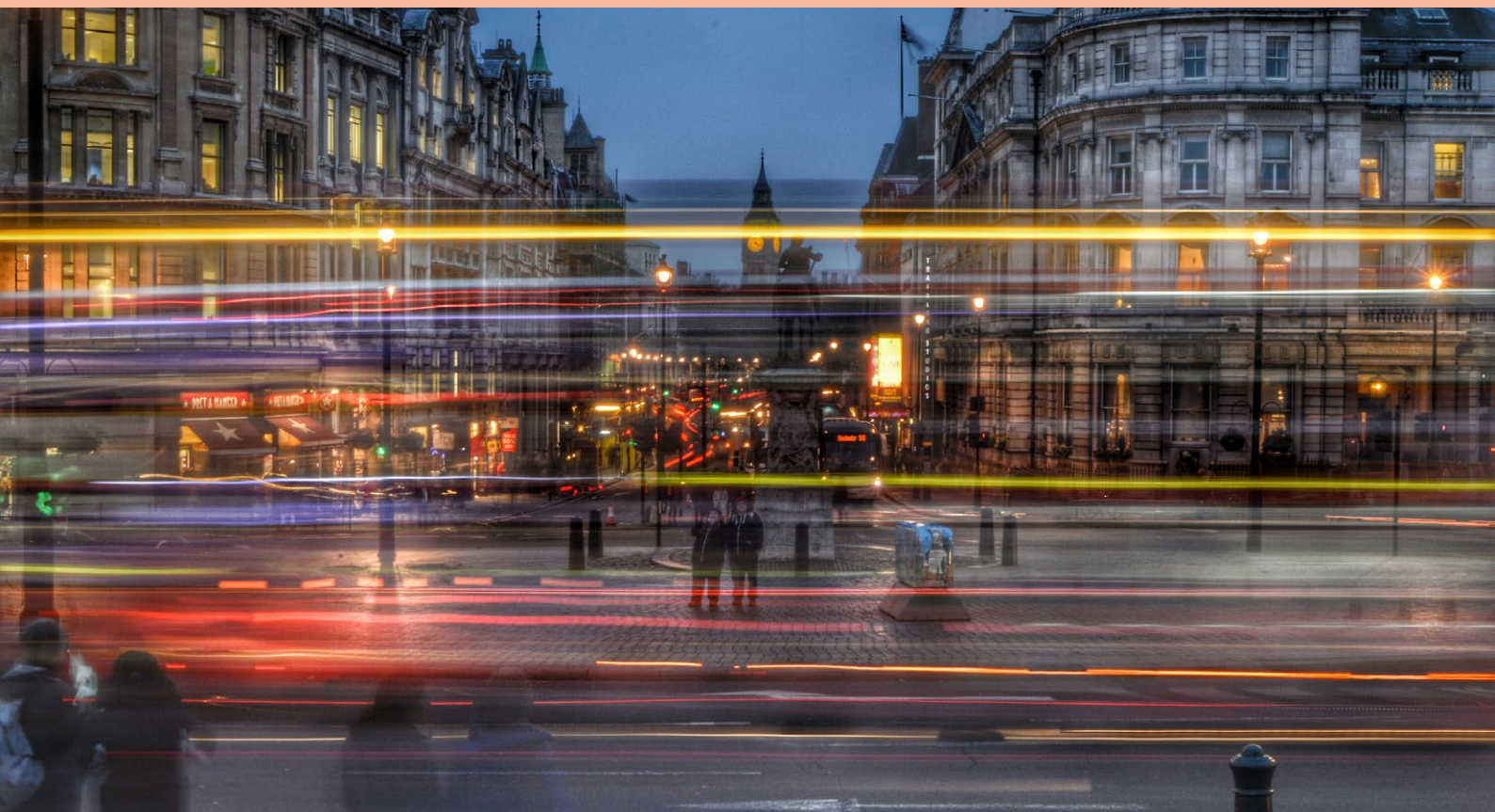


# Navigating homelessness

## Housing challenges faced by survivors of modern slavery

January 2026

Author: Dr Júlia Tomás



Research by:

The Passage 

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# About The Passage

Founded in 1980 by Cardinal Basil Hume and The Daughters of Charity of St Vincent de Paul, The Passage is based in the heart of Westminster in the UK. We provide practical support and a wide range of services to help transform the lives of people who are experiencing or at risk of street homelessness.

We are guided by our Vincentian values and offer our clients the resources and solutions to prevent or end their homelessness for good, including routes to employment, benefits, stable accommodation, and a pioneering Modern Slavery Programme.

## Our vision

Our vision is of a society where street homelessness no longer exists, and everyone has a place to call home.

## Our mission

1. Prevent homelessness by intervening quickly before people reach the crisis point.
2. End homelessness by providing innovative and tailor-made services that act with compassion and urgency.
3. Advocate for those who feel they are not heard by amplifying their voice to bring about real systemic change.

## Our values

- We assist people who are experiencing or at risk of homelessness, to realize their own potential and to transform their lives.
- We act with compassion and kindness.
- We are a voice for change and justice.
- We build relationships based on trust.
- We respect each other.
- We are straightforward in all our dealings.
- We believe in practical hands-on hard work.
- We collaborate across all sections of society.

## The Modern Slavery Policy and Evidence Centre

The Modern Slavery and Human Rights Policy and Evidence Centre (PEC) at the University of Oxford exists to enhance understanding of modern slavery and transform the effectiveness of laws and policies designed to address it.

Read more about the Centre at: [modernslaverypec.org](https://modernslaverypec.org).

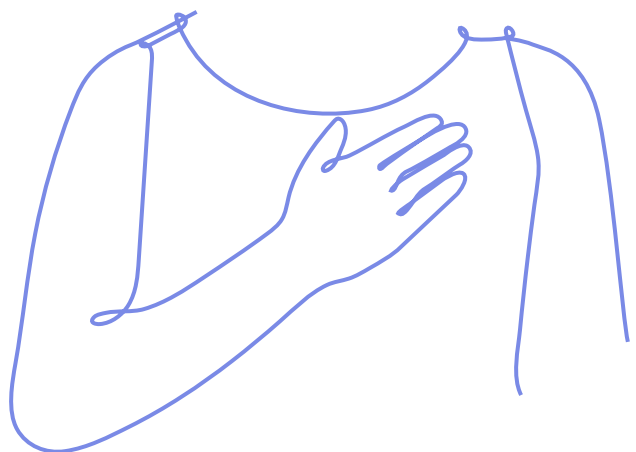
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This report was made possible through the support and funding of the Modern Slavery and Human Rights Policy and Evidence Centre, led by the University of Oxford, whose commitment to tackling modern slavery continues to drive meaningful change in policy and practice.

We are especially grateful to the participants with lived experience of modern slavery, whose voices and insights have been central to this work. Their contributions have helped ensure that the findings are grounded in real-world experiences and reflect the urgent need for survivor-informed responses.

We also thank all survey respondents for their time and thoughtful input, which have strengthened the evidence base and informed our recommendations.

In addition, we extend our sincere thanks to the following organisations and individuals who supported this research. Some contributors are named below with their consent; others have chosen to remain unnamed, and we honour their contributions equally.



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# Glossary of terms

## Survivor-centred terminology

Survivor	A person who has exited exploitation and is navigating recovery. The term emphasises resilience, agency and lived experience.
Victim	A person who has experienced harm or injustice due to exploitation. Often used in legal or safeguarding contexts to affirm rights and entitlements.
Person with lived experience	A neutral, inclusive term used in research and policy to centre the expertise of those directly affected by modern slavery.
Trauma-informed practice	An approach that recognises the impact of trauma and prioritises safety, choice, and empowerment in service delivery.

## Statutory and policy frameworks

National Referral Mechanism (NRM)	The UK's framework for identifying and supporting potential victims of modern slavery. It includes a two-stage decision process: Reasonable Grounds and Conclusive Grounds.
Modern Slavery Victim Care Contract (MSVCC)	The Home Office-funded support system for adult survivors referred into the NRM. It includes safehouse accommodation, weekly subsistence, a support worker, and outreach support.
Support for Victims of Modern Slavery Contract (SVMS)	The forthcoming replacement for the MSVCC, intended to provide enhanced support including accommodation for survivors with complex needs.
Reasonable Grounds Decision (RG)	The initial decision made by the Home Office Competent Authorities to determine whether an individual may be a victim of modern slavery.



Conclusive Grounds Decision (CG)	The final decision confirming whether an individual is a victim of modern slavery, following further investigation.
Single Competent Authority (SCA)	The Home Office body responsible for making decisions on whether individuals referred into the NRM are victims of modern slavery.
Immigration Enforcement Competent Authority (IECA)	A unit within the Home Office that also makes decisions under the NRM, specifically for cases involving immigration enforcement.

## Housing and homelessness

No Recourse to Public Funds (NRPF)	A condition applied to some immigration statuses that restricts access to welfare benefits and housing assistance.
Safehouse accommodation	Specialist supported housing for survivors of modern slavery, typically provided under the MSVCC.
MSVCC outreach support	MSVCC support provided to survivors who are not in safehouse accommodation but are living in other settings (e.g. asylum housing, local authority housing).
Home Office asylum accommodation in hotels	Temporary housing provided to asylum seekers in hotels. Widely considered unsuitable for survivors due to lack of privacy, stability, and trauma-informed support.
Hidden homelessness	Situations where individuals live in unsafe, unstable, or temporary accommodation not captured in official homelessness statistics.
Priority need	A legal category under homelessness legislation that entitles individuals to housing assistance. Survivors may qualify based on vulnerability.
Local connection	A criterion used by local authorities to determine eligibility for housing support, often based on residence, employment, or family ties in a borough.
Suitability assessment	Evaluation of whether accommodation meets the physical, psychological, and social needs of the survivor, including safety, accessibility, and proximity to support networks.

## Acronyms

<b>ASIOX</b>	Anti-Slavery Initiative Oxford
<b>ATLEU</b>	Anti-Trafficking and Labour Exploitation Unit
<b>CG</b>	Conclusive Grounds (decision)
<b>HTF</b>	Human Trafficking Foundation
<b>IECA</b>	Immigration Enforcement Competent Authority
<b>LAWRS</b>	Latin American Women's Rights Service
<b>MHCLG</b>	Ministry of Housing, Communities and Local Government
<b>MSPEC / PEC</b>	Modern Slavery and Human Rights Policy and Evidence Centre
<b>MSU</b>	Modern Slavery Unit (Home Office)
<b>MSVCC</b>	Modern Slavery Victim Care Contract
<b>NRM</b>	National Referral Mechanism
<b>NRPF</b>	No Recourse to Public Funds
<b>ONS</b>	Office for National Statistics
<b>RG</b>	Reasonable Grounds (decision)
<b>SCA</b>	Single Competent Authority
<b>SVMS</b>	Support for Victims of Modern Slavery (Contract)
<b>TAG</b>	TARA Lived Experience Panel
<b>TARA</b>	Trafficking Awareness Raising Alliance
<b>UK</b>	United Kingdom
<b>VOICE</b>	Survivor-led network within the West Midlands Anti-Slavery Network



# Foreword

Modern slavery and homelessness remain two of the most urgent and interconnected social issues facing the United Kingdom. Survivors emerging from exploitation often do so with profound trauma and limited support, and too many continue to encounter barriers to securing safe and stable housing. When these systems fail, the consequences are severe: instability, risk of re-exploitation, and a prolonged recovery journey.

The Passage was the first homelessness organisation in the UK to identify this link, and our work over the past seven years has consistently shown how closely the two issues intersect. Our Modern Slavery Service has found that 94% of survivors we support have experienced homelessness in its aftermath. This places the housing sector in a pivotal position for both identification and long-term support.

