

PROMOTING RACIAL EQUALITY, DIVERSITY AND INCLUSION

AN ACTION PLAN FOR THE UK MODERN SLAVERY AND HUMAN TRAFFICKING SECTOR



Independent
Anti-Slavery
Commissioner



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About BASNET

The UK BME Anti-Slavery Network (BASNET), established by the charity AFRUCA – Safeguarding Children in November 2019, is the first network in the UK and in Europe dedicated to promoting race equality, inclusion and diversity in the anti-trafficking and anti-slavery space.

Our network members are registered charities and community interest companies working in diaspora communities affected by modern slavery.

Glossary of Terms

AFRUCA – AFRUCA – Safeguarding Children

BME – Black and Minority Ethnic

BAME – Black, Asian and Minority Ethnic

BASNET – UK BME Anti-Slavery Network

CQC – Care Quality Commission

HO – UK Home Office

HTF – Human Trafficking Foundation

IASC – Independent Antislavery Commissioner

LGA – Local Government Association

MSHT – Modern Slavery and Human Trafficking

MS-PEC – Modern Slavery & Human Trafficking Policy & Evidence Centre

NRM – National Referral Mechanism

POC – People of Colour

In this Action Plan we have used the terms “Ethnic minorities” or “Ethnic communities” to denote the different populations of non-white people across the UK. We know that many are against the use of such umbrella terms. However, in the absence of any universally agreed definitions, we have employed these terms with the hope that they capture the audience-focus of this publication.

Preface

The BASNET Modern Slavery and Human Trafficking Race Equality, Diversity and Inclusion (EDI) Action Plan is the result of a year-long consultation and pain-staking effort by members of BASNET’s EDI Working Group. It followed the landmark conference held in July 2020 in partnership with the Human Trafficking Foundation to explore the plethora of gaps in race equality, diversity, inclusion and representation within the sector.

The triple issue of race equality, diversity and inclusion in our sector has been of concern for some time. Certainly at BASNET, this was the *raison d’être* for our initial set up by the charity AFRUCA in 2019. This was based on the recognition that many communities who bear the impact of human trafficking and modern slavery in different parts of the country are often marginalised and excluded in efforts to address the problem. Even worse, very few numbers of Black and Minority Ethnic led charities are seen round the policy and decision-making tables, giving the impression that, overall, these communities are totally irrelevant in the grand scheme of things.

There are practices within the sector that convey the message that race equality, diversity and inclusion are unimportant in relation to service provision, staffing and the composition of the range of charities and organisations working to meet the needs of victims and survivors. There are anecdotal reports of racism and racist behaviour towards survivors by staff in safe-houses. Of course, these reports merit further investigation but the possibility that they could be occurring is in itself a cause for concern.

There appears to be a gradual amalgamation of government policies on modern slavery and migration. The government’s recently published New Plan For Immigration describes the increasing numbers of UK modern slavery cases as “abuse of the system”, perpetuating a culture of disbelief with resultant denial of recognition and entitlements to service provisions for victims.

Our Race Equality, Diversity and Inclusion Action Plan has documented a list of modern slavery and human trafficking race equality issues which we believe need to be addressed over a period of time in order to improve policy and practice. We have professed recommendations and actions and identified progress indicators to address these issues. However, we maintain that our Action Plan is not prescriptive.

Action by those with the responsibilities will be in line with the acknowledgement of their own obligation in meeting their public sector equality duty as well as commitment to achieving racial justice and equity in their organisations.

Every eighteen months from July 2021, BASNET would work with sector colleagues to track progress in achieving each of the recommendations and indicators of progress, as identified. The report of this exercise would be published on our website at www.bmeantislavery.org

We hope that with this piece of ongoing work, we would help to achieve a more racially equal, diverse, inclusive and representative UK modern slavery and human trafficking sector.

Foreword

Dame Sara Thornton DBE QPM - *The Independent Anti-Slavery Commissioner*

As the Independent Anti-Slavery Commissioner, I have a UK-wide remit to encourage good practice in the detection, investigation and prosecution of modern slavery offences and the identification of victims. My Strategic Plan 2019-2021 sets out my strategic priorities: improving victim care and support; supporting law enforcement and prosecutions; focusing on prevention and getting value from research and innovation.

Last year, the UK BME Anti-Slavery Network (BASNET) encouraged reflection on equality, diversity and inclusion within the anti-slavery sector. In July 2020 I spoke at a virtual event hosted by BASNET alongside the Human Trafficking Foundation which provided a forum for discussion, to highlight concerns and to consider next steps. Since that event, I have also met with a group of BASNET CEOs who raised a number of important issues for the sector to prioritise.

I am pleased that BASNET has now appointed a manager who has worked on the development of this action plan, the product of the BASNET Working Group and multiple supportive stakeholders. It highlights many important issues and offers recommendations for where the current response to modern slavery could be improved in regard to equality, diversity and inclusion. This includes the need to ensure a diverse workforce to enable effective and culturally sensitive support for victims and survivors, as well as the requirement for more diverse leadership within the anti-slavery sector. I also strongly support the calls for more data and research on ethnicity in order to take an evidence based approach to activity that promotes EDI in the anti-slavery sector.

Whilst there are examples of good practice that exist nationally, it is clear that there are multiple areas for improvement. It is important that this work identifies where such good practice exists, and that any learning is shared across organisations.

I am encouraged by the enthusiasm within the sector to work collaboratively in order to drive change and have been pleased with the momentum that has been gained so far. I am committed to playing my part as the Independent Anti-Slavery Commissioner, therefore will continue to advocate for this important issue and promote good practice across the sector and the diverse range of organisations who have signed up to the action plan.

Foreword

Baroness Lola Young of Hornsey OBE

The past year has been routinely referred to as ‘unprecedented’. We’ve observed that we have been living in ‘dangerous times’ and note that the pandemic has ‘exacerbated existing inequalities’. These commonly asserted assessments are true with regard to the impact of the coronavirus, which is still rampaging across many parts of the world: it’s been devastating in so many respects, and we have a huge task on our hands if we want to give real meaning to another popular phrase and ‘build back better’. It’s important, though, to put some of these popular assertions into a context that’s broader than the current conjuncture.

In particular, the comment about inequalities bears some scrutiny. We have to acknowledge that the inequalities that afflict our societies aren’t new but rather long-standing and corrosive. On both a local and global level, too, many life-chances are blighted by poverty, climate change, discrimination and so on. Modern forms of enslavement, human trafficking, forced, abusive and exploitative working conditions and child labour have all thrived during the pandemic but they were already all too recognisable features in our interconnected world.

Organisations with a specific remit to address these abuses have emerged over the years and they do some impressive work. However, it’s clear that too few have looked deeply enough at their practices – in recruitment, employment, use of paid advisors, training, policies, colleague KPIs etc – and developed and delivered plans for addressing racism and unconscious bias within their organisations. This lack of insight inevitably has a negative impact on the effectiveness of the work they are attempting to do.

We’ve had enough soul searching following Black Lives Matter campaigns here and elsewhere. What we need now is demonstrable commitment and plans for action, especially from NGOs and government to whom many of us look to show leadership on such issues.

This report is a significant contribution towards making progress and I look forward to seeing a substantial improvement in the sector’s awareness of and action on racial and ethnic equity in the near future.

Foreword

Debbie Ariyo OBE - *Founder and Chair of UK BME Anti-Slavery Network*

When I founded the charity AFRUCA – Safeguarding Children in May 2001 to help address the trafficking of children from Africa to the UK, little did I know that almost twenty years later, I would establish a national network to address the problem of racial equality, diversity and inclusion in the UK modern slavery and human trafficking sector.

Over the years, as the challenges of human trafficking and modern slavery became more intractable, the sector expanded to accommodate a range of players, interventions, services, government policies and legislations. From the relatively small and mainly London led sector it was twenty years ago, the sector has become bigger, with a plethora of interventions and services taking place right across the country.

Yet what has remained constant is the huge racial imbalance permeating the sector. This is quite obvious in terms of victimhood – individuals and communities – vis-à-vis policy-making, sector leadership, service provision and in the composition and structure of most service delivery organisations. Without a doubt, most victims and survivors of human trafficking and modern slavery in the UK today are either from a foreign country or from a British ethnic minority background. Those who design and decide anti-trafficking and modern slavery policies are usually from a white British background. Those who research modern slavery and human trafficking are usually from a white British background. Those who create and deliver modern slavery service provisions are usually from a white British background and those who lead and run most anti trafficking and anti-slavery organisations, charities, partnerships and agencies are usually white British. The optics do not look good.

However, the problem is more than just the optics of racial imbalance. The resultant effect is that race plays a major role in how we enact modern slavery policies, how we research modern slavery, how we design and deliver support services for victims and survivors and how we build the resilience of affected communities to play a key role in identification, prevention and service provision. Race also influences our views of survivors as recipients of benevolence, rather than collaborators and partners for change. This state of affairs must change.

My colleagues and I at BASNET have produced this race equality, diversity and inclusion action plan for the UK Modern Slavery and Human Trafficking sector in a pioneering effort to help bring about the necessary change to the status quo. We hope it will be a useful tool to help improve our approaches towards racial justice in our sector.

Foreword

Tamara Barnett - *Director of Operations, Human Trafficking Foundation*

Twenty years ago, there was almost no awareness of the scale of human trafficking and modern slavery taking place on our doorsteps. Now, with the Modern Slavery Act and guidance in place, the anti-slavery sector has grown exponentially and the numbers of potential victims identified by the National Referral Mechanism (NRM) has now exceeded the Home Office's original estimate of the numbers in the UK. However huge challenges remain, with too many survivors not being identified, or worse being criminalised, or even being identified and yet still falling through the gaps in support.

When I first started looking into modern slavery a decade ago, one of the alarming issues that came to light was the high number of human trafficking survivors from West Africa in safe houses, yet they were being disregarded in official Government data. Debbie Ariyo, having founded AFRUCA twenty years ago, was a leading and pioneering voice demanding this omission be remedied. Another glaring concern that continues to this day was the much higher number of NRM rejections of survivors from outside the EU, fuelling concern the NRM itself was discriminatory and prioritising immigration over safeguarding victims.

Until the 2009 Coroners and Justice Act, there was no specific law to criminalise the labour trafficking of British citizens. Meanwhile it was assumed that most survivors would be female. There was a strong presumption that women must be duped while men were always agents of their activity.

The cruel murder of George Floyd by police in the US prompted a wide scale conversation about racism and the lack of diversity. The UK BME Antislavery Network (BASNET) responded by publishing a declaration about the lack of equality, diversity and inclusion that existed, not just towards survivors by the British system, but within the Anti-Slavery sector itself. This was a needed wakeup call. It started an important conversation, long gone unsaid. While some NGO sectors were survivor-led, the anti-slavery sector was not. Furthermore, anti-slavery research and projects were regularly carried out without any inclusion of the voices of diasporas they often addressed.

