### **British**RedCross

# First steps to safety?

The role of reception centres in supporting people out of exploitation

> Policy, Research and Advocacy

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# 1. Executive summary

People who have survived human trafficking and slavery have been exploited for others' personal gain. The exploitation can take many forms, including forced labour and criminality, sexual exploitation, and domestic servitude. Often, people are exploited in more than one way at once and are trafficked within countries and across borders.

When someone is leaving a situation of exploitation it is vital they can find immediate safety and have the support and advice they need to rest and make decisions about their future. One of the ways people leave those situations is when a police force carries out a welfare check or a raid on a location where they suspect people are being exploited.

As part of these anti-trafficking operations, police forces will often work with other agencies, including Local Authorities, to set up temporary reception centres at a nearby location such as a community centre. These centres provide a place to for the police to speak to people they suspect may be victims of trafficking and for people to receive emergency support such as food, clothing and first aid.

Reception centres play an increasing role in anti-trafficking operations, and across the UK the British Red Cross provides emergency support to people recovered to them. This research is based on observations at 10 of those centres as well as in-depth interviews with a range of people involved in running them.

The research looks at people's experiences of reception centres, the support on offer – and what support was accepted – and referrals from reception centres into the National Referral Mechanism (NRM), the UK government's system for determining whether it believes a person is a survivor of trafficking.

Whilst reception centres offered immediate respite, we conclude that limited resources, conflicting priorities, and the lack of onward support after the reception centre meant that people were often taken to centres that were time-pressured, confusing, and ultimately did not offer a route to safety.

Most people interviewed for this research felt that there was rarely enough time or specialist advice available in the reception centre to support people to make informed decisions about entering the NRM. In October 2017, the UK government committed to making several reforms to the NRM, including introducing 'Places of Safety' to give people leaving exploitation three days of accommodation and support as they decide on their next steps. 'Places of Safety' have not yet been introduced leaving limited support options for people immediately after leaving exploitation.

Reception centres are often only open for a few hours, and just as important as the support at the centre, is what happens to people when the centre closes. No one who attended the centres observed for this research agreed to enter the NRM and there were few alternative options offered. Most worryingly, most people taken to a reception centre either returned to their previous situation or were arrested by officers from Immigration Enforcement.

People must be protected before they feel safe enough to disclose exploitation and engage with support, but protection is not always the primary focus of reception centres. People cannot feel safe when facing threats of immigration enforcement and pressure to engage with criminal prosecutions, alongside fears of engaging with government authorities and retribution from traffickers.

Reception centres need to focus on care and support if they are to be part of someone's first steps to safety. And they can only successfully offer a route to safety if there are more and better options for survivors. Immediate reforms should include ensuring anti-trafficking operations are separate from immigration enforcement and introducing 'Places of Safety' to give people time and space to rest, consider their options and make informed decisions about their future.

### **Recommendations**

Anti-trafficking reception centres should be:

- Focused on protection: the primary purpose of reception centres should be to safely remove an individual from a situation of exploitation, to assess the risks they face and their immediate needs, and to work with the person to determine suitable next steps towards protection. The focus should not be to advance criminal prosecution or make immediate referrals to the NRM.
- Separate from immigration enforcement: to ensure that individuals leaving situations of exploitation are treated as potential victims, anti-trafficking operations should be distinct from immigration enforcement operations.
- Guided by minimum standards: to ensure that reception centres fulfil their purpose, guidance produced for police, Local Authorities, the voluntary and community sector and other organisations should ensure a minimum level of practice when reception centres are delivered.
- **Properly resourced:** to ensure that reception centres can meet these minimum standards, police forces and Local Authorities should be resourced to be able to run reception centres for as long as necessary and in appropriate venues.
- A first step to safety: individuals who have been removed from situations of exploitation should not be left at greater risk at the end of a reception centre. Next steps support should include access to Places of Safety, advice about the NRM and alternative support options and improved longer-term support for survivors to rebuild their lives after the NRM.

For full recommendations, see page 48.

"You are in effect asking people to make a leap into this period of limbo and uncertainty by engaging the NRM. There's no certainty of the outcomes or even where you'll be or what support you'll get."

(Law enforcement professional)



### 1.1 Research aims and methods

The broad object of this research was to explore how potentially exploited people experience the reception centres that are set up during antitrafficking operations, and how they engage with the support on offer. The research methods included observing reception centres and debriefs, interviewing reception centre staff and talking with people who have first-hand experience of being exploited.

This research sought to investigate:

- how people in exploitative situations experience anti-trafficking operations undertaken by police and other authorities – particularly those operations which include multi-agency reception centres
- what support is on offer for people recovered to reception centres, and how we can adapt that support to keep people engaged and improve their outcomes
- why some people engage with the support on offer in reception centres – including 'first responders' (who refer people into the National Referral Mechanism) and voluntary and community sector (VCS) organisations – and some do not
- how, and to what extent, people are referred into the NRM via reception centres.

Data-gathering for this report included:

- 70 hours of observation across 10 reception centres
- attendance at a reception centre debrief
- 19 stakeholder interviews with professionals from the public sector (police, Local Authorities) and VCS involved with anti-human trafficking operations and reception centres
- consultation with a panel of individuals with lived experience of trafficking and exploitation.

### 1.2 Key findings

Reception centres gave people a short-term opportunity to consider their situations, away from the places where they were potentially being exploited. Each reception centre opened for an average of 7 hours. People could hear how representatives from a variety of organisations viewed their situations. There was immediate practical support available, and this helped some people begin building trust with those who could assist them. In some instances, the presence of independent specialists meant they could get information about the NRM and other entitlements and could find out about ongoing support.

# However, most reception centres observed did not provide people with routes to safety.

People's safety and protection was not always the focus of the reception centres observed. The risks of retribution from traffickers, the threat of immigration enforcement and the potential for people to be less trusting of the authorities when they left were evident. Reception centres provided short-term support, and the lack of certainty about onward support could leave people potentially more vulnerable than when they arrived. A knock-on effect of negative experiences could be that some people felt less confident about coming forward in the future and might remain in exploitative situations for longer.

# Planning and setting up reception centres

The reception centres the researcher attended were set up when police forces and/or the National Crime Agency suspected people at a specific location might be in an exploitative situation. In most cases, reception centres were planned and set up by police and Local Authority emergency planning teams, and these agencies would invite other organisations such as Local Authority housing teams and voluntary sector agencies such as the British Red Cross.

### The immediate support on offer

The range of support and the organisations providing it varied for each operation, but support included help with:

- immediate practical needs, such as food, water, clothes, hygiene packs
- physical needs, such as health screening, managing addictions
- psychosocial and mental health needs, with professionals available to listen to people in distress
- information and communication support, with communication through interpreters and information provided in the person's first language. This information is likely to relate to modern slavery and human trafficking, employment conditions, the NRM and local support services
- advocacy, advice and support, in relation to issues including immigration, NRM, and housing.

## The importance of briefings with everyone working within reception centres

Multi-agency briefings led by the lead agency, such as the police, the National Crime Agency or the Local Authority, usually took place both before the reception centres were set up and while they were operating. These sessions helped people working in the centres clarify their own roles and responsibilities, address any risks and work together as a team. In some cases, where such briefings did not happen, the reception centres felt less organised and safe to the researcher.

### The many purposes of reception centres

Reception centres appeared to have a range of purposes, depending on the agencies involved and their aims. These included:

- protecting and supporting people who may have been exploited
- investigating and prosecuting crimes related to trafficking and exploitation
- immigration enforcement
- providing temporary safe havens for people who may have been exploited.

### At most of the reception centres the researcher observed, investigating and prosecuting crimes appeared to be the priority. The focus of each operation affected how it was managed, focusing on prosecution often trumped the need to provide care and support for survivors of trafficking and exploitation.

Although all the centre workers the researcher spoke to thought it was important to protect and support people, managing competing objectives was often a challenge. The problem was not that law enforcement professionals did not work in a caring way, but that the organisations whose focus was care had limited control over centre management.

# Supporting people recovered to reception centres, on the day

### People recovered to reception centres

During the research period, 172 people attended 28 reception centres where the British Red Cross provided support, and 22 people attended the 10 reception centres that the researcher observed. The sample of the individuals observed at the reception centres provided a good mix of characteristics, including those from both inside and outside the EU. Most were men who authorities believed were being exploited for their labour. There were also women involved in sexual or domestic work suspected to be exploitative. It should be noted that the individuals in these situations did not always agree that they were in an exploitative situation. All were recovered from the place where they either worked or lived, which in some cases was the same location.

### **Overcoming fears and building trust**

Survivors of trafficking, slavery and exploitation were often afraid of both the people exploiting them and the authorities. Issues of fear and trust were the biggest barriers stopping people taking up the help that was on offer. It was particularly difficult for the police, Local Authority teams and staff from other agencies to build trust with those who had just experienced a police operation, while the presence of immigration officials in the reception centres made some people more afraid.

### First impressions of reception centres were important, and there were lots of factors that acted to either aggravate people's fears or soothe them. These included:

- How well professionals at the reception centres managed their own fears and anxieties.
- Whether the purpose of the reception centre was clearly explained; this was not always the case, and people sometimes became anxious or angry as a result.
- A lack of privacy; the reception centres were often overcrowded, and sometimes the venues were also used for community activities that were open to the public.
- Whether the venue itself was fit for purpose; some reception centres were unclean and cold.
- The availability of interpreters to help overcome language barriers; interpreters were present at all of the centres the researcher observed, helping build relationships, reduce isolation and minimise misunderstandings.
- How freely people could come and go; it was often unclear whether people had the choice to attend a reception centre or could leave if they wanted to. Following police operations where police have executed a warrant and entered premises, people had often lost their homes and jobs in the same day, and they felt attending the reception centre was their only option. Police sometimes adopted stalling techniques when people asked to leave.
- Whether staff at the centre were in uniform or not; in an attempt to make themselves more approachable, organisations and agencies often did not wear uniforms, with the unintended consequence that people attending the reception centres could not always tell who they were.

## Ensuring professionals have the right skills and experience

Of the ten reception centres the researcher observed, five were led by people who had not supported an anti-trafficking operation before (four from law enforcement and one from a Local Authority). In addition, the presence of fledgling modern slavery teams meant these reception centres were managed by those with little previous experience. In these instances, managers worked to bridge the gaps in their own knowledge by seeking support from more experienced professionals within the Gangmasters and Labour Abuse Authority, the National Crime Agency and VCS organisations.

Although public authorities appeared confident in setting up reception centres and managing the associated risks, they were often much less experienced in understanding the complex support needs of survivors of trafficking and exploitation. This made it difficult for people to engage with the support on offer, and to help with investigations.

### A lack of time, and challenges of timing

Lack of time at reception centres emerged as a clear barrier to providing people with the right support. As law enforcement agencies work to ever tighter timescales, the time available in reception centres is decreasing. The researcher was told that when reception centres could remain open for days at a time, people had a much better chance of engaging with support and helping investigations; however, the average time each centre opened for was 7 hours. Moreover, some people brought to the centres are keen to leave as quickly as possible. The research showed that helping people overcome fears and begin to build trust takes time.

# The NRM and ensuring support for people beyond the reception centre

### Engaging with the NRM

The NRM is the UK government's framework for determining survivors of trafficking and people who have been exploited, and for referring them to appropriate support. In all the reception centres observed for this research, no one chose to be referred into the NRM at that point, and it became apparent during the course of the research that the number of people entering the NRM via reception centres had been decreasing over time. There are a number of obstacles to effectively engaging with the NRM in this setting:

- fear of the authorities, and mistrust of the support on offer
- fear of being detained by immigration enforcement and/or forcibly removed from the country
- the limited ability of reception centre staff to explain the NRM, along with the potential consequences of entering it and any alternative options
- pressure on people to continue working
- shortcomings of NRM support, including length, timings and location of support (people can be dispersed very far away).

# Obtaining informed consent to enter the NRM

To give informed consent to enter the NRM, a person must have access to relevant information and advice, as well as sufficient time and space to decide whether or not they want to engage. Often public authority staff who needed to refer people into the NRM had little knowledge of the mechanism. Key obstacles to obtaining informed consent also included a lack of alternative options to the NRM; limited access to relevant information, advice (including legal advice) and guidance; and insufficient time to make informed decisions. Some centres sought support from independent specialist organisations that could give people in-depth advice about the NRM in a trauma-informed way.

### Making a difference and doing no harm

While most law enforcement professionals interviewed thought that reception centres could help people to escape exploitation, interviewees from other agencies – particularly those from the voluntary and community sector – were less confident that the needs of people who had been exploited could be effectively met within this environment. Among the 22 people who attended the reception centres observed by the researcher, the immediate outcomes of coming to the centre varied widely:

- Eight were arrested, taken to police stations and interviewed by immigration enforcement.
- Eight returned to the potentially exploitative situation.
- Two decided to stay with friends and not return to their situation.
- Two decided to stay in a hotel, where they would have time to consider their options.<sup>1</sup>
- One returned to accommodation which was separate from their place of work.
- One went to stay at a pre-NRM accommodation provided by the British Red Cross, to give them more time to consider their options.

