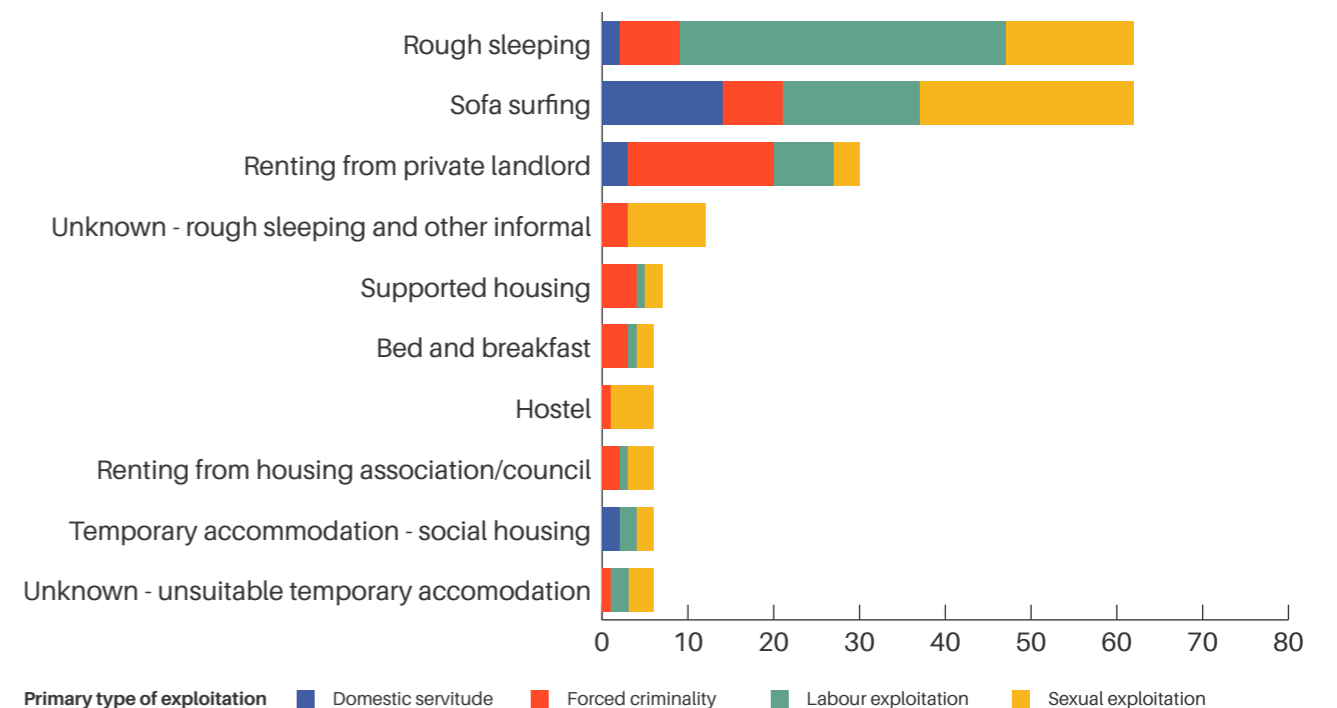
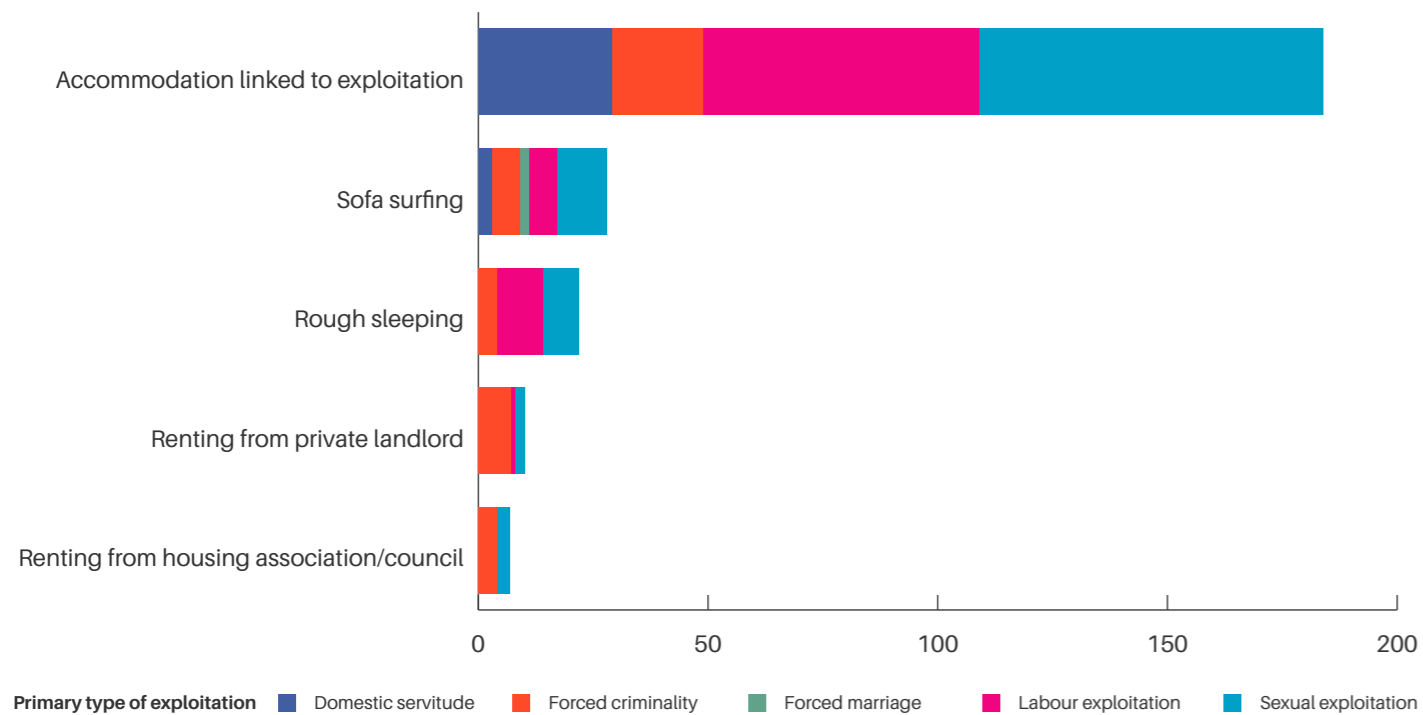


