

**Policy brief:**

# Reframing support: housing and safeguarding for survivors of modern slavery outside formal identification

Improving outcomes for survivors who decline the NRM

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Modern Slavery PEC Policy Brief 2026-1

This policy brief seeks to address the barriers to housing for those who do not enter the NRM and recommends potential reforms on addressing this gap. This brief is a supplement to the research project 'Navigating homelessness: challenges faced by people with lived experience of modern slavery' conducted by The Passage, and co-commissioned with the Modern Slavery and Human Rights Policy and Evidence Centre (Modern Slavery PEC) at the University of Oxford.

The initial scope of the project included a cohort of non-NRM participants but was quickly separated due to the volume of information generated. As a result, this supplementary briefing was created alongside the final project report and research summary to capture these findings, dedicating a separate piece to these individuals who are so often overlooked.

While this briefing was supported by colleagues at The Modern Slavery PEC, the views of this briefing are those of the authors and not necessarily of the funders.

## About The Passage

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

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, providing practical support and a wide range of services to help transform the lives of people who are experiencing or at risk of homelessness.

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

We run a modern Resource Centre in Victoria, five accommodation projects, outreach and health services, homelessness prevention schemes and a pioneering modern slavery referral programme.

The mission of The Passage is three-fold:

- Preventing homelessness by intervening quickly before people reach crisis point.
- Ending street homelessness by providing innovative and tailor-made services that act with both compassion and urgency.
- Advocating for, and with those who feel they are not heard by amplifying their voice to bring about real systemic change.

Our Patron is Cardinal Vincent Nichols and our Royal Patron is HRH The Prince of Wales.

## About the Modern Slavery and Human Rights Policy and Evidence Centre

The Modern Slavery and Human Rights Policy and Evidence Centre is hosted by the Humanities Division at the University of Oxford. The Centre is a consortium of three universities consisting of the Wilberforce Institute at the University of Hull, the University of Liverpool, and the Bonavero Institute of Human Rights at the University of Oxford, and in partnership with the Bingham Centre for the Rule of Law (part of the British Institute of International and Comparative Law (BIICL)). The PEC is funded by the Arts and Humanities Research Council on behalf of UK Research and Innovation. The Centre was established to enhance understanding of modern slavery and improve the effectiveness of laws and policies designed to address it. It commissions and co-produces high-quality, policy-relevant research and works collaboratively with academics, policymakers, civil society, businesses, and individuals affected by modern slavery. Its work is grounded in a human rights-based approach and focuses on four core areas: prevention, victim and survivor support, product supply chains, and legal enforcement measures.

