



STEP Project

*Sustainable integration of
Trafficked human beings through
proactive identification and
Enhanced Protection*

After the National Referral Mechanism – what next for survivors of trafficking?

Initial findings from the STEP Project

December 2018

The British Red Cross is partnering with Ashiana and Hestia for 12 months to offer long term support to survivors of trafficking. The pilot is funded through the European Commission's Asylum, Migration and Integration fund (AMIF).

The pilot will cover all London boroughs, West Yorkshire and the East Midlands. The support offered in each location will vary but all have a person centred approach allowing the survivor to identify and prioritise their needs. The pilot aims to work with fifty survivors of trafficking with the aim to increase their independence and integrate. The pilot's outcomes will be measured and presented in a report aimed at sharing learning and promoting long term care for survivors.

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Executive Summary

Within the UK, survivors of trafficking receive formal identification through the National Referral Mechanism (NRM). While people are waiting for a decision on whether or not they will be positively identified (known as a conclusive grounds decision), they are able to access specialist services and support. Once someone has received their decision, they leave the NRM.

Currently, it is at this point that support stops. Whether people have received a positive decision and are recognised as a survivor of trafficking or have been given a negative decision, the accommodation, financial support and specialist services that were available to people while they were in the NRM cease to be soon after the decision is made.

In October 2017, the UK Government announced a number of reforms to the way the NRM works. One element of these reforms was the introduction of pilots for longer-term support for some people leaving the NRM with a positive decision. Pilots of longer-term support were announced in six local authority areas in June 2018.

In February of that year, Ashiana, British Red Cross and Hestia began their own pilot of post-NRM support. The STEP pilot has a broader eligibility criteria than the Home Office pilot in recognition that many of those positively identified through the NRM leave support without leave to remain in the UK and therefore without access to crucial services. Six months in to that pilot, an evaluation was undertaken to explore initial findings and make initial recommendations that could help shape the development of the UK Government's own post-NRM support.

Interim Recommendations

- Support should be provided to anyone leaving the NRM following a positive conclusive grounds decision. To enable this, people with an insecure immigration status who received a positive conclusive grounds decision should be granted a minimum of 12 months leave to remain.
- All those leaving the NRM following a negative conclusive grounds decision should have a care pathway in place. The pathway should take on a multi-agency approach, led by statutory bodies, identifying any vulnerabilities and facilitating access to necessary support.
- The support provided to people leaving the NRM needs to be based on individual need. The design of services delivering support should acknowledge the reality that needs change over time, with more intensive casework support likely to be needed around key transition points.
- Local authorities should work with the Home Office and providers of asylum accommodation to ensure a smooth transition for those leaving the NRM and/or asylum support system, reducing the risk of homelessness and further exploitation and re-trafficking.
- The particular vulnerabilities of survivors of trafficking and need for secure accommodation should be recognised by adding survivors to the list of groups who have a priority need for housing if they become homeless.



Background

Internationally, there has been a renewed focus on addressing human trafficking and ensuring a survivor-centred approach. In September 2017, world leaders attending the UN General Assembly reaffirmed their commitment to the United Nations Global Plan of Action to Combatting Trafficking Persons. As well as seeking to address the drivers of human trafficking, the Assembly also debated how to better support survivors of trafficking.

The Sustainable integration of Trafficked human beings through proactive identification and Enhanced Protection (STEP) project is specifically designed to improve the identification of survivors of trafficking and to better support people after being identified. Co-funded by the European Commission's Asylum, Migration and Integration Fund, STEP works on achieving four key objectives:

- To foster collaboration on a pan-European level to share practice and work together on support programmes for survivors of trafficking;
- To create ways to sensitise people seeking asylum and migrants in transit across Europe to the risks of trafficking and exploitation;
- To enable frontline humanitarian workers to better recognise and respond to signs of trafficking in those they are supporting; and
- To pilot post-identification programmes providing longer-term support for survivors of trafficking.

STEP in the UK

In the UK, the STEP project is primarily focused on the last of these objectives. A pilot of complementary models of longer-term support for survivors of trafficking, delivered by Ashiana, British Red Cross and Hestia, this began in February

2018 and support will be provided until May 2019. A six-month evaluation of the project was carried out in September 2018, and this report reflects the initial evidence and learning that has emerged. A full evaluation will be carried out at the end of the pilot, along with a final report.

