

Cultural competency in UK responses to modern slavery

Research summary

August 2024

Authors: Zahra Shirgholami, University of Hull; Philippa King, Dami Omole, Shiva Foundation; Robin Brierley, West Midland Anti Slavery Network; Andrew Smith, Wilberforce Institute, University of Hull.



Research by:



UNIVERSITY
of HULL

Wilberforce
Institute



This is a summary of the report: Cultural Competency in UK Responses to Modern Slavery, based on research conducted by the University of Hull in partnership with Shiva Foundation and West Midlands Anti Slavery Network. The project was funded through an open call for proposals by the Modern Slavery and Human Rights Policy and Evidence Centre (Modern Slavery and Human Rights PEC), which in turn is funded and supported by the UK Arts and Humanities Research Council (AHRC). The full report can be accessed on the Modern Slavery PEC website at modernslaverypec.org/resources/cultural-competency-responses-modern-slavery.

The Modern Slavery PEC has actively supported the production of this Research Summary. However, the views expressed in this summary and the full report are those of the authors and not necessarily of the Modern Slavery and Human Rights PEC.

Key findings

Our findings reveal barriers for the survivors of modern slavery to access support created by a lack of cultural and structural competency at micro/individual, meso/organisation and macro/policy and legislation levels. We have identified barriers particularly for those who may face discrimination based on protected characteristics: age, disability, gender assignment, marriage and civil partnership, pregnancy and maternity, race, sex, and sexual orientation. The research also identified means by which support providers have attempted to remove these barriers.

1. At the micro level, our research identified the individual-level challenges that one may face that could make them vulnerable to exploitation or when attempting to leave an exploitative situation.
 - a. Based on the discussion with our research participants, individuals who experience modern slavery can experience discrimination in their interactions with law enforcement, National Referral Mechanism (NRM) support systems and beyond based on factors such as nationality, sexuality, age, nationality and class.¹
 - b. Research participants also referred to the mistrust of authorities in both the individual's home country and the UK context, which poses huge barriers for individuals who are being exploited.
 - c. Participants also suggested that the potential victims of modern slavery do not have accurate knowledge about their protections under the law and available support, e.g., NRM.

¹ It is important to note that barriers at the three levels are interconnected and may overlap. For example, discrimination and language barriers are relevant at all three levels.

- d. The lack of knowledge, along with the language barrier and feeling of shame, significantly prevent individuals who have been exploited from seeking support, according to our findings.
 - e. Research participants indicated that cultural competence could help in understanding the individual-level barriers faced by survivors and in creating a more supportive system for them.
- 2. At the meso/organisational level, our research identified professionals' stigma and stereotypes towards potential victims of modern slavery, as well as their limited engagement and action and inflexibility of systems as barriers to early identification and prevention of harm.
 - a. Professionals' biases and assumptions about cultural norms can hinder their understanding of the complex factors behind vulnerability, making it difficult to intervene and support potential victims of modern slavery. This could perpetuate exploitation by potentially hindering early identification and making it more challenging for survivors to come forward.
 - b. Further, systems' inflexibility can make accessing basic needs difficult and increase vulnerability to exploitation. Participants gave examples where the shift toward digitalisation and online services, combined with a lack of consideration for accessibility, resulted in significant challenges for migrants with limited English skills or individuals with disabilities.
 - c. By recognising the multiple challenges faced by people in vulnerable situations, promoting culturally competent practices, and challenging stigmas and biases, further harm can be prevented.
- 3. At the macro/legal and policy level, our research found that current immigration policies and political narratives, structural discrimination, and the complexity of the NRM support system have significant negative impacts on survivors' ability to access support and protection.
 - a. Our research participants highlighted the necessity of reforming some legislation and structures, pointing to the Illegal Migration Act and the Nationality and Borders Act.²
 - b. Research participants also pointed to the dysfunctionality of the NRM, e.g., the lengthy process survivors have to go through to receive a Conclusive Grounds Decision.
 - c. The research participants suggested that the legislation and systems should be more survivor-focused to deal with structural vulnerability and discrimination.
- 4. The research found that culturally and structurally competent approaches to service delivery are most effective when barriers at all three levels are recognised and addressed.

2. The Safety of Rwanda (Asylum and Immigration) Act 2024, which was passed to implement the Rwanda policy, has not been commenced, and in July 2024, the new UK Government [confirmed that it would end](#) the Rwanda Scheme.