## Summary

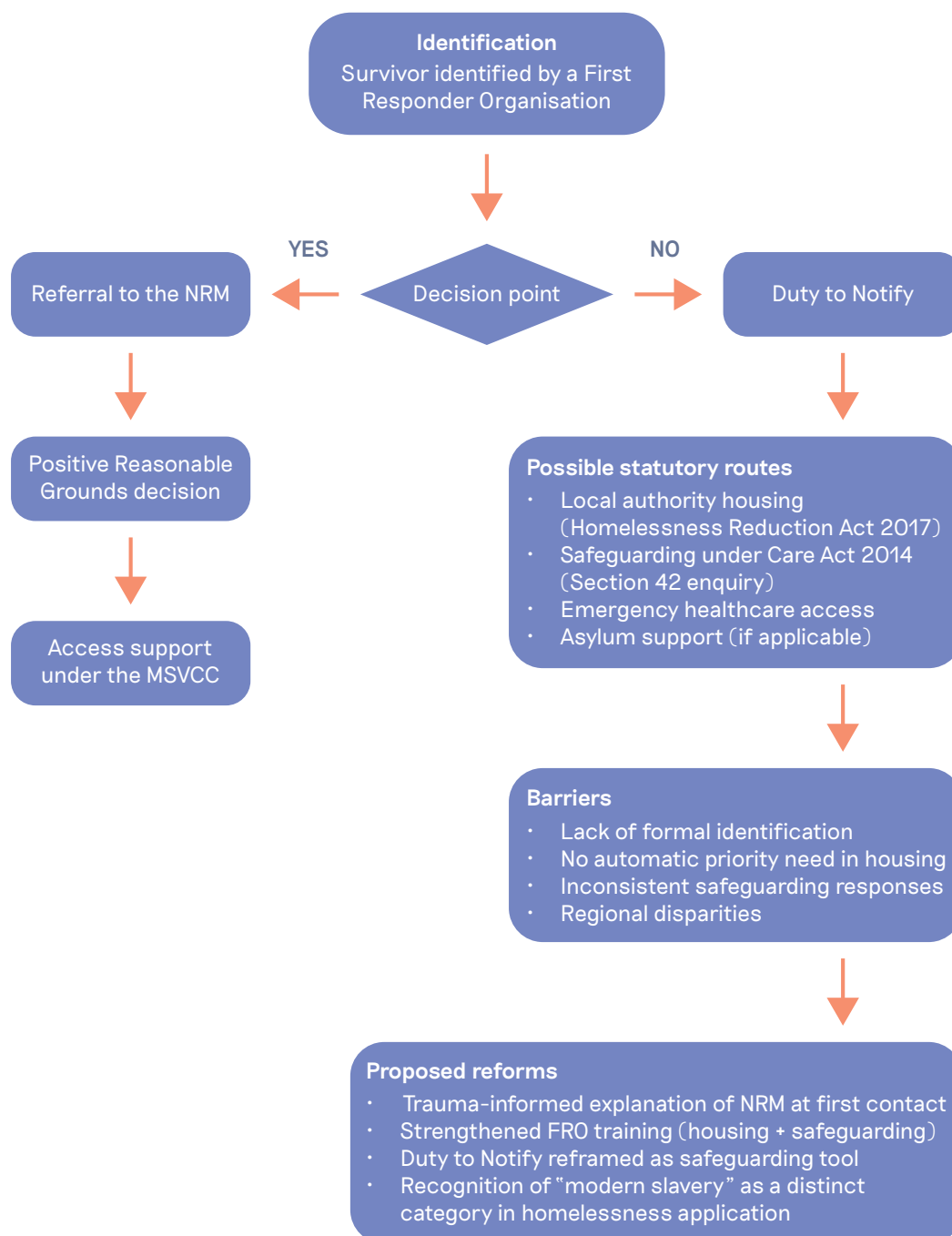
A significant number of people with lived experience of modern slavery identified by First Responder Organisations (FRO) decline entry into the National Referral Mechanism (NRM) – the UK system to identify and support survivors of modern slavery. While this does not preclude access to statutory housing or safeguarding in law, in practice, survivors who remain outside the NRM often face systemic barriers to support. These include lack of formal identification and limited recognition of modern slavery within housing frameworks.

This briefing outlines four targeted reforms to address these gaps:

1. Ensure trauma-informed, consistent explanations of the NRM at first contact.
2. Strengthen First Responder Organisations' training with a focus on trauma.
3. Reform the Duty to Notify to function as a safeguarding and service design tool.
4. Recognise modern slavery as a distinct category in homelessness applications.

These recommendations aim to improve survivor outcomes, reduce the risk of re-trafficking, and ensure that all survivors – regardless of NRM status – are treated as rights-holders within statutory systems.

### Flowchart: survivor pathways outside the NRM



## Who are non-NRM survivors?

Non-NRM survivors are individuals identified by First Responder Organisations (FROs) as potential victims of modern slavery who decline entry into the National Referral Mechanism (NRM). This includes British nationals and migrants, with or without recourse to public funds, who may opt out due to mistrust, trauma, or misalignment with immediate needs. While legally entitled to safeguarding and housing support, they often face systemic barriers, i.e. lack of formal identification, statutory invisibility, and limited access to safe accommodation. Without structured support under the Modern Slavery Victim Care Contract (MSVCC), they rely on fragmented local responses. Addressing these gaps is essential to ensure equitable recovery for all survivors.