The pilot has three aims:

- Enable survivors to increase their independence and to integrate within their host country;
- Reduce the specific vulnerability of women survivors to gender-related violence, abuse, exploitation and disempowerment;
- Inform an advocacy strategy to promote change and encourage public bodies to adopt a sustainable integration model.

It will provide support and information through outreach-based casework to a minimum of 50 women and men in England who have survived trafficking, have been identified through the National Referral Mechanism (NRM) but no longer have access to specialist support as their 45-day "recovery and reflection period" has come or is coming to an end. In addition, Ashiana is providing support to women who choose not to enter the NRM although they are survivors of trafficking, which is an opportunity to generate new learning about both the reach and the limitations of the NRM.



- Phoenix model: community-led recovery
- Casework provided by staff
- Two-tiers of integration volunteers
- Positive Conclusive Grounds decisions
- Pan-London



- Trauma-informed holistic support approach
- Mid/longer-term support to vulnerable women outside of the NRM
- Positive and Negative Conclusive Grounds decisions
- West Yorkshire



- Psychosocial support model
- One-to-one casework sessions
- Positive and Negative Conclusive Grounds decisions
- Derby and Nottingham, East Midlands



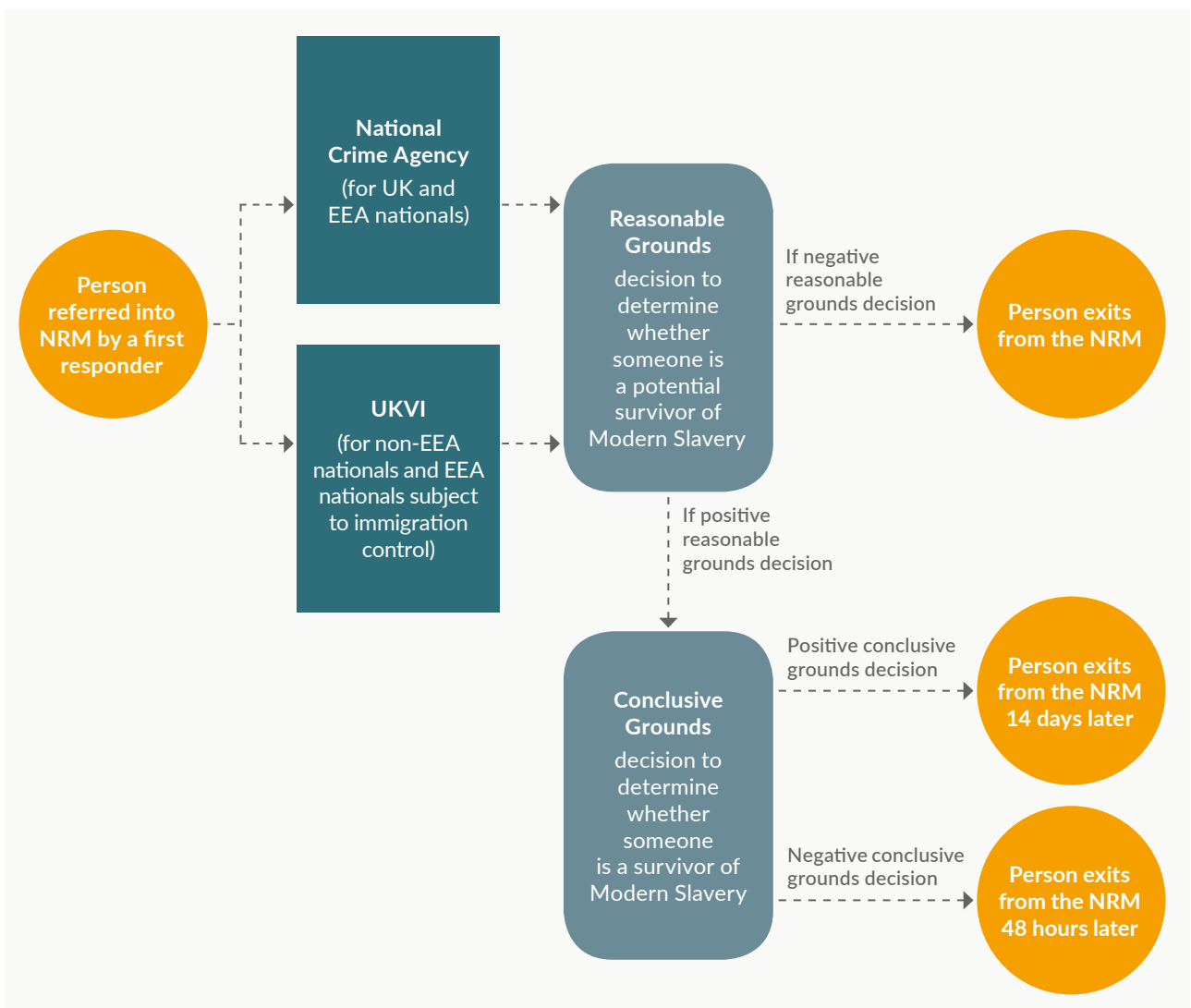
Policy Context

In the UK, the National Referral Mechanism (NRM) is the framework for formally identifying survivors of modern slavery, including those who have been trafficked. It was first introduced in 2009 to meet the UK's obligations under the Council of Europe Convention on Action against Trafficking in Human Beings. Initially, it covered only survivors of trafficking, but in July 2015 was extended to include survivors of modern slavery.

People who have potentially been trafficked are referred to the NRM by an authorised agency, known as a first responder. Agencies that are able to make referrals as first responders include the National Crime Agency (NCA), Police Forces, Home Office Immigration Enforcement, Home Office Visas and Immigration (UKVI), Local Authorities, the Gangmasters and Labour Abuse Authority, and twelve non-Governmental organisations including Salvation Army, Barnardos and Migrant Help. Potential survivors are then referred to one of two competent authorities—the NCA or UKVI—who then make decisions on whether or not to formally recognise survivors. The NCA make decisions on all potential survivors who are either UK or EEA nationals. In other cases, or where an EEA national is subject to immigration controls, decisions will be taken by UKVI.