The Human Trafficking Foundation (HTF) was honoured in 2020 to co-host with BASNET, a conference examining this issue. There were around 250 attendees, many being CEOs of their organisations – testament to a growing awareness of how seriously this needed to be addressed. At this event we heard disturbing evidence from a survivor from Nigeria who had experienced racism from a support worker within the National Referral Mechanism's safe house – the very person meant to be assisting her recovery. At another event HTF, we heard how support workers would sometimes not provide advice or support to British survivors on the mistaken assumption they knew how to access various British systems.

Yet meanwhile cases of British children and young people brutally exploited in 'county lines' are rising year on year, with boys and young men of African heritage disproportionately affected, and often being criminalised.

There should be no place for Racism, Islamophobia, Antisemitism, Sexism, Classism or any other type of bigotry within the anti-slavery sector or within the Governmental systems that support survivors. BASNET's Action Plan materialised out of the presentations from the 2020 Conference and looks to radically address the challenges in our sector and within the systems themselves.

The system must become more equal and there must be no hierarchy of victims. NGOs fighting for victims must themselves address their own gaps around diversity and inclusiveness. And each of us individually must address and challenge our own biases and assumptions, to begin that change that is needed.

Key Issues and Recommendations

Themes	Key Issues	Key Recommendations
1 Modern Slavery Policy and Data	<ul style="list-style-type: none"> • Current NRM statistics do not present data by race, nationality or ethnicity. There is great complexity underneath NRM data that needs to be examined. 	<ul style="list-style-type: none"> • Home Office should use ethnicity data to ensure equitable treatment and decision-making for ALL victims/survivors at all stages of the National Referral Mechanism process.
	<ul style="list-style-type: none"> • Government’s ‘Hostile Environment’ policy discriminates and impacts negatively on victims of trafficking from ethnic minority backgrounds. 	<ul style="list-style-type: none"> • Government should adopt a ‘Victim/Survivor First’ Policy in relation to modern slavery and human trafficking irrespective race, ethnicity, country of origin of victims.
	<ul style="list-style-type: none"> • Over-representation of Black children with learning disabilities (Autism and ADHD) in County Lines Trafficking and Exploitation. 	<ul style="list-style-type: none"> • Home Office should establish a National Working Group of academics, affected communities, faith and statutory experts to develop a National Action Plan to Tackle County Lines Trafficking as part of UK Modern Slavery strategy
2 Research	<ul style="list-style-type: none"> • Modern Slavery and Human Trafficking Research is insufficiently informed by people affected by modern slavery, including people from ethnic minority backgrounds. 	<ul style="list-style-type: none"> • MS-PEC should explicitly address issues of how structural racism is manifest in the way research has been historically funded. Seek to counteract these structural barriers in the modern slavery field e.g. through an audit of the place of race and ethnicity in the funding of research. An Action Plan should emerge from such an exercise.
3 Law Enforcement	<ul style="list-style-type: none"> • Some Police Officers not understanding the signs/indicators of trafficking of people from ethnic minority background or from outside the UK. 	<ul style="list-style-type: none"> • Law enforcement agencies should appoint paid “cultural mediators” to provide specialist training to staff and input into cases to help improve knowledge and understanding of country/cultural factors impacting human trafficking and modern slavery
4 Identification and Service Provision for Survivors	<ul style="list-style-type: none"> • Some non UK victims in shelters experiencing racism and discrimination on the basis of their race, ethnicity, nationality and religion. 	<ul style="list-style-type: none"> • Victim Care Contractor to develop and implement a robust and comprehensive Action Plan on addressing race Equality, Diversity and Inclusion in service provision. This should include the recruitment of a specialist Focal Point on EDI and Survivor Engagement

	<ul style="list-style-type: none"> Charities (NRM Contractor and Sub-contractors) do not collate/publish data by race, ethnicity and nationality. It is unclear the racial composition of service users and the trafficking issues covered. This gap makes it difficult to plan for bespoke care and considerations relating to culture, faith and ethnicity, and identify specialist-training needs for staff. 	<ul style="list-style-type: none"> Service providers should publish quarterly and annual ethnic monitoring data on their website.
5 Access to Care and Support from Local Authorities	<ul style="list-style-type: none"> Case evidence from charities like AFRUCA shows Local Authorities sometimes not performing legal duty to safeguard child victims of modern slavery from ethnic minority backgrounds, resulting in legal action/out of court settlements. For example, AFRUCA have been involved in at least three cases of service users where local authorities have settled out of court rather than face civil action. 	<ul style="list-style-type: none"> Independent Inquiry into some local authority failures to carry out legal duty to safeguard child victims with recommendations to prevent future occurrences.
	<ul style="list-style-type: none"> Survivors (with leave to remain) may experience difficulty in accessing safe, habitable and appropriate local authority housing. 	<ul style="list-style-type: none"> We are pleased the Homelessness Code of Guidance section on Modern Slavery was reviewed on 5 July 2021 to provide additional guidelines for housing staff regarding access by survivors of modern slavery and human trafficking to appropriate and safe housing. We are also pleased to learn local authorities have started to prioritise victims, based on AFRUCA's service user experience.
6 Immigration and Legal Provision	<ul style="list-style-type: none"> Lack of independent/external mechanisms for modern slavery and human trafficking victims/survivors in the legal system to escalate complaints of malpractices, racism and discrimination by legal practitioners. 	<ul style="list-style-type: none"> Establish an Independent Panel/Ombudsman to address Survivors/Victims complaints of racism, other equality and malpractices by legal practitioners. Establish a register of vetted law firms qualified or with expertise to take on modern slavery cases.
	<ul style="list-style-type: none"> Lack of clarity on legal aid entitlement for victims/survivors pre-NRM referral. 	<ul style="list-style-type: none"> Legal aid funding and support should automatically and unequivocally be provided for victims of trafficking and modern slavery before NRM.

7	Health Provision for Victims and Survivors of MSHT	<ul style="list-style-type: none"> • NHS charging regulations and information sharing with the Home Office negatively affects access to healthcare for unrecognised victims of modern slavery, particularly those from ethnic minority backgrounds. These regulations can also affect the immigration outcomes for victims/survivors from ethnic minority backgrounds. 	<ul style="list-style-type: none"> • Remove all barriers to free access to NHS health care including charging and information sharing with the Home Office for all. This is to allow access to healthcare for all victims of modern slavery, whether recognised or as yet unrecognised.
		<ul style="list-style-type: none"> • Lack of prioritisation or provision of accessible, culturally appropriate, trauma informed service for victims/survivors of modern slavery, including from foreign countries and ethnic minority backgrounds. 	<ul style="list-style-type: none"> • Improve provision of free, specialist culturally appropriate, trauma informed services for all survivors of modern slavery.
8	Engaging Affected Communities	<ul style="list-style-type: none"> • Ethnic communities are excluded and marginalised from government efforts to tackle human trafficking and modern slavery. 	<ul style="list-style-type: none"> • As part of central and regional governments' modern slavery strategies, Equality, Diversity and Inclusion (EDI) working groups should be established as platforms for dialogue and contribution to the modern slavery and human trafficking policy making process.
9	MSHT Charities Composition and Staffing	<ul style="list-style-type: none"> • Many charity boards are unrepresentative and unreflective of user base or wider society. 	<ul style="list-style-type: none"> • Organisations should commit to increase overall representation and diversity of Board and Senior Management by up to 25% (1 in 4) and actively seek to encourage leadership among ethnic minority groups.
		<ul style="list-style-type: none"> • Lack of monitoring and evaluation of Public Sector Equality Duty compliance by anti-trafficking service providers. 	<ul style="list-style-type: none"> • Introduce external quality monitoring of anti-trafficking service providers to measure compliance with the Public Sector Equality Duty.

Public Sector Equality Duty

The Public Sector Equality Duty (PSED) is a duty on public authorities to consider how their policies or decisions affect people who are protected under the Equality Act 2010. The duty aims to make sure public authorities think about things like discrimination and the needs of people who are disadvantaged or suffer inequality, when they make decisions about how they provide their services and implement policies.

The public sector equality duty consists of a general duty and specific duties:

The general duty is set out in Section 149 of the Equality Act 2010. It applies to public authorities and other organisations when they are carrying out public functions. It covers the following protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

In summary, authorities subject to the general duty must, in carrying out their functions, have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
- advance equality of opportunity between people who share a protected characteristic and those who do not, and
- foster good relations between people who share a protected characteristic and those who do not.

These are often referred to as the three aims or needs of the general duty.

There is no explicit legal requirement under the general duty to collect and use equality information. However, to have due regard to the aims or needs of the general duty, public authorities must understand how their policies and practices affect those with particular protected characteristics. Collecting and analysing equality information can be an important way for authorities to develop a better understanding.

Having due regard means public authorities must consciously consider or think about the need to do the three things set out in the public sector equality duty.

Public sector organisations tackling forms of modern slavery and human trafficking must ensure compliance with the PSED when involved in decision-making, policy development, information gathering and analysis functions. In procuring or delivering services, grant making, governance and scrutiny functions, public authorities should demonstrate their compliance with the PSED. Public authorities as well as organisations delivering a public function including child safeguarding and protection should demonstrate compliance with PSED.

Types of Anti-Trafficking Leaders – Tackling Racism in Anti-Slavery Organisations*

Indifferent	‘Racism/race is not a problem in our organisation’, we are already supporting victims and survivors so doing enough, this is not a priority for our organisation, not a Key Performance Indicator (KPI)
Sympathisers	
Passive Sympathisers	They acknowledge there is a problem, but do nothing to address it. They argue that they do not know what to do or how to tackle it. They do not seek help from the right sources to tackle it. Racism is not important enough to be a KPI.
Performative Sympathisers	They acknowledge racism is a problem. Commit to help but invest only minimally. Intervention is only self-serving. Tackling racism is not important enough to be a key performance indicator. They engage in words not deeds.
Activists	
Accidental Activists	They acknowledge racism is a problem. They are committed to making some form of intervention to tackling it. They may not know the outcome or the plan may not be clear, but their commitment is clear. Tackling racism is important and could be treated as a key performance indicator.
Deliberate Activists	They acknowledge racism is a problem. There is a personal commitment to change. Resources – financial, human and time are provided to devise planned interventions which are monitored and accounted for. Tackling racism is definitely a KPI. We hope to see many UK anti-trafficking and anti-slavery leaders striving to become “Deliberate Activists”, with the personal commitment to change the status quo within their organisations. We hope this Racial Equality, Diversity and Inclusion Action Plan would be a useful tool to make this happen.

*Adapted from: Miller P: 2020: Anti-Racist School Leadership: Making ‘Race’ Count in Leadership Preparation and Development (Professional Development in Education p12)

Theme One:

Modern Slavery and Human Trafficking Policy and Data

Priority Aims

- To ensure data on race/ethnicity is monitored, collated and reported in a systematic way to help meet gaps in identification and service delivery for victims/survivors irrespective of race, ethnicity.
- To ensure government's modern slavery and human trafficking policy and strategy is humane and meets the needs and priorities of ALL victims/survivors.
- To ensure government's modern slavery and human trafficking policy and strategy is inclusive of affected communities.