## Context and evidence

A significant proportion of individuals identified as potential victims of modern slavery do not enter the National Referral Mechanism (NRM). Data from The Passage's Modern Slavery Service indicates that 34% of survivors supported between 2018 and 2024 declined entry into the NRM, despite many experiencing homelessness or housing instability at the point of identification.<sup>1</sup> Their reasons for declining the NRM are complex and often rooted in previous negative experiences with statutory systems, including criminalisation, institutional neglect, and a lack of trust in authorities.<sup>2</sup> For some, the NRM is perceived as complex, difficult to navigate, or misaligned with their immediate needs for safety and stability.<sup>3</sup>

*“What’s the point of the NRM? What is the point of a positive conclusive decision? [...] The [NRM] system is not here for us, but only for them. You’re just a number.”<sup>4</sup>*

The Duty to Notify (DtN), introduced in 2016 by the Modern Slavery Act 2015, requires First Responder Organisations (FROs) in England and Wales to report any suspected adult victim of modern slavery to the Home Office. Entry into the NRM is voluntary for adults and requires informed consent. For those who do not consent, the DtN is submitted via the online Modern Slavery Portal and must remain anonymous unless the individual explicitly agrees to share their personal details. Only those who enter the NRM are eligible for support under the MSVCC. However, individuals who do not enter may still be eligible for other forms of support, including local authority housing (where eligible), asylum support, emergency healthcare, or safeguarding interventions under the Care Act 2014.

The primary aim of the DtN is to improve data collection on modern slavery, enhance understanding of its scale, and inform the development of more effective responses. In 2024, the Home Office recorded 19,125 NRM referrals and 5,598 DtN notifications for individuals who did not consent to enter.<sup>5</sup> This growing cohort reflects a range of barriers to engagement. Research highlights that fear of traffickers, concerns for family safety, distrust of authorities, immigration-related fears, and economic dependence on exploiters can all deter individuals from entering the NRM.<sup>6</sup> Psychological trauma and unclear or incomplete information provided by FROs<sup>7</sup> may also prevent informed decision-making. These challenges highlight the need for clearer communication at first contact and a more coordinated safeguarding response for those who remain outside the NRM.

While the DtN was designed to bridge the gap between estimated and identified victims, and to inform law enforcement responses, it is not designed to trigger safeguarding or support services. As a result, survivors who decline the NRM remain largely invisible in statutory frameworks, despite being known to frontline services.

## British survivors of modern slavery

Research by The Passage shows that 63% of British survivors identified by The Passage Modern Slavery Service refuse to enter the NRM and express deep mistrust in statutory systems.<sup>8</sup> This mistrust is often rooted in prior harm and repeated safeguarding failures.

Unlike non-British nationals, British survivors are not eligible for asylum support or immigration-based protections. They often face housing insecurity, especially when exiting exploitative situations without formal identification. Many are young adults who have aged out of care, been excluded from education, or experienced cycles of rough sleeping and incarceration. Without coordinated safeguarding responses, they are often excluded from local authority housing duties, even when known to frontline services.<sup>9</sup>

British survivors are frequently rendered invisible within existing support frameworks and face significant regional disparities when seeking housing or recovery support outside the NRM. A national strategy is urgently needed to address their specific needs, including access to trauma-informed accommodation and coordinated multi-agency responses.<sup>10</sup>

The lack of a statutory safety net for British survivors outside the NRM reveals a critical gap in the UK's safeguarding framework. It also undermines the principle of non-discrimination in victim support. Survivor-informed practice must recognise the specific vulnerabilities of British nationals and ensure that housing and safeguarding responses are not contingent on immigration status or NRM consent.