- a. Discrimination, system inflexibility, and government rhetoric around migration, among other challenges, were raised by professionals in the study as barriers to achieving cultural and structural competency. Such barriers need to be addressed to create a more conducive environment for cultural and structural competence.
- b. Individuals can be more competent through skills such as professional curiosity and having a non-judgmental approach.
- c. For an organisation, having a diverse workforce can be a good first step. However, it cannot replace culturally competent practices, particularly within an area that is very nuanced for standardised solutions.
- d. Also, the concepts of inclusivity and diversity should be understood as broadly inclusive paradigms that go beyond narrowly defined group identities.
- e. A multi-agency approach would be an effective initiative to tackle time and resource issues, and it could also be helpful against structural barriers.

Background

This project seeks to assess the value of cultural competency and practices in improving equity and effectiveness in prevention, legal enforcement, support services and identification of those affected by modern slavery. Cultural competency and structural competency originated in the US healthcare sector in response to disparities in medical care availability and treatment based on cultural differences. This research is one of the first to explore whether and how it could be applied in UK responses to modern slavery for those facing identity-based oppression based on protected characteristics.

Cultural competency involves a set of related behaviours, attitudes and policies enabling professionals to work effectively in cross-cultural situations (Cross et al., 1989). Structural competency complements cultural competency by recognising that economic, political, and societal structures can contribute to vulnerability and discrimination (Quesada et al., 2021; Metzl & Hansen, 2024). Hence, this project focused on individuals facing discrimination based on protected characteristics; it analyses how cultural competency can address modern slavery and re-exploitation risks by answering the following research questions:

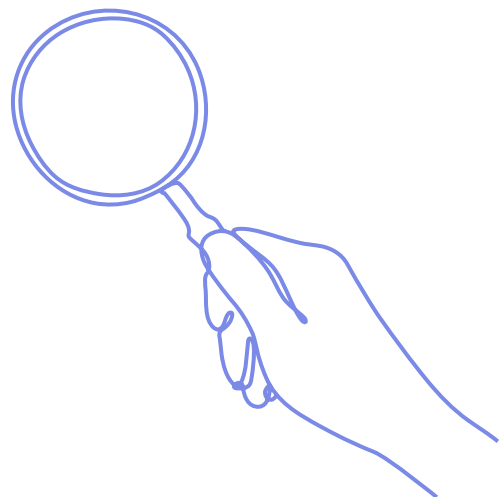
1. To what extent can engagement and delivery of services to individuals be improved based on their cultural background and identity?
2. What are the cultural and identity barriers for people with lived experience of modern slavery to engage with the necessary professionals and organisations? How can these be managed/mitigated?

Methodology

To conduct this research, we drew from both primary and secondary data sources. The secondary data included a literature review and analysis of existing cultural and structural competency research, as well as the analysis of population, ethnicity, and deprivation data in the four geographical areas. The study was carried out in four distinct geographic regions in England and Wales. These areas included a coastal region, a metropolitan region, a rural region and an area consisting of a dense metropolitan centre surrounded by agricultural land and rural communities.

For primary data collection, we created a list of related first responders, charities, and statutory and non-statutory organisations in each case study area to be invited for interviews and/or focus group discussions. The West Midlands Anti-Slavery Network, Humber Modern Slavery Partnership and the North Wales Police and Crime Commissioner distributed the research to the modern slavery workforce in their region and promoted it in related conferences and events. This helped us achieve a broad sample of 36 participants from the list to ensure responses could be generalised sufficiently and give representative results. Interviews and focus groups were semi-structured, wherein short lists of questions related to the issue were designed to guide discussions with research participants. Four individuals with lived experience of modern slavery also participated in our research through interviews and a focus group.

It is also important to note that our research has included interviews and focus groups with professionals who work with individuals who are being or have been exploited, at the point of identification or shortly afterwards. Certain public bodies and organisations, such as the police, the Home Office, local authorities, and NGOs, are responsible for identifying victims of modern slavery. It's unlikely that other public bodies like the DVLA or HMRC will encounter victims of modern slavery during their work. This research has only assessed the cultural and structural competencies of former public bodies and organisations, and the findings may not apply to the latter.



Findings

The findings were organised by three interrelated levels: micro/individual, meso/organisational, and macro/policy.

1. Micro/individual level:

Within this research, micro-level barriers refer to the challenges an individual may face that make them vulnerable to exploitation or when attempting to access support to leave an exploitative situation. Our findings relate to NRM support and non-NRM-related support and services (e.g., employment, education, and opening bank accounts). Based on our findings, the individual-level barriers include discrimination, mistrust of authorities, lack of awareness regarding their rights and available support, language barriers, lack of an interpreter, and shame.