Figure 18 Living situation of survivors during exploitation, separated by exploitation type
(n=266)



the survivors in the database, men were more often rough sleeping, and women were more often sofa surfing.

The database also recorded where survivors were living during their exploitation – overwhelmingly, this was in accommodation that was tied to their exploitation. This could be something like a brothel, a cannabis farm, or an overcrowded house of multiple occupancy provided by the perpetrators.

All types of exploitation forced survivors into some sort of accompanying accommodation. It was only forced criminality which didn't require this in a majority of cases. This suggests a deep link between homelessness and modern slavery – rather than being simply two separate factors which often occur together, modern slavery frequently deprives people of the safety, security and stability of a proper home, instead forcing survivors to exist in spaces that provide shelter and a means of subsistence only in order to facilitate their exploitation.

Figure 19 shows the flow of people from their living

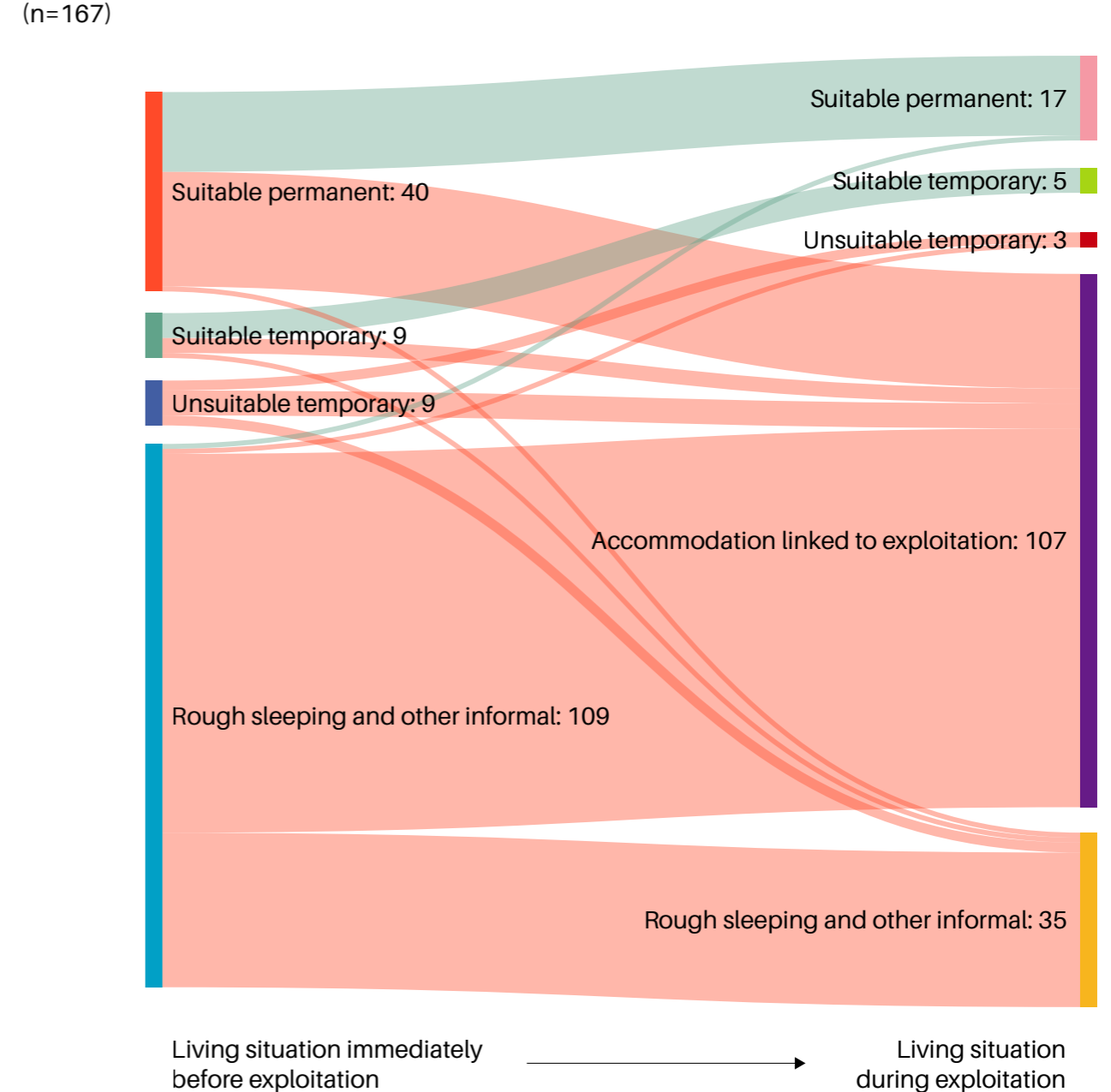
situation before exploitation to their living situation during exploitation (here accommodation types have been grouped into categories to make the diagram more readable – see appendix to see what falls into each category). This diagram shows how a large number of people experiencing homelessness were forced into exploitative situations. However, the movement away from 'suitable permanent' accommodation in the top left corner shows that more often than not, exploitation forced these people into homelessness too. The dominance of 'accommodation linked to exploitation' as a category on the right-hand side shows how often living situation is subordinated to exploitation, whether or not someone was previously homeless.