Note: MSHT Policy and Data are one of nine core themes of Race EDI identified in the BASNET Action Plan as requiring improvement. Following consultation with the Home Office, we acknowledge ongoing efforts by the UK government to strengthen its approaches to tackle modern slavery and embed survivors' voices in future policy. We note that the Home Office is currently reviewing its Modern Slavery Strategy. However, we have identified a range of issues that need addressing with specific/robust recommendations and indicators of progress for the Home Office to take on board.

These have been categorised into Short Term **(ST)** (immediate action), Medium Term **(MT)** (achievable within one year) and Long Term **(LT)** (achievable one year+). This document is not prescriptive. Efforts to achieve these changes should be seen as a demonstration of commitment to improve racial justice and equity within the sector. We hope to hold regular meetings with the Home Office in the coming months to review key areas.

Issues	Recommendations	Responsibility	Indicators of Progress
Data			
1 Current NRM statistics do not present data by race, nationality or ethnicity. There is great complexity underneath NRM data that needs to be examined. ¹	1 Collate and monitor data on nationality, race/ethnicity to understand impact on victims' survivors across all spectrum of the NRM process from initial referral by first responders to when victims/survivors exit the NRM.	Home Office	1 Publish quarterly and annual MSHT ethnic monitoring data. (LT)
	2 Use ethnicity data to ensure equitable treatment and decision-making for ALL victims/survivors at all stages of the National Referral Mechanism process.	Home Office	2 Develop a data collection and monitoring toolkit applicable across different relevant agencies working at national, regional or local level. (LT)
General Anti-Trafficking and Modern Slavery Policy			
2 Government's 'Hostile Environment' policy discriminates and impacts negatively on victims of trafficking and modern slavery from ethnic minority backgrounds. ^{2 3 4 5}	3 Review and update of Modern Slavery Act 2015 to genuinely take account of the needs and priorities of ALL slavery and trafficked victims, irrespective of race, ethnicity, age, disability, nationality, religion, sexuality and gender.	Home Office	3 Modern Slavery Act 2015 should be updated to take account of the needs and priorities of ALL slavery and trafficked victims/survivors. (LT)
	4 Government should adopt a 'Victim/Survivor First' Policy in relation to modern slavery and human trafficking irrespective of race, ethnicity, country of origin of victims.	Home Office	4 Review overall government policy on human trafficking and modern slavery to reflect Victims/Survivor First approach irrespective of race, ethnicity, country of origin. (LT)
	5 Review of UK Modern Slavery Strategy to include guidance on race, equality diversity and inclusion.	Home Office	5 Home Office Modern Slavery Strategy Group to establish a Modern Slavery Ethnic Minority Working Group consisting of BAME led organisations, academics and institutions to advise on equality, diversity and inclusion in Anti-trafficking and Modern Slavery policy.

¹ Dr Katarina Schwarz, Dr Ana Valverde-Cano, Alexandra Williams-Wood (2021) The top 20 source countries for modern slavery victims in the UK, Comparative Report University of Nottingham, Rights Lab <https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2021/april/the-top-20-source-countries-for-modern-slavery-in-the-uk.pdf>

² AFRUCA Safeguarding Children :Black Lives Matter and the UK Anti-Trafficking Sector (2020) <https://afruca.org/press-release-black-lives-matter-and-the-uk-anti-trafficking-sector/>

³ Debbie Ariyo : OPINION: Black Lives Matter and the UK's anti-trafficking sector (2020) <https://news.trust.org/item/20200616141000-y3ec4/>

⁴ After Exploitation: Data Shows 1256 Potential Victims of Trafficking Detained Last Year. <https://afterexploitation.com/2020/02/14/1256-potential-trafficking-victims-detained-last-year/>

⁵ The Guardian: Judge Tells Priti Patel To Bring Asylum Seeker Back To The UK: <https://www.theguardian.com/uk-news/2021/jul/06/asylum-seeker-removed-by-priti-patel-must-be-brought-back-to-uk>

		Home Office	Strong efforts must be made to ensure grass-root organisations are involved, creating opportunities for learning, development and best practice. (LT)
3 Over-representation of Black children with learning disabilities (Autism and ADHD) in County Lines Trafficking and Exploitation ^{6,7} .	6 Establish a National Working Group of academics, survivors, affected communities, faith and statutory experts to develop a National Action Plan to Tackle County Lines Trafficking as part of Modern Slavery strategy.	Home Office	6 Establish National Working Group (ST) and produce Action Plan. (MT)
4 Sometimes poor quality of NRM and immigration asylum case decisions based on lack of country information, knowledge of trafficking type and cultural intelligence ^{8,9} .	7 The Modern Slavery Training Standard framework should include mandatory training for all NRM case workers and decision makers on cultural intelligence, intersection of trafficking; race, religion; gender and sexuality; equality, diversity and inclusion.	St Mary's University (Bakhita Centre) Home Office BASNET	7 All NRM case workers and decision-makers should undertake yearly training on cultural intelligence, equality, diversity and inclusion and have access to specialist training on country/cultural/community information impacting ongoing cases. (ST)
5 High rate of negative decisions involving cases of foreign or non EU victims ¹⁰ .	8 Home Office should appoint paid "cultural mediators" to provide specialist training to NRM decision-makers and case workers to help improve knowledge and understanding of country/cultural factors impacting human trafficking.	St Mary's University (Bakhita Centre) Home Office BASNET	
6 Lack of legal aid funding for victims/survivors pre-NRM referral ¹¹ .	9 Provision of non-committal, independent advice for victims/survivors about legal routes to being recognised as victims of trafficking and to obtain leave to remain.	Home Office or/and Ministry of Justice	8 Availability of free legal advice for victims/survivors about legal routes before NRM application for victims. (LT)
7 Significant barriers for survivors to access legal aid which includes uncertainty about survivors' entitlement ¹² .			

⁶ Nadine White : Revealed: Drug Gangs Are Stealing Children From Loving Families – Even In Lockdown(2021) (https://www.huffingtonpost.co.uk/entry/county-lines-child-trafficking-minority-matters_uk_6033cc03c5b673b19b6a12f5)

⁷ Darren Devine : "Countless" SEND children groomed by drug trafficking gangs (<https://www.learningdisabilitytoday.co.uk/2019/countless-send-groomed-by-drug-trafficking-gangs>)

⁸ Debbie Ariyo : OPINION: Black Lives Matter and the UK's anti-trafficking sector (2020) <https://news.trust.org/item/20200616141000-y3ec4/>

⁹ The Independent: Home Office Using Low Paid Temporary Workers To Make "Life or Death" Decisions On Human Trafficking. <https://www.independent.co.uk/news/uk/home-news/modern-slavery-human-trafficking-home-office-job-description-nrm-decision-maker-a8777331.html>

¹⁰ After Exploitation: Trafficking Decisions on Non-EU Nationals 'Nearly Five Times More Likely' To Be Rejected Than British Claims: <https://afterexploitation.files.wordpress.com/2020/04/after-exploitation-analysis-nrm-statistics-2020.pdf>.

¹¹ Young Legal Aid Lawyers: A sector at breaking point: Justice denied for victims of trafficking (2020)

¹² Dr Samantha Currie and Dr Matthew Young, University of Liverpool : Access to legal advice and representation for survivors of modern slavery (2021) <https://modernslaverypec.org/assets/downloads/Legal-advice-summary.pdf>

<p>8 Lengthy time to decide cases involving foreign victims in the NRM process ¹³.</p> <p>9 Length of time to resolve cases of child victims in the foster care system ¹⁴.</p>	<p>10 Abolish the dual NRM and asylum processes for victims/survivors of modern slavery in relation to their immigration status. This will help reduce the length of time to conclude NRM/immigration cases.</p>	<p>Home Office</p>	<p>9 Leave to Remain to be recognised as part of NRM Positive Conclusive Grounds decision. There should be no need for asylum applications by recognised victims of modern slavery. (LT)</p>
<p>10 UK Modern Slavery policy making structures and processes marginalise and exclude ethnic minority communities ¹⁵.</p>	<p>11 As part of the review of its Modern Slavery Strategy, Home Office to work in partnership with affected communities to tackle modern slavery and human trafficking by launching a nation-wide prevention programme.</p>	<p>Home Office BASNET</p>	<p>10 Home Office to develop and implement a comprehensive community engagement action plan on tackling modern slavery and human trafficking. This should include ring-fenced funding for grass-root community action. (LT)</p>
<p>Immigration Policy ¹⁶</p>			
<p>11 Wrongful and unfair age assessment policy of child asylum seekers, including child victims of trafficking from foreign countries as adults and denying them their rights as children ^{17 18}.</p>	<p>12 We call on the government not to implement its planned changes to age assessment as set out in the Nationality and Borders Bill. These proposals could potentially put child victims of trafficking at risk of further harm. Instead adoption of the Association of Director of Children's Services Guidance on Age Assessment is recommended ^{19 20}.</p>	<p>Home Office</p>	<p>11 Standardisation of the ADCS's guidance on Age Assessment nation-wide. (LT)</p>
<p>12 No Recourse To Public Funds leaves children from ethnic minorities/ asylum seeking families in extreme poverty putting them at risk of child trafficking and modern slavery ^{21 22}.</p>	<p>13 Abolish the No Recourse to Public Funds policy.</p>	<p>Home Office</p>	<p>12 Asylum seeking families should be provided financial means to cater for their children, thus preventing vulnerability to child exploitation. (MT)</p>

¹³ Dr Samantha Currie and Dr Matthew Young, University of Liverpool : Access to legal advice and representation for survivors of modern slavery (2021) <https://modernslaverypec.org/assets/downloads/Legal-advice-summary.pdf>

¹⁴ Refugee Council: Thousands Seeking Asylum Face Cruel Wait of Years For Asylum Decisions: <https://refugeecouncil.org.uk/latest/news/thousands-seeking-asylum-face-cruel-wait-of-years-for-asylum-decision-fresh-research-shows/>

¹⁵ Ariyo D: Diaspora Communities As Safety Nets In Protection Child Victims of Trafficking. Winston Churchill Memorial Trust. (2021).