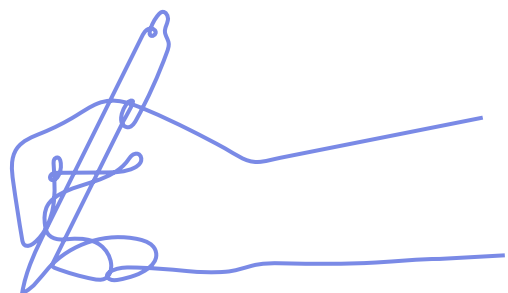
This report builds on that evidence. It focuses on the experiences of survivors who receive outreach-only support under the Modern Slavery Victim Care Contract (MSVCC) – a group whose housing needs are often overlooked or misunderstood. Through the contributions of survivors, practitioners, and statutory partners, the report highlights the structural and practical barriers that leave many individuals without the stability they need to recover.

I am deeply grateful to the participants with lived experience who shared their insights with honesty and courage. Their voices shape this report and remind us why survivor-informed policy is essential. I also thank the many organisations and partners who contributed their expertise, and the Modern Slavery and Human Rights Policy and Evidence Centre at the University of Oxford for funding and supporting this work.

Finally, I want to acknowledge the report's author, Dr Júlia Tomás, for coordinating this important piece of research.

The recommendations set out here are practical, achievable, and capable of making a real difference. If implemented, they will strengthen the UK's response to modern slavery and help ensure that survivors are not left without the housing and support they need. My hope is that this report contributes to the systemic change that is urgently required.

**Mick Clarke**  
The Passage CEO



# Voices of lived experience, voices of learnt experience

*“What’s the point of the NRM?  
What is the point of a positive  
conclusive decision?”*

MSVCC outreach service user, 15 May 2025

*“What’s there for them once they  
get on the other side?”*

Staff participant, 13 June 2025

*“I just want somewhere where  
I can have peace, even if it’s an  
empty space.”*

MSVCC outreach service user, 14 May 2025

*“When [survivors] receive  
refugee status, they become  
dependent on local authorities  
housing, and they don’t have  
priority need. Local authorities  
are not understanding their  
vulnerability and trauma. This  
increases their vulnerability to  
re-exploitation and further abuse.”*

Staff participant, 18 June 2025

*“They [the Home Office] don’t  
know what it is to live like this.  
I feel like an incapacitated parent.  
I am not disable. Let me work and  
look after my child.”*

MSVCC outreach service user, 14 May 2025

*“Does SCA and IECA staff  
have frontline experience to  
understand the impact of their  
decisions?”*

Staff Participant, 13 June 2025

*“The [NRM] system is not here for  
us, but only for them. You’re just  
a number.”*

MSVCC outreach service user, 15 May 2025

*“Modern slavery policies should  
focus on what does recovery  
looks like, define individual needs  
and how to achieve them. They  
should consider individuals as  
people, not numbers.”*

Staff participant, 10 June 2025

*“The SCA should contact us  
directly and communicate clear  
objectives since the beginning,  
so we know what to expect.”*

MSVCC outreach service user, 06 June 2025

*“It’s very difficult to recover if  
you don’t know your future.  
A meaningless Conclusive  
decision hinders recovery.”*

Staff participant, 11 June 2025

# Executive summary

Survivors of modern slavery have consistently reported that gaps in the UK's housing system are leaving survivors without adequate support. This report reveals how individuals recovering from exploitation, particularly those receiving outreach-only support under the Modern Slavery Victim Care Contract (MSVCC), face housing instability, unsafe placements, and fragmented support. Despite statutory duties and contractual frameworks, housing remains a structural blind spot in the UK's modern slavery response.

Drawing on thirty-eight interviews with survivors, practitioners, and statutory stakeholders, alongside policy analysis and frontline data, the report finds:

- **MSVCC outreach support is inconsistent.** Many survivors are placed in asylum accommodation in hotels or left to navigate local authority systems. Some report months without meaningful contact.
- **Access to MSVCC accommodation may be restricted based on interpretations of housing entitlements.** Survivors with UK nationality, refugee status, or access to public funds have reported that they were excluded from safehouse placements, even when experiencing street homelessness, housing instability, or in unsafe living conditions.
- **Survivors with complex needs,** such as substance misuse, suicidal ideation, or severe mental health conditions, may be excluded from MSVCC safehouse accommodation because providers assess that they require a level of on-site support the safehouse cannot deliver.
- **Local authority responses are inconsistent and fragmented.** Survivors are frequently caught in a "ping-pong" between councils and MSVCC providers.
- **Risk and Needs Assessments sometimes lack trauma-informed depth.** These assessments, conducted by MSVCC providers are frequently carried out remotely, which can limit attention to safety, housing issues, and survivor preferences.
- **Statutory guidance fails to reflect lived realities.** Survivors accessing outreach support through the MSVCC are not explicitly referenced within the Homelessness Code of Guidance. As a result, their specific vulnerabilities may be overlooked when assessing priority need for social housing allocation.
- **Data and training gaps undermine accountability.** The Home Office holds extensive housing-related information that is not shared or analysed. Some MSVCC support workers lack detailed housing knowledge, while local authority staff are not always familiar with modern slavery frameworks, or vulnerabilities specific to survivors of modern slavery.

This report is published at a pivotal moment, following the launch of the National Plan to End Homelessness (2025). The plan commits to amending Chapter 25 of the Homelessness Code of Guidance, creating a statutory window to embed survivor-centred housing pathways. Our findings and recommendations directly reinforce this commitment, ensuring that the amendment process addresses the realities faced by survivors receiving outreach-only support under the MSVCC. By aligning survivor voice with national policy, the report provides evidence-based detail to shape guidance that is trauma-informed, flexible, and responsive to safeguarding needs. To address these systemic shortcomings, the report proposes nine co-produced, actionable recommendations:<sup>1</sup>

1. Shape the amendment of Chapter 25 of the Homelessness Code of Guidance to ensure it reflects the unique vulnerabilities of modern slavery survivors who only receive outreach support under the MSVCC. This should include guidance on assessing priority need, flexibility in local connection rules, and trauma-informed housing pathways.
2. Clarify MSVCC eligibility rules to prevent exclusion after positive Reasonable Grounds decision.
3. Publish housing status data for survivors during and after statutory support under the MSVCC.
4. Embed housing suitability assessments into the Modern Slavery Statutory Guidance.
5. Introduce “modern slavery” as a recognised category on housing application forms.
6. Establish minimum face-to-face contact requirements in MSVCC outreach support.
7. Ensure that MSVCC housing needs assessments record whether a safeguarding referral was made – and if not, provide a clear reason. This creates accountability, helps track risks for survivors with complex needs, and ensures that housing decisions are linked to safeguarding actions.
8. Standardise and evaluate training for MSVCC support workers.
9. Scale Modern Slavery Coordinators/Leads nationally.

Housing is not a peripheral issue; it is foundational to recovery. Without safe, stable, and suitable accommodation, survivors remain at risk of re-trafficking, mental health deterioration, and disengagement from support. This report calls for a shift in how housing is understood within the modern slavery recovery journey: from a transactional service to a trauma-informed, rights-based pathway to stability and dignity.

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1. The detailed list of recommendations, including policy alignment and responsible entities are in the section “Recommendations.” In addition, a categorised matrix can be found in annex 2.

# Introduction

Modern slavery and homelessness are two deeply interconnected social issues that continue to affect thousands of individuals across the United Kingdom. Survivors of modern slavery often emerge from exploitation with complex trauma, limited resources, and significant barriers to accessing safe and stable housing. Despite policy advancements and increased awareness, many survivors remain at risk of homelessness, which can severely hinder their recovery and reintegration into society.

Numerous reports from The Passage<sup>2</sup> have demonstrated that modern slavery is closely related to homelessness, placing the housing sector in a pivotal role for identifying and supporting survivors. Drawing on more than five years of operational experience, The Passage's Modern Slavery Service has found that 94% of survivors supported through its programme have experienced homelessness either as a direct consequence of exploitation or in its aftermath.<sup>3</sup> This data shows the urgent need to address housing insecurity as a core component of modern slavery prevention and survivor recovery.

The Passage's frontline work also reveals emerging challenges in 2025<sup>4</sup>, particularly among individuals who have entered the National Referral Mechanism (NRM) – the UK's framework for identifying and supporting victims of modern slavery – and who have recently been granted refugee status. Despite being entitled to support under the Modern Slavery Victim Care Contract (MSVCC), these individuals are facing street homelessness following eviction from Home Office asylum accommodation. This situation highlights a critical gap in transitional housing support and raises questions about the adequacy of current systems in safeguarding survivors during key moments of vulnerability.

Although the NRM is intended to provide access to safety, legal protections, and tailored support, many survivors continue to face insecure housing, limited resources and systemic barriers that undermine long-term stability. As the Human Trafficking Foundation notes, only 13% of adult survivors reside in MSVCC safehouse accommodation; the majority are placed in alternative settings such as asylum accommodation or local authority provision.<sup>5</sup> Those receiving outreach support under the MSVCC – rather than safehouse accommodation – are particularly exposed to housing insecurity, often navigating complex systems without consistent advocacy or protection.

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2. The Passage Modern Slavery Annual Reports. [Modern Slavery and Homelessness](#).

3. The Passage (2024). [Modern Slavery Service Five Year Report](#), p.29.

4. The Passage. Unpublished data for the current year (2025-26).

5. Human Trafficking Foundation (2023). [The Key Issue: Housing for Survivors of Modern Slavery](#).

This report explores the housing challenges faced by survivors of modern slavery who only receive outreach support under the MSVCC, with a particular focus on the structural, legal, and practical barriers that contribute to housing insecurity. It draws on survivor testimony, practitioner insights, and policy analysis to examine how current systems respond to survivors' housing needs and where they fall short.

The intersection of modern slavery and homelessness is not merely a matter of service provision. It reflects broader systemic issues including immigration policy, access to public funds, trauma-informed care, and the availability of appropriate housing. Many survivors live in unsafe, unstable housing that is not counted in official homelessness data. These conditions can perpetuate vulnerability and increase the risk of re-trafficking.

By investigating these challenges, this report aims to inform policy and practice, highlight examples of good practice and propose actionable recommendations for improving housing outcomes for survivors. It advocates for a more integrated, survivor-centred approach that recognises housing as a fundamental component of recovery and long-term safety.

The findings presented in this report are not new to those working closely with survivors. For years, frontline organisations, survivor advocates and support providers have raised these concerns about housing insecurity, legal barriers, and systemic delays. What this report offers is further evidence, survivor-led analysis and policy-mapped recommendations that aim to catalyse long-overdue change.

## Purpose and scope

This report explores the intersection between modern slavery and homelessness, exposing critical gaps in existing support systems. By focusing on the experiences of survivors who rely exclusively on outreach support under the Modern Slavery Victim Care Contract (MSVCC), it sheds light on the complexity of their housing journeys and the systemic barriers they face in accessing stable accommodation.

The research seeks to deepen understanding and encourage the development of evidence-based solutions that address housing vulnerabilities with precision and compassion. Through detailed analysis and the identification of best practices, it aims to contribute to a framework in which survivors are supported with stability, dignity, and the assurance of long-term recovery.

The scope is geographically centred on England, with primary data drawn from London, the West and East Midlands, and the North-West. Interviews with survivors currently residing in Scotland offer valuable comparative insights into housing support across devolved administrations.



## Research objectives

1. To explore the housing challenges faced by adults with lived experience of modern slavery who receive only outreach support under the MSVCC, as well as the challenges encountered by frontline services that support them.
2. To examine how the National Referral Mechanism (NRM) and the MSVCC interact with the homelessness and housing sectors, including local authorities and third-sector organisations, to address housing insecurity among survivors.
3. To identify and embed best practices for integrating modern slavery considerations into homelessness policy frameworks, and for incorporating homelessness-related risks and housing insecurity into modern slavery strategies.