Once referred into the NRM, potential survivors should receive a first decision on their case within five working days. Known as a 'reasonable grounds' decision, this initial decision indicates whether or not the competent authority believes the individual to be a potential survivor. Where a positive reasonable grounds decision is given, the individual then qualifies for a minimum 45-day reflection and recovery period. During this time, the competent authority will gather information to make a final decision on whether or not the individual is recognised as a survivor of modern slavery. This decision is known as a 'conclusive grounds' decision. The aim is to make the decision as soon as possible after the end of the 45-day reflection and recovery period, although this is only a target. In reality, decisions often take much longer.

While 'in the NRM' – i.e. prior to a conclusive grounds decision being made - individuals are able to access support. Support is provided under the Victim Care Contract, which is currently delivered by the Salvation Army and its subcontractors on behalf of the Home Office, and can consist of accommodation and a range of outreach services, including financial support, medical treatment and help in accessing specialist services. Eligibility for support continues during the 45-day reflection and recovery period, and up until a conclusive grounds decision is made. Following a conclusive grounds decision, how long support continues depends on the outcome of the case. Where there is a positive conclusive grounds decision, NRM support continues for 14 days. In cases where there is a negative conclusive grounds decision, it stops after two days.



Once support provided under the NRM ends, there is no dedicated statutory support for survivors of trafficking available in the UK. Those leaving the NRM may be eligible for other forms of

support, including social security, but that will be independent of their status as a confirmed survivor of trafficking, and may be impacted by other considerations, including immigration status.



Home Office changes to the NRM

In October 2017, the Home Office announced several reforms to the NRM, including a number aimed at improving support for survivors.

These include:

- The introduction of 'places of safety' to give potential survivors three days of assistance and advice before they decide on whether to enter the NRM
- Extending the time support is given to people following a positive conclusive grounds decision from 14 days to 45 days
- Making the Home Office will be responsible for making all NRM decisions
- Introducing an independent panel of experts to review all negative decisions
- Drop-in services for all confirmed victims for up to 6 months after leaving support to aid the transition, provided by the Salvation Army
- Working with local authorities to improve best practice for survivors transitioning into a community and accessing local services through six regional Local Authority pilots.