Three of these 22 people agreed to be formally interviewed by police, but most did not want to be part of an investigation, and many wanted to return to work.

<sup>1</sup> In this case, the police offered, sourced and paid for the hotel.

### The role of the British Red Cross

The British Red Cross is part of the world's largest humanitarian network, the International Federation of the Red Cross Red Crescent Societies, with 192 National Red Cross and Red Crescent Societies worldwide. The British Red Cross works in the UK and internationally to provide and strengthen care, support and protection programs for survivors of trafficking and to address the severe humanitarian harm that results from human trafficking and exploitation.

In the UK, British Red Cross services for people who have experienced trafficking and exploitation range from immediate to longer-term support. These include:

- UK Crisis Response teams set up and provide support at reception centres for people recovered during anti-trafficking operations by law enforcement and other public authorities. This support includes emergency provisions, such as food, warm clothes and blankets, offering a listening ear and emotional support and giving first aid.
- Specialist anti-trafficking officers in London, the North-West, Yorkshire, the West Midlands and the East Midlands provide a range of support, including one-to-one casework support to people at all stages of their trafficking experience. Anti-trafficking officers support people who are still in exploitation, people who have recently left exploitation as well as those who left some time previously.
- The Your Space program provides accommodation, advice and support to people as they leave situations of exploitation. Currently running in Derby, Nottingham, London and Birmingham, it helps give people time and space to rest and access specialist advice as they make decisions about their next steps. We are working to roll out Your Space support across the UK.
- Projects providing long-term support, in partnership with organisations including Hestia and Ashiana, help people recover and regain their independence, after their support through the National Referral Mechanism ends.
- Refugee Support and Restoring Family Links services across the UK provide support and advice to refugees and people seeking asylum which includes supporting people at risk of and experiencing trafficking and exploitation.

The British Red Cross advocates for changes to strengthen protection, care and support for survivors of trafficking and exploitation and prevent people becoming vulnerable to exploitation.

# 2. Background

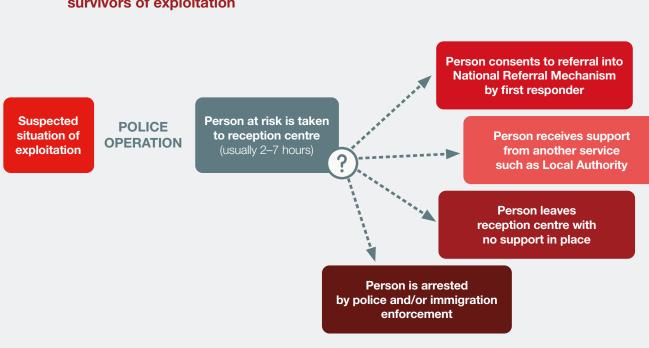
In 2015 the UK government introduced new legislation under the Modern Slavery Act that aimed to improve responses to human trafficking and modern slavery and redefined the criminal offences connected to slavery, servitude and forced or compulsory labour and human trafficking.<sup>1</sup> The terms human trafficking and modern slavery are often used interchangeably, and though these are distinct criminal offences, both relate to situations where people have been exploited for others' personal gain.<sup>2</sup>

In the UK, the number of people identified as potential victims of human trafficking and modern slavery is increasing each year. In 2019 over 10,000 people were referred to the authorities as potential victims of human trafficking and modern slavery, which is a 52 per cent increase from 2018.<sup>ii</sup> These figures only reflect the number of people formally identified by government authorities, and the true scale of human trafficking, slavery and exploitation is likely to be higher.

2 See Glossary in Appendix A for a full definition of terms.

There are a range of organisations involved in responding to suspected human trafficking and supporting people who are being exploited; they include law enforcement agencies such as the police and the National Crime Agency, Local Authorities, the Home Office and VCS organisations. In response to intelligence, law enforcement agencies can carry out antitrafficking operations including raids and welfare checks on locations where they suspect that people are being exploited or are at risk.

As part of these anti-trafficking operations, law enforcement agencies will often work with other organisations such as Local Authorities and the voluntary sector to set up reception centres to support people recovered during raids and welfare checks. Reception centres set up during anti-trafficking operations are usually assembled at a temporary location in the local area and can provide access to emergency provisions such as food, clothes and first aid as well as access to information and a place to speak to people recovered during anti-trafficking operations. Similar centres are set up by the



### Figure 1: Reception centres are not part of the formal system for identifying and supporting survivors of exploitation

police, Local Authorities and partners in response to emergencies such as severe weather, fires or industrial accidents.

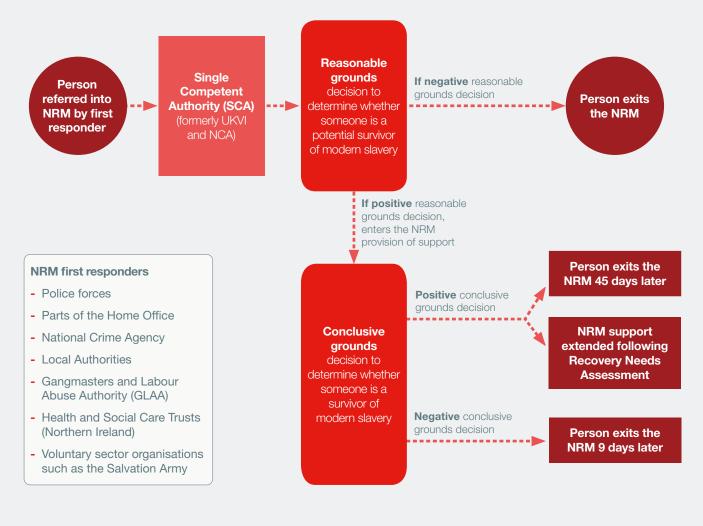
These reception centres are an increasingly important part of anti-trafficking operations, but there is limited publicly available information, research and guidance on their role and impact in supporting people who have been trafficking and exploited. Primary research focusing on trafficking and undertaken with people who have experienced exploitation rarely mentions reception centres specifically.

Reception centres are used as a short-term response during anti-trafficking operations and need to be understood in the context of the formal mechanisms in place for identifying and supporting survivors of trafficking and slavery. In 2008 the UK ratified the Council of Europe Convention on Action against Trafficking in Human Beings (2005). The convention, and its associated EU directive, sets out the features of government support for people in exploitative situations – in terms of their physical, psychological and social recovery. It sets out that people should be given access to:

- subsistence
- legal advice
- appropriate and safe accommodation
- emergency medical treatment
- counselling
- education for children.

In the UK, the NRM is the framework for formally identifying survivors of modern slavery, including those who have been trafficked. It was first introduced in 2009 to meet the UK's obligations under the Council of Europe Convention on Action against Trafficking in Human Beings, and the mechanism aims to provide financial and well-being support, and accommodation while people wait for a decision.

### Figure 2: The National Referral Mechanism



People cannot refer themselves to the NRM; instead there are a range of agencies that are authorised as anti-trafficking 'first responders', including the police, Local Authorities, Gangmasters and Labour Abuse Authority, parts of the Home Office and several voluntary sector organisations. First responder responsibilities include recognising indicators of modern slavery and identifying potential victims, gathering information about modern slavery and referring people to the NRM.<sup>iv</sup> Adults need to consent to being referred into the NRM process, whereas children are required to be referred. Once a referral is accepted, the Single Competent Authority (SCA) within the Home Office manages the decision-making process.

In October 2017 the UK government announced a number of reforms to the support available to survivors of trafficking. These reforms included a commitment to government-funded Places of Safety to provide adult survivors of trafficking and exploitation with assistance and advice for up to 3 days before they decide whether to enter the NRM. Currently, people are only eligible to access government-funded safe houses after being referred into the NRM.

At the time of writing, Places of Safety have not been implemented, and it remains unclear how they will operate in practice. This commitment by the UK government acknowledges the need for immediate support for people who have experienced trafficking and exploitation, as well as the importance of time, space and advice to enable people to make informed decisions about their options and give informed consent<sup>v</sup> to enter the NRM.

# Core principles for Places of Safety

In response to the government's commitment to introduce Places of Safety, the British Red Cross, alongside the Human Trafficking Foundation, the Anti-Trafficking Monitoring Group and the Anti-Trafficking and Labour Exploitation Unit, produced a set of principles<sup>iii</sup> that should underpin the provision of Places of Safety and early support for people in exploitative situations. These include:

- freedom
- open access to all
- needs-based assessment
- medical care
- material needs
- early legal advice
- high-quality advice and support
- choices and options for referral pathways and support
- confidential data management
- organisational accountability.



# 3. Planning and setting up reception centres

The effectiveness of a reception centre is often determined by processes that take place before people who have been potentially exploited even arrive. The observations drawn from visiting reception centres showed the importance of assembling a broad team of specialists, assessing the support required for each specific operation, briefing everyone thoroughly and having a clear and widely understood sense of the reception centre's purpose.

### 3.1 Setting up reception centres

In most instances, anti-trafficking operations and reception centres are led by the police or the National Crime Agency. Others are led by the Gangmasters and Labour Abuse Authority (GLAA) or Local Authorities, with police support. Of the ten reception centres the researcher observed, nine were led by law enforcement and one by a Local Authority.

Each of these operations was prompted by intelligence suggesting that people at a particular location were being exploited or were at risk. This intelligence was the result of investigations spanning anything from two weeks up to several months, involving at least 20 law enforcement professionals in each operation.

During the fieldwork, the British Red Cross was alerted to 28 potential operations in which we were asked to provide support. Of those, eight were stood down before a reception centre was set up. Among the reasons given for operations not going ahead were limited intelligence, lack of venues and challenges enlisting the right people to support the operation.

In the ten reception centres the researcher observed, those in charge of each operation collaborated with a range of organisations to plan the support on offer.

# 3.2 The immediate support on offer

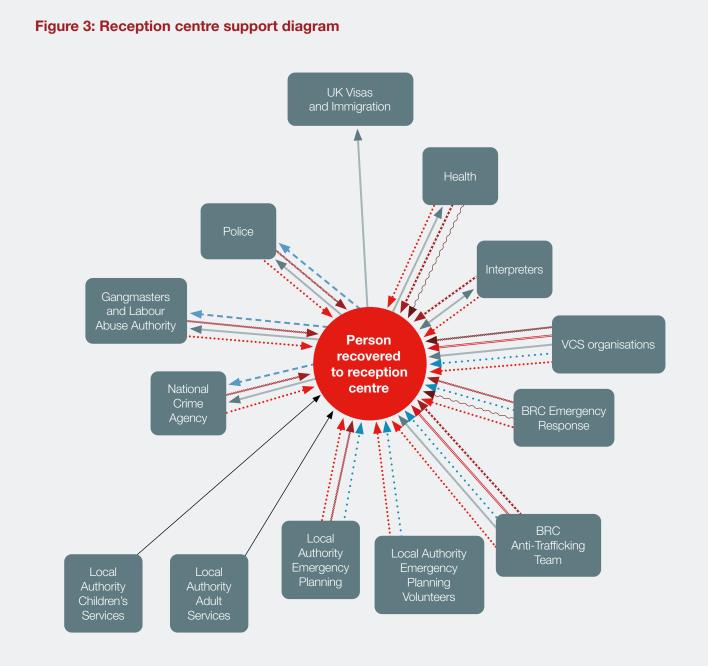
Intelligence from law enforcement helped inform the type of immediate support that was provided. Each operation was adapted to try to meet the potential needs of the people who were most likely to find themselves in the reception centre.

Figure 3 illustrates the range of support available in the reception centres the researcher observed, together with the roles and responsibilities of the people involved.

# 3.3 The importance of briefings with everyone

When the planning stage is complete, police or the National Crime Agency may organise a briefing with relevant professionals before undertaking an operation. These briefings have a number of aims:

- to provide an overview of the intelligence picture
- to map out the plan for the day
- to allocate roles and responsibilities
- to confirm lines of communication and command
- to create a sense of team
- to consider logistics, health and safety and any potential protection risks
- to clarify the purpose of the reception centre
- to provide an opportunity to raise questions and concerns.