Originally designed to explore housing experiences across two survivor cohorts – those supported by MSVCC outreach services and those who do not enter the NRM – the research was refined in response to significant differences in statutory engagement, support pathways, and data availability. As a result, this report focuses exclusively on MSVCC outreach service users. A separate policy briefing will address the housing challenges faced by survivors who do not enter the NRM, ensuring tailored recommendations for each cohort.

Importantly, the recommendations panels convened for this work reviewed proposals relevant to both groups, allowing survivor voice and practitioner insight to inform future policy development across the wider landscape.

## Methodology

### Desk-based evidence review

This review sought to build an understanding of the existing frameworks and statistical data underpinning the intersection of modern slavery and homelessness. Through analysis of current literature, policy documents, and available evidence, it identified key gaps and opportunities for improvement in existing systems of support.

The policy analysis focused on statutory and contractual guidance, including the *Modern Slavery Statutory Guidance*, the *Modern Slavery Victim Care Contract Assessing Destitution Guidance*, and the *Homelessness Reduction Code of Guidance*. Statistical data were drawn from multiple sources, including from the Home Office Modern Slavery Unit (MSU), the Office for National Statistics (ONS) and the Ministry of Housing, Communities and Local Government (MHCLG).

In addition, the review examined reports from the MSVCC prime contractor and subcontractors, The Passage and other agencies providing support services to survivors outside of the MSVCC framework.

To support thematic analysis and policy interpretation, the study drew on the Australian Red Cross's four-part housing access framework – Availability, Accessibility, Eligibility, and Suitability.<sup>6</sup> This framework was used to structure survivor and practitioner insights, enabling a clearer understanding of how housing barriers compound across different dimensions of access. By applying this model to the UK context, the research was able to identify systemic misalignments between modern slavery support and housing provision, and to map survivor experiences against statutory and contractual obligations.

## Empirical research

A mixed-methods approach was used, combining survivor insights with practitioner perspectives across the anti-slavery, housing, and homelessness sectors.

- **Survey:** An anonymous survey was distributed to Anti-Slavery Networks in England and Wales through the Human Trafficking Foundation's National Network Coordinators' Forum. A total of ten responses were received, providing initial insights into housing-related issues and service gaps.
- **Workgroup:** A dedicated workgroup was convened with Anti-Slavery Network Coordinators, including representatives from the Humber Anti-Slavery Partnership, Southwark Anti-Slavery Partnership, Victim Support, and the Modern Slavery and Human Rights Policy and Evidence Centre, to review the survey findings and collaboratively develop the initial draft recommendations.
- **Interviews:** Semi-structured interviews were conducted with 38 participants, both online and in person, including:
  - 11 survivors who have received MSVCC outreach support
  - 9 MSVCC outreach service providers
  - 5 Modern Slavery Coordinators or Leads from 6 local authorities
  - 2 representatives from 2 homelessness organisations
  - 1 representative from a human rights organisation
  - 9 representatives from 8 anti-slavery organisations
- **Co-produced recommendations:** The recommendations were developed through a participatory process, drawing on the lived experiences of survivors and the practical insights of frontline practitioners. To assess their feasibility and relevance, two recommendations panels were held with strategic stakeholders, providing an opportunity to test and refine proposals in dialogue with those responsible for shaping housing and modern slavery policy.

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6. Australian Red Cross (2021). Barriers in Accommodating Survivors of Modern Slavery: Working towards Safe, Suitable, and Sustainable Housing. [barriers-in-accommodating-survivors-of-modern-slavery.pdf](#).

## Limitations

This study was informed exclusively through engagement with survivors receiving support through MSVCC outreach services, alongside insights drawn from services that provide support to MSVCC outreach service users. These insights are valuable but may not capture the full diversity of survivor experiences.

While there may be some crossover with other devolved nations, the research was geographically limited to England, which constrains the direct applicability of findings across devolved administrations, where variations in commissioning, statutory responsibilities, and housing systems remain significant.

In addition, the survey component of the research received a limited number of responses (n=10), which restricts the applicability of those findings. Low response rates reflect the difficulty of engaging overstretched frontline professionals and may indicate the need for alternative or supplementary data collection methods in future studies.

## Ethics and safeguarding

Throughout the project and its associated activities, The Passage has adhered to its safeguarding policies, as well as those of the Modern Slavery and Human Rights Policy and Evidence Centre and the University of Oxford. The study has received full ethical clearance from the Social Sciences & Humanities Interdivisional Research Ethics Committee (SSH IDREC) at the University of Oxford (1087629) on 12 March 2025.

People with lived experience of modern slavery contributed to this project through The Passage's Modern Slavery Service and partner organisations. Each of these partners operates under their own safeguarding protocols and ethical frameworks.

Prior to engaging in any research activities, all participants were provided with a comprehensive Participant Information Sheet. This document outlined the aims and scope of the study, detailed the terms and conditions of participation, and clarified the role and expectations of participants. Informed consent was obtained electronically through the selection of a designated consent option at the point of submission. Participants were explicitly informed of their right to withdraw from the study at any stage without consequence. Furthermore, assurances were provided that all personal data would be anonymised in accordance with data protection regulations and ethical research standards.

The Passage has collected and stored all data in compliance with the Freedom of Information Act 2000, the Data Protection Act 2018, and the UK General Data Protection Regulation 2021. The Passage has maintained the confidentiality of all materials and reviews.

## Background and context

Modern slavery remains a pervasive issue in the UK, encompassing various forms of exploitation including forced labour, sexual exploitation, domestic servitude, criminal exploitation, organ harvesting, and human trafficking. In 2024, 19,125 individuals were referred to the Home Office as potential victims, marking a 13% increase from the previous year and the highest annual figure since the National Referral Mechanism (NRM) was established. Notably, 43% of these cases involved exploitation occurring exclusively within the UK, highlighting the domestic nature of modern slavery.<sup>7</sup>

Survivors often exit exploitation into housing environments that are unsafe, temporary, or incompatible with recovery. Homelessness can precede exploitation and frequently follows it. Without secure accommodation, individuals are more vulnerable to coercion, re-trafficking, and further harm. The Passage's Modern Slavery Service reports that 94% of survivors supported through its programme have experienced homelessness after exploitation, placing the housing sector in a pivotal role for both prevention and recovery.<sup>8</sup>

## Understanding homelessness

Homelessness extends beyond rough sleeping. The Ministry of Housing, Communities and Local Government (MHCLG) defines statutory homelessness to include individuals in temporary accommodation, those at risk of violence, and those without legal right to remain in their current housing.<sup>9</sup> However, this definition does not include hidden forms of homelessness such as sofa surfing, overcrowded housing, and temporary arrangements that fall outside official statistics.<sup>10</sup> The Office for National Statistics (ONS)<sup>11</sup> and organisations like Crisis<sup>12</sup> have highlighted that hidden homelessness is widespread and often unacknowledged in policy responses.

The definition of homelessness has profound implications for policy and practice. A broader understanding allows for more inclusive interventions that address the root causes of housing insecurity, such as poverty and discrimination. It also promotes systemic change, urging governments and organisations to allocate

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7. Home Office (2024). [Modern slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2024 - GOV.UK](#).

8. The Passage Modern Slavery Annual Reports. [Modern Slavery and Homelessness](#).

9. Ministry of Housing, Communities and Local Government (2024). [Statutory homelessness in England: financial year 2023-24 - GOV.UK](#).

10. Shelter (2013). [Defining Homelessness](#).

11. Office for National Statistics (2023). ["Hidden" homelessness in the UK: evidence review - Office for National Statistics](#).

12. Crisis (2011). [the\\_hidden\\_truth\\_about\\_homelessness.pdf](#).

resources effectively and design programmes tailored to diverse experiences of homelessness. Reframing homelessness as a complex social issue, rather than merely the absence of shelter, highlights the importance of inclusive definitions and targeted policies.

## Support systems: NRM and MSVCC

The National Referral Mechanism (NRM) is the UK's framework for identifying and supporting potential victims of modern slavery. Adults must consent to be referred; children are referred automatically. First Responder Organisations (FROs), including police, local authorities, Home Office teams, and specialist NGOs, are responsible for making referrals.<sup>13</sup>

Once a referral is made, the Home Office determines whether there are "Reasonable Grounds" to believe the individual may be a victim of modern slavery. A positive decision initiates a formal recovery period under the Modern Slavery Victim Care Contract (MSVCC), during which the individual receives support while awaiting a final "Conclusive Grounds" decision. This support includes a support worker, safe accommodation, subsistence payments, legal aid, and access to physical and mental health services. Children are supported by local authorities.<sup>14</sup>

The MSVCC is delivered by The Salvation Army and twelve subcontractors, including Ashiana, Bawso, BCHA, Black Country Women's Aid, Causeway, Hestia, Medaille Trust, Migrant Help, Saint John of God Hospitaller Services, Snowdrop Project, Palm Cove Society, and Unseen UK.

## MSVCC outreach support

MSVCC outreach support is typically provided to survivors who are already housed. For the Home Office, alternative suitable accommodation may include:

- *"Local authority accommodation.*
- *Accommodation provided under Section 95, 98 or Section 4 of the Immigration and Asylum Act 1999 ('asylum accommodation').*
- *Accommodation provided under paragraph 9 of Schedule 10 to the Immigration Act 2016 to enable individuals to meet bail conditions ('S10 support'); or*
- *Any other secure, appropriate, and adequately furnished accommodation, such as staying with friends or family.*"<sup>15</sup>

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13. The full list of FROs is available at: [National referral mechanism guidance: adult \(England and Wales\) - GOV.UK](#).

14. Home Office (2025, Version 3.12). [Modern Slavery: statutory guidance for England and Wales \(under s49 of the Modern Slavery Act 2015\) and non-statutory guidance for Scotland and Northern Ireland \(accessible version\) - GOV.UK](#), henceforth referred to as the Modern Slavery Statutory Guidance.

15. Modern Slavery Statutory Guidance, para 15.15.

After the Initial Risk Assessment, a Preliminary Risk Assessment is carried out to check for any urgent welfare needs that have not been addressed, confirm the right outreach support, and flag any safeguarding concerns. This sets the stage for the Full Risk Assessment and Needs-Based Assessment, which reviews accommodation decisions, continues monitoring welfare needs, and identifies any new risks that may emerge.

Two key points warrant attention. First, asylum accommodation in hotels may be unsuitable for survivors of modern slavery.<sup>16</sup> Unlike MSVCC accommodation and outreach services, these settings are not inspected by the Care Quality Commission, which may raise safeguarding concerns. Second, within the homelessness sector, staying with friends or family is often classified as a hidden form of homelessness, or recognised as an indicator of unstable housing.<sup>17</sup>

In 2023, the Care Quality Commission published a review of the services for survivors of human trafficking and modern slavery under the MSVCC.<sup>18</sup> According to the review, while the outreach service is generally regarded as good and caring, several issues were identified. Survivors often faced issues with the quality and access to accommodation, and support allocation did not always consider individual needs, leading to inadequate support.

MSVCC outreach faces critical challenges. Remote delivery often causes isolation and weak engagement. Gaps in ongoing risk assessments mean serious issues, such as suicidal ideation, can go unnoticed, increasing harm. Poor housing quality and delays in resolving accommodation problems undermine safety and prolong distress.

## Systemic barrier: local authority accommodation

The Homelessness Reduction Act 2017<sup>19</sup> introduced duties on local authorities to prevent and relieve homelessness. Survivors of modern slavery may qualify for priority need status, but eligibility often hinges on immigration status and access to public funds. Chapter 25 of the Homelessness Code of Guidance<sup>20</sup> outlines local authority powers to support survivors. However, survivors receiving only outreach services rather than safehouse accommodation are not explicitly covered in terms of distinct housing entitlements beyond general homelessness prevention measures.<sup>21</sup>

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16. Hibiscus (2020). [Closed Doors Report - Hibiscus Initiatives](#); UNHCR and the British Red Cross (2022). [At Risk: Exploitation and the UK asylum system](#).