The project's database also recorded living situations with reference to different stages of NRM support. There are concerns within the modern slavery sector that survivors are not properly supported to access safe, suitable accommodation as part of their support, and this leaves them exposed to re-exploitation^{33,34}. Figure 20 shows how people

33 Annie Kelley, 'British Woman Repeatedly Trafficked for Sex after Home Office Failures', The Guardian, 16 February 2020, sec. Global development, <http://www.theguardian.com/global-development/2020/feb/16/british-woman-repeatedly-trafficked-for-sex-after-home-office-failures>

34 'Life Beyond the Safe House for Survivors of Modern Slavery in London', 21.

Figure 19 Movement of survivors from their living situation before exploitation, to their living situation during exploitation
(n=167)



in the Project TILI database were accommodated whilst they received support from the NRM, and then subsequently as they exited NRM support³⁵.

Of the survivors in the database who did get support from the NRM, a fifth were still homeless upon their exit from the NRM, either in informal living situations like rough sleeping or sofa-surfing, or unsuitable

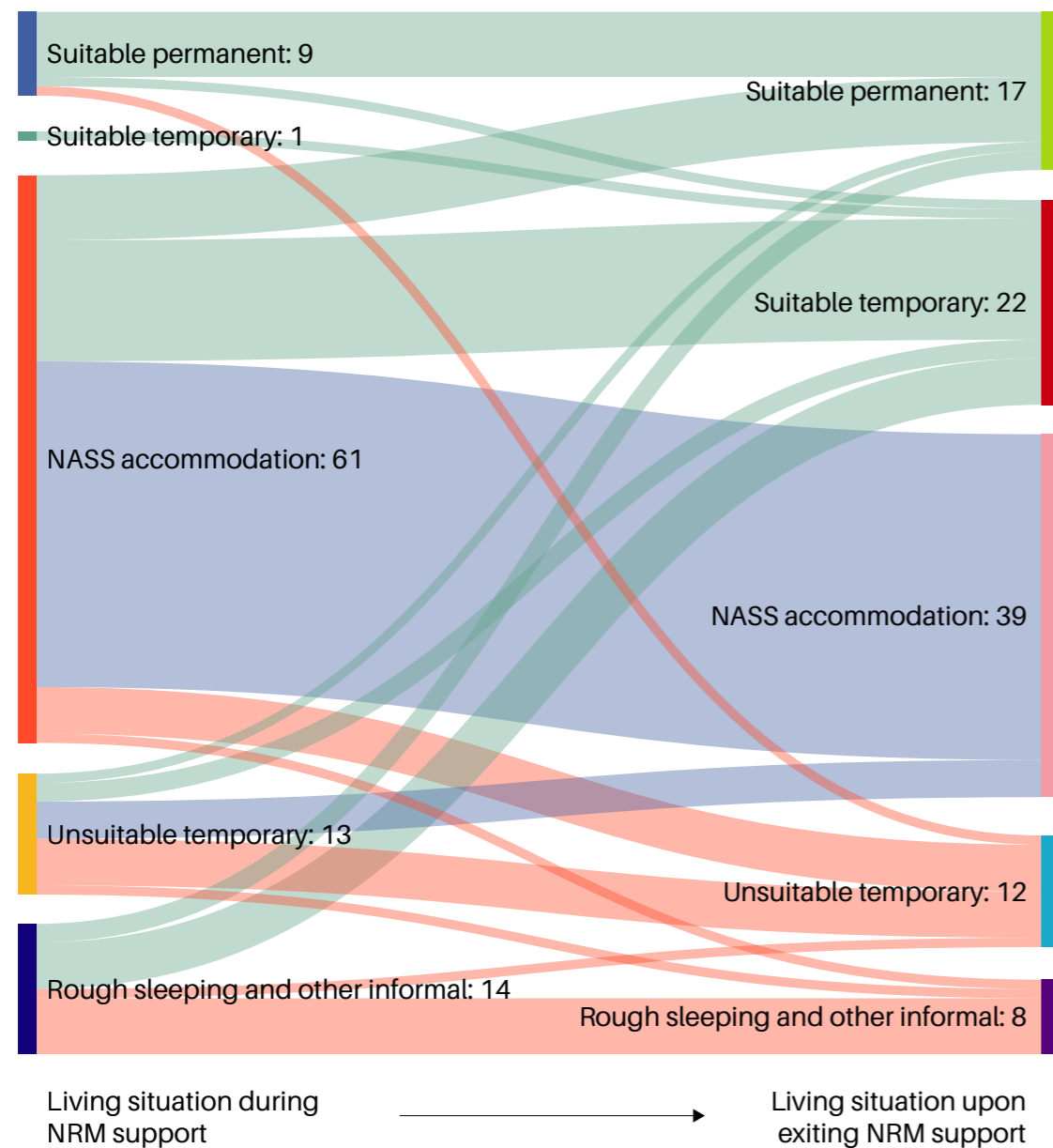
temporary accommodation. A larger proportion were still accommodated in asylum accommodation, which may not always be suitable for survivors of modern slavery – for example, women who've experienced sexual exploitation can be placed in mixed-gender accommodation.³⁶ Whilst there is a positive increase of survivors in suitable accommodation, more of this accommodation

35 Most of this data is derived from the support Project TILI partners provided to women survivors

36 'Hope for the Future: Support for Survivors of Trafficking after the National Referral Mechanism' (British Red Cross, 2019), 7, <https://www.redcross.org.uk/about-us/what-we-do/we-speak-up-for-change/human-trafficking-and-slavery/after-the-national-referral-mechanism-report>

