

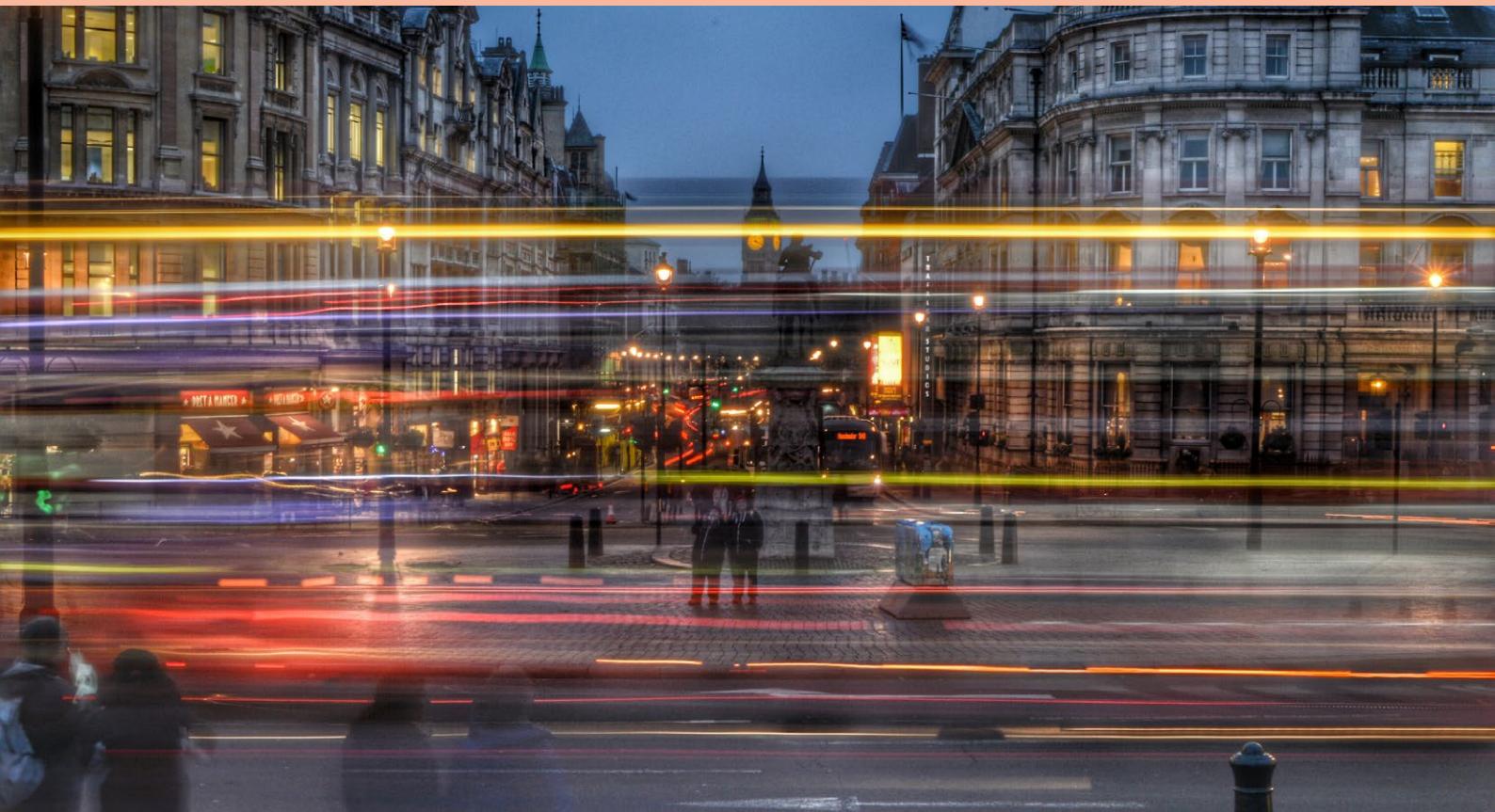
# Navigating homelessness

## Housing challenges faced by survivors of modern slavery

Research summary

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Research by:

This is the summary of the report *Navigating Homelessness: Housing Challenges faced by Survivors of Modern Slavery*, a research project conducted by The Passage in partnership with the Modern Slavery and Human Rights Policy and Evidence Centre (Modern Slavery PEC) led by the University of Oxford. The project was co-funded by The Passage and Modern Slavery PEC. The full report can be accessed on [https://files.modernslaverypec.org/production/assets/downloads/MSPEC\\_homelessness\\_Full-Report.pdf?dm=1768843451](https://files.modernslaverypec.org/production/assets/downloads/MSPEC_homelessness_Full-Report.pdf?dm=1768843451)

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We extend our deepest gratitude to the participants with lived experience of modern slavery. Their insights, courage and generosity have shaped every aspect of this work. By grounding the findings in real-world experiences, they have ensured that the recommendations reflect the urgent need for survivor-informed responses.

We also thank all survey respondents for their time and thoughtful contributions, which have strengthened the evidence base and informed the direction of this report.

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Anti-Slavery Initiative Oxford (ASIOX), Anti-Slavery International, ATLEU, Black Country Women's Aid, Caritas Bakhita House, Causeway, Coventry City Council, Ella's, Helen Bamber Foundation, Hestia, Home Office Modern Slavery Unit, Hope at Home, Hope for Justice, Human Trafficking Foundation, Humber Anti-Slavery Partnership, Independent Anti-Slavery Commissioner's Office, Justice and Care, Latin American Women's Rights Service (LAWRS), Local Government Association, London Borough of Bexley, London Borough of Hammersmith and Fulham, Medaille Trust, Migrant Help, Ministry of Housing, Communities and Local Government, Palm Cove Society, Porchlight, Rebuild East Midlands, Royal Boroughs of Kensington and Chelsea, Snowdrop Project, Southwark Against Modern Slavery, Southwark Council, St John of God Hospitallers Service, St Mungo's, The Passage Modern Slavery Service, The Salvation Army, Trafficking Awareness Raising Alliance (TARA) and their Lived Experience Panel (TAG), Unseen, Victim Support, West Midlands Anti-Slavery Network and their Lived Experience Panel (VOICE), and Westminster City Council.

# Key findings

1. **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.
2. **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.
3. **Survivors with complex needs may face restrictions when accessing MSVCC safehouse accommodation.** These individuals are often among the most vulnerable yet may be assessed as presenting too high risk for placement.
4. **Local authority responses are inconsistent and fragmented.** Survivors are frequently caught in a “ping-pong” between councils and MSVCC providers.
5. **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.
6. **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.
7. **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.
8. **Survivors are experts in their own recovery.** Participants called for person-centred support, greater transparency, and recognition of their specific needs, distinct from those of asylum seekers or general homelessness populations.

# Key recommendations

1. **Shape the amendment of Chapter 25 of the Homelessness Code of Guidance.** This should reflect the unique vulnerabilities of modern slavery survivors who only receive outreach support under the MSVCC.
2. **Clarify the application of the MSVCC Assessing Destitution Guidance.** This would ensure survivors with statutory entitlements are not excluded from safehouse accommodation following a positive Reasonable Grounds decision.
3. **Publish housing status data for survivors,** to help enable evidence-based policy, service design and accountability.
4. **Embed housing suitability assessments into the Modern Slavery Statutory Guidance.** 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.
5. **Introduce “modern slavery” as a recognised category on housing application forms.** 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.
6. **Enforce minimum face-to-face contact requirements in MSVCC outreach.** Survivors should retain choice over meeting format, but a minimum threshold must be upheld to ensure meaningful engagement, accurate risk assessment and tailored housing support planning.
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.
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.
9. **Scale Modern Slavery Coordinators/Leads nationally.** These roles should be embedded to support survivor assessments, facilitate multi-agency collaboration and advocate for trauma-informed housing solutions.

# Background

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 face significant barriers to accessing safe and stable housing. These barriers are often exacerbated by statutory systems intended to support them, and despite policy advancements, many survivors remain at risk of homelessness, which can severely hinder recovery and reintegration into society.