17. Crisis (2018). [The Homelessness Monitor: England 2018](#).

18. Care Quality Commission (2023). [Our key findings - Care Quality Commission](#).

19. UK Government (2017). [Homelessness Reduction Act 2017](#).

20. Ministry of Housing, Communities and Local Government (2024, Version 0.22). [Homelessness Code of Guidance for Local Authorities](#).

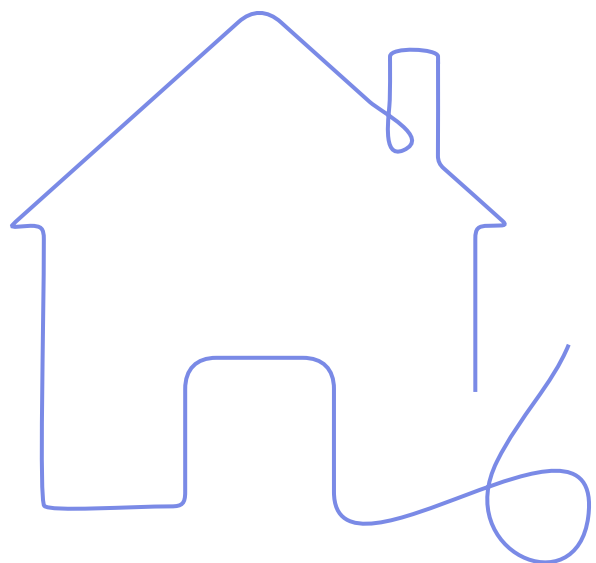
21. Human Trafficking Foundation (2024). [Trusted Housing Assessor Pilot in London](#).



Local authorities must assess whether an individual in outreach support is homeless or at risk of homelessness and determine eligibility for statutory housing assistance. As a result, access to appropriate accommodation remains inconsistent due to variations in local authority responses.<sup>22</sup> Lastly, while emergency accommodation is addressed, there is a lack of sustainable long-term housing solutions for survivors.<sup>23</sup>

The Local Government Association’s *Council Guide to Tackling Modern Slavery*<sup>24</sup> (2022) recommends embedding modern slavery considerations into housing and safeguarding strategies. The Home Office’s 2025 Action Plan on Modern Slavery acknowledges some gaps and commits to a new victim support contract, titled “Support for Victims of Modern Slavery (SVMS)” in 2027 with “*accommodation capable of housing victims with complex and specialist needs (related to their MS experience), e.g. sexual exploitation or substance misuse*].”<sup>25</sup>

These structural challenges are not abstract; they manifest daily in the lives of survivors navigating recovery. The following findings draw directly from survivor testimony, practitioner insight, and statutory engagement, offering a detailed account of the barriers faced by individuals receiving MSVCC outreach support. Through case study, thematic analysis, and policy mapping, the report illustrates how housing insecurity is sustained by systemic misalignments, and where opportunities for reform may lie.



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22. Human Trafficking Foundation (2023). [The Key Issue: Housing for Survivors of Modern Slavery](#).

23. [Secure and suitable housing - MSCOS](#).

24. Local Government Association (2022). [Council guide to tackling modern slavery](#).

25. Home Office (2025). [Action Plan on Modern Slavery](#), p.10.

## Case study (MSVCC outreach service user)

### Background

Jane\* was initially placed in MSVCC safehouse accommodation after escaping exploitation. However, the environment proved unsafe – male residents were using drugs and bringing unauthorised visitors – prompting her relocation to another safehouse.

### Immigration and housing instability

Jane received a negative Reasonable Grounds (RG) decision and was given nine days to leave the safehouse. Her solicitor submitted a reconsideration request, which was successful, resulting in a positive RG decision. Despite this, Jane was moved directly from the safehouse to Home Office asylum accommodation in a hotel because she was also in the process of claiming asylum.

### Hotel accommodation challenges

Upon arrival, the hotel had no record of her placement, leaving her homeless for two hours. This triggered severe anxiety and physical illness. During her five-month stay, Jane endured:

- Unsafe and unsanitary living conditions (leaking roof and rotting pipes)
- Inadequate access to food and hygiene facilities
- Harassment, racism, and sexual threats from male residents
- A fall in the bathroom leading to hospitalisation, with no follow-up from the MSVCC support worker.

Her unmanaged diabetes and incontinence worsened due to lack of support. Even after being moved to an en-suite room, conditions remained substandard.

### Current situation

Jane has since been transferred to a bedsit within the asylum accommodation system and received a positive Conclusive Grounds (CG). She was also granted residency in the UK. However, she now faces eviction with fewer than 28 days remaining in her asylum accommodation. She has not submitted a housing application—primarily because she received no support during the critical move-on period under MSVCC outreach.

### Survivor testimony

*“They [asylum hotel residents] abuse you. They ask you for sex. How many times do I have to report it?”*

*“I could be homeless again. Again, I’ll be trafficked. Again, I’ll be homeless.”*

(\*Not her real name)

## Findings

Jane's experience is not an isolated incident. It reflects wider patterns of housing precarity, administrative delay, and inadequate support that emerged across this study. Eleven survivors who engaged with MSVCC outreach services shared their experiences, revealing a system that sometimes fails to provide safe, stable, and trauma-informed housing pathways.

This chapter presents survivor-led and practitioner-informed insights into the barriers faced by survivors of modern slavery in accessing safe, suitable, and sustainable housing. Drawing on interviews, testimonies, and statutory analysis, it explores how housing systems – both within and beyond the Modern Slavery Victim Care Contract (MSVCC) – shape survivor experiences of safety, autonomy, and recovery.

To structure this analysis, we adopt a four-part framework developed by the Australian Red Cross in their 2021 report *Barriers in Accommodating Survivors of Modern Slavery*.<sup>26</sup> This framework identifies four intersecting dimensions that determine access to housing:

Dimension	Definition	UK Application
Availability	Whether housing exists and is offered	Bed shortages, lack of specialist provision, regional disparities
Accessibility	Whether survivors can reach or use housing	Geographic dislocation, disability access, local connection rules
Eligibility	Whether survivors are deemed entitled	Immigration status, housing entitlements, priority need criteria
Suitability	Whether housing meets survivor needs	Trauma-informed environments, autonomy, cultural proximity

**Table 1: Structural Dimensions of Housing Access: Mapping Barriers in the UK Context**

These dimensions are not isolated. They overlap and compound, creating complex barriers that often leave survivors navigating cycles of homelessness, institutional mistrust, and re-exploitation. For example, a survivor may be eligible for housing but excluded due to perceived risk or lack of local connection. Another may be offered accommodation that is technically available but unsuitable for trauma recovery.

Using this framework helps the chapter look at how policy, practice, and lived experience connect, rather than treating them separately. Survivor testimonies and practitioner insights are mapped onto these dimensions to reveal patterns of exclusion, operational constraints, and opportunities for reform.

26. Australian Red Cross (2021). *Barriers in Accommodating Survivors of Modern Slavery: Working towards Safe, Suitable, and Sustainable Housing*. [barriers-in-accommodating-survivors-of-modern-slavery.pdf](#).

The next sections examine each dimension using survivor stories, practitioner insights, and statutory guidance to show where housing systems fail – and outline practical steps for trauma-informed reform.

## Survivor insights: barriers to safe, suitable, and sustainable housing

Participants with lived experience shared detailed accounts of housing exclusion, institutional mistrust, and systemic failures. Their testimonies reveal how the four dimensions of housing access – availability, accessibility, eligibility, and suitability – intersect to shape recovery and risk. These are not abstract categories; they reflect lived realities of fear, displacement, and resilience.

### Availability: when housing is not offered

Research participants reported that, at the point of referral into the National Referral Mechanism (NRM), most were homeless or living in unsafe environments, including, in some cases, with traffickers. Several were placed in asylum accommodation, settings that are not trauma-informed and often exacerbate psychological distress.<sup>27</sup>

Only two of eleven had any choice between safehouse or outreach support. The remainder were routed into services not according to individual needs or safety but based on administrative categorisation – such as whether they were actively claiming asylum or eligible for housing and welfare support, such as UK nationals. One British national who was not offered a safehouse said:

*“I stayed in a [pre-NRM] safehouse for three months. After that, I had no choice but to declare myself homeless. Because I’m British, I couldn’t move into their [MSVCC] safe house. [...] When I was told I wouldn’t be offered accommodation [in an MSVCC safehouse], the feeling I had that week was just like the day I escaped: it brought all the fear and uncertainty back.”<sup>28</sup>*

Survivors reported being routed into services based on administrative categorisation such as asylum status or immigration conditions, rather than safety or need. This reflects a system more focused on procedural efficiency than survivor wellbeing.

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27. UNHCR and the British Red Cross (2022). [At Risk: Exploitation and the UK asylum system](#).

28. Interview with MSVCC outreach service user, 9 July 2025.

## Accessibility: when housing is out of reach

Survivors described being placed in accommodation far from their communities, support networks, or cultural anchors. This distance weakened their sense of trust and support and increased isolation.

*“It was really hard. I kept thinking, can we move out? But then I remembered how long we’d been homeless, nearly a year. If I said no to this place, would they send us back to a hotel or temporary accommodation? How long would it take to find another home? So, I had to find a way to cope with the new people, the new environment. But my son kept saying, ‘I don’t like this place. I don’t like this area. Mum, your neighbours don’t like us.’”<sup>29</sup>*

Others spoke of being approached by potential exploiters while rough sleeping or in insecure accommodation.<sup>30</sup> These risks were compounded by minimal contact with support workers – one survivor received just two calls over fifteen months,<sup>31</sup> another had no contact after moving to a hotel.<sup>32</sup>

These gaps often reflect systemic issues rather than simple operational oversights. While outreach services aim to provide flexible support, survivors consistently report that fragmented contact undermines continuity of care and recovery.

## Eligibility: when survivors are deemed ineligible

Survivors with access to public funds, typically UK nationals or those with certain immigration statuses, may be deprioritised for MSVCC safehouse accommodation unless a risk or needs assessment identifies specific vulnerability. Asylum seekers, who generally do not have access to public funds, are often placed in asylum accommodation instead.

This practice reflects systemic gaps in recognising survivor vulnerability and rights. Although statutory guidance requires accommodation suitability assessments to safeguard survivors, in practice asylum housing in hotels is often used as the default option for those claiming asylum. This operational approach does not fully reflect the intent of the guidance – to provide safe, appropriate housing that supports recovery.

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29. Interview with MSVCC outreach service user, 11 July 2025.

30. Interviews with MSVCC outreach service user, 22 April 2025 and 15 May 2025.

31. Interview with MSVCC outreach service user, 15 May 2025.

32. Interview with MSVCC outreach service user, 11 July 2025.

## Suitability: when housing feels unsafe

Two survivors who stayed in MSVCC safehouses before moving to outreach described the environment as rigid and disempowering. While communal living and strict rules are common in supported housing, they reported additional barriers to trust and recovery such as unclear placement information and limited autonomy.

Participants also reported that the lack of clear details at referral (i.e. where they would be placed or what to expect) fuelled anxiety and avoidance. One participant chose familiar, though precarious, arrangements over institutional settings they did not trust or understand.

*“I had to leave the safehouse because I was pregnant and it wasn’t suitable for a mother and baby. They moved me to an [asylum] hotel, and I stayed there for a few weeks before having an emergency caesarean. After that, I tried to explain that I couldn’t stay there: the room was small, poorly ventilated, no fridge, no storage, no hot water to sterilise baby items. I was sick and needed someone with me, but the hotel said no one could come upstairs. If someone wanted to help with the baby, it had to be in the lobby, which was loud, busy, and not safe. I couldn’t leave my baby downstairs and go back to rest. It was an incredibly stressful time.”<sup>33</sup>*

This account shows how “suitability” is not a secondary concern, but rather central to safeguarding and recovery.