### KEY:

*****	Mobilising reception centre
•••••	Protection
••••	Immediate practical support
~~~~~	Physical needs
	Psychosocial and mental health needs
	Information and communication
	Advocacy, advice and support
	Investigation
	No support needed/provided

Direction of exchange:

Distance from person recovered to reception centre = level of interaction (close = lots of interaction; far = little interaction)

### **Reception centre observations**

### Providing clarity of purpose

Pre-operation briefings did not take place for all the reception centres the researcher observed, and where they did they were often reserved for law enforcement personnel only, owing to the sensitive nature of the information.

Multi-agency briefings within the reception centres took place in three of the ten centres observed.

Where briefings did not take place, the reception centres felt less organised and at times chaotic. Staff appeared less confident in their roles and responsibilities, and tried to clarify these things by asking each other questions in an ad hoc manner. The fact that decisions were made in a less structured way led to limited cohesion within the multiagency teams, and meant these spaces felt less safe than those reception centres where clear briefings were provided.

# 3.4 The many purposes of reception centres

During the interviews, a variety of views emerged about the reasons for setting up reception centres. The primary purpose(s) appeared to depend on who was leading each reception centre, which in turn affected both the support on offer and the way the multi-agency team articulated their roles and responsibilities. This range of perceived purposes was also evident in the way the reception centres operated.

# 3.4.1 Protecting and supporting people recovered to reception centres

All the reception centres the researcher observed gave people immediate practical support, such as providing food, water, clothes and hygiene packs. Some also provided opportunities to get advice, guidance and advocacy, as well as relevant information and health screening. Those working in the reception centres generally acknowledged that their primary purpose should

# be to protect and support the people recovered to them.

"The priority and the focus for a reception centre is always the health and well-being of the people there, and from what we see, particularly the pre-prepared ones, in all of the planning, that's in black and white, that takes priority over an investigation. Investigation is always secondary, and the reception centre is about health and well-being, and that's generally quite accepted."

(Law enforcement professional)

Staff saw the reception centre environment as an important opportunity to assess people's needs and to provide a safe space to build trust and rapport. They also recognised the value of providing advocacy, and of giving people advice and information about their rights and the support available.

"Bringing somebody to an independent location [means] that you just get better opportunities to build up that rapport." (Local Authority professional)

The interviewees saw the reception centre as somewhere people could get some space, learn about different agencies and make important choices about their lives. Some viewed the presence of multi-agency teams within reception centres as a positive thing and thought that having a range of specialists in one place meant appropriate help could be given more promptly and effectively. That said, the observations showed that the number of different agencies working together often made the reception centres feel overcrowded. This required consideration and careful management to overcome. However, when the reception centre closes, people may be dispersed across various locations, making it more difficult to provide coordinated support.

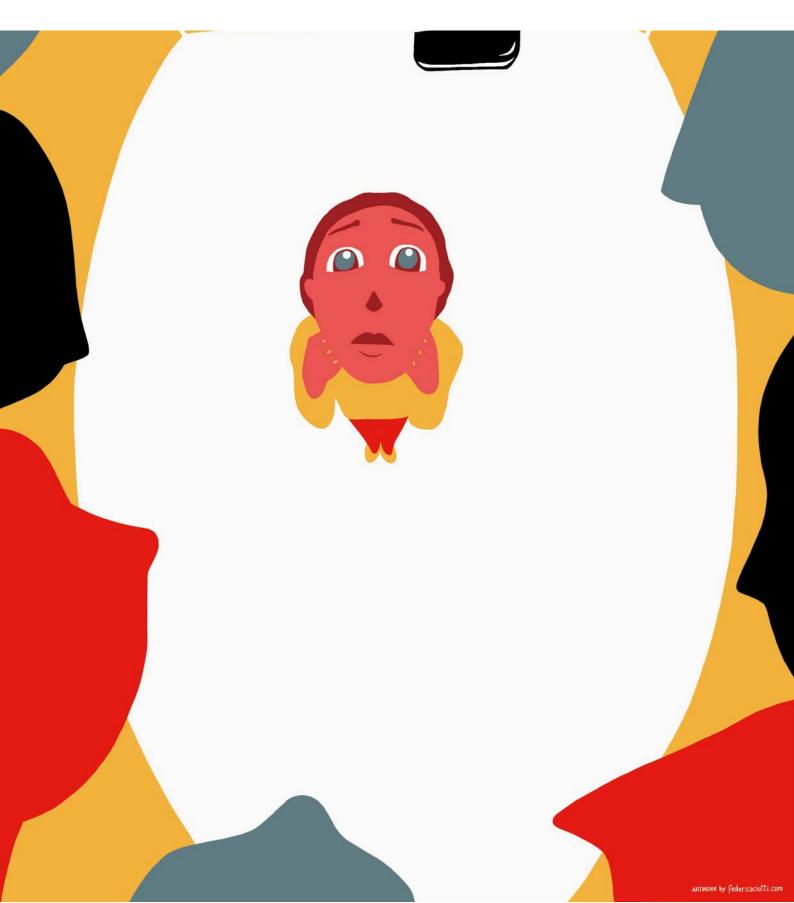
# **3.4.2 Investigating and prosecuting crimes**

Some interviewees saw the investigation and prosecution elements of anti-trafficking operations as being equally or sometimes more important than protecting and supporting people recovered to the reception centres. "...that's a lot of what the focus is really, in terms of the reception centre, no matter what anybody says, a lot of focus is about getting some evidence out; if you have a disclosure, then we can lock somebody up and do whatever."

(Law enforcement professional)

"[The purpose should be] to put the bad guys away, surely that's what every police officer should say."

(Law enforcement professional)



Through the interviews and observations, it became clear that anti-trafficking operations take a great deal of preparation, time and money. This can put police under a lot of pressure to secure witness testimonies that will help them prosecute the people behind the exploitation. This pressure could explain why elements of reception centre support that were not connected with the investigation appeared to be given less importance.

"The true purpose should be to seek a better life for that individual; however, in the majority of cases, it's a tick box to say we've done it, and to seek evidence to support prosecution." (Law enforcement professional)

"...for me, it's the tension between what the police want to do from a 'pursuing a crime' point of view, and what we need to do in terms of engaging and supporting...Sometimes, quite often actually, I don't think those two mix well." (Local Authority professional)

Interviewees generally recognised that not all people recovered to a reception centre will wish to be part of an investigation, and that wider support therefore remains important.

"We recognise that going down the prosecution route is not for everyone; it's not for every victim, we know that. It might be the future, but that moment in time it might not be. So just being able to talk about experiences and what they've been through can be a win for them."

(Law enforcement professional)

"You're dealing with people who are traumatised, frightened of repercussions; they're not really interested in what you're going to do for them as an agency, they are frightened of putting pen to paper or even starting to talk to you."

(Law enforcement professional)

# Managing the competing goals of investigation, prosecution, protection and support was an acknowledged challenge.

"You absolutely can't be focused on one or the other, because if you're just focused on the care, you keep caring for more and more victims, and you never disrupt the criminals on the other side. So, I think it's important to encourage and give victims an opportunity amidst their care to engage in that criminal justice process, but you can't be pushing just one or the other. And usually justice needs to be a bit more patient."

(VCS professional)

### 3.4.3 Immigration enforcement

Immigration officials were present at four of the reception centres the researcher observed and were available via phone and email for others. Where they were present, representatives of some VCS organisations raised concerns about the nature of their involvement and whether their purpose was immigration enforcement, rather than supporting people who may have been exploited.

In two of the reception centres observed by the researcher, immigration enforcement appeared to be a key priority; this is explored further in section 4.

### 3.4.4 Places of Safety

Under the government's Places of Safety initiative, adults recovered from situations of exploitation will be given help and advice for up to three days as they decide whether or not to enter the NRM.

Though this initiative had not yet come into effect at the time of the research, the researcher found that there was already an element of confusion over the purpose of reception centres and how they might align with this new provision in the future. Some interviewees thought that reception centres could and should function as statutory places of safety, while others felt that the environment would not meet the required standards or provide an appropriate safe space for people recently removed from potentially exploitative situations.

Through the observations and interviews, it became clear that managing competing and conflicting purposes within the reception centres was often a challenge. This was particularly the case for law enforcement officials, who had to assume various roles and responsibilities. However, it was also true for other support agencies, who were sometimes concerned when protection and support were trumped by investigations or immigration enforcement activity.

# 4. <u>Supporting people recovered to</u> reception centres, on the day

# 4.1 The people recovered to reception centres

People who are recovered from potentially exploitative situations can have a range of characteristics and circumstances. To explore these, the researcher collected information on people who attended the ten reception centres observed, and also tried to build a more general picture through the observations and discussions with reception centre staff.

# 4.1.1 Characteristics and circumstances observed in reception centres

Twenty-two people who had potentially been exploited attended the ten reception centres that the researcher observed. Their general characteristics and circumstances are outlined below:

### **Reception centre observations**

# Characteristics and circumstances of people recovered

- The people were aged between 18 and 45 years.
- The majority were from Vietnam, Bangladesh and China.
- Most of those from countries within the European Economic Area were Romanian or Bulgarian.
- The majority were male, and these men were mainly being exploited for labour (in nail bars, car washes and restaurants).
- The primary exploitation type for women was sexual exploitation, followed by labour exploitation (in nail bars).
- All were recovered from the place where they either worked or lived, and in some cases this was the same location.

Some professionals interviewed were more comfortable providing their own perceptions of the characteristics and circumstances of people who may be recovered to reception centres, based on their experience of working in these environments. In their view, common characteristics and trends include:

- The age of people who are recovered varies dramatically.
- The majority of men come from the European Economic Area, and these men are potentially recovered more readily than people of other nationalities because they are thought to be more prominent and identifiable within the community.
- The primary exploitation type for women is sexual exploitation, followed by domestic servitude – the latter being considerably harder to identify owing to its more hidden nature.
- Living conditions tend to be poor by UK standards, with people living in large shared houses, often without washing and cleaning facilities.
- People often live and work in the same place.
- People exhibit a range of vulnerabilities that were being exploited.

"They're all vulnerable; their background is vulnerability, whether it's through poverty or whether it's through the circumstances, debt [...] there's a vulnerability that someone's decided to exploit."

(Law enforcement professional)

# anxiety

ARTWORK by Federicaciotti com

# 4.1.2 People's behaviour in reception centres

The people who were recovered to the reception centres exhibited a range of behaviours, which changed over time. The behaviours most often observed are outlined below:

### **Reception centre observation**

# Behaviours of people recovered to the reception centres

- Fear tight body language; freezing; knee-jerking; hand-wringing; confusion/ disorientation; difficulty catching breath; regular toilet visits; the need to be physically close to the people they were recovered with; expressing concern about others; compliance; telling stories that appeared to be coached; taking time to accept offers of support
- Distress tearfulness; low mood; agitation
- Frustration anger; stress; agitation
- **Tiredness** frequent yawning; confusion; disorientation; sleeping or trying to sleep
- Levity laughing; joking. This could indicate that people were OK with the situation, that they had been coached or that they were nervous.

In terms of how people behaved in reception centres, interviewees reported observations similar to the researchers. They largely agreed that fear often dominated within reception centres.

"I think most of them find the whole experience quite daunting, and when I have been present at reception centres sometimes you can see the confusion on their faces and the fear almost."

### (VCS professional)

"In my experience people have been really confused, they're not sure why they're there, they're not aware that they can leave, they're not aware if they're a victim or if they're in trouble."

(VCS professional)

Interviewees observed that fear and anger could manifest in different ways. For some people, the urgency to leave the reception centre and return to work was tangible, as was their anger when they felt they were not being given sufficient information about their situation.

"Regardless of how human-centred they have planned it to be, what I've often found, their concerns were around: why they were there, whether they were in trouble, and when they'll be able to return to work."

(VCS professional)

"I think I always see a lot of anger from people at reception centres, because they don't know why they're there, because they haven't been given any information [about] why they're there."

### (VCS professional)

Interviewees reported that physical closeness with one another was important for some people, possibly as a way to manage anxiety. People recovered to the observed centres often sat or stood close to one another and reassured each other through hugs and smaller physical gestures.

"We've seen that when we've used camp beds, where you've got loads of space, people congregate in a tiny space [...] They move in, move the beds in [closer], yeah. They'll eat on their bed together, and they'll joke and chat and then go to sleep."

(VCS professional)

This could be particularly problematic when potential perpetrators had not yet been identified. In these cases, interviewees and staff at reception centres explained that perpetrators could continue to exert control over others in subtle ways.

In some instances, a minority of people were observed to be fairly relaxed and able to manage the environment better than others – almost as if they had been prepared for the possibility of police intervention. Interviewees said that people attending reception centres may have coached stories, and that some will have money in the back pockets of their trousers, put there by exploiters as 'evidence' that they are being paid for their work. "It's very rare that a potential victim will engage with us [...] often I find that they have quite a lot of insight and awareness of the situation, like they are slightly prepared for this and that's not always the case, you get pockets of people who are very distressed about being somewhere, but on the whole, people can be quite relaxed, almost like they're being made aware that this might happen at some point, so it's okay, ride it out."

(VCS professional)

Reception centre workers noted that some people may not engage with services at all and will make every effort to leave as quickly as possible. This will be explored further in section 4.3.

The people recovered to the reception centres exhibited a range of behaviours that were rarely static but fluctuated over time depending on what was happening and who they were interacting with. People adapted to the environment in different ways, and some appeared to be more comfortable than others. That said, feelings of anxiety and fear were obvious in most cases – and affected people's ability and willingness to engage with the authorities and the support on offer. The following sections explore the factors that appeared to feed these fears and create obstacles to engagement.

# 4.2 Ensuring professionals have the right skills and experience

It is important that those working in reception centres have the relevant knowledge and experience to engage with people who may be in an exploitative situation. If this expertise is missing, it can affect whether or not people engage with the support on offer and can hamper efforts to protect people who have been exploited.

### 4.2.1 Levels of experience

Of the ten reception centres the researcher observed, five were led by senior investigating officers or reception centre managers (sometimes the same person) who had not previously supported an anti-trafficking operation. In addition, some of the police forces were working with fledgling modern slavery teams who had not worked on an anti-trafficking operation before either. In three of these instances, more specialist support was drafted in from organisations such as the National Crime Agency and the Gangmasters and Labour Abuse Authority.

All reception centres offered immediate practical support from the British Red Cross, and six provided independent specialist support from a range of VCS organisations.

Some interviewees noted that law enforcement professionals are not – and cannot be – experts across all kinds of crime, and that having independent specialist organisations present in reception centres increases the range of knowledge and expertise available. Specialist organisations can also help people who have been recovered engage with the support that is on offer.

Interviewees acknowledged that knowledge and expertise is improving; however, in the context of vast public authority institutions, training anyone who might encounter people in exploitative situations was raised as a significant challenge.