*“Support shouldn’t be centred solely around asylum. That’s a separate issue. What’s needed is an equitable system that recognises and addresses the specific needs of all survivors, regardless of nationality. Services talk about being ‘person-centred’, but in practice, it doesn’t work. If you’re a white British person, it often feels like you’re left out. It just needs to be fair.”<sup>11</sup>*

## Housing and safeguarding duties for survivors outside the NRM

Access to housing and safeguarding support is not contingent on entry into the NRM. Survivors – whether British nationals or migrants, with or without recourse to public funds – may be eligible for statutory assistance based on their individual circumstances. However, in practice, those outside the NRM face significant barriers, including lack of formal identification, statutory invisibility, and inconsistent local responses. Local authorities have legal duties toward all survivors of modern slavery, regardless of NRM status. These include:

- **Safeguarding under the Care Act 2014**

Local authorities must consider initiating a Section 42 enquiry where an adult with care and support needs is at risk of abuse or neglect. This applies even if the individual has declined the NRM. However, being a victim of modern slavery alone does not guarantee access to housing or support under the Care Act.

- **Homelessness duties under the Homelessness Reduction Act 2017**

Survivors experiencing or at risk of homelessness should be assessed under Part 7 of the Housing Act 1996. A refusal to enter the NRM does not negate entitlement to housing assistance.

- **Referral to Adult Safeguarding Services**

First Responder Organisations (FROs) and frontline professionals should refer survivors to safeguarding teams where there is concern about exploitation, trauma, or vulnerability. This may trigger multi-agency responses and emergency accommodation.

- **Consideration of “Priority Need”**

Modern slavery is not currently recognised as a category for automatic priority need in housing legislation. Unlike survivors of domestic abuse, confirmed victims of modern slavery must rely on discretionary assessments of vulnerability, trauma, and risk of re-trafficking. This gap is even more pronounced for individuals who decline entry into the NRM, as they lack formal identification and are therefore at heightened risk of exclusion from housing support despite clear safeguarding needs.

- **No Recourse to Public Funds (NRPF)**

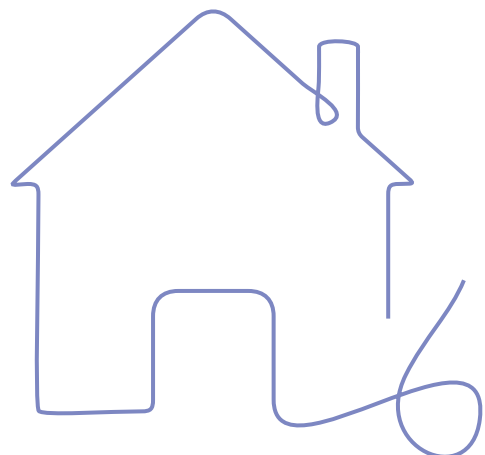
Survivors with NRPF are generally ineligible for social housing unless they qualify under the Care Act. Local authorities must assess eligibility and consider emergency options, including Section 17 of the Children Act 1989 (if children are involved) or discretionary housing support.

Even for survivors who meet eligibility criteria – such as British nationals – barriers persist. Victim status under the NRM does not confer automatic housing rights, and many survivors face prolonged homelessness or unsafe placements. Recognising modern slavery within housing systems and aligning statutory duties with survivor needs is essential to prevent re-trafficking and support recovery.

## Conclusion

This briefing has identified a series of statutory and procedural gaps affecting survivors of modern slavery who do not enter the NRM. While some forms of support may be available in principle, in practice, access to housing and safeguarding remains inconsistent and often inadequate. Survivors without formal identification, particularly those with prior negative experiences of state systems, frequently encounter barriers that hinder recovery and increase the risk of re-trafficking.

The proposed recommendations aim to improve clarity at the point of identification, strengthen trauma-informed practice, and ensure that survivors are not excluded from essential services due to procedural limitations. Aligning housing and safeguarding responses with survivor needs and statutory duties may contribute to more equitable and effective outcomes across the system.