## Practitioners’ perspectives: operational realities and ethical dilemmas

While survivor experiences offer a vital lens into housing exclusion, they do not stand alone. Practitioners working across statutory and voluntary sectors provided critical insights into how institutional logics, resource constraints, and policy ambiguities shape survivor access. Their perspectives reinforce and contextualise survivor testimony, revealing systemic gaps and ethical dilemmas.

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33. Interview with MSVCC outreach service user, 14 May 2025.



## Availability: when housing is not offered

Practitioners consistently reported that MSVCC safehouse accommodation is often unavailable – not only due to bed shortages in London, but also because survivors are deemed ineligible based on existing housing arrangements or prior entitlements to benefits and housing.

More concerning are exclusions made because survivors are considered a risk to other residents. Survivors with complex needs – such as substance use, suicidal ideation, or prior criminalisation – are sometimes excluded due to concerns about safeguarding. While safeguarding is essential, these exclusions reflect a broader gap in provision: many MSVCC accommodation providers are not equipped to deliver the specialised, trauma-informed support required by some of the most at-risk individuals. This raises difficult questions about who is considered “too complex” for support, and what alternatives are available.

*“It’s unrealistic to expect someone who’s using substances – often as a way to cope with trauma – to just stop because they’ve been placed somewhere. They know that if they disclose their substance use, it might stop them from getting in. That’s a barrier.”<sup>34</sup>*

Local authority housing systems were described as “brutal,” with practitioners referring to rigid eligibility rules, long delays, and inconsistent decisions – often without clear accountability at a national level. Survivors who are eligible for statutory housing are routinely referred to local authorities, yet responses vary widely across regions. Four practitioners highlighted the limited engagement of adult social services<sup>35</sup> and the lack of clarity surrounding local authority responsibilities.

*“The blame always goes back to the MSVCC, but we all have the duty of care. Local authorities don’t understand. They just think, ‘I’ve done my part.’ But local authorities’ duty of care doesn’t end with a referral to the NRM.”<sup>36</sup>*

However, this duty is contested. One local authority practitioner stated:

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34. Interview with practitioner, 27 April 2025

35. Under the Care Act 2014, adult social services may become involved when a survivor’s needs, such as disability, mental health, or safeguarding risks, require care and support that can include suitable accommodation.

36. Interview with practitioner, 5 June 2025.

*“The local authority’s duty ends when a person receives a positive Reasonable Grounds decision.”<sup>37</sup>*

Another clarified that long-term duties do not apply to survivors without access to public funds or priority need status.<sup>38</sup> Even when survivors are formally recognised as homeless and in priority need, they may be denied suitable accommodation due to local connection rules, limited stock, and a lack of consistent approach to statutory duties.

Practitioners described a “ping-pong”<sup>39</sup> between MSVCC providers and local authorities, driven by unclear guidance and overlapping responsibilities. Each assumes the other will provide housing, leaving survivors stuck between systems and unable to secure accommodation.

## Accessibility: when housing is out of reach

Geographic dislocation emerged as a consistent barrier to safe and sustainable housing. Practitioners reported that MSVCC safehouses are frequently located far from London, where most survivors have their communities, cultural anchors, and support networks. This distance was cited as a key reason why some survivors decline placements.

*“We have cases of domestic servitude who are sofa surfing, but they don’t want to go to a safe house because it’s outside of London primarily and they want to be near their community.”<sup>40</sup>*

In addition, local connection remains a significant barrier. Under the Housing Act 1996, local connection is usually established through residence – defined as six months in the past year or three years in the past five years. Survivors who relocate to a safehouse outside London for an extended period may no longer meet these criteria, meaning they could lose their eligibility for housing in their original London borough. In practice, this creates a dilemma: moving for safety can inadvertently sever their local connection and limit future housing options.

Practitioners agreed: housing is central to recovery and current systems must adapt to survivor realities. If housing is not trauma-informed and well-coordinated, it can do more harm than good.

37. Interview with practitioner, 23 April 2025.

38. Interview with practitioner, 25 April 2025.

39. Interview with practitioner, 13 June 2025.

40. Interview with practitioner, 23 April 2025.

This concern was echoed in The Salvation Army's written evidence to the Home Affairs Committee in 2024<sup>41</sup>, which highlighted inconsistencies in local authority responses to survivors seeking housing support. Survivors frequently encounter delays, refusals, or procedural exclusions, particularly due to the absence of a recognised local connection. These barriers are compounded by limited awareness of modern slavery frameworks among housing teams.

## Eligibility: when survivors are deemed ineligible

Practitioners described widespread confusion and inconsistency in how eligibility is interpreted. Survivors with access to public funds or housing entitlements – such as UK nationals and refugee – appear to be excluded from MSVCC safehouse accommodation, even after a positive Reasonable Grounds decision.

*“If you're entitled to housing, you're not destitute. If you're an asylum seeker, you're not destitute. Therefore, you're not offered MSVCC accommodation.”<sup>42</sup>*

This interpretation, often based on the MSVCC Assessing Destitution Guidance, was described as a misapplication of statutory intent. Survivors are denied support not because they are safe, but because they are administratively classified as “not destitute.”

*“MSVCC eligibility criteria doesn't match local authority housing criteria.”<sup>43</sup>*

British nationals were particularly affected. Despite formal entitlements, they often face advocacy battles to secure safehouse placements – or are excluded altogether. Research from the Bakhita Centre for Research on Slavery, Exploitation and Abuse (2022)<sup>44</sup> found that survivors with housing entitlements, such as UK nationals, are often excluded from MSVCC safehouse accommodation on the basis that they are eligible for mainstream housing provision. As a result, British nationals often face a “cycle of closed doors” when seeking support, particularly in relation to housing.

41. The Salvation Army (2024). [Written evidence to the Modern Slavery Act inquiry \(MSA0090\)](#).

42. Interview with practitioner, 9 June 2025.

43. Interview with practitioner, 25 April 2025.

44. Murphy, C. et al. (2022). [Identifying Pathways to Support British Victims of Modern Slavery towards Safety and Recovery: A Scoping Study](#).

*“We supported a British national who’d been exploited for over 30 years. When we contacted the Salvation Army for safehouse accommodation, they refused because he was British. He’d just left an exploitative situation, yet they said it was down to the local authority. It was shocking.”<sup>45</sup>*

*“In the six years I’ve worked in [MSVCC] safehouses, I’ve only seen one English national woman placed – and she didn’t stay long. It just wasn’t the right fit. That’s the only time I’ve known someone with recourse to public funds in our service. We’ve had maybe one or two British nationals in the male service, but it’s really rare. One of them had been through an extremely severe trafficking – maybe that’s what made the difference. But overall, we just don’t see many British nationals come through.”<sup>46</sup>*

These findings highlight a critical gap between statutory entitlements and contractual implementation. Survivors are excluded not because their needs are met, but because systems assume they are someone else’s responsibility.

## Suitability: when housing fails to meet survivor needs

Practitioners echoed survivor concerns about the rigidity of safehouse environments. Communal living, strict rules, and lack of trauma-informed practice were cited as barriers to recovery. The perceived rigidity of safehouse environments, including strict rules and communal living, can feel disempowering or retraumatising.

*“You’re not able to share your address with your friends or family, there is a curfew, there is no social reinsertion. People will choose unsafe options because they’ll have more freedom.”<sup>47</sup>*

For some, the absence of clear information at the point of referral, such as where they will be placed or what to expect, contributes to feelings of anxiety and results in avoidance.

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45. Interview with practitioner, 16 May 2025.

46. Interview with practitioner, 20 June 2025.

47. Interview with practitioner, 25 April 2025.

*“People don’t trust systems they don’t understand.”<sup>48</sup>*

Temporary accommodation in hotels was described as unsuitable, especially for heavily pregnant survivors, particularly in the absence of access to private rented sector or social housing options.<sup>49</sup>

Practitioners engaged in the research called for clearer, trauma-informed criteria for housing assessments. Risk and Needs Assessments were described as incoherent and inconsistent across regions.

*“It’s unclear whether placements are being allocated by need, by risk, or some other priority – and we don’t know how those decisions are being made. It feels arbitrary. There’s no transparent principle guiding who gets access to safe house spaces.*

*That lack of clarity makes it even harder. If there were defined criteria, at least we could manage expectations with clients and prepare accordingly. But as it stands, there’s no consistency.*

*For example, someone who appears to pose minimal risk might be offered a space, while another person – who’s been actively exploited until yesterday and is visibly unsafe – is left without access. It’s deeply frustrating and frankly bizarre.”<sup>50</sup>*

These operational realities point to deeper structural misalignments, particularly in how housing eligibility is interpreted across statutory and contractual frameworks. The next section examines these interpretations in detail, highlighting the tensions between policy intent and implementation.

## Interpretations of housing eligibility

When someone enters the NRM and is destitute, they can get MSVCC accommodation prior to receiving a positive Reasonable Grounds decision. The *MSVCC Assessing Destitution Guidance*<sup>51</sup> explains when emergency housing should be offered. It says MSVCC support is usually not provided before positive Reasonable Grounds decision if the person has access to public funds or local authority housing. It states:

48. Interview with practitioner, 23 April 2025.

49. Interview with practitioner, 18 June 2025.

50. Interview with practitioner, 9 July 2025.

51. Home Office (2024, Version 1.0). [MSVCC+Assessing+Destitution+Guidance.pdf](#).

*“If any of the below circumstances apply, the individual will usually not be considered destitute, or likely to be destitute, and MSVCC support for the purposes of preventing destitution should not be provided.”*

Among these circumstances are:

- *“They have recourse to public funds (for example they are British or have an immigration status which grants recourse to public funds).”*
- *“They have the right to homelessness assistance including emergency and longer-term housing provided by local authorities.”*

However, some service providers have reportedly applied this rule even after a positive Reasonable Grounds decision – when survivors are entitled to MSVCC support. This creates confusion between emergency rules and full entitlements. The *Statutory Guidance* (para 15.14) is clear: survivors without accommodation should be offered MSVCC safe housing after a positive Reasonable Grounds decision.

The observed misapplication of these frameworks highlights a need for clearer alignment between statutory entitlements and contractual implementation to ensure survivors are not excluded from safehouse access due to administrative interpretation. This interpretation of eligibility often results in delays and extensive advocacy to secure MSVCC accommodation.

These issues are connected and compound across the housing journey. The table below summarises the main barriers and gaps.

## **Synthesis table: barriers to safe, suitable, and sustainable housing**

This table consolidates survivor testimonies, practitioner insights, and statutory analysis across the four categories of housing access. It highlights recurring barriers, conflicting interpretations, and systemic misalignments that shape survivor experiences of homelessness, exclusion, and recovery.



Dimension	Definition	Survivor experience	Practitioner insight	Systemic tensions
<b>Availability</b>	Whether housing exists and is offered	Survivors placed in asylum accommodation or left homeless due to lack of safehouse options.  Lack of social supported housing.	MSVCC safehouses often full in London.	Safehouse access shaped by administrative categorisation rather than need.  Councils are not accountable for housing survivors, and there's no oversight at national level.
<b>Accessibility</b>	Whether survivors can reach or use housing	Geographic dislocation from communities and support networks.  MSVCC safehouses not accessible to people with complex needs.	Safehouses often located outside urban centres.  Local connection rules prevent survivors from settling where they received support.	Placement decisions ignore support-network safety and recovery needs.  Local connection rules conflict with survivor realities.
<b>Eligibility</b>	Whether survivors are deemed entitled	UK nationals and asylum seekers excluded from MSVCC accommodation despite homelessness.  Survivors routed into systems that do not recognise their vulnerability.	Eligibility interpreted through <i>Assessing Destitution Guidance</i> even post-RG decision.  Survivors with public funds deemed "not destitute."	Statutory guidance (para 15.14–15.15) misaligned with contractual implementation.  Survivors excluded due to presumed access to other systems, not actual safety.
<b>Suitability</b>	Whether housing meets survivor needs	Safehouses described as rigid, retraumatising.  Home Office asylum accommodation in hotels unsuitable for pregnancy and recovery.  Survivors choose unsafe options over institutional settings.	Communal living, curfews, and lack of trauma-informed practice cited as barriers.  Risk and Needs Assessments inconsistent and unclear.	Suitability not consistently assessed.  Survivors placed in environments that undermine autonomy, safety, and recovery.