"One of the difficulties is that we'd classify it as a high-risk but low-frequency crime. Trying to train every police officer – even if you did that, by the time they've encountered a case they'd have forgotten the training. We're never going to get to a point where we're going to make every police officer and police staff who are dealing with front-line stuff, we're never going to make them all experts in modern slavery." (Law enforcement professional) "So, there are some first responders who are really keen, but I think it's a huge problem that people become a first responder by the nature of joining an organisation, not as a result of having undergone training or having any experience. I think that's deeply worrying. It's not fair on anyone really."

### (VCS professional)

To counter this, some interviewees thought that only a few well-trained professionals within public authorities should be allowed to engage directly with people recovered from potentially exploitative situations. Some went a step further, by suggesting that within the reception centre environment, the 'first responder' role of referring people into the NRM should be reserved for independent specialist organisations rather than public authorities. They thought this could help minimise conflicts of interest between investigation and support – increasing trust with people recovered, making it easier for them to engage with support, and ensuring the bestquality NRM referrals are submitted.

Where interviewees came from police areas with more experience of anti-trafficking operations – and with a greater pool of proficient police officers and VCS specialists to pick from – they were generally more confident in their abilities. Not all areas had this advantage, however, and some appeared to be under pressure to learn as they went along.

What was very clear throughout the fieldwork was that everyone involved with the reception centres was willing to learn from those more experienced than themselves. Police in particular actively sought feedback from others, and seemed open to advice, rather than becoming defensive.

"I have seen where they have [been] really well intentioned and they want to get it right. They've had no experience and they've had no guidance on it, they've come to us to say, 'How shall we do this?'"

### (VCS professional)

"I think there's always some way to go, there generally is, but I think everybody is genuinely open to learn together."

(Local Authority professional)

# 4.2.2 Modern slavery – a 'new' offence?

Although the Modern Slavery Act was implemented in 2015, some interviewees considered modern slavery a relatively new offence, and thought public authorities still needed more time to fully understand wider vulnerabilities.

"It's still a relatively new offence really. It's 2015, so it's still relatively new. So, there is still a lot of people getting their heads around what modern slavery is. A lot of people are scared of it."

(Law enforcement professional)

Some interviewees also acknowledged that modern slavery is a different type of crime from many others that the police deal with. It takes a fresh approach to understand the reasons behind it and to support people who are unlikely to disclose exploitation immediately.

"The police are used to having somebody come in who says, 'I've been assaulted, I would like to make a complaint.' 'Would you like to make a statement?' 'Yes please.' 'Is that the truth?' 'Yes, it is.' Photograph your injuries and off we go – go to court, make an arrest, whether they get an admission or not, that process for me as a police officer has been embedded for 30-odd years."

(Law enforcement professional)

Few interviewees recognised that some of the skills and knowledge they had built up from addressing other types of crime might be transferable. For example, experience of domestic and child abuse could be relevant within the reception centre setting. A minority did note this link, however.

"So, in relation to domestic violence or domestic abuse, we're used to the first time the police get called, people will form an outside point of view, make irrational decisions about not leaving an offender and wanting to remain with them, despite us from the outside going 'That's crazy, why would you want to do that?' So, we're quite used to it in those circumstances, and I think it's just taking some of that almost understanding across." (Law enforcement professional)

# 4.2.3 The use of screening questionnaires

During most operations, police officers used ready-prepared screening questionnaires to gather information from the people present. More experienced officers could improvise rather than following the script when they came across something extra that was important to explore.

Interviewees were divided over the use of these screening questionnaires. While less experienced officers appeared to feel more confident working off a template, some interviewees were concerned that this approach hindered more conversational interactions.

"'These are the questions you must ask' and fill in a form kind of approach – it doesn't work because you cannot ask the right questions; it has to be a conversation."

(VCS professional)

"Questionnaires and things like that, I think they're a necessary evil. I don't like them, I don't agree with them, but to some degree they're necessary because we're not really going to take the time to get it [information] out any other way." (Law enforcement professional)

# 4.2.4 Implementing trauma-informed practice

Elements of trauma-informed practice<sup>3</sup> were used mostly by people from independent specialist organisations, rather than across the board. The observations and interviews provided little evidence to suggest that trauma-informed practice was widely understood or implemented.

"Over the years we've done trauma-informed training, but I think it's one of those that it's always been there, but never had the priority that it needed."

(Local Authority professional)

Again, interviewees thought that involving independent specialist organisations was a good way to help operations become more traumainformed. "I would say in my experience there's still a way to go, and that's the role I feel that the VCS organisations can play in operations." (VCS professional)

### 4.2.5 Setting up reception centres

One area where law enforcement and Local Authorities appeared more confident was in setting up reception centres. This appeared fairly routine for Local Authority emergency planning teams and the police, who do so in a variety of situations.<sup>4</sup> Working to existing Local Authority emergency planning guidelines, they appeared comfortable managing the practicalities of setting up a reception centre, but what was more challenging - often due to limited relevant knowledge and expertise - was ensuring the centres could manage the unique needs of people who had been removed from potentially exploitative situations. People working in the centres often did not consider important factors that could promote better engagement with the support on offer. This is discussed further in section 4.3.

# 4.2.6 Managing risks within reception centres

Although reception centres were not always set up in the most suitable venues, police officers in particular appeared skilled at assessing and managing potential risks. The researcher observed this on different occasions when officers moved potential perpetrators away from other people to assess changes in dynamics and to manage possible risks.

# 4.2.7 Learning from experience – the importance of debriefing

Debriefs were known to have taken place for two of the observed reception centres, and the researcher was permitted to observe one of these.

The debrief felt like a positive experience for those taking part and was an important way to consolidate learning and agree any changes that should be made for future operations.

In general, most public authority staff working in the reception centres appeared to be on a

<sup>3</sup> Trauma-informed practice is a strengths-based approach that involves understanding, recognising and responding to the effects of all types of trauma by creating safe environments and opportunities for people to rebuild a sense of control and empowerment.

<sup>4</sup> Reception centres may be set up in the event of flooding, severe weather, fires, industrial accidents and outbreaks of disease, including flu pandemics, for example.

learning journey with respect to anti-trafficking operations. More experienced organisations offered guidance and helped them improve the way they offered support to people recovered from exploitative situations.

### **Reception centre debrief observation**

### **Good practice**

- All partner agencies were invited to attend the debrief.
- Although the debrief was facilitated by the police, a joint agenda was agreed.
- Constructive points were raised about how the reception centre had been managed, and challenges were met with openness and agreement.
- The various organisations could clarify their roles, responsibilities and expectations.
- Improvements that could be made for future operations were acknowledged.
- The debrief was collaborative, involving all organisations equally.

### 4.3 Overcoming fears and building trust

"For some reason, I thought I would walk in there and they'd be grateful that they'd been saved and I'd look after them for a couple of days in a reception centre and they'd all go back off to their families and will be saying 'Thank you, you've rescued me'; I was so stupid to think that; that didn't happen." (Law enforcement professional)

# 4.3.1 Pre-existing fears held by people recovered to reception centres

### Fear of authorities

People recovered to reception centres may be profoundly afraid of the authorities, as well as the people exploiting them. Interviewees agreed that people who have been exploited may have preexisting fears about law enforcement. These may stem from experiences of police in their countries of origin or may have been instilled in them by their traffickers. "We are judged 100 per cent on their own police force [in the country] that they come from. Because they think we're all evil, or they've had that drummed into them by the trafficker, that 'we do not trust the police'." (Law enforcement professional)

"It's because back home in my village, we never had a police officer, we don't have them. It was in our traditional language it was the village head, the people that are heading the village we do have. So, when we do have a problem, we go to the chief, and then the chief will sort out the problem, without anything called a police station or stuff."

(Person with lived experience of exploitation)

By observing reception centres it became clear that – for the people taken to them – the presence of law enforcement meant overwhelmingly that they were in trouble.

A number of interviewees recognised that the presence of immigration officials in reception centres would increase fears of being removed from the country – particularly for people from outside the European Economic Area.<sup>5</sup> This in turn made them less likely to engage with the police or accept help.

"[Having immigration officials present during anti-trafficking operations is] a terrible idea [laughs]. I mean, I think it will undermine their ability to do anything positive for a potential victim of trafficking. I can't see why they need to be there either. I don't understand what the benefit of it would be."

### (VCS professional)

In recognition of this, some police forces did not ask immigration officials to be present at reception centres. Some linked them in via phone and email, while other centres did not involve them at all.

The researcher observed two occasions where removal from the country became a very real risk for people recovered to reception centres, proving that there was some substance to their fear of immigration officials.

<sup>5</sup> Any person who is not a citizen of the European Union and who is not a person enjoying the European Union right to free movement. https://ec.europa.eu/homeaffairs/content/third-country-national\_en

### **Reception centre observation 1**

Seven Vietnamese people came to a reception centre early in the morning. On entry, a police officer told them they were safe, that staff in the centre were concerned for their welfare and that they were not in trouble in any way. This was reinforced with a card that gave a similar message in Vietnamese.

Professionals from the police, the National Crime Agency, immigration enforcement, the Local Authority and the British Red Cross were present, along with a number of interpreters.

Each person was taken to a private room to speak with a police officer, and information about the NRM was provided. Towards the end of the day, time appeared to be running out. Nobody had made a disclosure of exploitation, and nobody wanted to enter the NRM or be part of a police investigation – and they were not offered any support options outside the NRM.

Immigration officials carried out checks on the Vietnamese people and identified them all as irregular migrants. They were escorted out of the reception centre and taken to a local police station to await further action from immigration enforcement.

It is not known what happened to these people.

### **Reception centre observation 2**

Three other Vietnamese people came to a reception centre early in the morning. Police reassured them that they were not in trouble and that everybody at the centre was there to help them.

Professionals from the police, Local Authority emergency planning, adult social care and the British Red Cross were present, as well as three interpreters. Immigration enforcement made themselves available via email and phone.

The police spoke to two of the people in the communal reception centre space and talked to the third in a separate room. They provided information about the NRM – and, in fact, two of the people had previously been referred into

the NRM but were unaware of this and had therefore not obtained any support.

The third person was not in the NRM and did not want to be. He did not disclose any exploitation or want to be part of a formal police investigation, and was not offered any support other than entering the NRM.

Immigration enforcement carried out checks remotely, concluding that the person who was not in the NRM was an irregular migrant.

The police arrested and handcuffed him in the reception centre, and escorted him to the police station to await further action from immigration enforcement, who were not available until the next day.

In both instances, police tried to build trust and rapport by telling people they were safe and not in trouble. However, when the people did not disclose any exploitation, they were taken to police stations to await interview by immigration enforcement. The observations and interviews suggested that passing people on to immigration enforcement in this way may not be particularly unusual.

*"If there is no disclosure that they are a victim of trafficking, immigration will take over from there."* 

(Law enforcement professional)

"I think some police forces use immigration powers to arrest, to bring people to the reception centre. I've been in briefings where the police have said 'If someone says they will not come, use your immigration powers to arrest.""

(VCS professional)

### **Fear of traffickers**

Interviewees acknowledged that people are likely to be afraid of exploiters exerting control over them, even after they are no longer in a situation of exploitation. In some cases, these fears were aggravated by concerns that family members could be harmed. Some interviewees noted that people may not be confident that authorities could protect them if they cooperated with an investigation, and this was another barrier that stopped people engaging with the authorities.

"Protection would certainly be one [obstacle]. You know, what reassurances can we give to the individual that the evidence that they're providing isn't going to come back to haunt them should a prosecution take place?" (Local Authority professional)

Exploiters can be present not only in the places where police execute warrants but also in the reception centres themselves. This can stop people engaging with support due to fear of retribution. In the reception centres the researcher observed, law enforcement staff showed expertise in identifying potential exploiters. They were watchful of the dynamics between people, and if they became concerned that a perpetrator was present, they swiftly split them off from the group. Not only did this reduce potential risks, it also allowed them to observe any changes in the group dynamics which might have indicated they were being controlled by the person they had removed.

In one operation, the screening and interviewing was carried out in the same place that the people were potentially being exploited. It was possible that traffickers were present during this process, which would have made it difficult for anyone to tell the police if they were being exploited. In this instance, no one disclosed anything, and so the authorities concluded that they were not being exploited. The reception centre lead later acknowledged that screening people within this environment was not a good way to gain their trust, and that the investigation may have come to the wrong conclusion as a result. It is important to note that many people do not disclose exploitation simply because they do not recognise that their situation is exploitative, and this was something mentioned by many of the interviewees.

# 4.3.2 Finding people who are being exploited – executing warrants

When the police or the National Crime Agency have good intelligence to suspect exploitation is occurring at a specific location, they obtain a warrant to enter the place.

### The impact of executing a warrant

Warrants are often executed with force. Doors can be banged down, and there can be lots of loud shouting to create a disruption. A police interviewee acknowledged that this can be followed by a period of intense disorientation, confusion and uncertainty for the people inside the property.