Reports from The Passage<sup>1</sup> have shown 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>2</sup> Current policy frameworks often assume linear recovery trajectories and stable accommodation options that do not exist in practice. Survivors are expected to navigate bureaucratic systems with little support, while facing trauma, stigma, and ongoing risk.

This research was commissioned to examine the structural and procedural housing barriers that leave survivors at risk of homelessness or indeed street homeless, despite their entitlements under the Modern Slavery Victim Care Contract (MSVCC) and broader statutory frameworks. The study responds to evidence that some survivors (for example, UK nationals and individuals with newly granted refugee status) are routinely excluded from MSVCC safehouse accommodation due to their housing entitlements, while others (e.g., asylum seekers) are accommodated in unsuitable Home Office asylum hotels. Data was gathered from people with lived experience, frontline practitioners, and local authorities who shared insights on housing availability, accessibility, and survivor eligibility.

This report explores the housing challenges faced by survivors of modern slavery who only receive outreach support under the MSVCC, with particular focus on the structural, legal, and practical barriers that contribute to housing insecurity. This report offers further evidence, survivor-led analysis and policy-mapped recommendations that aim to shape the policy landscape at both national and local levels.

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

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

# Methodology

This research adopts a systems-level lens, mapping statutory levers, identifying procedural gaps and proposing actionable recommendations. To do this, it employed a mixed-methods approach, combining qualitative and quantitative data collection with participatory and trauma-informed principles. Data was drawn from cross-sector evidence, including data from statutory bodies, practitioner insight and survivor testimony, to build a comprehensive picture of housing precarity within the modern slavery support landscape.

Central to this research is the testimony of people with lived experience. Through interviews, participants who have or are still receiving outreach support under the MSVCC described repeated displacement, unsuitable housing conditions and the psychological toll of being permanently at risk of homelessness. Their insights challenge assumptions embedded in policy and highlight the need for survivor-informed systemic change.

The research combined a desk-based evidence review of current literature, policy documents on statutory and contractual guidance, with new empirical research. To support thematic analysis and policy interpretation, the study drew on the Australian Red Cross's four-part housing access framework:

1. Availability,
2. Accessibility,
3. Eligibility, and
4. Suitability.<sup>3</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.

Empirical research required a combination of a survey distributed to Anti-Slavery networks in England and Wales through the Human Trafficking Foundation, a workgroup convened with Anti-Slavery Coordinators to review survey findings, and semi-structured interviews (38) conducted with survivors (11), MSVCC outreach service providers (9), Modern Slavery Coordinators or Leads (5), and non-government organisations (12). Ethics was submitted to and approved by the Social Sciences & Humanities Interdivisional Research Ethics Committee (SSH IDREC) at the University of Oxford (1087629) in light of the Modern Slavery PEC's active support of the project and the involvement of team members.

3. 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](https://www.redcross.org.au/-/media/assets/red-cross/our-work/advocacy-and-research/reports-and-research/barriers-in-accommodating-survivors-of-modern-slavery.pdf).

Participants were recruited through survivor-led organisations, MSVCC providers and sector networks. The sample included individuals with diverse immigration statuses, housing histories and support experiences. Geographic coverage spanned multiple regions in England and Scotland.

The recommendations in this report were co-produced and developed through a participatory process, drawing on the lived experience of survivors and the practical insights of frontline practitioners. Two recommendation panels were held with strategic stakeholders to assess their feasibility and relevance, as well as to offer an opportunity to test and refine proposals in dialogue with those responsible for shaping housing and modern slavery policy.

In parallel, this study draws on the analytical framework developed by the Australian Red Cross in *Barriers in Accommodating Survivors of Modern Slavery*<sup>4</sup>, which identifies four key dimensions of housing exclusion: availability, accessibility, eligibility, and suitability. These themes were echoed by participants in this research and are used here to structure further reflections.

## Limitations

This study was informed exclusively through engagement with survivors receiving support via MSVCC outreach services, alongside insights drawn from services that provide support to MSVCC outreach service users. While this provided valuable insight into the housing and support experiences shaped by the MSVCC framework, it may not fully reflect the diversity of survivor journeys across other contractual arrangements, informal systems or post-support contexts.

The study 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.