Table 2: Synthesis table: barriers to safe, suitable, and sustainable housing

While the synthesis table captures the structural barriers survivors face across housing systems, two cross-cutting issues emerged throughout the research: the lack of consistent, trauma-informed training for frontline professionals, and the absence of coherent data to track housing outcomes. These gaps not only limit the system's ability to respond effectively – they also obscure accountability and prevent meaningful reform. The following sections explore these issues in more detail.

## Absence of evaluation mechanisms for training quality and impact

Although First Responder Organisations, MSVCC support providers and local authorities are required to receive training under the Modern Slavery Act 2015, there is no national system to monitor its quality or impact. Training varies widely across regions and organisations, with no consistent standards or oversights. In many cases, training is designed and commissioned internally, without survivor input, external scrutiny, or alignment with trauma-informed standards.<sup>52</sup>

Without proper oversight, survivors may be misidentified, retraumatised, or denied support. Some participants with lived experience described being disbelieved or redirected by professionals who lacked understanding of modern slavery.<sup>53</sup>

As stated above, practitioners noted that MSVCC staff sometimes lack housing knowledge, while local authorities may not understand modern slavery frameworks. This knowledge gaps lead to delays, miscommunication, and missed opportunities for coordinated care.

While guidance such as *PPN 009 Guidance on Tackling Modern Slavery in Government Supply Chains*<sup>54</sup> outlines procurement standards, there is no equivalent framework for frontline training. The absence of a national evaluation mechanism means that poor practice often goes unchallenged and good practice remains siloed. A national framework for training evaluation could improve survivor outcomes and strengthen statutory compliance.

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52. The Salvation Army (2024). [Written evidence to the Modern Slavery Act inquiry \(MSA0090\)](#)

53. Interview with MSVCC outreach service user, 15 May 2025.

54. Cabinet Office (2025). [PPN 009 Guidance on Tackling Modern Slavery in Government Supply Chains](#).

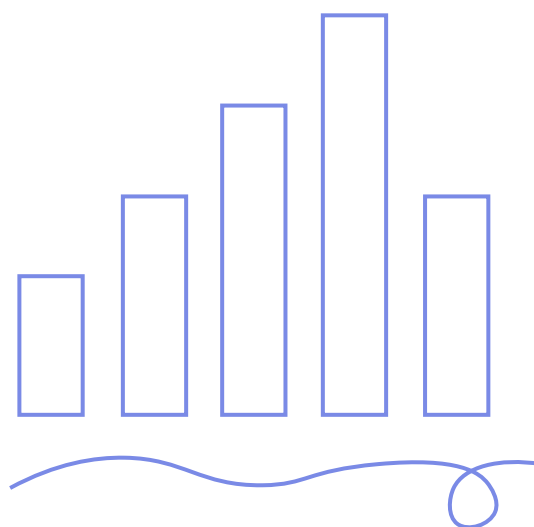
## Data gathering and data sharing

Seven practitioners expressed frustration with the lack of usable data on housing outcomes. The Home Office holds extensive data from initial assessments and post-NRM stages, but, as stated by one practitioner: *“they don’t do anything with it.”*<sup>55</sup>

The shared Client Management System (CMS), which is processed by The Salvation Army and controlled by the Home Office, was criticised for being inaccessible and ineffective.<sup>56</sup> This centralised ownership means that even subcontractors and the main contract holder often lack meaningful access to the data they input. As a result, the system is perceived as opaque and unresponsive, limiting its utility for service improvement, survivor support, or policy evaluation. Other practitioners reported data inaccuracies, which further undermine accountability.<sup>57</sup>

Taken together, these insights highlight the urgent need for a more coherent, trauma-informed, and enhanced housing response. The barriers outlined, from limited availability to statutory ambiguity and unsuitable accommodation, are not isolated challenges but interconnected symptoms of systemic fragmentation. Addressing them requires not only policy reform but a fundamental shift in how housing is understood within the modern slavery recovery journey.

These reflections highlight the need for coordinated survivor-centred housing strategies – explored in the next section.



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55. Interview with practitioner, 18 June 2025.

56. Interviews with practitioners, 12 May and 20 June 2025.

57. Interviews with practitioners, 3 June and 5 June 2025.

# Strategies for improvement

The publication of the *English Devolution White Paper*<sup>58</sup> marks a pivotal moment to reframe how survivor housing is addressed within local modern slavery responses. As decision-making powers transition from central government to newly established Strategic Authorities and elected Mayors, local authorities are poised to gain greater autonomy in shaping housing strategies. This shift presents a critical opportunity to embed trauma-informed, survivor-responsive approaches into locally tailored accommodation pathways – ones that reflect the complexity and urgency of survivors' housing needs.

## Appropriate survivor support

### Modern Slavery Leads/Coordinators in local authorities

To improve consistency, accountability, and survivor-centred practice, each local or regional authority should appoint a designated Modern Slavery Lead or Coordinator. This role would hold strategic responsibility for coordinating modern slavery responses across housing, safeguarding and adult social care, ensuring that survivor voice informs commissioning, service design, and operational decision-making.

Where Modern Slavery Coordinators are already embedded, such as in Coventry City Council and Westminster City Council, evidence shows improved multi-agency coordination, clearer referral pathways, and more consistent statutory compliance. The *Coventry Protocol for Addressing Adult Modern Slavery* (2025)<sup>59</sup> outlines the responsibilities of the council's Modern Slavery Lead, including oversight of survivor pathways, training delivery, and escalation of non-compliance. Practitioners report increased confidence in navigating complex statutory duties and survivors describe greater trust in services that demonstrate coordinated, trauma-informed responses.

This is echoed in the Human Trafficking Foundation's report *Acting Local: The Need for Modern Slavery Coordinators in Local Authorities* (2025)<sup>60</sup>, which documents the transformative impact of these roles. Despite only 9 out of 339 councils having a dedicated Modern Slavery Coordinator, these roles accounted for 18% of all adult NRM referrals in 2023, demonstrating exceptional effectiveness. The report highlights how Modern Slavery Coordinators

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58. Ministry of Housing, Communities and Local Government (2024). [English Devolution White Paper](#) – GOV.UK.

59. Coventry City Council (2025). [Coventry Protocol for Addressing Adult Modern Slavery](#) – Coventry City Council.

60. Human Trafficking Foundation (2025). [Acting Local: The Need for Modern Slavery Coordinators in Local Authorities](#).

improve identification, streamline survivor pathways, and foster multi-agency collaboration, including convening reception centres, coordinating joint enforcement visits, and embedding training across statutory teams. It also highlights the precariousness of these roles, often funded ad hoc and lacking statutory mandate, despite their strategic and operational importance.

Westminster City Council's *Ending Modern Slavery: Our Strategy for a Coordinated Community Response 2021-2026*<sup>61</sup> reinforces the need for local leadership and multi-agency coordination. The strategy sets out a borough-wide vision for ending exploitation through place-based, trauma-informed responses, co-produced with survivors and frontline partners.

Embedding both local and regional leads, supported by statutory guidance and long-term investment, would help resolve persistent issues such as fragmented provision, lack of continuity in care and postcode-dependent access to housing and support. These protocols and reports collectively demonstrate that when leadership is clearly defined and survivor-centred, statutory systems become more responsive, transparent, and ethically grounded.

## The IMSA<sup>®</sup> model

The Independent Modern Slavery Advocate<sup>®</sup> (IMSA<sup>®</sup>) model<sup>62</sup> provides consistent, expert, and independent support across a survivor's journey. Acting as a single point of contact, IMSAs help survivors access services, understand legal processes, and make informed decisions. Crucially, IMSAs are not bound by the limitations of statutory services and can prioritise survivors' needs without conflict of interest.

This initiative is reshaping the UK's response to modern slavery by piloting a national, accredited model of independent advocacy for adult survivors. One that is trauma-informed, person-led, and rooted in lived experience. The IMSA<sup>®</sup> model complements existing services and ensures continuity, especially during transitions between support systems.

Led by Hope for Justice, in collaboration with the British Red Cross, The Snowdrop Project, SOHTIS, and the Bakhita Centre for Research on Slavery, Exploitation and Abuse, the model has been shaped by consultants with lived experience and informed by frontline advocacy.<sup>63</sup> A postgraduate qualification for IMSAs was launched in 2025.<sup>64</sup>

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61. Westminster City Council (2021). [Ending Modern Slavery](#).

62. [Independent Modern Slavery Advocacy: The IMSA Model](#)

63. Hope for Justice (2024). [National-Framework-for-IMSAs-Exec-Summary.-Feb-2024.pdf](#).

64. Hope for Justice (2025). [Independent-Modern-Slavery-Advocacy-Working-Together-For-Lasting-Change.-Briefing-July-2025.pdf](#).

The IMSA<sup>®</sup> model aligns with several key UK policy frameworks such as the *Modern Slavery Statutory Guidance*<sup>65</sup> under Section 49 of the Modern Slavery Act, which emphasises the need for trauma-informed, person-centred support, and multi-agency collaboration. IMSAs directly fulfil this mandate by providing integrated, survivor-led advocacy across systems.

The Modern Slavery and Human Rights Policy and Evidence Centre recommends embedding survivor-informed practice into national strategy and strengthening the legal framework for independent advocacy.<sup>66</sup> The Independent Anti-Slavery Commissioner's Strategic Plan (2024–2026) also calls for the formal recognition of IMSAs to improve long-term outcomes for survivors.<sup>67</sup>

## Enhanced practitioner knowledge

### Slavery and Trafficking Survivor Care Standards

The *Slavery and Trafficking Survivor Care Standards*,<sup>68</sup> widely adopted across the UK since 2015, emphasise that recovery from exploitation requires a holistic, trauma-informed approach. Stable housing is identified as a foundational element of care, enabling survivors to begin addressing psychological trauma in a safe and secure environment. The *Survivor Care Standards* advocate for accommodation that is not only physically safe but also psychologically supportive, recognising that instability can retraumatise survivors and hinder recovery.

The *Survivor Care Standards*, published by the Human Trafficking Foundation were updated in 2018 and in 2025.

### The Modern Slavery Core Outcome Set

The Modern Slavery Core Outcome Set (MS-COS)<sup>69</sup> is a survivor-led, evidence-based framework for improving recovery, wellbeing, and reintegration outcomes. Developed through participatory research, MS-COS identifies seven core outcomes that should underpin the design, delivery, and evaluation of support services. These include secure and suitable housing, safety from traffickers, long-term support, trauma-informed care, access to healthcare and education, and opportunities for self-actualisation.

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65. Home Office (2025, Version 3.12). *Modern Slavery: statutory guidance for England and Wales (under s49 of the Modern Slavery Act 2015) and non-statutory guidance for Scotland and Northern Ireland (accessible version)* - GOV.UK

66. Modern Slavery and Human Rights Policy and Evidence Centre (2023). *UK Government Priorities on Modern Slavery: What Does the Evidence Say?*

67. *The IASC supports the IMSA Model Development Project* | Independent Anti-Slavery Commissioner

68. Human Trafficking Foundation (2018). *Slavery and Trafficking Survivor Care Standards*.

69. *Community of Practice - Community of Practice*

The MS-COS toolkit provides practical descriptors and implementation guidance while its associated Community of Practice brings together survivor leaders, NGOs, statutory agencies, and researchers to embed these outcomes across systems. MS-COS should drive the commissioning and design of housing and support services, ensuring that survivors' needs are met through coordinated, measurable, and ethically grounded approaches.