"Everybody's frightened to an extent, traumatised, there's a lot of noise, the door hanging off the hinges and we've suddenly got a room full of policemen, everybody's being told to stay still, stand still."

(Law enforcement professional)

It was clear from the interviews that the way warrants were executed was particularly troubling for some people.

"One of the victims described the process or the point at which they were 'rescued' – said it was one of the most traumatic things he'd ever experienced."

### (Law enforcement professional)

For some interviewees, executing a warrant with force could compound the trauma of exploitation. It was also thought to hamper trust-building and to stop people engaging with support and investigations.

"I think firstly you need to understand potential traumas that victims may have gone through. So that's really important, just that potential to retraumatise somebody, especially if it is one of those disruptions that's loud and noisy, and everybody is going in and causing a confusion. That's pretty much going to put somebody back at square one for their trauma, and you're definitely not going to get an opportunity to build trust when somebody's in that place – they're still responding to their trauma." (Local Authority professional)

Police colleagues agreed that calm must be restored as quickly as possible after a warrant has been executed. Surveying the situation, asking searching questions, identifying potential perpetrators, gathering evidence and providing an explanation about the reception centre must happen rapidly. There appeared to be a fine balance between minimising the impact of the disruption and also ensuring potential evidence was not covered up.

It was widely acknowledged by most interviewees that entering a property by force is inherently problematic. Law enforcement professionals were clear, however, that this is often the only way, and pointed out that if they did not disrupt exploitation, who would?

Although there was some understanding about how this may affect people, for most police officers the need to 'get their job done' precluded them fully understanding the impact of this approach.

Some interviewees acknowledged that before people were ready to engage with support in any way, they often needed time to manage the feelings created by forceful warrant execution.

# 4.3.3 Alternative approaches to finding people who are being exploited

Warrants are not the only way to find people who might be being exploited. Authorities can also do this through informal welfare checks, and interviewees suggested the possibility of working with partner agencies and companies to devise less traumatic ways of uncovering exploitative situations.

### Welfare checks and partnership working

As well as executing warrants, law enforcement may undertake welfare checks<sup>6</sup> on locations where they believe exploitation is taking place. In such instances, the police may visit a place to have an informal chat with the people working and/or living there to check on their welfare. Some interviewees believed this approach could promote wider choice for people wishing to obtain support and could foster greater trust in authorities. Others worried that welfare checks could place people at greater risk if they were not timed well, thus having the opposite effect and damaging trust in authorities.

Interviewees suggested that partnership working alongside agencies and organisations such as Her Majesty's Revenue and Customs (HMRC), the Environment Agency or the Fire Service, for example, could provide alternative ways to gain access to locations in which exploitation may be occurring to check on people's welfare.

# 4.3.4 Building trust within reception centres: first impressions matter

While people often came into the reception centres with pre-existing fears of the authorities and their exploiters, the researcher observed several factors in the reception centre environment that either aggravated or soothed these fears.

### Professionals' personal fears and anxieties

There were instances where the anxieties and fears of people working in the reception centres mirrored those of the people attending them. These anxieties were particularly noticeable when people first arrived after being recovered. Less experienced staff and those taking part in operations for the first time were visibly anxious. In some cases, more experienced staff from the National Crime Agency and the Gangmasters and Labour Abuse Authority were brought in to supervise proceedings and bolster the confidence of their colleagues.

### The reception centre venue

A variety of venues were used, including army barracks, community centres, church halls, a police victim support centre and a scout hut. The suitability of venues varied. They were sometimes unclean and cold, and some were not fit for purpose.

Interviewees acknowledged that finding suitable venues was a major challenge, with better venues often booked up well in advance. Having to apply for warrants electronically meant police often could not plan effectively, since not knowing when a warrant would be granted affected their ability to obtain a venue.

<sup>6</sup> A visit to a premises/location to check on inhabitants'/ workers' welfare, with a view to identifying people who are potentially being, or at risk of being, harmed.

Rooms in the reception centres the researcher observed were often large, with a lot of open space that felt exposing for people who needed privacy. However, attempts were always made to divide up the space and create 'breakout' areas for people to rest and relax. An approach that seemed to make people more anxious was when reception centres were set up to replicate custody suites: logging people in and out and putting them in interview-type situations.

"It's a difficult one, but I can see how when you're dealing with victims, some of the processes we have for dealing with suspects in custody – whilst it is all about risk assessing and ensuring safety – might have to be a bit careful because the way somebody views it could be that they'd been arrested." (Local Authority professional)

### Providing clarity of purpose

It was not always made clear why people had been taken to reception centres. At times, translated information was made available to explain the purpose of the reception centre and/ or interpreters were used to do this. However, interpreters were not always present when people first arrived, leaving them without an explanation for a while. When that explanation came, it was often brief and was not well communicated. This appeared to increase feelings of anxiety, fear and even anger.

"The uncertainty for most people then can lead to that level of anger, resentment, frustration." (VCS professional)

### Helping people get privacy

Although privacy was understood to be important, the venues sometimes made this difficult to achieve. Interview spaces were fashioned from moveable screens, tables were shifted to separate sides of rooms, and staff often overcrowded 'breakout' spaces, particularly around mealtimes.

"I guess it's difficult because the reason why you have a lot of people there sometimes is, you're not sure what the needs are going to be and you want to be able to meet them immediately. But then that becomes hundreds of people and a couple of people feeling a little bit like a mouse in a cage."

(VCS professional)

Venues were not always exclusive to the reception centre either. At times the centres ran alongside a range of community activities with public access, which brought an additional element of risk and reduced privacy.

In one instance, DNA swabs were taken from people in the crowded 'breakout' space. It appeared that privacy had not been considered.

### Addressing language barriers

Interpreters were available at most of the reception centres. However, as mentioned above, interpreters were sometimes not present when people first arrived, and there were not always enough of them. However, they played an important role in aiding communication and building rapport. People visibly relaxed when interpreters arrived, and their presence appeared to reduce misunderstandings and feelings of isolation.

"As quickly as possible, pairing them up with someone who is there just to support them outside of police – I think that can do a lot. And often some of those things will happen once they get to the reception centre or a little bit later down the line, but having it as early as possible when they're actually first greeted, having that card [to explain the purpose of the reception centre], that interpreter does a lot in terms of building trust and building willingness to engage."

(VCS professional)

### Freedom of movement and choice

In all but one instance, freedom of movement was restricted. It was not clear by observing the centres whether people had been given a choice to attend or whether they were allowed to leave. Some interviewees were sceptical that the optional nature of attending and remaining in reception centres was made clear to people.

"They will not coerce people into coming, but they won't give them the option of not coming. They'll say 'You need to come into this rest centre', and if they go 'I don't want to come, do I have to come?' No, you don't, but actually we're not going to give you that option." (VCS professional)

Considering potential pre-existing fears of law enforcement, even if people were given the option

of not attending, the likelihood of them going against the wishes of the police might be slim.

"Obviously, we can't ever force anyone to come to a reception centre. People decide. Some will come along because they think they might get arrested if they don't, but they'll come along."

### (Law enforcement professional)

In addition, after warrants were executed, locations in which the people worked and lived were often closed down, meaning they lost their homes and jobs in the same day. With nowhere else to go, attending the reception centre appeared to be their only option.

Considering the resources that went into these anti-trafficking operations, reception centre workers always hoped that people would attend and stay. There were times, however, when people asked to leave but were not allowed to. The police often adopted stalling techniques to prevent people going.

"I also see sometimes a lot of anger around being free to leave. So even though people are told they're allowed to leave, often the police have a look at their belongings, and they have no idea where they are, and they've got no way of getting home."

(VCS professional)

"We try every means under the sun to get round it [people leaving]. To delay them from doing so and to make sure they know they're not being held against their will but 'in the meantime, just speak to these people or that people' or whatever."

### (Law enforcement professional)

People were commonly kept under constant surveillance – escorted to the toilet, for fresh air or to smoke. Police saw these moments as opportunities to engage with people and build trust, but some other interviewees thought these actions exhibited too much control, increasing fear and mistrust.

"I don't really understand why we're being asked to chaperone. It does put us in that same bag of control over movement in and out of the centre. Or the police will go with them with an interpreter, so they can hear what's being said, which definitely replicates that feeling of 'you're in trouble', rather than 'you're a victim and we're here to support you'." (VCS professional)

The pressure on law enforcement to secure witness testimonies, along with the need to distinguish perpetrators from people at risk, could explain the urge to keep people for as long as possible.

"I think the other thing that worries me is when I say loss of agency, I also think loss of any kind of freedom, so people need to be free to make decisions – even bad decisions."

(VCS professional)

### The presence of uniforms

It was a widely held view by the authorities and VCS organisations working within the reception centres that staff should not wear uniforms. They thought wearing day-to-day clothes put them more on a level with the people recovered. On one occasion, a senior investigating officer was asked by the reception centre lead to remove his jacket and tie, as he looked 'too formal'.

"[Casual clothing] just breaks down the barriers. It just breaks down that you're a human being and you're not a police officer really for a while."

### (Law enforcement professional)

Some organisations such as the British Red Cross, Local Authority emergency planning teams and the Gangmasters and Labour Abuse Authority wore identifiable pieces of uniform such as branded t-shirts, though the rest of their clothing remained informal.

Most people working in reception centres adopted a different type of 'uniform', comprising jeans, t-shirts, hoodies and trainers. This meant that everybody within the centres looked the same, and it was unclear which organisation each person represented. Though it was an attempt to remove barriers and work in a traumainformed way, this casual dress code may have had the opposite effect. A sea of the 'same faces' could be daunting and confusing, and made it difficult for people to choose which organisations or agencies they interacted with.

A woman with lived experience of exploitation recounted her own experience of plain-clothes police officers visiting her house. Though they were attempting to make themselves more accessible, she thought they were traffickers, and the experience left her distressed and fearful.

### 4.3.5 Building trust within reception centres: a continual process

For the reasons outlined above, first impressions of reception centres seemed mostly to feed people's fears rather than helping overcome them. However, building trust is a continual process, and it was not only the first impressions that mattered, but also how the centres were managed for the entire time people were there.

### **Care and control**

The overriding purpose of each operation tended to influence how the balance of care and control was managed. As previously mentioned, most reception centres appeared to focus on investigation and prosecution rather than protection and support. This meant reception centres sometimes felt focused less on caring for people and more on getting them to do things.

While a number of obstacles have been mentioned so far that could have been overcome through more careful consideration, it is also worth noting that even when control was the

main focus, it was often executed with care. Police officers in particular worked to build trust and rapport by spending time with people informally outside interview situations - eating together and playing games such as cards and pool. In many instances, they were observed checking in on people's welfare and ensuring their basic needs were being met.

The challenge in these circumstances was that organisations best equipped to provide things such as immediate support, advocacy, advice and psychosocial support were rarely in control. These organisations (mostly VCS organisations) had to work within the restrictive timeframes and parameters set by law enforcement colleagues, meaning they could not offer support as freely as they would have liked. This prevented people from getting help at whatever time was best for them, and also meant organisations struggled to provide the same level of support to each person present.

In addition, the number of staff members enlisted to gather information from people far outweighed those who were there to give information to people. This added to the sense that control dominated over care.

Information 'givers' from the voluntary and community sector often held more relevant



### Figure 4: Information givers and information gatherers

knowledge and expertise than professionals gathering information, but they were underused in the reception centre context.

Some interviewees felt that elements of care and control could be balanced more effectively by making sure that reception centres were managed through collaboration between Local Authorities and independent specialist organisations, rather than by law enforcement.

"We have the police accompany because they're the ones that are going to break down the doors and issue warrants or whatever. But from the moment that person is rescued and relocated to a safe location such as a reception centre, law enforcement should not be involved in any contact with an individual until we've gone through the engagement." (Local Authority professional)

The following example shows how people from different organisations worked to build trust in one of the reception centres the researcher observed.

### Independent specialist support

Independent specialist organisations played an important role in offering impartial advice and advocacy. For example, members of the British Red Cross anti-trafficking team provided information about the NRM and more general entitlements linked to employment and education.

In providing immediate practical support, the British Red Cross emergency response team in particular kept the heart of reception centres running. As one law enforcement officer commented, in 'keeping the kettle warm' they met the most basic needs of everyone in the centres. Their presence, and that of allied organisations, brought a 'friendly face' and an element of calm to the centres, and they used informal interactions to build connections with the people recovered to the centres.

### **Reception centre observation**

# Good practice example: Trust-building within a reception centre

- A multi-agency briefing took place at the reception centre, which brought the team together and provided clarity of purpose and a timeline of events.
- A police officer of the same nationality as the people recovered helped execute the warrant then went on to the reception centre to offer a sense of continuity. His presence appeared to help the police build trust more easily.