¹⁶ Home Office: New Immigration Plan Policy Statement (2021) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/972517/CCS207_CCS0820091708-001_Sovereign_Borders_Web_Accessible.pdf

¹⁷ The Supreme Court: BF (Eritrea) V The Secretary of State For The Home Department: <https://www.supremecourt.uk/cases/uksc-2019-0147.html>

¹⁸ The Guardian: Teenage Asylum Seeker In UK Wins Legal Battle Over 'Unlawful' Age Assessment: <https://www.theguardian.com/uk-news/2021/jan/25/teenage-asylum-seeker-in-uk-wins-legal-battle-over-unlawful-age-assessment>

¹⁹ Community Care: Deeply Worrying" Age Assessment Changes Will Increase Risks To Child Asylum Seekers, Warn Charities. <https://www.communitycare.co.uk/2021/03/26/deeply-worrying-age-assessment-changes-will-increase-risks-to-child-asylum-seekers-warn-charities/>

²⁰ ADCS: Age Assessment Guidance. 2017. https://adcs.org.uk/assets/documentation/Age_Assessment_Guidance_2015_Final.pdf

²¹ Ilona Pinter, Scott Compton, Rupinder Parhar and Husna Majid A Lifeline for All Children and Families with No Recourse to Public Funds (May 2020) <https://www.childrenssociety.org.uk/sites/default/files/2020-11/a-lifeline-for-all-report.pdf>

²² Debbie Ariyo: Diaspora Communities As Safety Nets In Protecting Child Victims of Trafficking. Winston Churchill Memorial Trust. March 2021. <https://www.wcmt.org.uk/sites/default/files/report-documents/Ariyo%20D%202019%20Final.pdf>

<p>13 Detention of potential victims of trafficking from foreign countries ^{23 24}.</p>	<p>14 Immediate cessation of detention of victims of trafficking and modern slavery from foreign countries. The ‘Detention Gatekeeping’ process should be strengthened to protect victims of modern slavery.</p>	<p>Home Office</p>	<p>13 Ongoing provision of appropriate and humane accommodation and support for victims of human trafficking and modern slavery. (ST)</p>
Survivor Policy			
<p>14 Lack of clear guidance and framework on equality, diversity and inclusion for NRM service providers ²⁵. There is no clear-cut equality, diversity and inclusion framework for safe-houses to inform inspection by CQC ²⁶.</p>	<p>15 Review Survivor Care Standards so there is clear guidance on racial diversity, inclusion and the various intersections. Inspection of safe-houses should include external monitoring of compliance with Survivor Care Quality Assurance EDI component.</p> <p>16 Mandatory for NRM Contractor and sub-contractors to adopt the Survivor Care Standards.</p> <p>17 To strengthen CQC inspection regime, amendment to Home Office MOU with CQC to cover Equality, Diversity and Inclusion compliance.</p>	<p>Home Office</p>	<p>14 Update Survivor Care Standards. (LT)</p> <p>15 Work towards establishment of a Survivor Care Quality Assurance mechanism with EDI as a core component. (LT)</p> <p>16 Adoption of Survivor Care Standards by all service providers. (LT)</p> <p>17 Amend CQC MOU to include EDI Compliance by Service Providers.</p>
<p>15 Inadequate mechanisms for modern slavery and human trafficking victims/survivors in the NRM system to complain about experiences of overt or covert racist behaviour and discrimination.</p>	<p>18 Establish a robust, independent system for escalating survivor complaints about the NRM from identification to exit, especially in relation to racism and racist behaviour.</p>	<p>Home Office</p>	<p>18 Establish An Independent Ombudsman to address Survivors/ Victims complaints of racism and other equality issues. (ST)</p>

²³ The Guardian : More Trafficking Victims To Be Held In Detention Under UK Rule Change (2021) <https://www.theguardian.com/global-development/2021/may/05/tougher-rules-leave-more-trafficking-victims-facing-forcible-removal>

²⁴ After Exploitation: Data Shows 1256 Potential Trafficking Victims Detained Last Year. <https://afterexploitation.com/2020/02/14/1256-potential-trafficking-victims-detained-last-year/>

²⁵ <https://afuca.org/press-release-black-lives-matter-and-the-uk-anti-trafficking-sector/>

²⁶ Care Quality Commission: How CQC Inspects Safe-Houses and Outreach Services. January 2021. https://www.cqc.org.uk/sites/default/files/How_CQC_inspects_safehouses_and_outreach_services1.pdf

Theme Two: Research

Priority Aim: To ensure research in the UK anti human trafficking/modern slavery field is inclusive, diverse and represents the range of affected ethnic and racial communities and survivors of modern slavery.

Note: MSHT Research is one of nine core themes of race EDI areas identified in the BASNET Action Plan as requiring improvement, with MS-PEC as lead agency in the sector to help drive change in this area. We have consulted with MS-PEC. We note that MS-PEC's 2020 Consultation on MSHT Research Priorities covered issues of race equity ²⁸. MS-PEC's recently launched Strategy Document 2021-2024²⁹ outlines its approach to EDI. Following consultation, our Action Plan set out below further identifies a range of important action that could be taken and indicators of progress for MS-PEC and others to take on board. These have been categorised into: Ongoing (where action has already started), Short Term (ST) (immediate action), Medium Term (MT) (within one year) and Long Term (LT) (one year+). This document is not prescriptive. Efforts to achieve these proposed changes should be seen as aspirational and a demonstration of commitment to improve racial justice and equity within the sector.

Issues	Recommendations	Responsibility	Indicators of Progress
1 Insufficient knowledge of and means of measuring the ethnic diversity of those i) carrying out modern slavery research and ii) those participating in research.	1 Seek means of collating data on the ethnicity of research applicants seeking UK Research Institute and other sources of funding for research projects. Monitor ethnicity and award outcomes routinely and transparently.	MS-PEC	1 Establish modern slavery research ethnicity data collection, collation and routine reporting. (ST)
2 Modern slavery and human trafficking research and evaluation is insufficiently informed by people affected by modern slavery, including people from ethnic minority backgrounds.	2 Explicitly address issues of how structural racism is manifest in the way research has been historically funded. Seek to counteract these structural barriers in the modern slavery field e.g. through an audit of the place of race and ethnicity in the funding of research. An Action Plan should emerge from such an exercise.	MS-PEC	2 Conduct Modern Slavery and Human Trafficking Research Sector EDI Audit (potentially a funded research project). (MT) 3 Develop Modern Slavery and Human Trafficking Research EDI Action Plan. (LT)
3 The UK research profession is dominated by people with a White British background; this is mirrored by an apparent lack of diversity among researchers working in the modern slavery field;	3 Undertake a formal process of working with BASNET using best practice models e.g. National Institute for Health Research's Race Equality Public Action Group (REPAG) ³⁰ .	BASNET MS-PEC	4 Ongoing engagement with BASNET to work on Action Plan. (Ongoing)

²⁸ Balch A: Consultation on the Modern Slavery PEC's Research Priorities. Modern Slavery and Human Rights Policy Evidence Centre. January 2021

²⁹ The Bingham Centre: Modern Slavery and Human Rights Policy and Evidence Centre Strategy 2021-2024. April 2021

³⁰ National Institute for Health Research: NIHR Establishes A Race Equality Public Action Group. October 2020. <https://www.nihr.ac.uk/news/nihr-establishes-a-race-equality-public-action-group/25929>

<p>4 There is a need to build capacity within community-level organisations that represent affected ethnic communities to develop research and evaluation based on their work and experiences.</p>	<p>4 Build on the work of the BASNET Research Panel by formalising an ethnically diverse Involvement Panel. The goal of the Panel will be to i) Empower BASNET members to conduct modern slavery community research projects ii) Inform the modern slavery research agenda, iii) Ensure research questions and design are appropriate and well-informed, iv) Advise researchers throughout the research process.</p>	<p>BASNET MS-PEC</p>	<p>5 Establishment of a resourced Ethnic Minority Involvement Panel (MT)</p>
	<p>5 Consult on and establish means of routinely guiding research funding applicants towards meaningful consideration of questions of race and ethnicity in their research proposals. Ensure that data collection appropriately collects ethnicity data.</p>	<p>MS-PEC and other funding bodies BASNET</p>	<p>6 Consultation on and production of guidance for funding applicants on inclusion, equality and diversity. (MT)</p> <p>7 More and better ethnicity data in research and evaluation studies. (MT)</p>
	<p>6 Ensure research dissemination events include speakers from ethnic backgrounds.</p>	<p>All research award holders</p>	<p>8 Diverse events become the norm (MT)</p>
	<p>7 Develop funding mechanisms and means by which counter-slavery community organisations can access appropriate and robust research and evaluation skills and training. Community researchers should be developed through the support of specific funding streams.</p>	<p>MS-PEC BASNET Other research bodies</p>	<p>9 Funding mechanism to develop community based research established. (MT)</p> <p>10 Establish training programme for community researchers. (MT)</p>
	<p>8 Conduct a Public Sector Equality Duty exercise to develop an EDI Policy, once new Monitoring and Evaluation Manager starts in role.</p>	<p>MS-PEC</p>	<p>11 Conduct Public Sector Equality Duty and develop EDI Policy. (MT)</p>

	<p>9 Ensure funding panels, the MS-PEC Advisory Group and peer reviewers contain members from Black and Minority Ethnic backgrounds.</p> <p>10 Ensure ethnicity data are collected and monitored during and after funding rounds.</p>	<p>MS-PEC and other funding bodies</p>	<p>12 Proactive recruitment of qualified ethnic minority Advisory Group members and peer reviewers (ongoing)</p> <p>13 Yearly funding data collection, collation, monitoring and reporting (MT)</p>
	<p>11 Plan for and explicitly promote a development strategy for Black and Minority Ethnic doctoral and post-doctoral research capacity in the modern slavery field.</p>	<p>Academia, MS-PEC and other funding bodies</p>	<p>14 Tailor PhD and post-doc programmes to attract minority applicants and build researcher capacity within Higher Education Institutions. (MT/LT)</p>

Theme Three: Law Enforcement

Priority Aim: To improve law enforcement systems and structures to better protect survivors/victims of trafficking from ethnic and minority backgrounds.

Note: MSHT Law Enforcement is one of nine core themes of race EDI identified in the BASNET Action Plan as requiring improvement. We have consulted with the National Police Modern Slavery and Organised Immigration Crime Unit. We note the recent joint investigation by Her Majesty’s Inspectorate of Constabulary and Fire & Rescue Services, The College of Policing and The Independent Office of Police Conduct to the Super Complaint by the charity Hestia about Police response to Modern Slavery. Our EDI Action Plan has been produced specifically to address important gaps within the UK MSHT sector. We have identified a range of issues that need addressing with specific/robust recommendations and indicators of progress for different parties to take on board. These have been categorised into Short Term (ST) (immediate action), Medium Term (MT) (within one year) and Long Term (LT) (one year+). These recommendations are not prescriptive. Efforts to achieve these changes should be seen as a demonstration of commitment to improve racial justice and equity within the sector.