The last of the above reforms is particularly relevant for the STEP pilot. The first implementation of the reform is being undertaken via six Modern Slavery victim pathway pilots being funded by the Controlling Migration Fund. The pilots are taking place in six different local authorities, and each will run for 12 months:

Local Authority	Description of Pilot
Birmingham	Funding to create a 'one-stop' provision catering for all the potential needs of victims transitioning out of National Referral Mechanism (NRM) support. Community navigators will assess victims' needs, signpost them to appropriate agencies, help fast track their housing and health needs, and establish pathways into volunteering, employment, education and training.
Croydon	Funding to provide 20 weeks of support to victims of Modern Slavery leaving National Referral Mechanism support including an initial intensive 8 week programme. Victims will be provided with safe accommodation, and support to make appropriate links to help with employment, health and wellbeing, legal issues, financial issues and education to support long term recovery.
Derby	Dedicated social worker support to assess victims' needs and manage care plans and the provision of community based support to develop independent living skills.
Leeds	Funding will provide 3 months of specialised help for victims of trafficking to integrate into the local community including mental health support and English language classes.
Nottingham	Caseworkers to work with victims being supported by the National Referral Mechanism to establish post-NRM plans and ease transition into the community. An evaluation of interventions is also being funded.
Redbridge	Support to ensure that a robust care plan is in place for victims leaving the National Referral Mechanism. The funding will also ensure victims have safe accommodation and fund technology to help victims feel safe in their homes.

STEP UK Statistics after the first 6 months

In the first six months of the project, STEP UK:

- Received 53 referrals
- Supported 38 survivors of trafficking.

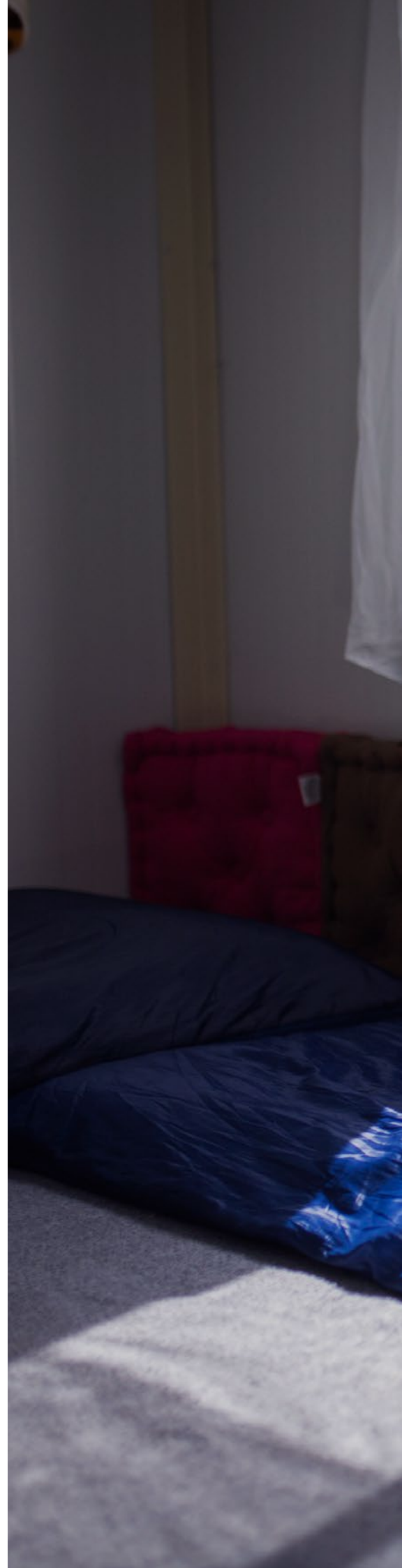
Of the 38 referrals, people supported were in the majority within the asylum system, or in the move-on process following a grant of leave:

Immigration status	Number
Asylum seeker	16
Asylum seeker – appeal pending	5
Discretionary Leave to Remain	7
Refugee/Humanitarian protection	7
Irregular Migrant	2
Indefinite Leave to Remain	1

30 survivors referred in this period had received a positive conclusive grounds decision:

Conclusive Grounds decision	Number
Positive – of which	30
<i>Made following reconsideration request</i>	1
Negative - of which	5
<i>Reconsideration request pending</i>	2
Non-NRM	3

It is important to dissect from the above data that half of survivors who had received positive conclusive grounds decisions, had unresolved immigration status.