- Face-to-face interpreters were available from the outset.
- The purpose of the reception centre was made clear to the people attending.
- Although the venue was not private (community groups also used the space), the reception centre lead managed the potential risks well, keeping the public and the people who were recovered apart from one another.
- Health professionals undertook health screenings and provided psychosocial support throughout the day.
- The centre was not overcrowded, and staff tried to create a calm environment where people could have privacy.
- The same three police officers stayed all day, working continuously to reduce fears and build trust.
- The British Red Cross helped with immediate practical needs.

### Outcomes

- People appeared to trust the reception centre staff more throughout the day, and slowly disclosed more of their stories.
- Although they showed distress throughout, this reduced as they began to feel less afraid.
- Two of the three people agreed to work with the police to leave the exploitative situation they had been in. They gave witness testimonies and allowed the police to find them accommodation for the night, so they could have space and time to decide what to do next.

### **Reception centre observation**

# Good practice example: Advice, advocacy and support provided by the British Red Cross anti-trafficking team

- A British Red Cross anti-trafficking officer went to the reception centre to provide advice and advocacy, and to give the three people who had been recovered to the centre information about their rights and entitlements.
- The anti-trafficking officer could only talk to the people with police permission, and had to wait until after the police had undertaken informal interviews with them. This meant she could not spend the same amount of time with each person and so could not give everyone the same level of support.
- The police decided what would happen to two of the people present before the antitrafficking officer could spend time with them. One was taken to a police station to await interview by immigration, and the other was returned to where he lived. The anti-trafficking officer was made aware of these decisions after the police had already removed the two people from the reception centre.
- Concerned by this, the anti-trafficking officer spoke with one of the lead police officers.

She asked for time to speak with the two people who had left, to ensure they had the opportunity to obtain relevant information and advice.

- The police lead apologised and acknowledged that time should have been given to the anti-trafficking officer to support each of the people equally. He promptly arranged for the man who was heading home to be brought back to the reception centre. Although the anti-trafficking officer appeared unsure whether it was right to bring him back to the centre, this did mean she could offer him relevant support. As the other man had already been taken into custody, a phone call was organised so she could provide support remotely.
- In both cases, the men were given opportunities to ask questions, clarify information and understand how to access ongoing support should they want to in the future.

### **Reception centre observation**

# Good practice example: Immediate practical support provided by the British Red Cross emergency response team

- A British Red Cross volunteer with a number of years' experience attended the reception centre.
- He appeared calm and patient.
- He was alert to the needs of the people and professionals within the centre, and was on hand to provide immediate practical support in the form of food and drinks.
- He moved tables around to increase privacy, and people became visibly more relaxed after this.
- He asked the police to designate an area outside for smoking so people could have a single safe space to go.

- He got a sleeping area set up when people looked tired.
- He sat with people and worked to build trust and rapport through informal conversations, working with interpreters to aid this communication.
- He regularly washed up mugs, glasses and plates to keep the centre tidy and clean.
- The people present appeared relaxed in his company and interacted with him more readily as the day progressed.

# Time AND Space

ARTWORK by Federicaciotti com

# 4.4 A lack of time, and challenges of timing

"Some barriers we won't overcome. The trust element is going to take time, but if you can understand the barriers, you can start to break them down [...] be prepared that it's going to take a long time and that's the best you can do - just accept there's going to be no instant fix, nothing we can change straightaway."

(Law enforcement professional)

## 4.4.1 Time pressures

In most cases, centre workers did not have enough time to help people overcome their fears and engage with the help on offer. Staff were under pressure to deliver support and gather witness testimonies within everdecreasing timescales, and the lack of time stopped people engaging with both immediate and ongoing support.

The reception centres the researcher observed were in operation for between 2 and 12 hours, with an average duration of 7 hours. While reception centres technically work to a 24-hour model – with some prepared to work longer - they generally operate for much shorter periods than this.

"Sometimes we've gone overnight, but usually maximum 24 hours – we're probably talking 12 to 18 hours maximum."

### (Local Authority professional)

Law enforcement interviewees acknowledged that where they had solid intelligence and where exit strategies were well planned, reception centres could afford to be open for shorter periods. However, they also made clear that undertaking initial assessments and beginning the engagement process was likely to take longer than the time available.

Some police interviewees admitted a sense of desperation created by only having short windows of time to encourage people to open up and speak. They also highlighted the additional pressures created by limited venue availability and people asking to leave - and these were things that the researcher observed in practice too.

"In some cases, it's the victims themselves because they want to go. Everything you've said in terms of cost and everything else, there's some time constraints around that [...] but very often the most pressing time restraint is that victims want to get up and go."

#### (Law enforcement professional)

One overriding reason that was often given for the time pressures placed on reception centres was the cost of running them.

Most interviewees agreed that how time is used must be considered with care, to stop reception centres feeling like factory production lines.

"I suppose what comes to mind is having the time and space for it not to appear like a production line."

(VCS professional)

## 4.4.2 The timing of events – getting it right

It appeared to the researcher that managing reception centres was about balancing the best interests of the people attending the centres against the need to gather information for potential investigations.

Through informal conversations with law enforcement professionals at reception centres, it became clear that the timing of certain events was more complex than one might imagine. Careful thought had to be given to the timing of initial conversations and interviews, along with when to give information about the NRM and when more formal 'achieving best evidence' interviews should or could be undertaken. Some believed that, as NRM support can take some time to arrange, providing information about it should take priority over interviewing people. However, for others, the risk of offering support via the NRM too soon – and then being held to account for potentially inducing people to provide witness testimonies through the 'promise' of such support - was too much of a risk to take.

As one person with lived experience of exploitation commented, information has to be given at whatever time is right for each individual. "I'd never heard that word [NRM] before. So, imagine here is a person, she started telling me about the NRM, something like that, and then she started talking to me bit by bit, for me to understand. But it's not at the right time, it's everything I am going to keep in my head, because my mind was confused, I don't know what I'm doing."

(Person with lived experience of exploitation)

For partner agencies within the centres, working within available timeframes was also a challenge, as they were often obliged to fit support around the activities and priorities of law enforcement colleagues.

# 4.4.3 Slowing things down and speeding them up

There were instances where things needed to be slowed down to give people space to consider their options. Independent specialist organisations played an important role in gently pushing back against law enforcement when people needed more time. Conversely, these organisations could then help speed up proceedings to move people safely on once decisions had been made. The following scenario highlights these processes in action:

### **Reception centre observation**

### Good practice example: Slowing things down and speeding them up

- A British Red Cross anti-trafficking officer offered information, advice, advocacy and support to a woman who was recovered to the reception centre.
- The police assumed the woman would enter the NRM and hurried the anti-trafficking officer to tell her about it.
- The woman was distressed. She cried a lot and could not communicate.
- The anti-trafficking officer asked that the woman be given some time and space to manage her feelings before she explained the NRM and other options to her. The police agreed and left the room for about an hour.
- On their return, the police asked whether the woman had made any decisions about entering the NRM or accessing other options. Their presence changed the atmosphere in the room from one that had become more relaxed to one that felt pressurised.

- The anti-trafficking officer asked for more time to explain the NRM, and made sure the police officers were clear that any decisions needed to be made by the woman herself and not the centre staff. The police officers took a step back and gave the antitrafficking officer space to continue providing information at a pace that worked for the woman.
- Towards the end of the day, the woman agreed to access a pre-NRM safe house so she could have more time to decide her future.
- Once she had decided to go to the safe house, the anti-trafficking officer worked quickly to secure a place and made all the arrangements to move her on from the reception centre safely and swiftly.
- In this way, the anti-trafficking officer slowed things down when the woman needed more time, and sped them up once she had decided what she wanted to do.

# 5. The National Referral Mechanism and support beyond the reception centre

The National Referral Mechanism (NRM) is the UK government's framework for formally identifying survivors of modern slavery and people who have been trafficked and referring them to the support they are entitled to. It is the main form of support for people who have been exploited, and alternative options are limited.

However, the NRM is a complex process, and the observations of reception centres revealed a number of factors that made it more difficult for people to engage with it. An NRM referral also requires a person to give informed consent, and this appeared very difficult to achieve in the reception centre environment.

# 5.1 Engaging with the National Referral Mechanism

During the fieldwork period, 172 people were recovered to a reception centre where the British Red Cross provided support, and four of these people entered the NRM. Of the 22 people who attended the ten observed reception centres, none entered the NRM. Such low numbers signify a possible disconnect between what the NRM is supposed to do and how it was viewed by the very people it was set up to protect and support. A VCS interviewee mentioned that the number of people referred into the NRM via reception centres appears to have decreased over time. During the fieldwork, a range of obstacles emerged that might explain this.

## 5.1.1 Fear of authorities

As outlined previously, people may have an innate fear of the authorities which may make it difficult to trust the support mechanisms provided by those same authorities – such as the NRM. People may be unclear about how the things they say or don't say might affect any decisions that are made about them, and interviewees felt that this could be a barrier to entering the NRM for some.

### "There is fear of not knowing what to say." (Person with lived experience of exploitation)

Likewise, others mentioned the fear that engaging with the authorities could have a detrimental rather than a positive effect.

"It becomes worse, worse, worse. We only want assurance that really they can help us, not to put us in another situation that it becomes more worse, because really, really traumatised, the trauma is still there, it's hard to remove fears."

(Person with lived experience of exploitation)

# 5.1.2 Fear of removal from the country

Linked to anxieties about the authorities was the specific fear of being removed from the country. Interviewees spoke about how people might worry that engaging with authorities and the NRM could make them more vulnerable to involuntary removal.

"That would be the first thing, that will be the first thing what come to him or she, the person's mind. That's all: 'They are going to take me to a detention.'"

(Person with lived experience of exploitation)

# 5.1.3 Knowledge and expertise of people working in reception centres

In practice, the NRM is a complex process, and anyone helping a person decide whether to enter it needs a sound level of knowledge about its timings, limitations, and interactions with other systems (e.g. the asylum system). Organisations that submit referrals are officially known as 'first responders', and in addition to an understanding of the NRM and exploitationrelated offences, they need competent assessment skills and the ability to explain all of the consequences of an NRM referral to the person in question.<sup>vi</sup> Apart from a few specialists, many first responders do not regularly encounter exploitation in their daily work, so their knowledge of the NRM can be limited. In general, interviewees thought NRM training across public authorities was improving, but confirmed there is some way to go before the system's complexities are fully understood.

"Things may be improving, with professionals beginning to understand a bit more about the NRM, but not the intricacies – the end-to-end process and what happens to people when they exit."

#### (VCS professional)

Part of the problem is that people working for public authorities – such as police officers, for example – often have to be able to respond to a very wide range of situations, and it may be unrealistic to think they can be experts at everything.

"Today they're doing modern slavery, and tomorrow they're going to go and support [...] victims of domestic violence. They do have to know a lot about everything, and I appreciate that."

#### (VCS professional)

This poses a challenge, because detailed knowledge of the NRM is a key requirement in reception centres if people are to be referred via this route. It is crucial that, among staff in the centre, someone can explain the NRM in straightforward terms, while also helping people tell their story in a way that will make sense to the decision-makers at the Single Competent Authority – who will ultimately decide whether or not the person is recognised as having been trafficked.

Engaging people in the process is very difficult if professionals cannot explain clearly what it is.

"The NRM is great because it provides safeguarding and care and support for victims. How can you sell that to a victim? There's one point where you're going to have to be a salesperson around the NRM. How can you sell that if you don't know what it is?" (Law enforcement professional)

In general, public authority interviewees saw the NRM as an entirely positive thing and did

### **Reception centre observation**

# Account of a conversation between a police officer and a man recovered to the reception centre

The police officer appeared professional. He was not warm in his manner, but not cold either. He sat on a table opposite the man and did not make any eye contact with him throughout. Towards the end of the conversation, the police officer began to explain modern slavery. His explanation was not thorough or well communicated.

In explaining the concept and the support on offer via the NRM, he said,

"In the UK we have something called modern slavery. If you think you are being exploited we can offer you support in the form of housing if you are unhappy with your situation."

The police officer did not appear confident in his explanation of modern slavery, nor did he fully explain the support that could be available – either through the NRM or other avenues. The man had told the police officer that he was working 7 days a week, around 12 hours a day. He was being paid under the national minimum wage. The police officer did not talk about the national minimum wage or fully explore further exploitation indicators which were present.

The man said everything was fine, and that he just wanted to go back to work. The police officer agreed that he could go back to work the same day.

In this example, the NRM was explained in 3 minutes.

not always appear to understand the wider ramifications for people who enter the process.