## Strategic stakeholder training

To strengthen systemic responses, targeted training for strategic stakeholders, including Councillors, Commissioners, Directors of Housing and senior decision-makers, is essential. These individuals shape policy and resource allocation yet often lack clarity on their statutory duties under the *Modern Slavery Statutory Guidance* and the *Homelessness Code of Guidance*.

The *Skills for Care Training Framework on Identification, Care and Support of Victims and Survivors of Modern Slavery and Human Trafficking (2020)*<sup>70</sup> offers a structured, competency-based approach to workforce development, promoting trauma-informed and survivor-centred practice across care settings.

Complementing this, the *Preliminary Training Framework for Local Authorities (2025)*,<sup>71</sup> developed by Middlesex University and the Anti-Trafficking Monitoring Group, provides tailored guidance for councils acting as First Responder Organisations. It outlines the knowledge, skills, and ethical principles required to identify victims, make effective referrals, and uphold statutory responsibilities.

Embedding these frameworks into leadership and frontline training can help prioritise modern slavery within local strategies, improve multi-agency coordination, and unlock resources for more effective housing interventions.

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70. Skill for Care (2020). [Training Framework - Identification, Care and Support of Victims and Survivors of Modern Slavery and Human Trafficking](#).

71. Parsa, S. et al. (2025). [The Development of a Preliminary Training Framework for Local Authorities as Modern Slavery First Responders in England and Wales](#).



## Suitable housing solutions for survivors

### Whole Housing Approach

*The Key Issue: Housing for Survivors of Modern Slavery*<sup>72</sup> from the Human Trafficking Foundation, supported by Commonwealth Housing, explores the critical role of housing in survivor recovery. Drawing on the “Whole Housing Approach” used in domestic abuse services, it recommends adapting similar models for modern slavery.

The Whole Housing Approach offers a coordinated, multi-agency model that integrates housing into the wider recovery and safeguarding process. Key features include:

- Emergency, temporary, and long-term accommodation options tailored to survivor needs.
- Wrap-around support including advocacy, mental health services, and legal aid.
- Survivor involvement in service design and feedback loops.
- Emphasis on stability, safety, and personal agency.

### Integrated housing and homelessness prevention

A 2025 report by The Passage and the Independent Anti-Slavery Commissioner<sup>73</sup> reiterates that housing instability is both a cause and consequence of modern slavery. Effective strategies include:

- Training housing officers to identify and respond to modern slavery.
- Embedding modern slavery risk assessments in homelessness prevention protocols.
- Cross-sector collaboration between local authorities, law enforcement, health services and the third sector.

### Local authority-led innovation

Several UK councils have piloted innovative housing models to better support survivors, particularly during transitions from emergency or asylum accommodation. These models reflect a growing recognition that housing is central to recovery and long-term stability.

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72. Human Trafficking Foundation (2023). [The Key Issue: Housing for Survivors of Modern Slavery](#).

73. Tomás, J. (2025) [Enhancing modern slavery prevention within the homelessness sector in the UK](#).

- Move-on accommodation schemes with flexible tenancies and wraparound support have been implemented by councils responding to the challenges faced by newly recognised refugees and survivors exiting safehouse provision. These schemes often include support with deposits, furniture, and tenancy sustainment, and align with recommendations from the Local Government Association<sup>74</sup> and the NRPF Network<sup>75</sup> on preventing homelessness at the point of transition.
- Housing First models<sup>76</sup>, traditionally used in homelessness services, have been adapted to prioritise stable housing without preconditions. Those models integrate mental health, legal, and advocacy support. The Single Homeless Project delivers Housing First in Islington, Redbridge and East London, offering tailored support to individuals with overlapping vulnerabilities, including those leaving prison or experiencing repeat homelessness.<sup>77</sup> While not exclusively for survivors, these models demonstrate scalable approaches that can be adapted to meet their needs.
- The Trusted Housing Assessors Pilot<sup>78</sup>, coordinated by the Human Trafficking Foundation with The Salvation Army, Hestia, and three London boroughs, demonstrated the value of embedding trained MSVCC support providers within local authority systems to assess housing suitability and submit applications on behalf of survivors. Designed to reduce administrative burdens and avoid re-traumatisation, the pilot improved collaboration and reduced stress for many survivors. However, challenges remained, including uneven case distribution, staff turnover, and restrictive eligibility criteria. The pilot highlighted the potential of intermediary models to enhance survivor access to housing when paired with structured referral pathways and reciprocal training.
- The Local Government Association's *Council Guide to Tackling Modern Slavery*<sup>79</sup> provides practical frameworks for councils to strengthen identification, referral, and support pathways, including housing provision. It encourages multi-agency collaboration and survivor-informed approaches to housing strategy.

These examples highlight the potential for local innovation to fill systemic gaps and offer survivor-centred housing solutions. Scaling such models nationally could significantly improve outcomes for survivors navigating complex housing systems.

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74. Local Government Association (2024). [Moving on from asylum accommodation](#).

75. [Move on | NRPF](#)

76. Housing First is an evidence-based approach to ending homelessness that prioritises immediate access to permanent housing without preconditions such as sobriety or treatment compliance. It is grounded in the belief that stable housing is a human right and a foundation for recovery. The model includes two primary pathways: Permanent Supportive Housing (PSH) for individuals with chronic needs and Rapid Re-Housing (RRH) for those requiring short-term assistance. Key principles include client choice, self-determination and access to voluntary supportive services.

77. [Housing First - Single Homeless Project](#).

78. Human Trafficking Foundation (2025). [Trusted Housing Assessors Pilot in London. Evaluation Report](#).

79. Local Government Association (2022). [Council guide to tackling modern slavery](#).

## Resource allocation

The publication of the *English Devolution White Paper*<sup>80</sup> presents a timely opportunity for local authorities to develop tailored housing strategies that respond to the complex needs of survivors of modern slavery. As decision-making powers shift toward decentralisation, it raises concerns about funding equity and capacity.

While some councils have demonstrated leadership in embedding trauma-informed housing pathways and designating specialist roles, others face significant resource constraints. The absence of ring-fenced funding for modern slavery coordination – whether for statutory roles or strategic initiatives – poses a major barrier to consistent implementation across regions.

Recent analysis from the Institute for Fiscal Studies' *Fair Funding Review*<sup>81</sup> highlights how current funding formulas may disadvantage councils in high-need areas, exacerbating disparities in service provision. In this context, the absence of ring-fenced funding for modern slavery coordination. Without targeted investment, survivor-centred housing responses risk becoming postcode-dependent and contingent on local discretion rather than national obligation.

To address this, national and local funding bodies should prioritise modern slavery within broader housing and homelessness allocations. This includes:

- Sustained funding for Modern Slavery Leads/Coordinators and independent advocacy roles such as IMSAs,
- Investment in training and workforce development across housing, safeguarding, and commissioning teams,
- Support for multi-agency coordination and integrated housing pathways that reflect both statutory duties and survivor recovery needs.

Embedding these priorities into devolved funding frameworks would help ensure that survivor-responsive housing is not an optional add-on, but a core component of local authority strategy, grounded in legal duty, ethical practice, and survivor voice.

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80. Ministry of Housing, Communities and Local Government (2024). [English Devolution White Paper - GOV.UK](#).

81. Ogden, K. and Phillips, D. (2025). [Fair Funding Review 2.0](#).

## Conclusion

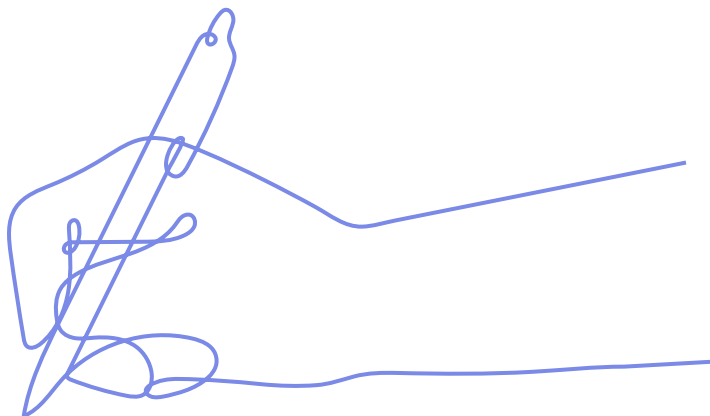
This report has shown the complex and often precarious housing journeys of survivors of modern slavery in England, particularly those receiving outreach-only support under the MSVCC. Drawing on survivor testimony, practitioner insights, and policy analysis, it has revealed systemic gaps in housing provision, statutory ambiguity, and the exclusion of vulnerable individuals from safe, stable accommodation.

The evidence presented confirms what the anti-slavery sector has long known: housing insecurity is not a peripheral issue but a central barrier to recovery, safety, and long-term reintegration. Survivors face hidden homelessness, unsuitable placements and fragmented support systems that fail to respond to their trauma, legal status or lived experience. These challenges are compounded for young adults transitioning out of child services, British nationals navigating statutory blind spots and individuals with complex needs who are routinely excluded from safehouse accommodation.

The findings also highlight the resilience and expertise of survivors, whose insights have shaped the recommendations in this report. Their voices call for a system that recognises their humanity, prioritises their safety and supports their recovery with dignity and care.

To move forward, we must reimagine housing as a core component of modern slavery support, not an afterthought. This requires statutory reform, cross-sector collaboration, and sustained investment in trauma-informed, survivor-led housing pathways.

This report invites policymakers, practitioners and communities to work together toward housing systems that uphold dignity, safety, and justice.



# Recommendations

This section outlines co-produced recommendations to improve housing outcomes for survivors of modern slavery. Developed with individuals with lived experience, practitioners and statutory partners, these proposals respond to systemic gaps identified in the study and reflect longstanding calls from across the anti-slavery sector for trauma-informed housing, clearer statutory duties, and stronger cross-sector collaboration.

## Clarifying statutory duties and housing entitlements

### 1. Shape the amendment of Chapter 25 of the Homelessness Code of Guidance.

Revise Chapter 25 to reflect the unique vulnerabilities of modern slavery survivors who only receive outreach support under the MSVCC. Guidance should include trauma recovery needs, peer support networks, flexibility in local connection criteria and safeguarding integration into housing assessments.

**Rationale:** Survivors receiving outreach support under the MSVCC are often excluded from housing assistance due to unclear eligibility and rigid local connection rules. With the national strategy now committing to amend Chapter 25, this is the moment to ensure survivor-centred pathways are embedded in statutory guidance.

**Policy alignment:** Homelessness Reduction Act 2017; Homelessness Code of Guidance (2024), Chapter 25; National Plan to End Homelessness (2025)

**Responsible entity:** MHCLG

### 2. Clarify the application of the MSVCC Assessing Destitution Guidance to ensure survivors with statutory entitlements are not excluded from safehouse accommodation following a positive Reasonable Grounds decision

Clarify the MSVCC Assessing Destitution Guidance, which states that *“an individual may need MSVCC support solely to prevent destitution at various stages during their NRM journey including, on an emergency basis prior to a Reasonable Grounds (RG) decision, following a negative RG or Conclusive Grounds (CG) decision or following a Public Order or Bad Faith*

*Disqualification.*<sup>82</sup> This guidance should not be routinely applied to individuals with statutory entitlements who have received a positive Reasonable Grounds decision.

To ensure survivors such as UK nationals and refugees are not automatically excluded from MSVCC safehouse accommodation, practice should align with paragraph 15.14 of the Modern Slavery Statutory Guidance: “A victim will enter Modern Slavery Victim Care Contract (MSVCC) accommodation if [...] the victim is destitute at the point of referral to the NRM or does not have accommodation upon entry into MSVCC support following a positive Reasonable Grounds decision.”

**Rationale:** Some survivors supported under MSVCC outreach services remain homeless and destitute due to wrong interpretations of statutory entitlement.