Figure 20 Movement of survivors from their living situation during NRM support to when they exit from the NRM

(n=98)



is temporary than permanent. Despite being theoretically suitable, this temporariness can be detrimental to the recovery of survivors. The administrative burden and uncertainty of temporary accommodation can undermine the stability needed to recover from trauma, and moves between local authority area can make accessing services difficult – for example, having to keep re-joining at the bottom waiting lists for counselling.³⁷

“Project TILI is about housing and making sure people are safe, and moving people around and some of the houses are very bad... well most of our clients are asylum seekers... many of the places I have been to are not suitable, not healthy, not safe.”³⁸
 – Project TILI support delivery partner

37 ‘Hope for the Future: Support for Survivors of Trafficking after the National Referral Mechanism’, 22.

38 Mason, Atkinson, and Stevenson, ‘Interim Report: Evaluation of Project TILI’, 65.

Furthermore, as the results of this report have already outlined, a significant number of the survivors whose data is in the project database did not want to enter the NRM. For these people, their housing situation was significantly worse. Whilst these people may be receiving support to end their homelessness,

the organisations supporting them do not generally have the resources to provide support for people traumatised by modern slavery, meaning their recovery is jeopardised. They are also exposed to re-exploitation, as perpetrators are known to target homeless communities.

Case study 3

Rita* was trafficked from Albania to Italy, where her boyfriend sold her, and she was forced to work in a brothel. After escaping her exploiters and being threatened by her family, Rita eventually got herself to the UK where she claimed asylum. She entered the NRM and received a positive conclusive grounds decision on appeal and was granted humanitarian protection, but despite being pregnant she had no support to access housing and was pushed into homelessness.