Others, particularly workers from VCS organisations, felt that people were sometimes being coerced into the NRM through false promises and over-selling of the support available. It was felt that people were being channelled into the NRM as if it were their only option. There was a perceived police fear that if people did not enter the NRM they might 'lose' them, with negative consequences for their investigations. Within the reception centre environment, the additional pressure to get people into a safe place before the day's end was another reason why some thought the NRM option was often pushed hard.

Some reception centres included independent specialist organisations in their multi-agency teams. Such organisations helped develop the knowledge of their public authority colleagues by providing independent information and advice about the NRM and its consequences. They could also ensure that people fully understood the NRM before they agreed to enter it. One interviewee who provided independent support for reception centres highlighted the difference it can make when the NRM is explained by somebody with the correct knowledge and expertise right from the outset:

"I think if I get to them and I'm the first person explaining the NRM, usually it's positive. Surprise and gratitude and hopefulness that [the NRM referral] will happen really quickly, and they'll be safe and protected and get support. But if I've come in after someone else has explained, I often have to do a lot of clarifying because they're confused, or they don't want it, because they don't understand that it could be many different things." (VCS professional)

## **Reception centre observation**

Independent specialist support: Account of a conversation between a British Red Cross anti-trafficking officer and a woman recovered to the reception centre

- The woman was visibly distressed, crying and wringing her hands. Her eyes were glazed and still. The British Red Cross anti-trafficking officer spoke softly and slowly. She asked occasional questions about the woman's welfare and reassured her by saying that they could talk when she was ready. There were lots of long silences, but the anti-trafficking officer did not appear uncomfortable with them or attempt to fill them.
- After about half an hour the woman agreed that she was ready to hear some more information about her options. The antitrafficking officer moved to sit next to her, rather than across the table.
- The anti-trafficking officer was concise and clear throughout. She kept checking that the woman understood what she was saying and felt OK to continue. She made sure that the woman knew that she could ask for things to be repeated, take a break or have more or less information as she wished.
- The anti-trafficking officer began by asking the woman about her understanding of trafficking. She replied "It's like when they moved me around from place to place like a goat." The anti-trafficking officer began

to explain the NRM. She did this in very small segments, making it understandable and manageable. She talked about the full range of support that could be provided via the NRM, including outreach support if a safe house was not what the woman wanted. She explained the importance of informed consent and what this meant. She also explained how the NRM and asylum processes related to one another.

- This skilful interaction demonstrated the antitrafficking officer's expert knowledge of the NRM and trauma-informed practice. Over time, the woman appeared to relax slightly.
   She was no longer crying, and her eyes were less still. Her mind appeared clear enough to ask some clarifying questions.
- It transpired that she had previously been referred into the NRM but had not realised and so had not yet received any help. She decided to take some more time to consider her options by accessing a safe space for a few days before accepting support from the NRM.

In this example, the NRM was explained in 45 minutes.

### 5.1.4 People's need to return to work

For most people recovered to the observed reception centres, returning to work was their primary focus. Being able to send money to their families or to pay off debts to their traffickers were likely motivations, according to police officers the researcher spoke to during observations.

Entering the NRM reduces earning potential, significantly discouraging people from engaging with it.

"There's a real concern amongst victims: 'You're offering me help and support and accommodation and food [but] I was going to earn money to send back to my family, so whilst that person maybe exploiting me, they may pay me some money, you're not going to pay me any money, I'm going to stay.'" (Law enforcement professional)

"We don't have an answer to that because we can't give people money, we can't take that up, and I think that's one area where it is different to other crime types. There can be some really stark financial choices for victims that we just can't help with – not in the short term." (Law enforcement professional)

In addition, not being able to work can have adverse psychological effects that are compounded by placing people in positions of 'victimhood'.

"We've got this proud Polish man who said "I'm not a victim. I may not earn as much as you, but I'm not a victim. I send £50 a week back to Poland."

(Law enforcement professional)

"Why do they treat us like this? We are not begging for money; we are asking for [...] justice. We are seeking for justice; we are not begging. We still have strength, and we still have more productive in this country. But now they are doing like that, how can we get on with our life? So that's why I said, in this country I thought they are human rights, but no, I didn't feel that. Especially they are pressing you on this NRM, this is only the option, pushing you to this NRM."

(Person with lived experience of exploitation)

# 5.1.5 Uncertainty and distance: availability of NRM support

The location of support available through the NRM – particularly safe house accommodation – depends on where the provider has space, and getting support may mean moving to a different part of the country. Initially a person may have no idea where they are going, who will be taking them there or who they will be living with.

"You probably won't get much detail until we're picking you up, you know? That's quite scary, a bunch of people you've never met before are coming to pick you up and take you to another bit of the country and you don't know what it's going to look like, you don't know who else is going to be there. And even though where you are isn't good, at least it's got some familiarity." (VCS professional)

Often with little information or understanding, people are expected to take a leap of faith into an uncertain future, and the situation is worsened by losing the connections and networks that they have built.

"You are in effect asking people to make a leap into this period of limbo and uncertainty by engaging the NRM. There's no certainty of the outcomes or even where you'll be or what support you'll get."

#### (Law enforcement professional)

"'Why do I have to be moved away? Because I still need to provide for my family. Why do I have to be moved from where the work is in London to Middlesbrough or Manchester? All my friends are here – although I've been trafficked and I haven't been given any money, these are my friends, so why do two of them have to go there? Why do I have to go up to Manchester on my own? Why does she have to go to Wales? We want to stay together.' That's always a bit of a concern."

(Law enforcement professional)

Interviewees mentioned that reception centre staff have to be alert to the needs of people who have been routinely let down and exploited by others, to ensure offers of support do not replicate their trafficking experience. "I mean if [moving people to an unknown location is] not replicating a trafficking situation, it is certainly not the beginning of an empowering recovery period."

(VCS professional)

# 5.1.6 The length and timing of NRM support

Some interviewees pointed out that support available within the NRM is time-limited, and does not guarantee leave to remain in the country or work, which can reduce people's willingness to engage with it but also means that people can be re-trafficked after their NRM support ends.

"For how long, how long they give you security in this country if you're going to go to the NRM?"

(Person with lived experience of exploitation)

"What's going to happen when we let them go at the end of the NRM? It's no good people just falling off a conveyor belt into the abyss and then we find them [again] five, six weeks later or six months later."

(Law enforcement professional)

Resourcing constraints mean that support is not always immediately available for those who choose to enter the NRM, and several interviewees mentioned that this gap in support could be an issue. The person may stay temporarily in the reception centre (if resources enable), or they may get a hotel room for a few days. The latter option in particular has to be managed carefully as it can involve risks of being found by their trafficker, or of their returning to work or simply leaving the premises because the support they thought they were signing up for has not materialised.

"So, we put them up in the Premier Inn, 20-odd people for two nights. After the first night the trafficker found out where they were and turned up at the hotel. And said 'Yeah, come and work, here's your money, here's your wages that I owe you.' Terrible. They didn't [return] no, but they could have done, and they shouldn't have been there; they should have been taken off to their safe houses."

(Law enforcement professional)

## 5.1.7 The lack of alternative support options and the role of Local Authorities

It became clear during the research that options other than the NRM are not always available. People may have a stark, two-way choice between either entering the NRM or leaving themselves potentially without a home or workplace. One police officer told the researcher about a group of people found during an operation. By the time the reception centre was stood down, their only option was to leave without any support, as they did not wish to enter the NRM and did not meet the criteria for Local Authority housing. They were provided with a taxi fare to their destination of choice and walked away from the reception centre.

Local Authority staff had different roles and responsibilities within the reception centres the researcher observed, but their roles were mostly minimal, as most people who were recovered to the reception centres either returned to their place of work or were arrested to await interview by immigration enforcement.

Interviewees mentioned that in some areas Local Authorities are rarely involved in reception centres, as they cannot spare the staff. Other interviewees felt that Local Authority staff sometimes think that providing reception centre support goes beyond what should be expected of them in their roles. Some also questioned whether a lack of knowledge and expertise in supporting exploited people might affect Local Authority engagement with anti-trafficking reception centres.

In addition, interviewees stated that some Local Authority professionals do not necessarily understand their role in supporting people in exploitative situations, and that this makes support options outside the NRM unclear and limited.

# 5.2 Quality of referrals into the National Referral Mechanism

It is not possible to say whether referrals made through reception centres are any better or worse than those submitted via other routes, as relevant data was not available. However, some experts the researcher spoke to felt confident to comment on how reception centres affect the quality of NRM referrals.

The general view from law enforcement and Local Authority interviewees was that NRM referrals coming through reception centres are better than most. In their opinions, a reception centre provides more time to collect relevant information and complete the assessment form compared with other environments where they might complete a referral - such as police stations. Interviewees felt that the presence of a multi-agency team improved the quality of referrals, because the referral could draw on the knowledge and expertise of all the agencies involved. There was also an assumption that 'first responders' chosen to attend reception centres were likely to hold more relevant knowledge and expertise than first responders in other settings, pushing up the quality of referrals.

"I think if you've got victims there, I genuinely think it would have been a positive response because you're able to build that rapport with somebody, and really take that time with them." (Local Authority professional)

"Generally, I think they are typically better in that space, because when you know you're going in with potential victims and you're prepared to do NRMs you tend to get people who are more prepared to do NRMs. Whereas in other spaces, they tend to be done kind of on a whim, unexpectedly, whoever's available. And so [with] the planning that comes with reception centres you will have more specialist people participating and hopefully doing those referrals."

(VCS professional)

A few interviewees, however, had the opposite view, saying that the time constraints within reception centres generally led to poorer-quality referrals. As timeframes got tighter, some saw it as increasingly unlikely that they could submit a referral of high enough quality to secure a positive decision.

"The reception centre is working to a more rigid timeframe and format, whereas taking time has just got to be better for that person."

(Local Authority professional)

"I have seen that sometimes, and obviously the impact can be disastrous, because people basically get negative decisions or have their credibility undermined because the information's not accurate on the form." (VCS professional)

In particular, interviewees highlighted that time is important for allowing people to tell their full stories and for any gaps to be filled in and inconsistencies ironed out, promoting accuracy from the outset.

Within a reception centre, the police are most likely to complete NRM referrals. Considering that people in the reception centres often fear or mistrust them, this could affect the level of information that a person is willing to disclose – which in turn could affect the quality of the referral and the likelihood of a positive decision from the Single Competent Authority.

"They think they're making a statement to the police, which invariably they are if the police are the first responder. That can be a bit of a barrier."

#### (Law enforcement professional)

As mentioned in section 5.1.3, first responders at a reception centre can have limited knowledge and expertise around the NRM, and although some areas may be in a position to choose experienced professionals to attend reception centres, many are not.

"I don't think a lot of first responders understand the NRM process. They know they're a first responder, they know there's this form to fill in but [...] to be able to explain all the process, I'm not sure all are fully equipped to do that."

(Law enforcement professional)

## 5.3 Obtaining informed consent to enter the National Referral Mechanism

"Me, I will not sign document which I don't even go through briefly with someone, I will not. Because signature means a lot, signature can lead you to trouble. It means a lot." (Person with lived experience of exploitation)

# 5.3.1 The meaning of informed consent

Interviewees raised concerns about the process of obtaining informed consent, and how this can be done properly within the time available. The researcher also observed people coming into reception centres who were already in the NRM but were not aware of it. This section explores the meaning of informed consent and the inherent challenges around getting it in a reception centre environment.

The NRM requires a person to give their full consent and is not an automatic process for any adult who may have been trafficked. To give consent, the person must be able to understand what they are doing, and consent must be voluntary and informed.<sup>vii</sup>

The Human Trafficking Foundations, Slavery and Trafficking Survivor Care Standards 2018 provide an overview of the essential components of informed consent:

The person must be given clear and thorough information about the following things:

- the concerns that the professional has about them
- the NRM process including the person's freedom to withdraw consent and to enter or leave the support service at any time, along with the consequences of these actions
- the support available, including the benefits and risks of taking up such support and the likelihood of each of these
- alternative options and how different agencies or services can support them, including the limits to this support.

The person must be given time to:

- make their decisions and reflect, understand the information they have been given and the consequences of any actions they do or do not take. If there is an immediate safeguarding risk, providing this time will need consideration. - ask questions and clarify information as many times as needed.

In addition:

- the person must be told why personal information is being gathered from them, who is going to use the information, and how their personal information will be stored.

## 5.3.2 Choosing to enter the NRM

"I've known people who have entered the NRM and not known they've been in the NRM. They didn't really understand what they were signing up to."

### (VCS professional)

Through observation it was apparent that some law enforcement professionals saw the NRM as the automatic and only route for people making a disclosure of trafficking or other forms of exploitation.

During one operation that the researcher observed, a police officer acknowledged that everyone would be treated as people who had experienced trafficking from the outset, adding that if officers still thought this was the case after interview, "they will enter the NRM".