Issues	Recommendations	Responsibility	Indicators of Progress
<p>1 Some police officers do not understand the signs/indicators of trafficking of people from other countries or from ethnic backgrounds or from outside the UK ^{31 32}.</p> <p>2 Police sometimes not understanding the intersection and role of culture, race, ethnicity and other issues in fuelling/promoting human trafficking and modern slavery ³³.</p> <p>3 Some police officers not believing victims’ stories of human trafficking/modern slavery. Criminalisation of victims of trafficking ³⁴.</p>	<p>1 Modern Slavery Training Standards Framework should include mandatory training for all legal, immigration and law enforcement professionals on cultural intelligence, intersection of trafficking, race, religion, disability, gender and sexuality, equality, diversity and inclusion.</p> <p>2 Law enforcement agencies should appoint paid “cultural mediators” to provide specialist training to staff or input into ongoing cases to help improve knowledge and understanding of country/cultural/community factors impacting human trafficking and modern slavery.</p>	<p>Bakhita Centre (St Mary’s University)</p> <p>College of Police</p> <p>Police and Crime Commissioners</p>	<p>1 Law enforcement officers should undertake yearly training on cultural intelligence, equality, diversity and inclusion and have access to specialist training on country/cultural information impacting ongoing cases. (ST)</p>

³¹ High Court of Justice: OOO Vs The Commissioner of Police For The Metropolis (2010): <http://www.bailii.org/ew/cases/EWHC/QB/2011/1246.html>

³² Dr Katarina Schwarz, Dr Ana Valverde-Cano, Alexandra Williams-Wood (2021) The Top 20 Source Countries for Modern Slavery Victims In The UK, Comparative Report University of Nottingham, Rights Lab(2021) <https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2021/april/the-top-20-source-countries-for-modern-slavery-in-the-uk.pdf>

³³ Debbie Ariyo: Opinion: Black Lives Matter and The UK Anti-Trafficking Sector. In Thomson Reuters News (June 2020): <https://news.trust.org/item/20200616141000-y3ec4/>

³⁴ HESTIA: Underground

<p>4 Police sometimes not performing legal duty to safeguard victims of modern slavery from ethnic minority backgrounds, resulting in legal action/out of court settlements^{35 36} 37 38.</p>	<p>3 Training curriculum for trainee police officers by College of Police should include mandatory training on cultural intelligence, intersection of trafficking, race, religion, disability, gender and sexuality.</p>	<p>College of Police Police and Crime Commissioners</p>	<p>2 Review of police college curriculum to cover cultural intelligence, equality, diversity and inclusion. (MT)</p>
	<p>4 Review of police policy/ approach to working with modern slavery victims so it is more humane and culturally appropriate.</p> <p>5 We call on relevant parties to prioritise the urgent implementation of the various recommendations in the HM Inspectorate of Constabulary, Fire and Rescue’s “Hidden Victims” report.</p>	<p>Police Constabularies Police and Crime Commissioners</p>	<p>3 Police should set up review panel of modern slavery survivors to share their experiences and provide insight into police approaches. (ST)</p> <p>4 Chief Constable Shawn Sawyer to write to all 43 Chief Constables in England and Wales to highlight importance of recommendations and offer guidance (ST)</p> <p>5 Independent oversight body (consisting of survivors, charities, academics) to be established to ensure implementation of Hidden Victims report recommendation (MT)</p>

³⁵ Her Majesty’s Inspectorate of Constabulary, Fire & Rescue: The Hidden Victims: Report on Hestia’s Super-Complaint On The Police Response To Victims of Modern Slavery (2021): https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/989185/hidden-victims-report-hestias-super-complaint-police-response-victims-modern-slavery.pdf

³⁶ High Court of Justice: OOO Vs The Commissioner of Police For The Metropolis (2010): <http://www.bailii.org/ew/cases/EWHC/QB/2011/1246.html>

³⁷ BBC: Metropolitan Police Pay Damages Over Slave Case Women (2011): <https://www.bbc.co.uk/news/uk-england-london-13470956>

³⁸ Bhatt Murphy Solicitors: Tony Murphy’s Notable Cases. <https://bhattmurphy.co.uk/about-bhatt-murphy/notable-cases/tony-murphys-notable-cases>

Theme Four:

Identification and Service Provision for Survivors

Priority Aim: To improve victim and survivor protection and well-being

Note: MSHT Survivor Identification, Protection and Service Provision are one of nine core themes of race EDI identified in the BASNET Action Plan as requiring improvement⁴⁰. We have consulted with the Salvation Army and the Care Quality Commission. We acknowledge excellent work by many in the MSHT sector to provide services to meet the needs of survivors, helping them to recover and heal from their experiences. We believe more could be done to improve identification and service provision on the basis of ethnicity, race and nationality. We have identified a range of issues that need addressing with specific/robust recommendations and indicators of progress for charities, NRM contractor and sub-contractors and other relevant parties to take on board. These have been categorised into Short Term (ST) (immediate action), Medium Term (MT) (achievable within one year) and Long Term (LT) (achievable one year+). These recommendations are not prescriptive. Efforts to achieve these changes should be seen as a demonstration of commitment to improve racial justice and equity within the sector.

Prevention and Identification of Survivors from Ethnic Backgrounds			
Issues	Recommendations	Responsibility	Indicators of Progress
1 Some professionals not understanding the intersection and role of culture, race, ethnicity and other issues in fuelling/promoting child/human trafficking and modern slavery ⁴¹ .	1 Modern Slavery Training Standards Framework ⁴² should include mandatory training for all anti-trafficking professionals on cultural intelligence, intersection of trafficking, race, religion, disability, gender and sexuality, equality, diversity and inclusion. 2 Design and delivery of specialist sector events exploring country/culture/community specific modern slavery and human trafficking topics of benefit to sector practitioners and wider partners.	St Mary's University (Bakhita Centre) Service Providers BASNET Survivors Alliance Sector Partners	1 All staff working with survivors of anti-trafficking and modern slavery should undertake yearly training on cultural intelligence, equality, diversity and inclusion. (ST) 2 Monthly delivery of specialist sector events and workshops accessible to all sector practitioners. Attendance based on learning needs aligning with client/user base. (Ongoing)
2 Over-representation of Black children with learning disabilities (Autism and ADHD) in County Lines Trafficking and Exploitation ⁴³ .	3 Constitute National Working Group on County Lines Trafficking to include affected communities, faith and other experts to develop a National Action Plan as part of Modern Slavery Strategy.		3 Establish a representative and diverse National Working Group (ST) and produce Action Plan. (MT)

⁴⁰ BASNET: Black Lives Matter and The UK Anti-Trafficking Sector. 10 June 2020. <https://afruca.org/press-release-black-lives-matter-and-the-uk-anti-trafficking-sector/>

⁴¹ Debbie Ariyo: Opinion: Black Lives Matter and The UK Anti-Trafficking Sector. In Thomson Reuters News (June 2020): <https://news.trust.org/item/20200616141000-y3ec4/>

⁴² Training Framework: Identification, Care and Support of Victims and Survivors of Modern Slavery and Human Trafficking. <https://www.antislaverycommissioner.co.uk/media/1468/training-framework-identification-care-and-support-of-victims-and-survivors-of-modern-slavery-and-human-trafficking.pdf>

⁴³ Nadine White : Revealed: Drug Gangs Are Stealing Children From Loving Families – Even In Lockdown(2021) (https://www.huffingtonpost.co.uk/entry/county-lines-child-trafficking-minority-matters_uk_6033cc03c5b673b19b6a12f5)

⁴⁴ Nadine White : Revealed: Drug Gangs Are Stealing Children From Loving Families – Even In Lockdown(2021) (https://www.huffingtonpost.co.uk/entry/county-lines-child-trafficking-minority-matters_uk_6033cc03c5b673b19b6a12f5)

⁴⁵ Darren Devine : "Countless" SEND children groomed by drug trafficking gangs (<https://www.learningdisabilitytoday.co.uk/2019/countless-send-groomed-by-drug-trafficking-gangs>)

<p>3 Criminalisation of child victims of trafficking from ethnic minority communities ^{44 45}.</p> <p>4 Lack of recognition of trafficking of children/ young people from foreign countries into the UK for sports. ⁴⁶. There is also potential exploitation regarding UK children (including children from ethnic minority backgrounds) and football academies ^{47 48}.</p>	<p>4 Partner with communities to develop innovative prevention programmes to tackle child criminal exploitation.</p>	<p>Home Office</p> <p>Academia</p> <p>Communities/ Faith Organisations</p> <p>Charities</p>	<p>4 Establish at least one partnership prevention project between one academic body/ mainstream charity/ service provider and one community/grass-root organisation by. (MT)</p>
	<p>5 Charities and academia to conduct further research into trafficking and exploitation of children (including ethnic minority children) for sports to better understand this phenomenon.</p>	<p>Academia</p> <p>Charities</p> <p>Football Associations</p>	<p>5 A launched report evidencing findings and recommendations on child trafficking for sports by. (MT)</p>
<p>NRM: Protection/Support for Victims/Survivors from Ethnic Backgrounds</p>			
<p>5 Placement of non UK victims in unsafe accommodation ⁴⁹.</p> <p>6 Some non UK victims in shelters experiencing racism and discrimination on the basis of their race, ethnicity, nationality and religion ⁵⁰.</p>	<p>6 Review Survivor Care Standards so there is clear guidance for service providers on racial equality, diversity, inclusion and the various intersections.</p> <p>7 Mandatory for all anti-trafficking service providers to adopt the Survivor Care Standards. Inspection of safe-houses should include external monitoring of compliance with Survivor Care Quality Assurance EDI component.</p>	<p>Human Trafficking Foundation</p> <p>Home Office</p> <p>NRM Contractor and Sub-Contractors</p> <p>Care Quality Commission</p>	<p>6 Review Survivor Care Standard to include EDI component. (MT)</p> <p>7 Work towards establishment of a Survivor Care Quality Assurance mechanism with EDI as a core component. (MT)</p> <p>8 Develop EDI Action Plan. (ST)</p>

⁴⁶Ini-Obong Nkang How The Search For Football's Next Big Thing is Fuelling A Modern-Day Slave Trade (2019) <https://theconversation.com/how-the-search-for-footballs-next-big-thing-is-fuelling-a-modern-day-slave-trade-121350>

⁴⁷ Nadine White : Revealed: Drug Gangs Are Stealing Children From Loving Families – Even In Lockdown(2021) (https://www.huffingtonpost.co.uk/entry/county-lines-child-trafficking-minority-matters_uk_6033cc03c5b673b19b6a12f5)

⁴⁸ Darren Devine : "Countless" SEND children groomed by drug trafficking gangs (<https://www.learningdisabilitytoday.co.uk/2019/countless-send-groomed-by-drug-trafficking-gangs>)

⁴⁹ Ini-Obong Nkang How The Search For Football's Next Big Thing is Fuelling A Modern-Day Slave Trade (2019) <https://theconversation.com/how-the-search-for-footballs-next-big-thing-is-fuelling-a-modern-day-slave-trade-121350>

⁵⁰ Written and Video Evidence By AFRUCA Service Users Regarding Experiences of Racist Behaviors in Placement Shelters. <https://youtu.be/qIFaFaMQC8A>

	<p>8 Victim Care Contractor to develop and implement a robust and comprehensive Action Plan on addressing race Equality, Diversity and Inclusion in service provision. This should include the recruitment of a specialist Focal Point on EDI and Survivor Engagement.</p>	<p>Salvation Army/ NRM Contractor</p>	
	<p>9 Produce a research project looking at the experiences of survivors and racism</p> <p>10 Enable the voices and participation of ethnic minority survivors in service provision through capacity building, training and engagement.</p> <p>11 Anti-trafficking organisations to establish or strengthen internal disciplinary mechanisms for addressing racist behaviour by staff towards survivors/ service users.</p>	<p>BASNET Salvation Army Charities Service Providers</p>	<p>12 Complete research project and release report of findings. (MT)</p> <p>13 Develop training programme to build the capacity of survivor. (ST)</p> <p>14 Charities to develop and put in place internal mechanism/ policy to address racist behaviours. (MT)</p>
<p>7 Lack of independent / transparent external mechanisms for modern slavery and human trafficking victims/survivors in the NRM system or shelters to escalate complaints of racism and discrimination.</p>	<p>12 Establish a robust independent system for handling survivor complaints about the NRM from identification to exit, especially in relation to racism and racist behaviour.</p>	<p>Home Office</p>	<p>15 Establish an Independent Ombudsman to address Survivors/Victims complaints of racism and other equality issues. (ST)</p>

	<p>13 Organisations should publish their Complaints Policies and Procedures covering racism, discrimination, all unfair/bullying allegations on their websites.</p>	<p>Contractor/sub-contractors</p> <p>Charities</p>	<p>16 Complaints policies and procedures should be published on websites. (ST)</p>
<p>8 Charities (NRM Contractor and Sub-contractors) do not collate/publish data by race, ethnicity and nationality. It is unclear the racial composition of service users and the trafficking issues covered. This gap makes it difficult to plan for bespoke care and considerations relating to culture, faith and ethnicity, and identify specialist training needs for staff.</p>	<p>14 Collate and monitor victim care contract data on nationality, race/ethnicity to understand variations in service provisions across the board and impact on victims'/survivors.</p> <p>15 Use ethnicity data to ensure equitable treatment and decision-making for ALL victims/survivors at all stages of service provision.</p>	<p>Home Office</p> <p>Charities (Sub-contractors)</p> <p>Salvation Army</p>	<p>17 Service providers should publish quarterly and annual ethnic monitoring data on their website. (ST)</p> <p>18 Develop a victim care contract data collection and monitoring toolkit on nationality, race/ethnicity to inform internal EDI policy. (MT)</p>

Chapter Five: Access to Care and Support from Local Authorities

Priority Aim: To improve access to local authority service provision, care and support in the best interest of survivors/victims of trafficking from ethnic and minority backgrounds.