4. Australian Red Cross (2021). [barriers-in-accommodating-survivors-of-modern-slavery.pdf](https://www.redcross.org.au/research/barriers-in-accommodating-survivors-of-modern-slavery.pdf).

# Findings

## 1. 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.

The research reveals a deeply fragmented and often exclusionary housing landscape for survivors of modern slavery. Despite statutory entitlements under the Modern Slavery Victim Care Contract (MSVCC), many survivors face homelessness, unsuitable accommodation, and repeated displacement. These outcomes are not anomalies, they are systemic.

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 refugees – appear to be excluded from MSVCC safehouse accommodation, even after a positive Reasonable Grounds decision. 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.”

The limited availability of long-term housing solutions for survivors of modern slavery has resulted in constrained transition pathways from short-term accommodation. This creates systemic congestion, reducing turnover and restricting access for new individuals seeking housing support. This is compounded by the limited availability of safehouses in London, which compels some survivors to opt for MSVCC outreach support alone, prioritising proximity to peer networks over supported accommodation. This often results in them remaining in unsafe or unsuitable housing, thereby heightening their vulnerability to re-exploitation.

The Modern Slavery Statutory Guidance (para 15.15) provides for an assessment of accommodation suitability, but the routine use of asylum housing as a default option suggests a misalignment between statutory intent and contractual practice. Survivors who are placed in hotel-based asylum accommodation have reported finding the accommodation unsuitable for survivors, particularly those with young children or infants, due to the lack of privacy, stability and child-friendly facilities necessary for recovery and wellbeing. These limitations mean that outreach support remains inconsistent across survivors and can confuse and misdirect those in need.

The research identifies critical gaps in statutory frameworks:

- **MSVCC outreach limitations:** Risk and Needs Assessments are not consistent, assessments by phone are not trauma-informed and frontline practitioners lack knowledge in housing.
- **Lack of joined-up working:** There is minimal coordination between MSVCC providers, local authorities and housing teams. Survivors are left to navigate complex systems alone.
- **Policy blind spots:** Existing guidance does not reflect the realities of survivor housing journeys. It assumes linear progression and overlooks the need for flexible, trauma-informed pathways.

Practitioners consistently reported frustration with unclear protocols, lack of escalation routes and inconsistent responses across local authorities.

## 2. 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.

Practitioners consistently reported that MSVCC safehouse accommodation is often unavailable – not only due to bed shortages, but also because survivors are deemed ineligible based on existing housing arrangements or prior entitlements to benefits and housing. Survivors placed in asylum accommodation, or those with recourse to public funds, are frequently excluded from safehouse provision. In practice, these administrative criteria often override trauma-informed assessments of safety and need.

British nationals were particularly affected. Despite formal entitlements, they often face advocacy battles to secure safehouse placements – or are excluded altogether. Survivors who are eligible for public benefits and housing, such as UK nationals or asylum seekers, may not be prioritised for MSVCC safehouse accommodation unless a risk or needs assessment identifies a specific vulnerability. As a result, access to safehouses is not solely determined by survivors' needs, but also by their existing entitlements and housing status.

To be eligible for social housing, applicants are required to have leave to remain for more than six months or British citizenship. Survivors on temporary visas or EU pre-settled status are often excluded from housing registers, despite their vulnerability.

### 3. Survivors with complex needs may face restrictions when accessing MSVCC safehouse accommodation.

These individuals are often among the most vulnerable yet may be assessed as presenting too high risk for placement.

Survivors of modern slavery with complex needs such as substance misuse, suicidal ideation or physical disabilities, often require specialised support that MSVCC accommodation providers are not always equipped to deliver. Furthermore, online housing applications may be inaccessible to those who do not have or cannot afford internet access, creating digital exclusion and administrative delays. This gap in provision can result in unmet needs and increased vulnerability for some of the most at-risk individuals.

Specialised services such as supported accommodation (i.e. MSVCC safehouses) are often more suitable for survivors of modern slavery who experience complex needs related to trauma.

Taken together, these insights highlight the urgent need for a more coherent, trauma-informed and survivor-led housing response. The barriers outlined, from limited availability to statutory ambiguity and unsuitable accommodation, are not isolated challenges but interconnected symptoms of systemic fragmentation.