## Recommendations

### 1. Clarify the purpose and benefits of the NRM at first contact

Survivors must receive clear, trauma-informed explanations of the NRM at the point of identification. This includes outlining their rights, available protections, and the implications of entering the NRM, such as access to safe housing, legal aid, and support services. Materials should be co-designed with survivors and delivered consistently across agencies. This addresses widespread confusion and mistrust, particularly among British nationals, and ensures informed consent.

### 2. Strengthen trauma-informed training for First Responder Organisations

All professionals completing NRM referrals should undergo mandatory, survivor-informed training that includes housing pathways and safeguarding responsibilities. Training should be accessible (e.g. online and in-person), accredited, and refreshed annually. This will improve the quality of referrals, reduce inappropriate housing placements, and ensure First Responders are equipped to recognise trauma and advocate effectively.

### 3. Reform and strategically apply the Duty to Notify (DtN)

The DtN should be redefined as a safeguarding and service design tool – not just a data collection mechanism. It should be separated from the NRM referral form, use standardised fields, and follow ethical consent protocols. Reforming the DtN as a safeguarding and service design tool must be accompanied by robust ethical safeguards. Survivors who decline the NRM often do so due to trauma, fear, or mistrust, and any data collection must respect their autonomy and privacy. Survivor-led protocols should be developed to ensure informed consent, transparency about data use, and the right to anonymity. These protocols must be embedded in frontline practice and supported by trauma-informed training. Ethical reform of the DtN can enhance visibility without compromising trust and ensure that survivors remain active agents in decisions about their support and recovery.<sup>12</sup>



## 4. Recognise “modern slavery” in homelessness applications

Modern slavery should be recognised as a distinct category on homeless application forms, following the precedent set by the Domestic Abuse Act 2021, which established domestic abuse survivors as having automatic priority need for homelessness assistance. This reform enabled clearer identification, improved access to safe accommodation, and enhanced data collection through the H-CLIC system (Housing Client Information Classification), which includes “support needs” categories. Currently, survivors of modern slavery are not explicitly recognised in housing legislation, resulting in missed entitlements and invisibility in local authority data. Introducing “modern slavery” as a formal category would:

- Enable survivors to be flagged for appropriate safeguarding and housing support, including those identified through the DtN who decline entry into the NRM, ensuring that recognition is not contingent on formal NRM status;
- Improve consistency in local authority responses and reduce regional disparities by providing a clear statutory marker for all survivors, whether or not they have entered the NRM;
- Support strategic commissioning and service design by making survivor needs visible, capturing data on both NRM and Non-NRM cohorts;
- Align housing systems with the UK’s victim protection obligations under the Modern Slavery Act 2015 and Care Act 2014, ensuring that safeguarding duties extend equitably to all survivors.

This change is particularly important for British nationals, who are often excluded from immigration-linked support and face prolonged homelessness without formal recognition. It would also help prevent re-trafficking by ensuring survivors are not placed in unsafe or unsuitable accommodation.

## Policy recommendations matrix: housing and safeguarding for Non-NRM survivors

Recommendation	Rationale	Policy alignment	Responsible entities	Implementation considerations
Clarify the purpose and benefits of the NRM at first contact	Survivors often enter or decline the NRM without understanding its implications, leading to mistrust and disengagement.	Modern Slavery Statutory Guidance (2025), Section 5.4 Home Office Duty to Notify Regulations (2015)	Home Office Modern Slavery Unit (MSU) First Responder Organisations (FROs)	Monitor consistency across FROs Embed in statutory guidance and training
Strengthen trauma-informed training for First Responder Organisations	Inconsistent referral quality and lack of housing knowledge among FROs leads to poor safeguarding and housing outcomes.	Parsa et al. (2025). <i>Preliminary Training Framework</i> <sup>13</sup>	Home Office MSU Anti-Slavery Partnerships Local Authorities	National rollout with accreditation Monitor uptake and quality
Reform and strategically apply the Duty to Notify (DtN)	DtN is underused and poorly understood. Survivors who decline the NRM are often lost to follow-up, and data is inconsistently recorded.	Modern Slavery Act 2015, Section 52	Home Office MSU	Fund data infrastructure Survivor-led consent protocols Integrate into strategic planning and commissioning
Introduce "Modern Slavery" as a recognised category on homelessness application forms	Survivors are not recognised in housing systems, leading to missed entitlements. A formal category would improve access, visibility, and data.	Domestic Abuse Act (2021) precedent H-CLIC (support needs category)	MHCLG	Amend homeless application systems Align with Homelessness Code of Guidance