**Policy alignment:** MSVCC Assessing Destitution Guidance (2024); Home Office Action Plan on Modern Slavery (2025), Pillar 3

**Responsible entity:** Home Office Modern Slavery Unit (MSU); MSVCC providers

## Housing suitability and access pathways

### 3. Publish housing status data for survivors

Publish survivor housing status during and after the NRM process. Data should include type of accommodation, duration, suitability, and outcomes. This enables evidence-based policy, service design, and accountability.

**Rationale:** The report highlights that the Home Office holds extensive housing data but does not use it strategically. Survivors remain invisible in housing statistics, especially those in outreach support. Transparent data is essential for reform and resource allocation.

**Policy alignment:** MSPEC (2023), *UK Government Priorities*

**Responsible entities:** Home Office MSU; Office for National Statistics (ONS); MSVCC Providers

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82. [Modern Slavery Victim Care Contract: assessing destitution \(accessible\)](#) – GOV.UK

#### 4. Embed housing suitability assessments into the Modern Slavery Statutory Guidance

Embed housing suitability assessments into the Modern Slavery Statutory Guidance and reference Sections 206 and 210 of the Housing Act 1996. Assessments must consider physical condition and safety of the property, accessibility and adaptations for disability, risk of violence or harassment, proximity to support networks, affordability and impact on employment or education.

**Rationale:** Findings show that survivors are placed in unsuitable housing, including asylum hotels, hostels, and shared accommodation, without proper assessment. Suitability must be defined holistically, recognising the psychological and social dimensions of recovery.

**Policy alignment:** Housing Act 1996, Sections 206 and 210; Homelessness Code of Guidance, Chapter 25

**Responsible entity:** Home Office MSU

#### 5. Introduce “modern slavery” as a recognised category on housing application forms

Add “modern slavery” as a distinct category on housing applications, akin to domestic abuse. This enables survivors to access appropriate support, ensures visibility within statutory systems, and facilitates data collection for service design.

**Rationale:** Although “modern slavery” is a specific entry in H-CLIC<sup>83</sup>, it is framed as support needs and therefore, does not match the Homelessness Code of Guidance criteria. Findings show that survivors of modern slavery are still not recognised within social housing systems, leading to missed entitlements and inadequate support. A formal category in housing applications would improve access, accountability, and strategic planning. This is particularly important for UK nationals and falls into homelessness prevention.

**Policy alignment:** Domestic Abuse Act (2021) precedent

**Responsible entity:** MHCLG

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83. H-CLIC stands for Homelessness Case Level Collection. It is a database on statutory homelessness owned by MHCLG.



## Embedding trauma-informed practice in MSVCC outreach

### 6. Enforce minimum face-to-face contact requirements in MSVCC outreach

Review and reinforce the contractual minimum for in-person communication between support workers and MSVCC outreach service users. Survivors should retain choice over meeting format, but the minimum threshold must be upheld to ensure meaningful engagement, accurate risk assessment, and tailored housing support planning.

**Rationale:** Interviews revealed that remote-only outreach undermines trust, privacy, and trauma-informed care. Some survivors report passing months without speaking with their MSVCC support worker. This was confirmed in practitioner interviews. Face-to-face contact is essential for building relationships and identifying housing needs.

**Policy alignment:** CQC Review (2023), *Services for Survivors*; MSVCC Contractual Requirements

**Responsible entities:** Home Office MSU, MSVCC service providers

### 7. Document safeguarding referrals in MSVCC housing needs assessments

Require MSVCC service providers to routinely record whether a safeguarding referral was made during housing needs assessments. If not, a clear justification or alternative documentation route must be provided. This ensures accountability and protects survivors from systemic neglect.

**Rationale:** Interviews revealed inconsistent safeguarding practices and poor documentation. Survivors with complex needs, including suicidal ideation and substance misuse, may be unsupported due to gaps in referral processes. Documentation is essential for oversight and protection.

**Policy alignment:** MSSG (2025), para 15.21

**Responsible entities:** MSVCC Providers; Home Office MSU

### 8. Standardise survivor-led training for MSVCC support workers

Develop mandatory training modules co-produced with individuals with lived experience, focused on trauma-informed housing support, statutory duties, and survivor-centred practice. Training should be consistent across regions, and it should be managed and monitored by the Home Office Modern Slavery Unit, rather than the Single Competent Authority (that manage MSVCC),

to ensure independent oversight and avoid conflicts of interest in contract delivery and evaluation. Contractual levers (i.e. pre-qualification criteria, performance indicators, contractual clauses, and annual compliance audit) should be used to embed this requirement into provider agreements. Training must be completed before support workers begin working with survivors and refreshed annually.

**Rationale:** Findings show that MSVCC outreach workers often lack housing knowledge and trauma-informed skills. Survivors report poor assessments, inadequate advocacy, and inconsistent support. Survivor-led training ensures relevance, empathy, and accountability.

**Policy alignment:** Parsa et al. (2025), *Training Framework for Local Authorities*; MSPEC (2023), *UK Government Priorities*

**Responsible entities:** Home Office MSU; MSVCC Prime Contractor and Subcontractors

## Infrastructure and strategic coordination

### 9. Scale Modern Slavery Coordinators/Leads nationally

The Passage encourages the government to consider the cost benefit of scaling up the role of Modern Slavery Coordinators/Leads across local or regional authorities to enhance local response to tackling modern slavery. These roles should be embedded to support survivor assessments, facilitate multi-agency collaboration and advocate for trauma-informed housing solutions.

**Rationale:** The study shows that some survivors face a “ping-pong” game between agencies, with no clear housing accountability. Where Coordinators exist, outcomes improve. These roles bridge gaps, build trust, and ensure survivors are not lost in the system. However, we acknowledge that funding is limited, hence this call to the government. This is also supported by the Local Government Association, Human Trafficking Foundation, and the Independent Anti-Slavery Commissioner.

**Policy alignment:** IASC Strategic Plan (2024–2026); English Devolution White Paper (2024)

**Responsible entities:** MHCLG; Home Office MSU

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# Annex 1

## Statutory mapping table: MSVCC outreach service users (Post-RG, Pre-CG)

Survivor profile	Statutory frameworks	Housing entitlement	Observed gaps / risks	Policy levers for reform
UK national, MSVCC outreach service user, rough sleeping	Modern Slavery Statutory Guidance; Homelessness Reduction Act 2017; Housing Act 1996	Eligible for public funds and homelessness assistance	Denied MSVCC safehouse due to perceived statutory access; local authority may not recognise trauma-related vulnerability	Amend MSVCC Assessing Destitution Guidance to prioritise suitability over entitlement; revise Homelessness Code of Guidance, Chapter 25 to include outreach-only survivors
Refugee, MSVCC outreach service user, in asylum hotel	Modern Slavery Statutory Guidance; Immigration Act 1999; Housing Act 1996	Eligible for local authority housing; limited priority need recognition	Placed in unsuitable hotel accommodation; no trauma-informed assessment; risk of re-trafficking	Embed housing suitability assessments in MSSG; revise Chapter 25 to include outreach-only survivors
EU national with pre-settled status, MSVCC outreach service user	Modern Slavery Statutory Guidance; Immigration Rules	Limited access to public funds; must prove continuous employment	Excluded from housing registers; risk of hidden homelessness; not offered MSVCC accommodation	Introduce "modern slavery" category on housing forms; clarify MSVCC safehouse eligibility criteria
Survivor with suicidal ideation, MSVCC outreach service user in asylum accommodation	Modern Slavery Statutory Guidance; Care Act 2014; CQC Standards	May qualify for adult social care; often excluded from safehouse	Deemed "too risky" for MSVCC accommodation; safeguarding referral not documented	Embed safeguarding referrals in housing assessments; enforce trauma-informed standards
Pregnant survivor, MSVCC outreach service user in hostel	Modern Slavery Statutory Guidance; Housing Act 1996; Homelessness Reduction Act 2017	May qualify for priority need; eligible for public funds	Placed in unsuitable shared accommodation; no access to specialist housing	Revise MSSG and Chapter 25 to mandate suitability standards; fund specialist housing pathways
British national, MSVCC outreach service user, sofa-surfing	Modern Slavery Statutory Guidance; Housing Act 1996; ONS Hidden Homelessness Review	Eligible for housing assistance; may not meet priority need	Hidden homelessness not recognised; excluded from MSVCC accommodation	Amend MSSG to include hidden homelessness



## Annex 2

### Categorised matrix: survivor housing recommendations

To support implementation and policy alignment, the following matrix clusters the recommendations thematically and maps responsible entities, statutory levers, and indicative timelines. This structure is designed to aid statutory partners in prioritising reforms and coordinating cross-sector responses.

#### Clarifying statutory duties and housing entitlements

Recommendation	Policy lever	Responsible entity	Timeline
Revise Chapter 25 of the Homelessness Code of Guidance to reflect survivor vulnerabilities	Homelessness Code of Guidance, Chapter 25	MHCLG	<b>Short-Term</b>
Clarify the application of the MSVCC Assessing Destitution Guidance to ensure survivors with statutory entitlements are not excluded from safehouse accommodation following a positive Reasonable Grounds decision	MSVCC Assessing Destitution Guidance; Modern Slavery Statutory Guidance	Home Office MSU	<b>Short-Term</b>

#### Housing suitability and access pathways

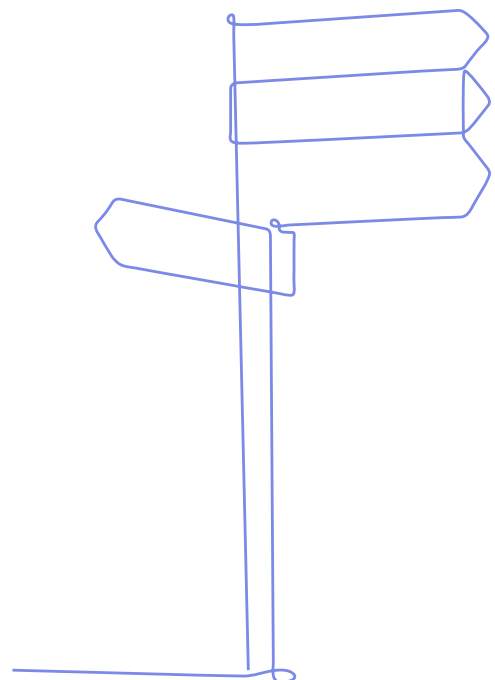
Recommendation	Policy lever	Responsible entity	Timeline
Publish housing status data for survivors during and after NRM	MSPEC (2023); UK Government Priorities	Home Office MSU, ONS, MSVCC Providers	<b>Medium-Term</b>
Embed housing suitability assessments into the Modern Slavery Statutory Guidance referencing Housing Act 1996	Modern Slavery Statutory Guidance; Housing Act 1996, Sections 206 & 210	Home Office MSU	<b>Short-Term</b>
Introduce “modern slavery” as a recognised category on housing application forms	Domestic Abuse Act (2021) precedent	MHCLG	<b>Medium-Term</b>

## Embedding trauma-informed practice in MSVCC outreach

Recommendation	Policy lever	Responsible entity	Timeline
Enforce minimum face-to-face contact requirements in MSVCC outreach	MSVCC Contractual Requirements; CQC Review (2023)	Home Office MSU, MSVCC Providers	<b>Short-Term</b>
Document safeguarding referrals in MSVCC housing needs assessments	MSSG (2025), para 15.21	MSVCC Providers, Home Office MSU	<b>Short-Term</b>
Standardise and monitor survivor-led training for MSVCC support workers	Parsa et al. (2025); MSPEC (2023)	Home Office MSU, MSVCC Prime Contractor & Subcontractors	<b>Medium-Term</b>

## Infrastructure and strategic coordination

Recommendation	Policy lever	Responsible entity	Timeline
Encourage the government to scale Modern Slavery Coordinators/Leads nationally	HTF (2025) IASC Strategic Plan (2024-2026); English Devolution White Paper (2024)	MHCLG, Home Office MSU	<b>Long-Term</b>



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