Note: Access to Care and Support from Local Authorities by victims and survivors of modern slavery and human trafficking is one of nine core themes of race EDI areas identified in the BASNET Action Plan as requiring improvement. We note that local authorities' approaches to victim care and support can vary based on local circumstances and resources. Our EDI Action Plan has been produced specifically to address important gaps within the UK MSHT sector. Following consultation with the Local Government Association, we have identified a range of issues that need addressing with specific/robust recommendations and indicators of progress for local authorities to take on board. These have been categorised into Short Term (ST) (immediate action), Medium Term (MT) (within one year) and Long Term (LT) (one year+). This document is not prescriptive. Efforts to achieve these proposed changes should be seen as aspirational and a demonstration of commitment to improve racial justice and equity within the sector.

Issues	Recommendations	Responsibility	Indicators of Progress
Child Victims/Survivors			
1 Case evidence from AFRUCA shows Local Authorities sometimes not performing legal duty to safeguard child victims of modern slavery from ethnic minority backgrounds, resulting in legal action/out of court settlements ⁵¹ . AFRUCA have been involved in at least three cases of service users where local authorities have settled out of court rather than face civil action ⁵² .	1 Independent Inquiry into some local authority failures to carry out legal duty to safeguard child victims with recommendations to prevent future failures.	We have contacted the Association of Directors of Children's Services on this	1 Inquiry to hold by end 2022. (LT)
2 Child victims of trafficking (for example, from foreign countries) going missing from care ⁵³ .	2 Local authorities to strengthen implementation of existing protocols for protecting and preventing child victims of trafficking going missing from care. Reviews of existing protocols could be done by using models such as the Children's Society Benchmarking Tool ⁵⁴ .	Local Authorities	2 Local authorities to complete reviews of existing protocols and the effectiveness of their implementation. (MT)

⁵¹ Evidence collated from AFRUCA Case Work

⁵² Bhatt Murphy Solicitors: Tony Murphy's Notable Cases (see AXS V Lancashire Social Services). <https://bhattmurphy.co.uk/about-bhatt-murphy/notable-cases/tony-murphys-notable-cases>

⁵³ Tackling Modern Slavery: A Council Guide. https://www.local.gov.uk/sites/default/files/documents/22.12_Modern_slavery_WEB%202.pdf

⁵⁴ Children's Society: Missing Children Response Assessment Tool: <https://www.surveygizmo.eu/s3/90245008/Benchmarking-Tool-Missing-Children>

<p>3 Failure of some local authorities to ensure child victims in the foster care system get access to legal representation/ legal aid for their immigration cases ⁵⁵.</p>	<p>3 Clear guidance and support for staff with obligation for children social workers to ensure legal representation/ legal aid is sought for children in foster care. Local authority staff to work with Child Trafficking Guardians on this.</p>	<p>Local Authorities</p>	<p>3 Produce guidance document for local authority staff on how to ensure children gain legal representation and legal aid to resolve their immigration status. (MT)</p>
<p>4 Some affected local authorities not effectively addressing surge in county lines trafficking cases in ethnic minority communities ⁵⁶.</p>	<p>4 Local authorities, police and crime commissioners and other local partners to collaborate with and fund local community based organisations to design and deliver innovative programmes to help address county lines trafficking in their areas (see example of Manchester City Council and AFRUCA ⁵⁷).</p>	<p>Local Authorities</p>	<p>4 Establish a local pilot partnership prevention project. (MT)</p>
<p>5 Some affected local authorities not acting to tackle problem of sexual exploitation of Black girls ⁵⁸.</p>	<p>5 Local authorities, police and crime commissioners and other local partners to collaborate with and fund local community based organisations to design and deliver innovative programmes to help address the sexual exploitation of Black girls in their areas.</p>	<p>Local Authorities</p>	<p>5 Establish a local pilot partnership prevention project. (MT)</p>

⁵⁵ Report: Bridging The Gap: Transitional Safeguarding And The Role Of Social Work With Adults. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/990426/dhsc_transitional_safeguarding_report_bridging_the_gap_web.pdf

⁵⁶ Nadine White : Revealed: Drug Gangs Are Stealing Children From Loving Families – Even In Lockdown(2021) (https://www.huffingtonpost.co.uk/entry/county-lines-child-trafficking-minority-matters_uk_6033cc03c5b673b19b6a12f5)

⁵⁷ AFRUCA: <https://afruca.org/county-lines-child-trafficking-family-support-programme/>

⁵⁸ Community Care: Where Are The Black Girls In Our CSA Services, Studies and Statistics? (Jahnine Davis): <https://www.communitycare.co.uk/2019/11/20/where-are-the-black-girls-in-our-services-studies-and-statistics-on-csa/>

Adult Victims/Survivors			
<p>6 Survivors (with leave to remain) may experience difficulty in accessing safe, habitable and appropriate local authority housing ⁵⁹.</p>	<p>6 Further research involving survivors and local authority housing staff to gather evidence about scale of problem</p> <p>7 We are pleased the Homelessness Code of Guidance section on Modern Slavery ⁶⁰ was reviewed on 5 July 2021 to provide additional guidelines for housing staff regarding access by survivors of modern slavery and human trafficking to appropriate and safe housing. We are also pleased to learn local authorities have started to prioritise victims, based on AFRUCA’s service user experience. Additional training is required for housing staff to be better able to understand indicators of trafficking so they can prioritise victims.</p>	<p>BASNET</p> <p>MHCLG</p>	<p>6 Research to be conducted as part of BASNET Survey on Survivor Experiences of Racism (MT)</p> <p>7 Training for housing staff on the Homelessness Code of Guidance section on Modern Slavery to be developed and delivered across local authorities.</p>
<p>7 Anecdotal reports from survivors of some Local Authority Housing staff exhibiting bullying and racist behaviours towards victims/survivors of modern slavery from ethnic minority backgrounds⁶¹.</p>	<p>8 The Modern Slavery Training Standard framework should include mandatory training for all local authority housing staff and decision makers on cultural intelligence, intersection of trafficking; race, religion; gender and sexuality; equality, diversity and inclusion.</p> <p>9 Local Authority staff should receive training to enable them understand different forms of modern slavery and impact on victims.</p>	<p>Local Authorities</p>	<p>8 All local authority staff in contact with survivors of human trafficking and modern slavery should undertake yearly training on modern slavery, cultural intelligence, equality, diversity and inclusion. (ST)</p>

⁵⁹ Evidence Collated From AFRUCA Casework

⁶⁰ Homelessness Code of Guidance April 2021. https://assets.publishing.service.gov.uk/media/5ef9d8613a6f4023cf12fc67/Current_Homelessness_Code_of_Guidance.pdf

⁶¹ BASNET EDI Action Plan Consultation With Survivors. 18 June 2021

⁶² Training Framework: Identification, Care and Support of Victims and Survivors of Modern Slavery and Human Trafficking. <https://www.antislaverycommissioner.co.uk/media/1468/training-framework-identification-care-and-support-of-victims-and-survivors-of-modern-slavery-and-human-trafficking.pdf>

Theme Six: Immigration and Legal Provisions

Priority Aim: To ensure immigration and legal provisions can serve the best interest of survivors/victims of trafficking from ethnic and minority backgrounds.

Note: MSHT Immigration and Legal Provisions are one of nine core themes of race EDI areas identified in the BASNET Action Plan as requiring improvement. We have consulted with the Crown Prosecution Service with ongoing consultation with other parties. Our EDI Action Plan has been produced specifically to address important gaps within the UK MSHT sector. We have identified a range of issues that need addressing with specific/robust recommendations and indicators of progress for the relevant statutory agencies to take on board. These have been categorised into Short Term (ST) (immediate action), Medium Term (MT) (within one year) and Long Term (LT) (one year+).

Issues	Recommendations	Responsibility	Indicators of Progress
Identification			
1 Some legal professionals not understanding the signs/indicators of trafficking of people from ethnic background	1 Modern Slavery Training Standards Framework ⁶⁵ should include mandatory training for all legal practitioners, judiciary on cultural intelligence, intersection of trafficking, race, religion, disability, gender and sexuality, equality, diversity and inclusion	Crown Prosecution Service Lawyers/ Solicitors/ Barristers	1 All professionals working with survivors of anti-trafficking and modern slavery should undertake yearly training on cultural intelligence, equality, diversity and inclusion. (MT)
2 Some legal professionals not understanding the intersection and role of culture, race, ethnicity and other issues including disability and sexuality fuelling/promoting human trafficking and modern slavery ⁶³ .	2 Design and delivery of specialist events exploring country/culture/community specific modern slavery and human trafficking topics of benefit to legal practitioners and the judiciary.	The Judiciary Immigration Judges BASNET	2 Regular delivery of specialist events and workshops accessible to all legal practitioners. Attendance based on learning needs aligning with case-work. (Ongoing)
3 Sometimes poor quality immigration/asylum case applications and appeals for victims/survivors from ethnic minority backgrounds ⁶⁴ .	3 Continue to improve guidance for prosecutors, solicitors, judiciary, immigration judges on working with and understanding victims of modern slavery.	Crown Prosecution Service The Law Society	3 Ongoing improvements to guidance for legal practitioners, immigration judges and judiciary. (Ongoing)
4 Sometimes poor quality immigration/asylum case determinations for victims/survivors from ethnic minority backgrounds.			