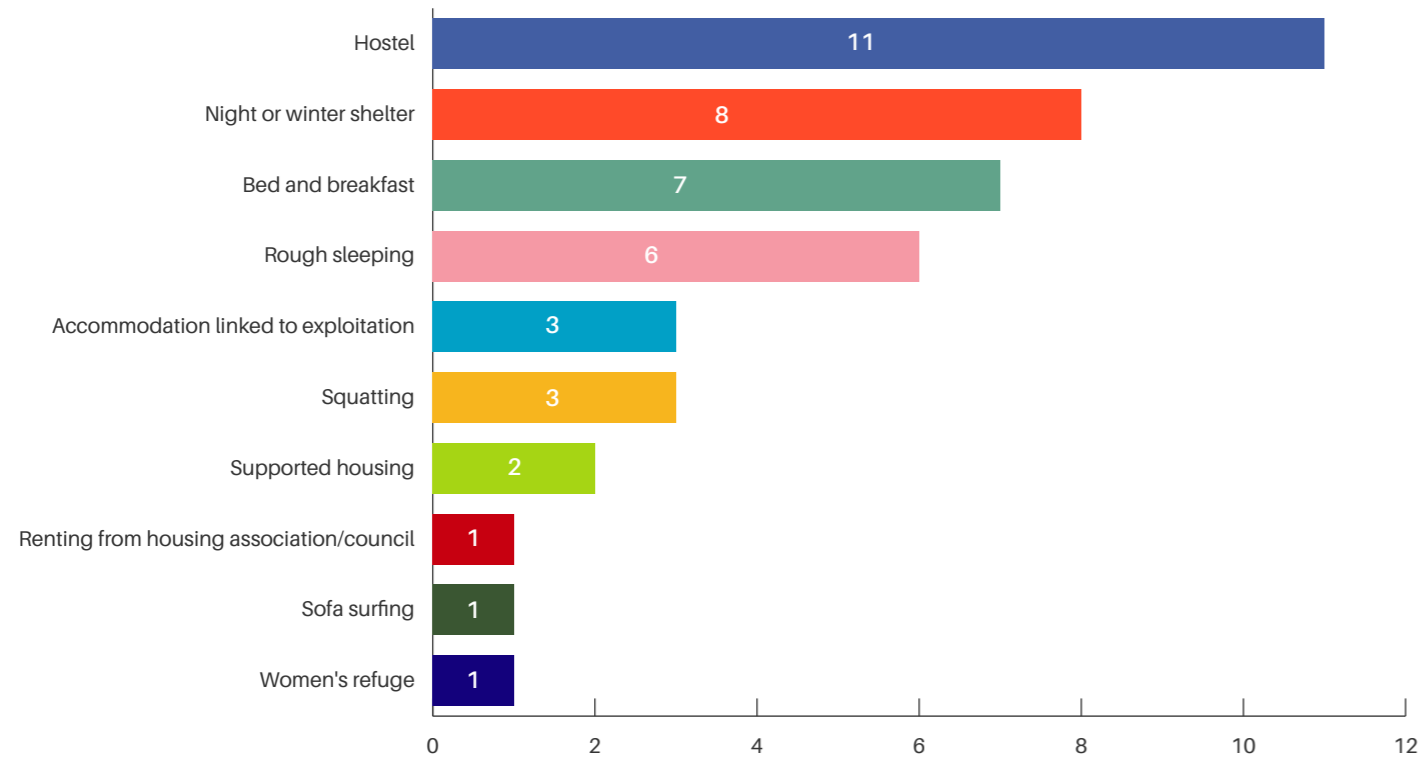
Rita was referred to Project TILI via the Croydon Modern Slavery Project, and prior to that was supported in Hestia’s Modern Slavery Response Team. She was diagnosed with PTSD, anxiety and depression. At first, Rita was frightened to leave her house, terrified to take her son out in the community, and could only communicate via an interpreter. She would cry throughout key-working sessions, reliving her past and fearing for her future.

Rita’s Project TILI caseworker supported her to access a bank account and Universal Credit and taught her to use a cash machine, and she completed a course of therapy to overcome her trauma. Rita is now studying full time at her local college and her son is attending nursery five times a week with full funding from Rita’s college. Since starting college, Rita’s confidence has increased significantly, and she has built a network of friendships in her local community. Rita’s Project TILI caseworker provides regular emotional support and initially attended meetings with Rita and other professionals, but now Rita feels confident to attend meetings alone.

Rita has built a community for herself, she is busy throughout the week and able to advocate for her own rights in English. She has tangible goals for her future, and the independent knowledge of how to achieve them.

* All names have been changed

Figure 21 Living situation of survivors after refusing an NRM referral
(n=43)