## Endnotes

1. The Passage (2024). [Modern Slavery Service Five Year Report](#).
2. Modern Slavery and Human Rights Policy and Evidence Centre (2023). *Thousands of potential survivors of modern slavery choose not to be considered for formal identification and support*. British Institute for International and Comparative Law & Human Trafficking Foundation. [Identification-full-report.pdf](#).
3. Independent Anti-Slavery Commissioner (2025). *Refusal to Consent: Factors Influencing the Uptake of Modern Slavery Support under the National Referral Mechanism*. Rights Lab, University of Nottingham. [REFUSAL TO CONSENT](#).
4. Person with lived experience of modern slavery and homelessness. Interview, 15 May 2025.
5. Home Office (2024). [Annex: An analysis of NRM referrals and DtN reports for potential victims of modern slavery, 2023 to 2024 - GOV.UK](#)
6. Independent Anti-Slavery Commissioner (2025). *Refusal to Consent*, op. cit.
7. The Passage (2025). Unpublished internal data on NRM referrals.
8. The Passage (2018-2024). [Modern Slavery Service Annual Reports](#).
9. Tomás, J. (2025). *Enhancing Modern Slavery Prevention in the Homelessness Sector*. The Passage and the Independent Anti-Slavery Commissioner. [Enhancing modern slavery prevention within the homelessness sector in the UK](#).
10. Murphy, C. et al. (2022). *Identifying Pathways to Support British Victims of Modern Slavery towards Safety and Recovery: A Scoping Study*. St Mary's University, Bakhita Centre for Research on Slavery, Exploitation and Abuse. [bakhita-centre-modern-slavery-report-august-2022](#).
11. Person with lived experience of modern slavery. Interview, 5 June 2025.
12. Home Office (2016), Duty to Notify Guidance: Section 52 of the Modern Slavery Act 2015 – confirms that DtN notifications should be accompanied by safeguarding processes, providing a statutory precedent for reframing DtN as a safeguarding tool. Independent Anti-Slavery Commissioner (2025), *Refusal to Consent: Factors Influencing Uptake of Modern Slavery Support under the NRM* – highlights trauma and mistrust as key reasons for declining the NRM, reinforcing the need for survivor-led consent protocols. Modern Slavery and Human Rights Policy and Evidence Centre (2023), *Thousands of potential survivors of modern slavery choose not to be considered for formal identification and support* – demonstrates the scale of non-NRM survivors and the importance of using DtN data for service design rather than statistical reporting alone.
13. Parsa, S. et al. (2025). *The Development of a Preliminary Training Framework for Local Authorities as Modern Slavery First Responders in England and Wales*. Middlesex University and the Anti-Trafficking Monitoring Group. [Preliminary-training-framework-for-LAs-as-modern-slavery-first-responders\\_May-2025.pdf](#).

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. The Centre funds and co-produces high quality research with a focus on policy impact, and brings together academics, policymakers, businesses, civil society and survivors to collaborate on solving this global challenge.

The Centre is a consortium of three Universities of Oxford, Liverpool and Hull, and is funded by the Arts and Humanities Research Council (AHRC) on behalf of UK Research and Innovation (UKRI).

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