Discrimination and unfair treatment of migrants, especially undocumented individuals, by both local and national statutory bodies, as well as gender disparities, racial prejudice and the adultification of children, were identified by research participants as barriers that they encountered in their professional or lived experience. Most participants also pointed out that the mistrust of authorities in both the individual's home country and in the UK context poses significant challenges for individuals who are being exploited. The mistrust stems from various factors, including corruption and discrimination in the individuals' country of origin, the possible collusion of these authorities with traffickers, and a presumption of guilt.

Most participants also suggested that survivors should have more information about their rights and entitlements. They need to know about their protections under the law and what help is available so that if they become trapped in an exploitative situation, they are more likely to trust authorities and seek support. Language was also identified as a major barrier for individuals who have been exploited and are seeking support. This barrier causes frustration and nervousness, making it even more difficult for people who have been exploited to access the help they need.

Further, shame was reported as a major obstacle preventing people from seeking support. Shame tends to be concerned with perception and how it influences the decisions individuals make, which could be rooted in individuals' past experiences. So, prevention of such barriers might also require fundamental and structural changes in the care provided to children in the UK and beyond.

Based on our research, these barriers can be removed through a cultural competency approach and by creating a more inclusive and supportive system for survivors. This includes providing equal treatment and respect regardless of gender, sexuality, age, nationality, or class. Further details on best practices in this area are included in the full research report.

2. Meso/organisational level:

Our research identified stigma, biases, and assumptions regarding individuals that hinder support providers' understanding and response to individuals in vulnerable situations. Based on our findings, professionals' stigma towards individuals in vulnerable situations hinders their ability to understand the complex factors that contribute to vulnerability and exploitation. Stereotyping and prejudice also play a role in perpetuating stigma. The research participants emphasised that certain nationalities and communities, such as the Roma and Albanian communities, are over-criminalised and over-policed, and this plays into how much professionals are prepared to engage those communities beyond the criminal justice system. The research also showed that these biases and assumptions are present in the treatment of the traveller community, e.g., prevalent beliefs around their way of life and lack of engagement with authorities.

Our research participants also reported the lack of engagement of voluntary and non-statutory organisations in reporting cases of modern slavery as a pervasive issue. Further, inflexible systems can make accessing basic needs difficult and increase vulnerability to exploitation. As is outlined fully in the report, addressing vulnerabilities has been automated and commodified, causing individuals, their identities, and backgrounds to get lost within the system. This can lead to a cold and impersonal approach, which is the opposite of culturally competent practices.

It is crucial to recognise the multiple issues individuals may be facing and avoid reducing them to labels. Culturally competent support is essential in providing more effective interventions, appropriate assistance, and prevention of further harm. It is worth noting that we do not aim to undermine the good practice of many individuals who want to be culturally competent; however, they could be limited by resources and macro-level barriers explained in the section below.

3. Macro/legal and policy level:

Our research found that current immigration policies and political narratives, structural discrimination, and the complexity of the NRM support system have significant impacts on survivors' ability to access support and protection.

The current policies around modern slavery and immigration were considered "the big elephant in the room", with a massive concern amongst participants about how to genuinely provide support for people affected by modern slavery in light of restrictions imposed by recently introduced policies and legislation. For instance, a law enforcement representative referred to the implications of the Illegal Migration Act 2023 on an individual's eligibility for NRM support and Conclusive Grounds decisions. For instance, the Illegal Migration Act 2023, when the UK has a return agreement with another country or a safe third-country agreement, puts a duty on the Home Secretary to remove everyone who arrived in the UK irregularly, including victims of modern slavery.³

³ The provision in the Act that creates this duty has not been commenced. At the time of writing (August 2024), the new UK Government has not set out its detailed plans in relation to the Illegal Migration Act.

Most participants also criticised the politicisation of the issue and the prioritisation of immigration enforcement over the protection of people being exploited. They reported feeling restricted in their ability to offer support to potential victims of modern slavery by red tape and government policies that do not consider on-the-ground expertise. These research findings highlighted that the current political agenda complicated the understanding and access to support for individuals who have experienced modern slavery, particularly for those without legal immigration status. For individuals already vulnerable to exploitation, this heightened fear and uncertainty can be extremely daunting. Further, professionals expressed frustration and disappointment with the lack of structural competency within the systems and believed that the NRM was insufficient in addressing underlying vulnerabilities. Recognising and understanding these structural issues is crucial for creating positive change.