Of the 38 people supported:

32 were women

4 women were pregnant

17 different nationalities were helped, with the most frequent being Nigerian and Albanian

22 had experienced sexual exploitation

15 had experienced domestic servitude

4 had been subject to forced labour

4 had experienced more than one type of exploitation.



Interim Findings

During the initial six months of the STEP UK project, 53 referrals were made and 38 people were supported across the three organisations. Many of the clients are still being supported within STEP, and the full findings of the programme will be published at its conclusion. However, across the three organisations, interim trends and findings have emerged.

Need for individualised support when people exit the NRM

When people leave the NRM they become ineligible for support provided under it. However, the need for support for survivors of trafficking does not end at that point. That need is apparent for third country nationals supported through the STEP project, including those with an insecure immigration status – indeed people who receive a positive conclusive grounds decision but then on exiting the NRM do not have a secure immigration status may require additional support due to the continued uncertainty they face. However, at the time of writing this group would not consistently qualify for support under the Modern Slavery victim pathway pilots.

The support provided should be needs-led, and the level required varies between individuals and over time. While the majority of people required intensive support when first entering the STEP project, some people had relatively lower needs. However, those who have relatively low needs for support initially may then need additional support later on, including casework and advocacy support to access statutory services, particularly at key transition points. For those people who required intensive support when first entering the STEP project, their support needs

remain high or they may decrease over time before needing higher levels of support again, often during those key transitions. These key transition points include when decisions are made on an immigration application and changes to housing.

As a result, the support provided to survivors of trafficking after exiting the NRM must be flexible enough to be able to respond to the variable and changing needs that are exhibited. This also has implications for who can provide the support. At times of low-level need, less-specialist support is sufficient. In comparison, when more intensive casework support is required, for example around some of the key transition points, more specialist knowledge, including detailed knowledge of housing and welfare policy, is likely to be required. This was an important learning from Hestia's model within the STEP project, which was originally designed as being volunteer-led. While volunteers can play a vital role, particularly in helping people connect with their local communities, as the project has developed the need for more specialist casework support at certain times has become apparent.

People exiting the NRM struggle to access secure housing

None of the people supported in the STEP UK project were in secure, long term accommodation when they were referred for support. The majority of people were housed in asylum accommodation provided by the Home Office as they had outstanding or recently concluded asylum decisions. In these cases, the housing was not long-term as on the conclusion of an asylum claim, eligibility for any accommodation from the Home Office ends 28 days later in the case of a positive decision, or after 21 days if the application has been refused. Issues in transitioning from Home Office accommodation to local authority or private housing is well documented, including the risk of failing to secure accommodation within the transition period. For those unable to secure accommodation at this point, the lack of somewhere safe to live can be a barrier to being able to either access other support, or for that support to be effective.

A connected issue is that there is significant variance in practice between local authorities, with some being much more proactive in ensuring survivors of trafficking are able to access housing when moving out of Home Office provided accommodation than others. A reason for this is that it is open to interpretation whether or not a survivor of trafficking has a priority need for accommodation. The groups that are eligible for priority need are set out in section 189 of the Housing Act 1996 and in regulations made under that same section.

Case Study – Transition from Home Office to Local Authority Housing

Cynthia received a positive conclusive grounds decision officially recognising her as a survivor of trafficking, which was quickly followed by a refusal on her asylum application. She and her children accessed support through the STEP programme, with her needs assessed as being connected to mental health needs, social isolation and the appeal against the refusal of her asylum application. Cynthia was successful in appealing that decision, but then despite knowing she would need to vacate her asylum accommodation, the eviction notice did not arrive for two months. As a result of not receiving the eviction notice, she was unable to make a homelessness application to be able to secure local authority housing. The uncertainty undermined much of the positive impact the support provided by the STEP programme had had, particularly in terms of helping her overcome her isolation and feeling more independent.