7 Re-exploitation



7 Re-exploitation

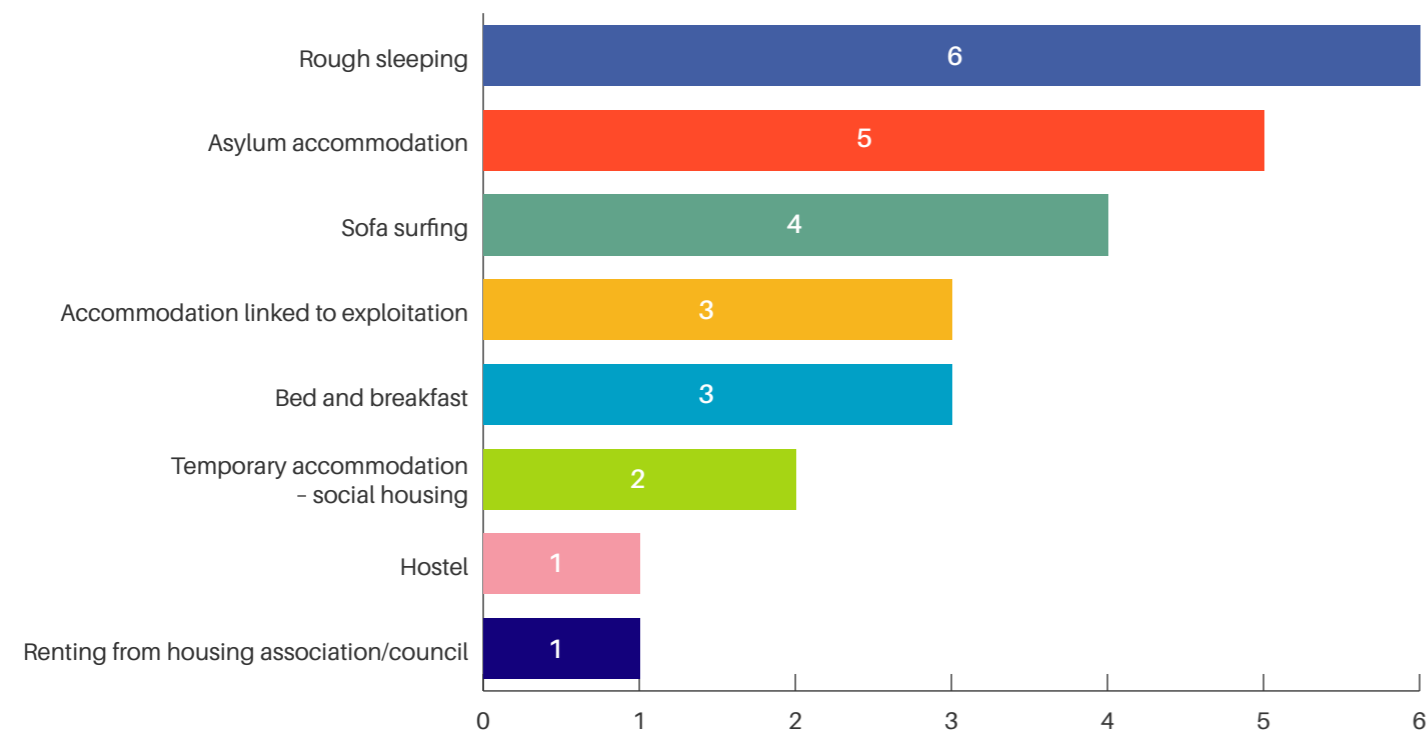
The data showed that 25 survivors had been re-exploited, although there may be other instances that staff collecting the data were not aware of.

When re-exploitation has occurred, a key question is whether an NRM referral was made the first time around which could have prevented subsequent exploitation. For 15 of the 25 people who were re-exploited, there was no indication of an NRM referral when the first instance of exploitation occurred. Of the remaining 10, six declined NRM support or disengaged from it, and one had a negative reasonable grounds decision. Two people did receive a positive conclusive grounds decision but were re-exploited nonetheless, and one person was re-exploited whilst their NRM support was ongoing.

For exploitation which happened in the past, it can be hard for staff to learn as many of the details, because it can be re-traumatising for survivors to talk about their experience, and many complex changes to someone's situation might have occurred since. However, the database does record the living situation of people who've been exploited in the past at the time of their initial contact with the organisation who collected their data. Almost all of these people had remained trapped in homelessness, or been forced into homelessness by the time they made contact with the organisation which recorded their data. This fact contributed to their re-exploitation.

Figure 22 Living situation of survivors who were exploited historically at initial contact with the organisation who submitted their data

(n=25)



8 Recommendations

8 Recommendations

Based on the data collected through project TILI and presented in this report, we make the following recommendations.

For national government

The Home Office should collect and publish information on whether a person has experienced homelessness when an NRM referral is made, and when they exit from NRM support.

The Home Office does not currently collect or publish data on whether people are homeless when referred to the NRM, or when a “Duty to Notify” form is submitted. This means that a key opportunity for understanding the extent to which being homeless increases the risk of exploitation is being missed. Furthermore, some people in the Project TILI database were still in unsuitable temporary accommodation when NRM support ends – potentially leaving them more exposed to re-exploitation and jeopardising recovery from the trauma that they have experienced. It is vital that we understand how often this happens so that measures can be taken to ensure that everyone who is supported through the NRM can access a safe, stable home.

Further research should be commissioned into the scale of non-engagement with the NRM, and the reasons that people refuse to be referred.