4. Effectiveness of existing interventions:

The research found that culturally and structurally competent approaches to service delivery are most effective when barriers at all three levels are recognised and addressed: (1) individuals are professionally curious and have a non-judgmental approach, (2) organisations have a more diverse workforce and use a multi-agency approach to tackle time and resource issues which can go beyond a tokenistic and ticking box exercise, (3) at the macro level, the structural barriers are also recognised and dealt with to address modern slavery. All these barriers need to be addressed to create a more conducive environment for cultural and structural competency.

Based on the findings, achieving cultural competency requires diversity in staff, professional curiosity, a multi-agency and a non-tokenistic approach. Whilst inclusivity and diversity can improve responses to modern slavery and build trust and rapport with people with lived experience of modern slavery, most participants expressed disappointment with the lack of diversity within their teams, both in terms of staff and senior leadership and recognised that this lack of diversity can hinder the ability to serve communities and understand their unique needs effectively.

While diversity should be embraced, it is important to recognise that diversity alone is not enough. Individuals who have experienced exploitation should not be seen as a homogenous group, even if they are from the same country. On the surface level, this might make the success of any prevention initiatives more challenging because authorities cannot make assumptions about the vulnerability of populations or groups. However, if prevention focuses on addressing structural issues and macro-level barriers that produce vulnerabilities, such as immigration policies and legislation, then, at the micro-level, each person's experience can be considered individually. This means that practitioners, through professional curiosity, should undertake individual assessments where they understand a person's circumstances, and support should be tailored to the individual's needs.

However, it is important to note that the practices discussed in this topic are not a cure-all solution. Treating them as such would reduce them to mere buzzwords without any meaningful impact.