One of the groups included is defined as “a person who is vulnerable as a result of old age, mental illness or handicap or physical disability or other special reason, or with whom such a person resides or might reasonably be expected to reside”. This can include survivors of trafficking as they may be deemed as vulnerable under the “other special reason” provision, but this is done on a case-by-case basis. As survivors of trafficking are not recognised as a distinct group in need of priority access to accommodation, there is no clear acceptance that a positive conclusive grounds decision is an indicator of vulnerability. For example, one local authority engaged with through the STEP UK project which does not recognise survivors of trafficking as being priority need for accommodation usually requires people to present at the Council offices on the day of eviction before being granted temporary accommodation.

For those clients who were accommodated by the local authority, all were in temporary accommodation. In a similar way to homelessness, the lack of secure, long term accommodation can act as a barrier to a survivor of trafficking being able to move on with their lives after exiting the NRM. The insecurity causes stress, particularly if people are receiving support from other services and moving may put the ability to access that support at risk.

One of the women supported by the STEP project is a single mother who was given a positive conclusive grounds decision and was granted asylum. Since leaving her asylum accommodation she has been housed in temporary accommodation by her local authority. While waiting for permanent housing

for her and her children, she has been moved three times, affecting her ability to access her GP and her child’s nursery. She was offered permanent housing and after viewing it was very excited as the location was ideal, but the offer was withdrawn following racist hate crime in the area and so was still waiting for her housing situation to be resolved.

Case Study – Lack of Priority Need

Odion had received a positive conclusive grounds decision but became homeless after leaving his asylum accommodation as a result of his asylum claim also being accepted. He received no support from the provider of the asylum accommodation in securing alternative housing. Odion had previously been diagnosed with post-traumatic stress disorder, and his homelessness caused this to worsen. When he entered the project, he had no knowledge of how to navigate the housing system or what his entitlements were. It was only upon accessing support through the STEP project that an emergency referral to the local authority was made to provide accommodation. Once in temporary accommodation, Odion was then able to access regular casework support, receive mental health support, and apply for a university course.

There is high prevalence of need for mental health support

There were very high needs for mental health services within the people who accessed support under the STEP UK programme. 26 of the people in the programme were identified as being in need of some mental health support. The need ranged from low level interventions, to more severe conditions including anxiety, PTSD and psychosis. Referrals to organisations who can provide mental health support was a common requirement of the organisations in the STEP UK programme, as well as supporting clients to gain referrals through their GP. Additionally, the uncertainty experienced on leaving the NRM can negatively impact the mental health of survivors of trafficking. By working to remove some of that uncertainty, the STEP UK programme was able to positively improve peoples' mental health.

An insecure immigration status creates stress and can be a barrier to integration

Out of the 53 people referred to the STEP UK programme, 30 received a positive conclusive grounds decision. Of them, three-quarters (23) had an insecure immigration status, either having an outstanding asylum claim or having had an asylum claim refused. The uncertainty and emotional stress of legal claims and appeals processes without clear timescales acts as a barrier to the ability of a support services to work with a trafficked person on longer term plans for greater independence and integration until these legal issues are resolved.

Interim Recommendations

Based on the findings set out above, we make a number of interim recommendations relating to support for those leaving the NRM and the need to ensure a survivor-centred approach:

Support should be provided to anyone leaving the NRM following a positive conclusive grounds decision. To enable this, people with an insecure immigration status should be automatically granted a minimum of 12 months leave to remain.

All those leaving the NRM following a negative conclusive grounds decision should have a care pathway in place. The pathway should take on a multi-agency approach, led by statutory bodies and should identify any vulnerabilities, and access to necessary support.

The support provided to people leaving the NRM needs to be based on individual need. The design of services delivering support should acknowledge the reality that needs change over time, with more intensive casework support likely to be needed around key transition points. There needs to be minimum consistent statutory support across the UK.

Local authorities should work with the Home Office and providers of asylum accommodation to ensure a smooth transition for those exiting support under the victim care contract / NRM and /or leaving the asylum support system, reducing the risk of homelessness and re-trafficking.

The particular vulnerabilities of survivors of trafficking and need for secure accommodation should be recognised by adding survivors to the list of groups who have a priority need for housing if they become homeless.

STEP Project:
*Sustainable integration of Trafficked human beings through
proactive identification and Enhanced Protection.*

Coordinated by:



Working in partnership with:



Co-funded by the Asylum, Migration and Integration Fund of the European Union.