This report has shown that some people experiencing homelessness do not want to engage with support from the NRM, and so do not consent to a referral, or are never offered a referral. For people who do not consent to a referral, the first responder can still submit a “Duty to Notify” form to the NRM, which says that that a potential survivor has not consented to a referral. This means that this person will still be counted in official government statistics on the prevalence of modern slavery. However, it is unclear how reliably “Duty to Notify” forms are submitted. For example, frontline staff may choose

not to submit a Duty to Notify due to concerns about immigration enforcement when passing survivor’s information to the Home Office – concerns which will only be heightened for homeless survivors after recent changes to the Immigration Rules made rough sleeping grounds for removing someone’s permission to be in the UK. There needs to be more research to understand the prevalence of NRM non-engagement amongst people who are homeless, and how many homeless survivors of modern slavery are excluded from official figures. More should also be done to understand the barriers to engaging with the NRM experienced by homeless survivors of modern slavery – with special attention paid to the complex relationship between the NRM, immigration and the asylum system – so that these barriers can be removed and the NRM can support more people out of modern slavery.

The Home Office and Ministry for Housing, Communities and Local Government should develop alternative means of funded local support for survivors who do not want to be referred to the NRM.

Ideally, everyone who survives modern slavery should feel that they can get the support they need to recover from the NRM. However, there needs to be recognition that in the immediate term, there is a significant group of people who cannot access this support. The Home Office and Ministry for Housing, Communities and Local Government should develop a standard offer and funding stream to ensure local authorities working with third sector organisations can provide alternative local support outside of the NRM.

The Government should ensure that the Modern Slavery (Victim Support) Bill, which entitles survivors to at least 12 months of tailored support following a positive conclusive ground decision, is passed as soon as possible.

The support delivered through Project TILI by Hestia, Bawso, and Women’s Aid Belfast has shown how

crucial long-term post-NRM support is,³⁹ as has the work of many other organisations across the UK. However, not all survivors are able to access post-NRM support, and as the data in this report has shown, some are still in precarious situations upon exiting the NRM and therefore exposed to the risk of re-exploitation. Support for long-term recovery from the trauma of exploitation should be available to all survivors of modern slavery. The Modern Slavery (Victim Support) Bill was introduced to the House of Lords in 2017, but failed to complete its passage through Parliament before the end of the session. It was re-introduced in January of 2020, and includes guarantees that “assistance and support must be provided for at least 12 months” including but not limited to: appropriate and safe accommodation, a support worker, counselling, financial assistance and legal advice.⁴⁰ After these delays, it is vital the bill is passed as soon as possible to stop re-exploitation and homelessness which could easily be prevented.

For local government

Statutory data collection on homelessness should include data about modern slavery when a household approaches a local authority for assistance.

In England, the H-CLIC data set should add ‘at risk of/has experienced modern slavery’ as a support need. In Wales and Northern Ireland, the statutory homelessness data should record all types of support needs and include ‘at risk of/has experienced modern slavery’. This report notes that the Combined Homelessness and Information Network (CHAIN), a multi-agency database recording information about rough sleepers and the wider street population in London and is commissioned and funded by the Greater London Authority, can record whether people are victims of modern slavery. This report recommends that similar databases in other parts of the country do the same.

There are many barriers to safe reconnections support to help a survivor return to another country. Local authorities should only provide

reconnections support with the person’s fully informed consent, where support will be available to them in the country they are returning to, and where there is no chance of re-trafficking occurring.

In some cases, particularly where someone is unable to resolve their immigration status in the UK, returning to another country may be the best option to resolve their homelessness. There are many challenges associated with reconnections and it may not always be possible or appropriate. The limited data available suggests that reconnection experiences and outcomes vary dramatically but they are much more likely to be successful when the person has a meaningful connection to the area and when the connecting authority ensures there is meaningful support at the destination before the person travels there.⁴¹ This is further complicated in cases of modern slavery, where a survivor’s traffickers may have contacts in the area they travelled from, making re-trafficking a risk. Reconnections support should always be provided alongside independent immigration advice and information about the support available to someone in the UK. Reconnections should only be supported with a person’s fully informed consent and when the connecting authority is confident that support will be available to them in the country they are returning to.

For third-sector organisations

Homelessness, housing, sex work and other organisations who work with adults at risk of exploitation should embed data collection on modern day slavery into their usual practice.

Whilst the project has generated one of the largest datasets on homelessness and modern slavery in the UK, it has also highlighted how many cases are excluded from the dataset. Organisations who have dedicated roles for modern slavery support have reported data for far more survivors than those who don’t – even after they have received Project TILI’s training for frontline staff on identifying modern slavery, and had the support of the TILI data analyst

³⁹ Mason, Atkinson, and Stevenson, 49–63.

⁴⁰ Lord McColl of Dulwich, ‘Modern Slavery (Victim Support) Bill’, Pub. L. No. HL Bill 21 (2020), <https://bills.parliament.uk/bills/2543>

⁴¹ Mackie, Johnsen, and Wood, ‘Ending Rough Sleeping: What Works? An International Evidence Review’, 85–90.

in collecting data. Further to this, the data that has been collected suggests that many survivors who are homeless are not accounted for in official statistics. Given this, it is vital that the vantage point of frontline staff is used to routinely and systemically collect data which can shed light on the scale of exploitation amongst people who're homeless.