Recommendations

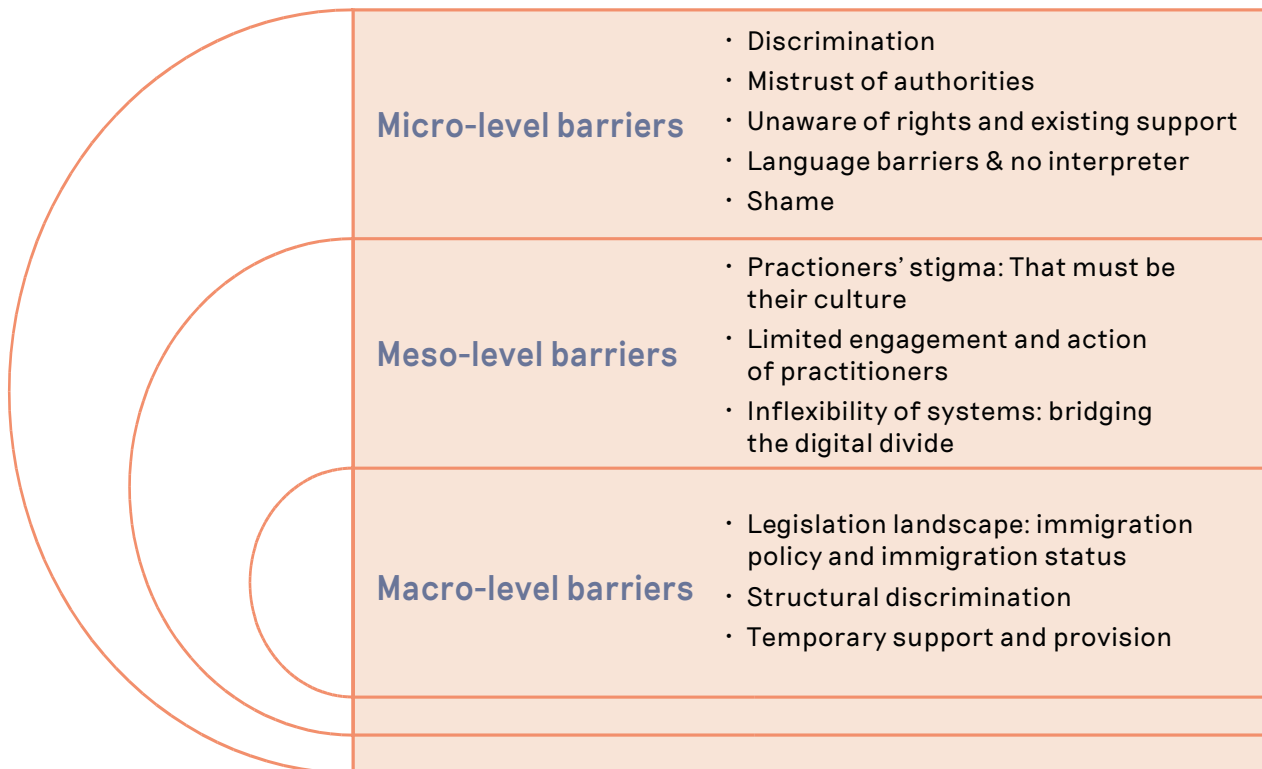


Figure 1 - Summary of barriers

Based on the findings of this research, we recommend the following actions be taken to improve support provision for survivors of modern slavery, and to address exploitation and re-exploitation risks. For further detail on each of the following recommendations, see the full report.

Recommendation 1: Embed culturally competent approaches.

The research findings suggest that an understanding of how diverse cultural backgrounds can impact vulnerability and exploitation may improve the effectiveness of support provision and responses to exploitation risk.

- a. Local-level statutory and non-statutory agencies should consider embedding culturally competent approaches into their in-house or commissioned training and development programmes.
- b. The Home Office Modern Slavery Unit should consider a robust review of current First Responder training, embedding culturally competent language and information, and making First Responder training mandatory for all relevant organisations.

Recommendation 2: Build trust and confidence in authorities.

The responses from the interviews and focus groups indicate that efforts should be made at all levels from Central Government to statutory and non-statutory local actors to address the widespread mistrust of authorities in the UK.

In part, this can be achieved by organisations who interact with survivors (as victims of crime, as service users, or in other capacities) systematically monitoring and evaluating their approach. This includes by collecting and acting upon feedback from individuals impacted by modern slavery.

Recommendation 3: Increase awareness among victims of their rights.

The research findings indicate that there is a lack of awareness among individuals who are being exploited about their rights and the support systems available to them, such support provided through the Modern Slavery Victim Care Contract (MSVCC) as part of the NRM. Ensuring those experiencing modern slavery are aware of their rights and entitlements and have trust in authorities (see recommendation 2) will empower individuals to seek help and prevent further harm.

To do this, the Home Office Modern Slavery Unit and the Director of Labour Market Enforcement could jointly interrogate and improve the flow of information to at-risk groups, including through partnership with local community groups.

Recommendation 4: Increase awareness of cultural barriers to support.

During the interviews and focus groups, most participants talked about how professionals sometimes tend to stigmatise and stereotype potential victims of modern slavery and survivors. They also explained survivors' profound feelings of shame and language barriers throughout their engagement with a broad range of support services, both statutory and non-statutory, as well as with everyday issues such as opening a bank account or visiting a doctor, for example.

Local-level advisory panels and working groups composed of people with lived experience of modern slavery may help to address this issue, by bringing together those who have faced these challenges to support and guide local actors to amend their services and policies to be more culturally competent. Research and programme funders should consider making funding pathways available for organisations seeking to build and maintain these panels and groups, and civil society organisations should consider prioritising establishing internal panels and groups.

All Modern Slavery Victim Care Contract service providers (safehouse and reach-in) should have access to interpreters to facilitate effective communication and prevent re-traumatisation as outlined in Annex F of the relevant Statutory

Guidance. Modern slavery partnerships and networks could consider prioritising supporting organisations to work together to share resources and ensure access to interpretation services when needed.

Recommendation 5: Address the Inflexibility of Systems.

The research indicates that addressing vulnerabilities has become automated and commodified, causing individuals, their identities, and backgrounds to get lost within the system. This can lead to a cold and impersonal approach, which is the opposite of the antecedents and attitudes of culturally competent practices. Responses by participants support our assertion that many systems cannot adapt to meet the needs of these diverse communities. The responses from both those with lived experience and practitioner focus groups indicate that digital systems such as online application forms and websites should be significantly revised and updated to be more accessible to non-English speaking people and people with disabilities.

To achieve this, Government Departments, local authorities, banks, NHS Digital, and other service providers should incorporate the perspectives and experiences of people from diverse backgrounds into the user research that informs the design of such systems.