### 4. Local authority responses are inconsistent and fragmented.

Survivors are frequently caught in a “ping-pong” between councils and MSVCC providers.

Local authority housing systems were described as “brutal,” with practitioners noting the absence of a national accountability framework. 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 and the lack of clarity surrounding local authority responsibilities.

Practitioners described a “ping-pong game”<sup>5</sup> between MSVCC providers and local authorities, with survivors caught between systems and unable to secure accommodation. This fragmentation undermines recovery and increases vulnerability to re-exploitation.

This concern was echoed in The Salvation Army’s written evidence to the Home Affairs Committee in 2024,<sup>6</sup> which highlighted inconsistencies in local authority responses to survivors seeking housing support. Survivors frequently encounter delays, refusals, or procedural exclusions, particularly

5. Interview with practitioner, 13 June 2025.

6. The Salvation Army (2024). <https://committees.parliament.uk/writtenevidence/129562/pdf/>

due to the absence of a recognised local connection. These barriers are compounded by limited awareness of modern slavery frameworks among housing teams.

As an example of best practice, local authorities are piloting promising models:

- **Move-on schemes** with flexible tenancies and wraparound support help survivors transition from safehouse or asylum accommodation.
- **Housing First** models prioritise unconditional access to permanent housing, integrating legal, mental health and advocacy support.
- The **Trusted Housing Assessors Pilot** embeds trained professionals to secure trauma-informed accommodation through ethical landlords.

These models demonstrate scalable, survivor-centred approaches that can be adapted nationally.

For such initiatives to be successful, there is a need for resource allocation and funding equity. Devolution offers flexibility, but risks deepening regional disparities as many councils lack the resources to embed trauma-informed housing pathways or designate specialist roles. A potential avenue of exploration could involve ring-fenced funding for modern slavery coordination, training and housing innovation.

## 5. 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.

The challenges faced by the MSVCC outreach support have several significant implications. The remote nature of the service can lead to feelings of isolation and make effective communication and engagement more difficult. Without continuing risk and needs assessments, survivors with serious issues, such as suicidal ideation, may not receive the necessary support, increasing the risk of harm to their wellbeing. 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.

*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.<sup>7</sup>*

7. Interview with practitioner, 9 July 2025.

Interviews also 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 was reported to be essential for building relationships and identifying housing needs. These operational realities point to deeper structural misalignments, particularly in how housing eligibility is interpreted across statutory and contractual frameworks.

## 6. 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.

A potential remedy would be to rely on recommendations from existing evidence that meaningfully engaged with those with lived experience. For example, The **MS-COS** provides a survivor-led framework for service design and evaluation, identifying seven core outcomes including:

- Secure housing, safety from traffickers, trauma-informed care, and opportunities for self-actualisation.
- Its Community of Practice fosters cross-sector collaboration and ethical service delivery.
- Embedding MS-COS into housing pathways ensures coordinated, measurable and survivor-centred support.

To improve consistency, accountability, and survivor-centred practice, each local 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.

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.

Finally, the **Independent Modern Slavery Advocate® (IMSA®)** model offers trauma-informed, survivor-led support across systems. 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:

- IMSAs act as consistent, independent points of contact, helping survivors navigate legal, housing and support services.
- Piloted nationally by Hope for Justice and partners, the model aligns with statutory guidance under Section 49 of the Modern Slavery Act.
- Calls for formal recognition and funding of IMSAs are supported by the Independent Anti-Slavery Commissioner and the Modern Slavery PEC.

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® model complements existing services and ensures continuity, especially during transitions between support systems.

## 7. Data and training gaps undermine accountability.

MSVCC providers hold 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.

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>57</sup>

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.

There is a need to enhance practitioner knowledge and trauma-informed care. Survivors face long-term psychological impacts, often worsened by housing instability. To address this:

- **Training frameworks** (e.g. Skills for Care, Middlesex University and the Anti-Trafficking Monitoring Group) should be embedded across statutory teams and leadership.
- The *Slavery and Trafficking Survivor Care Standards* emphasise stable housing as foundational to recovery.
- Strategic stakeholders such as Councillors, Commissioners and Directors must be equipped to prioritise modern slavery within housing policy.