⁶³ Debbie Ariyo: Opinion: Black Lives Matter and The UK Anti-Trafficking Sector. In Thomson Reuters News (June 2020): <https://news.trust.org/item/20200616141000-y3ec4/>

⁶⁴ Dr Samantha Currie and Dr Matthew Young, University of Liverpool : Access to legal advice and representation for survivors of modern slavery (2021) <https://modernslaverypec.org/assets/downloads/Legal-advice-summary.pdf>

⁶⁵ Training Framework: Identification, Care and Support of Victims and Survivors of Modern Slavery and Human Trafficking. <https://www.antislaverycommissioner.co.uk/media/1468/training-framework-identification-care-and-support-of-victims-and-survivors-of-modern-slavery-and-human-trafficking.pdf>

	4 Training and guidance for members of the judiciary on the use of Equal Treatment Bench Book (ETB) which makes express reference to trafficking and modern slavery. This will enable judges and those supporting victims through legal proceedings make reference to it and ensure that appropriate steps are taken.	The Judiciary	3 Practitioners/support workers receiving yearly training on the ETB and routinely use ETB to inform modern slavery and human trafficking cases. (Ongoing)
Legal Advice and Support			
5 Victims of Modern Slavery and human trafficking from foreign countries may find it difficult to get access to appropriate legal advice and support pre NRM ⁶⁷ .	5 Provision of non-committal, independent advice for victims/survivors about legal routes to being recognised as victims of trafficking and to obtain leave to remain.	Home Office Ministry of Justice Crown Prosecution Services	4 Availability of free legal advice for victims/survivors about legal routes before NRM application for victims. (MT)
6 Lack of clarity on legal aid entitlement for victims/survivors pre-NRM referral ⁶⁸ . 7 Significant barriers for survivors to access legal aid which includes uncertainty about survivors' entitlement ⁶⁹ .	6 Legal aid funding and support should automatically and unequivocally be provided for victims of trafficking and modern slavery before NRM.	Home Office Ministry of Justice The Law Society	5 Review provision of legal aid funding for victims of trafficking and modern slavery so they have access to legal support before NRM
Legal Redress			
8 Lack of independent/external mechanisms for modern slavery and human trafficking victims/survivors in the legal system to escalate complaints of malpractices, racism and discrimination by legal practitioners.	7 Establish a robust system for handling survivor complaints about legal malpractices, especially in relation to racism and racist behaviour. 8 Establish a register of vetted law firms qualified or with expertise to take on modern slavery cases.	Home Office Ministry of Justice Crown Prosecution Services The Law Society	6 Establish an Independent Ombudsman to address Survivors/Victims complaints of racism and other equality issues. (LT)
9 Complex and onerous system for victims/survivors from ethnic minority backgrounds to claim compensation after conviction of their traffickers.	9 Establish a simplified system for victims/survivors of trafficking to claim compensation.	Ministry of Justice The Law Society Home Office	7 Establish an Independent Compensation Panel for recognised Victims of Modern Slavery and Human Trafficking (LT)

⁶⁷ FLEX: Access To Compensation For Victims Of Human Trafficking (2016) <https://www.antislaverycommissioner.co.uk/media/1066/dwp-compensation-f.pdf>

⁶⁸ Young Legal Aid Lawyers: A sector at breaking point: Justice denied for victims of trafficking (2020) <http://www.younglegalaidlawyers.org/sites/default/files/200621%20YLAL%20trafficking%20report.pdf>

⁶⁹ Dr Samantha Currie and Dr Matthew Young, University of Liverpool : Access to legal advice and representation for survivors of modern slavery (2021) <https://modernslaverypec.org/assets/downloads/Legal-advice-summary.pdf>

⁷⁰ FLEX: Access To Compensation For Victims Of Human Trafficking (2016) <https://www.antislaverycommissioner.co.uk/media/1066/dwp-compensation-f.pdf>

Theme Seven: Health Care Provision for Survivors

Priority Aim: To Ensure Victims and Survivors of Modern Slavery and Human Trafficking from Ethnic Minority Backgrounds have free, timely and inclusive access to health care.

Note: Health Care Provision for Survivors of Modern Slavery is one of nine core themes of race EDI identified in the BASNET Action Plan as requiring improvement. We have consulted with the National Health Service and Public Health England. We note that different health agencies have produced EDI Action Plans but there is no over-arching health sector wide approach to EDI in relation to victims and survivors of modern slavery and human trafficking. Our EDI Action Plan has been produced specifically to address important gaps within the UK MSHT sector, looking at the health needs of victims and survivors from ethnic backgrounds. We have identified a range of issues that need addressing with specific/robust recommendations and indicators of progress for the NHS, DHSC and Public Health England to take on board. These have been categorised into (Ongoing) where action is already happening; Short Term (ST) (immediate action); Medium Term (MT) (within one year) and Long Term (LT) (one year+). This document is not prescriptive. Efforts to achieve these proposed changes should be seen as aspirational and a demonstration of commitment to improve racial justice and equity within the sector.

Issues	Recommendations	Responsibility	Indicators of Progress
1 Victims and survivors of modern slavery from ethnic minorities are likely to have barriers in accessing NHS health care, including GP care ^{71 72} .	1 GP practices should commit to taking steps to tackle the barriers faced by migrants from ethnic minority backgrounds in accessing healthcare.	Department for Health & Social Care NHS The Royal Colleges and Professional Bodies Public Health England	1 Everyone living in UK should be registered with GP regardless of immigration status. (ST) 2 Roll out the Safe Surgeries Initiative by Doctors of the World nationwide to help reduce barriers in accessing primary healthcare ⁷³ . (MT)
2 NHS charging regulations and information sharing with the Home Office negatively affects access to healthcare for unrecognised victims of modern slavery, particularly those from ethnic minority backgrounds. These regulations can also affect the immigration outcomes for victims/survivors from ethnic minority backgrounds ⁷⁴ .	2 Remove all barriers to free access to NHS health care including charging and information sharing with the Home Office for all. This is to allow access to healthcare for all victims of modern slavery and human trafficking, whether recognised or as yet unrecognised.	NHS England Department of Health & Social Care	3 Reversal of charging regulations and stop sharing information with Home Office. (MT) 4 The NHS should launch an annual target to end race disparity within the service. (ST)

⁷¹ Wood L: Child Modern Slavery, Trafficking and Health: A Practical Review of Factors Contributing To Children's Vulnerability and The Potential Impacts of Severe Exploitation on Health. BMJ Paediatrics. June 2020. <https://bmjpaedsopen.bmj.com/content/bmjpo/4/1/e000327.full.pdf>

⁷² Goodwin Elaine: Supporting The Commissioning of Provision To Meet The Health And Well-Being Of People Seeking Asylum. <https://www.yhphnetwork.co.uk/media/72670/elaine-goodwin-supporting-the-commissioning-provision-to-meet-the-hw-needs-of-asylum-seekers.pdf>

⁷³ Doctors of The World Safe Surgeries Network (24.04.2021) <https://www.doctorsoftheworld.org.uk/what-we-stand-for/supporting-medics/safe-surgeries-initiative/safe-surgeries-network/>

⁷⁴ Brace E, Sanders J, Oomen H: Access To Health Care for Victims of Human Trafficking: A Focus Group With Third Sector Agencies. In: Diversity and Equality In Health Care 2018.

<p>3 Language barriers, lack of interpreters and lack of knowledge on how victims/survivors from minority ethnic backgrounds may present (for example at GP surgeries and Accident and Emergency).</p>	<p>3 Modern Slavery Training Standards Framework ⁷⁵ and training curriculum for health professionals should include mandatory training on cultural intelligence, intersection of trafficking, race, religion, disability, gender and sexuality, equality, diversity and inclusion.</p> <p>4 Design and delivery of specialist events exploring country/culture/community specific modern slavery and human trafficking topics of benefit to health practitioners and wider partners</p> <p>5 Modern Slavery training should be included in mandatory safeguarding training for all NHS staff.</p>	<p>NHS Trusts</p>	<p>5 All health professionals should undertake 2 yearly training on Modern slavery and human trafficking focusing on cultural intelligence, equality, diversity and inclusion. (MT)</p> <p>6 Monthly delivery of specialist events and workshops accessible to all health practitioners. Attendance based on learning needs aligning with client/user base. (Ongoing)</p> <p>7 Recruit more interpreters and make better use of existing interpreting services to help health practitioners better spot and understand the plight of potential victims of Modern Slavery and Human Trafficking. (MT)</p>
<p>4 Lack of prioritisation or provision of accessible, culturally appropriate, trauma informed service for victims/survivors of modern slavery, including from foreign countries and ethnic minority backgrounds⁷⁶.</p>	<p>6 Improve provision of free specialist culturally appropriate, trauma informed services for all survivors of modern slavery.</p>	<p>Home Office</p> <p>NHS</p> <p>Department of Health & Social Care</p>	<p>8 All survivors of modern slavery and human trafficking are able to access timely, appropriate and free specialist trauma informed services. (MT)</p>

⁷⁵ Training Framework: Identification, Care and Support of Victims and Survivors of Modern Slavery and Human Trafficking. <https://www.antislaverycommissioner.co.uk/media/1468/training-framework-identification-care-and-support-of-victims-and-survivors-of-modern-slavery-and-human-trafficking.pdf>

⁷⁶ Anti-Slavery: Mental Health Can Be Fundamental To Survival After Slavery. <https://www.antislavery.org/mental-health-work/>

Theme Eight: Engaging Affected Communities

Priority Aim: To improve the inclusion, representation and engagement of ethnic minority communities in UK anti-trafficking and anti-slavery work.

Note: Community Engagement is one of nine core themes of race EDI identified in the BASNET Action Plan as requiring improvement ⁷⁷. We have consulted with members of BASNET. We note the relatively lack of involvement or engagement of affected communities in efforts to tackle human trafficking and modern slavery with resultant impact on identification, prevention and early intervention. Our EDI Action Plan has been produced specifically to address important gaps within the UK MSHT sector. We have identified a range of gaps in the engagement of affected communities that require addressing with specific/robust recommendations and indicators of progress for academia, charities, networks and partnerships and government agencies to take on board. These have been categorised into Short Term (ST) (immediate action), Medium Term (MT) (within one year) and Long Term (LT) (one year+). This document is not prescriptive. Efforts to achieve these proposed changes should be seen as aspirational and a demonstration of commitment to improve racial justice and equity within the sector.