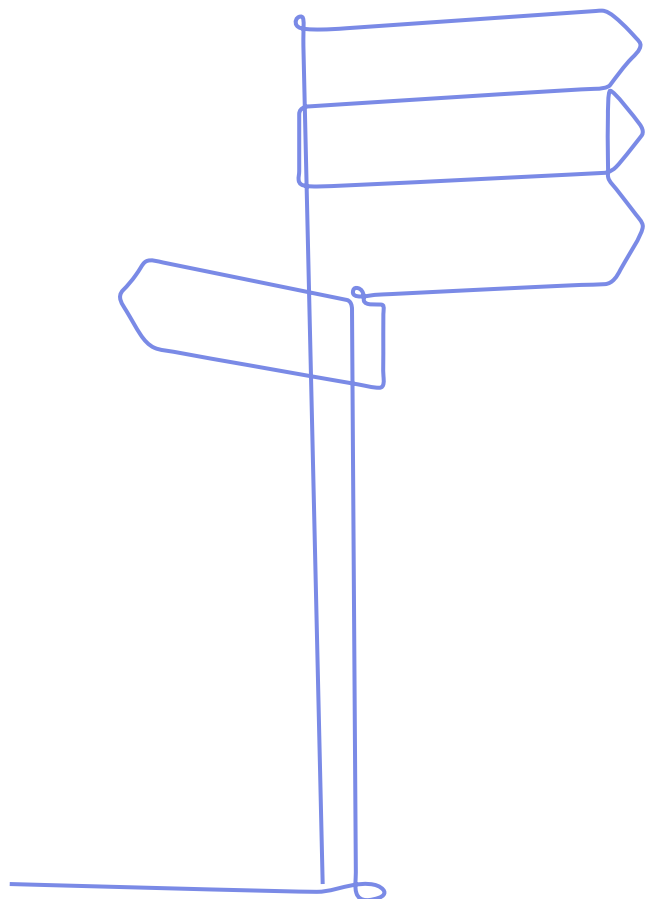
Recommendation 6: Embed Cultural Competency into the Public Health Approach to Modern Slavery.

A public health approach to modern slavery offers an opportunity to coordinate efforts across the anti-slavery sector. The public health approach has been successfully applied in response to domestic abuse and sexual violence and is a good practice example of an equitable multi-agency approach. This approach should include micro, meso, and macro-level factors, engaging actors across government, victim care contract providers, lived experience panels/advisory groups and local statutory and non-statutory partners. This approach also builds on the existing good practice displayed by the many anti-slavery partnerships across the UK. Properly supported and funded by the Home Office, these partnerships would be ideally placed to drive culturally competent multi-agency working that not only addresses victim identification and support but also prevention and disruption.

Areas for further research

This study evaluated the value of cultural and structural competency in the UK's response to modern slavery. It was found that gaining cultural competency requires key elements such as professional curiosity. However, there is a lack of research on the effectiveness of professional curiosity, as well as the challenges and barriers associated with it. Thus, more research could provide further clarity and evaluate its practical effectiveness.

Further, it's important to acknowledge that recognising a problem and understanding the structural and macro-level issues without having the necessary tools or agency to solve it can lead to negative feelings and burnout for professionals working in this field. Therefore, conducting further research can help improve our understanding of how to empower professionals against structural issues. Additionally, future research could assist in the development of a reflective cultural and structural competency practice framework for responding to modern slavery in the UK.



MODERN SLAVERY & HUMAN RIGHTS | POLICY & EVIDENCE CENTRE

Led by the University of Oxford

The Modern Slavery and Human Rights Policy and Evidence Centre (Modern Slavery and Human Rights PEC) works to enhance understanding of modern slavery and transform the effectiveness of law and policies designed to address it. The Centre funds and co-creates high-quality research with a focus on policy impact, and brings together academics, policymakers, businesses, civil society, survivors and the public on a scale not seen before in the UK to collaborate on solving this global challenge.

The Centre is hosted by the Humanities Division at the University of Oxford. The Centre is a consortium of three universities consisting of the Wilberforce Institute at the University of Hull, the University of Liverpool, and the Bonavero Institute of Human Rights at the University of Oxford. Between 2019 and March 2024, the period when this project was awarded funding, the Centre was led by the Bingham Centre for the Rule of Law (part of the British Institute of International and Comparative Law (BIICL)) and was a consortium of six organisations consisting of the Rights Lab at the University of Nottingham, the Wilberforce Institute at the University of Hull, the University of Liverpool, the Bonavero Institute on Human Rights at the University of Oxford and the Alan Turing Institute.



The Modern Slavery and Human Rights Policy and Evidence Centre is funded and actively supported by the Arts and Humanities Research Council (AHRC), part of UK Research and Innovation (UKRI).

Read more about the Modern Slavery and Human Rights PEC at
www.modernslaverypec.org