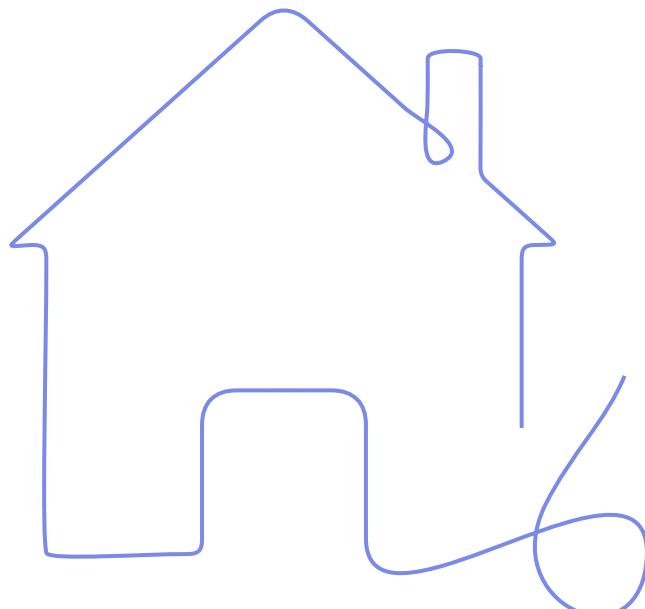
## 8. Survivors are experts in their own recovery.

Participants called for person-centred support, greater transparency, and recognition of their specific needs, distinct from those of asylum seekers or general homelessness populations.

As part of this research, interviewed survivors offered clear, actionable insights that can be summarised below:

- **Need for safe, stable housing:** Survivors emphasised the importance of housing that is secure, private and free from exploitation. Many called for longer-term accommodation options beyond emergency provision.
- **Trauma-informed support:** Participants advocated for housing processes that recognise trauma, avoid re-traumatisation and offer choice and control.
- **Statutory accountability:** Survivors called for clearer responsibilities, better training for housing officers and mechanisms to challenge wrongful decisions.

These findings directly informed the recommendations matrix, statutory mapping tables, and proposed amendments to MSVCC guidance.



# 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)

### 2. Clarify the MSVCC Assessing Destitution Guidance by stating it is for pre-Reasonable Grounds decision only

Clarify the MSVCC Assessing Destitution Guidance to ensure that survivors with statutory entitlements (e.g. UK nationals and refugees) are not automatically excluded from MSVCC safehouse accommodation. As the Modern Slavery Statutory Guidance states in paragraph 15.14: "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)

## 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

### 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>8</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

## 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 reveal that remote-only outreach undermines trust, privacy and trauma-informed care. Some survivors report passing months without speaking with their MSVCC support worker. This is confirmed by practitioners. 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

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

## 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 reveal 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. 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

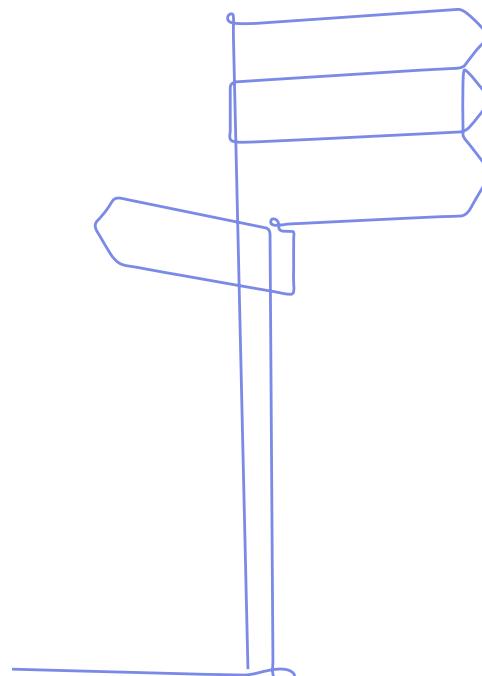
### 9. Scale Modern Slavery Coordinators/Leads nationally

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 report 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





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.

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