Issues ⁷⁸	Recommendations	Responsibility	Indicators of Progress
1 Dearth of charities led by people from ethnic minority backgrounds addressing human trafficking and modern slavery in the UK.	1 Develop a set of “Anti-Trafficking Innovators” from ethnic communities and provide them with the necessary knowledge and skills to build their organisations and strengthen their capacity to intervene successfully.	Academia BASNET	1 Establish a Social Innovation Training Programme for leaders from ethnic communities on Modern Slavery and Human Trafficking in partnership with BASNET ⁷⁹ . (MT)
2 Ethnic communities are not engaged in sector-wide efforts to tackle modern slavery and human trafficking. Where such engagements exist, it is often tokenistic ⁸⁰ .	2 Existing community engagement structures like BASNET should be nurtured and developed as platforms for interactions between communities, academia, policy makers and practitioners 3 Charities should endeavour to be representative of the communities they aim to serve and should develop strategies to build relationships with such communities.	BASNET Charities Academia	2 Following publication of Race EDI Action Plan, to hold six monthly round table meetings between BASNET and key stakeholders to address EDI issues within the sector (MT) 3 Charities and Academia should develop and implement Action Plans on Community Engagement as part of their overall Stakeholder Engagement (ST)

⁷⁷ BASNET: Black Lives Matter and The UK Anti-Trafficking Sector. 10 June 2020. <https://afuca.org/press-release-black-lives-matter-and-the-uk-anti-trafficking-sector/>

⁷⁸ BASNET: Black Lives Matter And The UK Anti-Trafficking Sector. 10 June 2020. <https://bmeantislavery.org/news/black-lives-matter-and-the-uk-anti-trafficking-sector/>

⁷⁹ Ariyo Debbie: Diaspora Communities As Safety Nets In Protecting Child Victims of Trafficking. Winston Churchill Memorial Trust. March 2021. <https://www.wcmt.org.uk/sites/default/files/report-documents/Ariyo%20D%202019%20Final.pdf>

⁸⁰ BASNET: Black Lives Matter And The UK Anti-Trafficking Sector. 10 June 2020. <https://bmeantislavery.org/news/black-lives-matter-and-the-uk-anti-trafficking-sector/>

<p>3 Ethnic communities are excluded and marginalised from Government efforts to tackle human trafficking and modern slavery.</p>	<p>4 As part of central and regional governments' modern slavery strategies, equality, diversity and inclusion (EDI) working groups should be established as platforms for dialogue and contribution to the policy making process.</p>	<p>Home Office Mayors Crime Prevention Agencies Academia Charities</p>	<p>4 Home Office to establish EDI or BAME working group (ST) 5 Mayors of major cities (London, Manchester, Birmingham) should establish EDI or BAME working groups as part of their anti- trafficking strategies (MT)</p>
<p>4 Lack of government efforts to address the intersection of human trafficking and modern slavery and social problems including poverty, deprivation and child criminal exploitation.</p>	<p>5 The government should collaborate with key affected communities to tackle modern slavery and human trafficking by launching a nation-wide prevention programme addressing drivers of trafficking demand and supply especially in relation to the impact of human trafficking on children</p>	<p>Home Office Local Councils Mayors</p>	<p>6 Governments (central, local, regional) to develop and implement a comprehensive community engagement action plan on tackling modern slavery and human trafficking. This should include ring-fenced funding for grass-root community action. (MT)</p>
<p>5 Research and evaluation is insufficiently informed by people affected by modern slavery, including ethnic communities.</p>	<p>6 Academia should partner with ethnic communities to conduct relevant research to help inform policy interventions and impactful service provision³.</p>	<p>MS-PEC Academia BASNET</p>	<p>7 Establish a resourced Ethnic Minority Research Involvement Panel. (MT) 8 Launch a ring-fenced funding programme for communities to conduct research on MSHT within their communities. (MT)</p>
<p>6 Mainstream charities and agencies supporting victims/ survivors of trafficking do not have strategies to involve the relevant affected communities in their work.</p>	<p>7 Charities should endeavour to be representative of the communities they aim to serve and should develop strategies to build relationships with such communities.</p>	<p>Charities</p>	<p>9 Charities should develop stakeholder forums with representatives from the communities they serve to inform their anti-trafficking work by. (MT)</p>

Theme Nine: Charities, Networks and Partnerships – Composition and Staffing

Priority Aim: To promote racially equal, diverse and inclusive human centred anti-trafficking and anti-slavery organisations.

Note: Charities, Networks and Partnerships are one of nine core themes of race EDI identified in the BASNET Action Plan as requiring improvement⁸¹. We have consulted with some MSHT charities and the West Midlands Anti-Slavery Network. We note the excellent work done to address MSHT by many organisations in the sector. It is important that the structure and composition of anti-trafficking organisations are reflective of service users to ensure equality, diversity and inclusion, and that the quality of service provision for survivors is enhanced and improved, based on their ethnicity, race and nationality. We have identified a range of EDI issues that need addressing with specific/robust recommendations and indicators of progress for MSHT organisations to take on board. These have been categorised into Short Term (ST) (immediate action), Medium Term (MT) (within one year) and Long Term (LT) (one year+). These recommendations are not prescriptive. Efforts to achieve these changes should be seen as aspirational and a demonstration of commitment to improve racial justice and equality within the sector.

Issues ^{82 83}	Recommendations	Responsibility	Indicators of Progress
Charities			
<p>1 Staff base of some charities not reflective of their users and beneficiaries or not racially diverse.</p> <p>2 Staff from ethnic backgrounds in many charities are usually in junior positions with little opportunities for progression within organisations⁸⁴.</p> <p>3 Staff from ethnic backgrounds might feel uncomfortable and unable to express their heritage and culture at work.</p>	<p>1 Organisations should improve their recruitment and progression criteria to ensure staff reflect users, beneficiaries and society. Organisations' user base of survivors with Leave To Remain can be supported, trained and developed to transition into paid employment.</p>	Charities	<p>1 At least 25% (1 in 4) of organisation staff to be from an ethnic minority background. (MT/LT)</p>

⁸¹ BASNET: Black Lives Matter and The UK Anti-Trafficking Sector. 10 June 2020. <https://afuca.org/press-release-black-lives-matter-and-the-uk-anti-trafficking-sector/>

⁸² Debbie Ariyo: Opinion - Black Lives Matter and The UK Anti Trafficking Sector, in Thomson Reuters News. 17 June 2020. <https://news.trust.org/item/20200616141000-y3ec4/>

⁸³ Debbie Ariyo: Diaspora Communities As Safety Nets In Protecting Child Victims of Trafficking. Winston Churchill Memorial Trust. March 2021. <https://www.wcmt.org.uk/sites/default/files/report-documents/Ariyo%20D%202019%20Final.pdf>

⁸⁴ ACEVO: EDI Action Plan: <https://www.acevo.org.uk/advocacy/diversity-in-the-charity-sector/acevos-edi-action-plan/>

<p>4 Many charity boards are unrepresentative and unreflective of user base and wider society.</p>	<p>2 Organisations should commit to increase overall representation and diversity of Board and Senior Management and actively seek to encourage leadership among ethnic minority groups.</p>	<p>Charities</p>	<p>2 At least 25% of board and senior management (1 in 4) to be from an ethnic minority background. (MT/LT)</p>
<p>5 Many charity staff lack knowledge of cultural and country issues impacting the trafficking experiences of users, and understanding of culture and religious practices of survivors and users.</p>	<p>3 All anti-trafficking organisations should provide mandatory training for all staff on cultural intelligence, intersection of trafficking; race, religion; gender and sexuality; equality, diversity and inclusion.</p> <p>4 Design and delivery of specialist events exploring country/culture/community specific modern slavery and human trafficking topics of benefit to staff and partners.</p>	<p>Charities BASNET</p>	<p>3 Charities should hold a yearly in house training on cultural intelligence for their staff, volunteers and Board members. (ST)</p> <p>4 Monthly delivery of specialist events and workshops accessible to all staff. Attendance based on learning needs aligning with client/user base. (Ongoing)</p>
<p>6 Most charities do not have connections or engagement with key communities affected by the issues they address.</p>	<p>5 Charities should undertake two yearly leaderships, partnership, stakeholder and staff audits to provide evidence-based picture of racial imbalances and under-representation within the organisation.</p> <p>6 Charities should endeavour to be representative of the communities they aim to serve and should develop strategies to build relationships with the communities.</p>	<p>Charities</p>	<p>5 Organisations should develop systems to implement learning from EDI audits as normal part of organisational strategies. (MT)</p> <p>6 Organisations should publish on their websites two yearly EDI reports and document their EDI strategies and processes. (MT)</p> <p>7 Charities should develop stakeholder forums with representatives from the communities they serve to inform their anti-trafficking work. (MT)</p>

7 Lack of monitoring and evaluation of Public Sector Equality Duty compliance by anti-trafficking service providers.	7 Introduce external quality monitoring of anti-trafficking service providers to measure compliance with the Public Sector Equality Duty.	Charities	8 Two yearly external review of charities to measure compliance with EDI and Public Sector Equality Duty. (MT)
Networks and Partnerships			
8 Lack of racial diversity within some partnerships.	8 Ensure anti-slavery partnerships membership are representative of the communities they aim to serve. Partnerships should encourage their members to embrace the BASNET Action Plan.	Charities BASNET	9 Partnerships should make strong efforts to identify and engage with communities and invite members to attend partnership events. (ST)
9 Some partnerships are unrepresentative and unreflective of their user base or communities	All anti-trafficking partnerships should provide mandatory training for all staff on cultural intelligence, intersection of trafficking; race, religion; gender and sexuality; equality, diversity and inclusion.	Anti-Slavery Partnerships and Networks	10 Regular delivery of specialist events and workshops accessible to all partners. Attendance based on learning needs aligning with client/user base. (Ongoing)

Appendix One: EDI Working Group Members

Survivor Panel:

Ruth

Halilat

Juliet

Yomi

EDI Action Plan Working Group:

Debbie Ariyo OBE – *Chair of BASNET*

Naeema Ahmed – *Network Manager, BASNET*

Magdalene Adenaike – *CEO, Music Relief Foundation (BASNET Full Member)*

Dr. Elizabeth Such – *NIHR Knowledge Mobilisation Research Fellow. SCHARR, University of Sheffield (BASNET Associate Member and Research Advisor)*

Neena Samota – *Programme Director MA Human Trafficking, Migration and Organised Crime, St Mary's University (BASNET Associate Member)*

Fabiola Bavuyage – *Project Coordinator-Manchester Against Modern Slavery, AFRUCA (BASNET Full Member)*

Jamila Duncan-Bosu – *Solicitor, Anti Trafficking Legal Unit, Lead on Immigration, (BASNET Associate Member)*

Dr Minh Dang – *CEO Survivor Alliance, (BASNET Associate Member)*

Tamara Barnett – *Director of Operations, Human Trafficking Foundation (BASNET Associate Member)*

Appendix Two: List of Consulted Organisations

Office of the Independent Anti-Slavery Commissioner
Home Office
NHS England
Public Health England
National Police Modern Slavery and Organised Immigration Crime Unit
Care Quality Commission
Crime Prosecution Service
Local Government Association
Modern Slavery Policy and Evidence Centre
Vita Network
National Network Co-ordinators' Forum
West Midlands Anti-Slavery Network
Stop the Traffik
Salvation Army
ECPAT UK

BASNET Members (Full and Associate)

Edo Diaspora UK
Reflecteen Hub
House of Rainbow
End Slavery UK
AFRUCA – Safeguarding Children
Music Relief Foundation
Focus on Labour Exploitation (FLEX)
Khai Tzedek CIC
Tapeza CIC



**UK BME ANTI-
SLAVERY NETWORK**

UK BME Anti-Slavery Network
c/o AFRUCA – Safeguarding Children
Head Office
Unit 3D/F Leroy House
436 Essex Road
London N1 3QP
Telephone: 0207 704 2261
Email: BASNET@AFRUCA.org
Website: www.bmeantislavery.org

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