Housing-led solutions should be employed by organisations and local authorities who support survivors of modern slavery to move people quickly from unsuitable temporary accommodation to permanent affordable housing options. This should include increased use of PRS access schemes and Housing First for people with complex support needs.

One of the most shocking findings from this data is how often exploitation means entering accommodation tied to that exploitation. When modern slavery deprives people of their liberty by removing them from their home, instead forcing them to live in spaces designed principally to facilitate their exploitation, a major part of recovery must involve survivors having rapid access to the safety, security and stability of a proper home. The uncertainty of temporary accommodation can undermine efforts to tackle mental health challenges, and moves between different local authorities can present bureaucratic barriers to accessing vital

support. A rapid rehousing or housing-led approach would mean that access to permanent, affordable housing is a prerequisite for effective tailored support for survivors of modern slavery. This could take the form of PRS access schemes, or Housing First for survivors with complex support needs (this report has shown that there are a significant number of survivors who fall into the latter category).

Homelessness, housing, sex work and other organisations who work with adults at risk of exploitation should ensure their staff have access to good quality training on modern slavery and homelessness.

Feedback from Project TILI training attendants reflect increased confidence in identifying modern slavery, with non-specialists identifying potential survivors. Some organisations were not even aware that support for survivors is available from the government and had not heard of the NRM. Better access to training for frontline staff, facilitated by funding at national and local government level, would increase the probability that more survivors are able to access support, improve access to the NRM, and potentially prevent exploitation occurring in the first place. It would also improve data collection and recording in databases such as CHAIN, where modern slavery can be recorded but is not used by all teams who input.

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Acknowledgements

We would like to thank the following organisations for working with us to collect the data in this report:

Boaz Trust

Cadwyn

Caring for Communities and People

Caritas Anchor House

Community Links

Coventry Haven

Cyfannol Women's Aid

Elim Housing

Falcoln Support Services

Foundation

Harbour Housing

Hightown Housing

Hope Centre

Horton Housing

Making Space

My Doorstep

Nelson Trust

New Futures

New Pathways

Oxford Gatehouse

Porchlight

East London Housing Project

Richmond Fellowship

Safer Merthyr Tydfil

Shelter Slough

St Basil's

Stop The Traffik

The Bond Board

The Passage

The Welcome Organisation

Turnaround West Midlands

We Are With You

WHAG

We'd would also like to thank all partners of the TILI project: Hestia, Bawso, Women's Aid Belfast and Lisburn and Shared Lives.

Finally, we would like to thank Crisis Skylight centres in Birmingham, Brent, Coventry, Croydon, Merseyside, Newcastle, Oxford, South Yorkshire; and the London-Wide Services team.

Appendix

Appendix A: Country regional groupings

Region	Countries included
UK	UK only
Europe (EEA)	Austria, Belgium, Croatia, Cyprus, Denmark, Finland, France, Germany, Gibraltar, Greece, Iceland, Ireland, Italy, Liechtenstein, Luxembourg, Malta, Netherlands, Norway, Portugal, Spain, Sweden, Switzerland
Europe (CEE+EEA)	Bulgaria, Czech Republic, Estonia, Hungary, Latvia, Lithuania, Poland, Romania, Slovakia, Slovenia
Europe (Non-EEA)	Albania, Andorra, Belarus, Bosnia and Herzegovina, Kosovo, Macedonia, Moldova, Montenegro, Russia, San Marino, Serbia, Turkey, Ukraine
Africa	All African countries
Americas	All American countries
Australasia	All Australasian countries

Appendix B: Accommodation categories

Note: In this report, “suitability” refers to whether or not a person would be considered homeless or not if they lived in this type of accommodation. Accommodation such as a women’s refuge might in one sense be the most ‘suitable’ option for someone in a particular set of circumstances, but would not be suitable as a long term accommodation from the perspective of homelessness.

Accommodation category	Accommodation types
Suitable permanent	Own your own home, renting from private landlord, renting from housing association/council, supported housing
Suitable temporary	Temporary accommodation (social housing), temporary accommodation (private rented)
Unsuitable temporary	Night or winter shelter, bed and breakfast, hostel, women’s refuge
Rough sleeping and other informal	Rough sleeping, sofa-surfing, squatting, cars or public transport, sleeping in tents
Asylum accommodation	Accommodation provided by the government for people in the asylum system
Accommodation linked to exploitation	Accommodation provided by perpetrators while exploitation is ongoing



Project TILI is a partnership between Crisis, Hestia, Bawso, Women's Aid and Shared Lives Plus.

It was funded by the Department for Culture, Media and Sport through the Tampon Tax Fund.

To find out more, visit: www.crisis.org.uk/ending-homelessness/project-tili/

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Registered Charity Numbers: E&W1082947, SC040094.
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