"I think my personal reflection is the police are probably thinking that the NRM is a duty to just automatically refer, the same as everything else they have to do. It's just another thing they just have to do, and so the consent thing is constantly a challenge for us."

(VCS professional)

When a person's home and workplace are locked up by the police or Local Authority, limited alternative options can mean people often have no choice but to enter the NRM. For those from outside the European Economic Area the 'choice' is starker still – enter the NRM or risk being detained.

"There are not many options, yeah. So, it's like it's in front of you. If you don't go there, you detain me. If I don't go there, you set me free. Of course, I will say it, I will do it, because that will set me free, and not really because they truly understand what they're going through." (VCS professional)

# 5.3.3 Getting relevant information and advice

Section 5.1.3 discussed the challenges people can face getting good-quality information about the NRM from reception centre staff who may not be specialists. With this in mind, many of the interviewees felt that the NRM should only be explained by those with the relevant knowledge and expertise – and preferably by someone independent from the authorities.

"I guess my feeling is that the information about the NRM probably needs to be given by someone that's actually not a member of one of the authorities, probably."

(VCS professional)

"Yeah, and it's probably an opportunity to talk it through with someone who's independent. I think the idea that you are given information from, say, a police officer and being expected to make a decision quite quickly with no one else to talk to... I certainly know if I've got big decisions to make, I almost always will talk it through with someone else. And the idea that someone wouldn't in this situation I think is quite odd."

#### (VCS professional)

Pre-NRM legal advice funded through legal aid is currently not available. Independent legal advice was seen as important, particularly for people from outside the European Economic Area who needed to understand the consequences of an NRM referral alongside a possible application for leave to remain.

"You are clearly vulnerable – there's loads of issues going on here. You might not be here legally, you might be being exploited, you might have some pressures at home. Actually, we're going to cool off for an hour, and here is an independent legal adviser who can tell you what this means and all of your options, and it's up to you."

(VCS professional)

To prevent a conflict of interest between an investigation and the NRM process, interviewees suggested having an independent person to complete referrals within reception centres as a way to improve the process of informed consent. They also acknowledged, however, that when the police submit referrals, they are dealt with more efficiently and taken more seriously than VCS referrals, meaning that support comes through sooner. It was beyond the scope of this research to consider these points further, but they could form part of a future research project.

## 5.3.4 Getting time and space

Section 4.4 of this report discussed challenges relating to time and space. A lack of time is possibly the biggest obstacle to securing informed consent.

In circumstances where reception centres are only open for a few hours, it is hard to be confident that any referrals can truly be 'informed'.

"I think that's a huge problem. I think there's real questions about whether any referrals under those circumstances have been met under informed consent."

(VCS professional)

People need time and space to make sense of their situation. For some, information will need to be explained a number of times before it becomes clear enough to make decisions.

"Yeah, it's good, but it's not that moment the person is going to accept it, because it's difficult. I don't know for other people, but for me it's not the same day that somebody explained to be about NRM is the same day I'm going to accept it, no. Because I need time to think about it."

(Person with lived experience of exploitation)

Taking into consideration all the obstacles presented in this report – particularly the evertighter timescales that reception centres operate under – it is difficult to see how the conditions of informed consent can be met within that environment.

# 6. What happened next? The consequences of attending a reception centre

Interviewees did not agree whether being recovered to a reception centre was a positive or negative thing for a person in an exploitative situation. The police and statutory agencies felt that reception centres were a force for good, while the voluntary and community sector was less certain. In the sample of reception centres observed for this research, people went on to a range of locations once they left the centres.

# 6.1 After the reception centre

Twenty-two people attended the reception centres observed for this research, and their next steps varied widely:

- Eight were arrested, taken to police stations and interviewed by immigration enforcement officials.
- Eight returned to work.
- Two decided to stay with friends and not return to work.
- Two decided to stay in a hotel, where they would have more time to consider their options.
- One returned to accommodation which was separate from their place of work.
- One went to stay at a pre-NRM safe house to take more time to consider their options.
- Three of these 22 people agreed to be interviewed by police, but the remaining 19 did not wish to be part of an investigation.

# 6.2 Making a difference: potential positive effects

Most interviewees from statutory bodies, primarily police, felt that anti-trafficking operations and reception centres were the most effective way of helping people leave exploitation, apart from people choosing to come forward themselves. They were generally convinced that the less formal nature of reception centres, as compared to police stations, provided better opportunities to build rapport and make referrals to the NRM. The majority of these interviewees were confident that reception centres made a positive difference, and that the support on offer was generally well received.

"I fail to see how it would be negative. They're given a safe haven and fed, watered, showered, chit chat with a police officer, go away armed with a load of information, potentially getting all the benefits they're entitled to."

(Law enforcement professional)

One VCS interviewee also commented that reception centres provided more time and space than might be available in alternative environments such as police stations, which impacts positively on building trust. They reported other benefits, including opportunities to support people with immigration issues and to disrupt the activities of potential traffickers.

Some of the reception centres the researcher observed gave people a short-term opportunity to consider their situations, away from the places where they were potentially being exploited. They could hear from representatives of various organisations how their situations could be seen as exploitation. In a few instances, the presence of independent specialists from the VCS meant that people could obtain information about the NRM and other entitlements and find out about ongoing support. This immediate practical support demonstrated that others cared about them and enabled some people to begin building trust with those offering the support. These factors could have gone some way to making a positive difference to the people recovered.

The following example shows the positive effects of one of the reception centres the researcher observed.

### **Reception centre observation**

#### **Good practice**

- Two women came to a reception centre where police, immigration, British Red Cross emergency response staff and volunteers were present, along with two interpreters.
- The women were very distressed on arrival and at various times throughout the day. Their emotions were up and down throughout.
- They did not eat or drink for some time after arrival.
- They said they wanted to leave.
- The British Red Cross provided immediate practical support and sat with the women all day. They played a few games of Jenga to pass the time and build trust.
- The police spoke with each of the women for a few hours. They were both more anxious when the other was being interviewed.
- Over the course of the day they began to relax.
- One of the women said thank you to the British Red Cross – particularly the volunteers
   for "giving up" their time to be with her and her friend. She cried as she said this, almost overwhelmed that people would care enough about them to help.

- The women did not agree to be part of an investigation or enter the NRM, although they did acknowledge they were being exploited.
- They agreed to go to a friend's house, rather than return to their place of exploitation.
- The senior investigating officer gave them a basic new phone so she could keep in touch with them.
- On leaving the centre, the women hugged the senior investigating officer and female Red Cross staff and volunteers, shaking hands with the male member of staff.
- Once the women had left, the senior investigating officer thanked the Red Cross team. She acknowledged how much the women's behaviour had changed over the course of the day, from "yelling and screaming" at the police to hugging everybody on departure.
- Although she was disappointed they had not accepted any kind of help at the time, she hoped the way they had been treated that day might make them more confident to do so in the future.

# 6.3 Doing no harm? Potential negative effects

VCS interviewees in particular were less clear on the benefits of reception centres for the people recovered to them. These interviewees wondered whether other methods – such as undertaking welfare checks – could be more effective in recovering people and helping them out of exploitation. The findings in this report show how potentially damaging certain forms of police anti-trafficking activity can be to people who have been trafficked – especially executing warrants, which can hamper efforts to build trust, and cause lasting trauma. It appeared that such activity could do more harm than good, and interviewees were concerned that it was harder to help people leave exploitation when they were afraid.

As noted previously, none of the people attending the reception centres the researcher observed entered the NRM while the centres were in operation. Nor did Local Authorities offer any further support to the people recovered. Reception centres were most often stood down when people did not disclose to the authorities that they had been exploited. At this point, the police in particular appeared at a loss, not knowing how to help the people in the centres any further, and not having the capacity to. Therefore, when a reception centre was stood down, this appeared to represent a 'cliff edge' where support ended, since there were no



perceived support options outside the NRM. In most instances, the police provided transport to take people to their next destination – whether that was back to their places of work, on to new accommodation or to police stations. In other cases, people took themselves back to their workplaces or to other locations where they indicated they would stay.

Overall, it appeared that the reception centres observed for this research did not offer people a route to safety. It was clear that the increased risks of retribution from employers and/or traffickers was compounded by the potential for people to leave the centre feeling even less trusting of the authorities than when they arrived, especially following the trauma of warrant executions. Most people in these centres had been deprived of their incomes and homes in the same day, leaving them potentially more vulnerable than when they arrived. After this experience, people may have felt less confident about coming forward in the future and might therefore remain in exploitative situations for longer.

# 7. Conclusions

This research sought to investigate how people in exploitative situations experienced antitrafficking operations and multi-agency reception centres. The purpose was to explore what support was on offer – and what support was accepted – and to examine referrals into the NRM that happened via this route.

As the researcher undertook observations and interviews and spoke with people who had lived experience of exploitation, themes emerged around the support on offer, and a complex picture of interwoven obstacles to engagement with it became apparent. Problems with engagement in reception centres could be caused by tight timescales, the fears and anxieties of people recovered to the centres, and the limited knowledge and expertise of some of the people working in them.

In addition, the NRM was considered particularly challenging to engage with, giving rise to a range of uncertainties for people who had been exploited. With limited opportunities for support other than the NRM, options after the reception centres were very limited when people did not agree to an NRM referral. Furthermore, obtaining informed consent for an NRM referral within the reception centre environment was viewed by most working there as an impossible undertaking, since there was rarely enough space, time or good-quality advice available to help people make informed decisions.

Having a clear role for independent, specialist organisations in reception centre teams helped overcome some of these obstacles, as did a general willingness among centre workers to learn from one another and continually improve the reception centre model. However, as resources continue to diminish, achieving a good result for people in reception centres will be a struggle. Unless resources are sufficient to provide the time and space for effective engagement and the options for onward support for survivors improve, the potential benefits of reception centres may not materialise.

## 7.1 Recommendations

 The primary purpose of a reception centre should be to safely remove an individual from a situation of exploitation, to assess the risks they face and their immediate needs, and work with the person to determine suitable next steps towards protection. The focus of reception centres should not be to advance a criminal prosecution or to make an immediate referral into the National Referral Mechanism.

To achieve this:

- The Home Office should introduce Places of Safety, providing at least 3 days of time, space and support for survivors to make informed decisions about their future options. Reception centres are an immediate response following an antitrafficking operation. Places of Safety would be a next step for people after a reception centre, enabling them access to advocacy, advice and guidance so that they can make informed decisions around the National Referral Mechanism and their next steps.
- The Ministry of Justice should enable access to legal advice funded by legal aid for individuals prior to entering the National Referral Mechanism. To ensure that individuals understand the potential consequences of entering the National Referral Mechanism, and the other legal options available, the Legal Aid, Sentencing and Punishment of Offenders Act 2012 should be amended to provide for legal services for potential survivors of human trafficking and exploitation.
- 2. Anti-trafficking operations should be distinct from immigration enforcement operations to ensure that individuals leaving situations of exploitation are treated as potential victims.

To ensure this happens:

- Information gathered by agencies in reception centres should not be shared with the Home Office for immigration enforcement purposes. There should be a firewall between information gathered by the police or any other agency during an antitrafficking operation and the Home Office's immigration enforcement element.
- The Home Office and the National Crime Agency should ensure that immigration enforcement are not present at antitrafficking reception centres. There should be a clear distinction between a police action on slavery, trafficking and exploitation grounds and one which takes place for the purpose of enforcing immigration rules. Immigration enforcement do not have a role in achieving the purpose of a reception centre and so should not be present.
- **3.** All reception centres should be run to a minimum set of standards to ensure that they are able to fulfil their purpose.

To achieve this:

- Guidance produced for police, Local Authorities, the voluntary and community sector and other organisations should ensure a minimum level of practice when reception centres are delivered.

This guidance should include:

- a. The principles and necessary organisations/agencies
- Presence of necessary organisations: At every reception centre, the organisations present should be the ones necessary to meet the purpose of the reception centre. These should include, at a minimum, the police, a representative of the Local Authority, a healthcare team, and an organisation able to provide independent advice, specialist knowledge and expertise and to help reception centres work in a more traumainformed way, such as a voluntary sector organisation.

- Information on the roles of organisations present: The guidance should set out the responsibilities of the organisations present in a reception centre.
- Information on the principle of consent: The guidance should set out that people who have been removed from situations of exploitation should be free to leave and to move about freely
- *Minimum level of suitable physical location:* Reception centres should be held in premises that are of a suitable size depending on how many people are expected to be removed from a situation of exploitation, that are able to be used solely for the purpose of a reception centre, and that offer space for private conversations to take place.
- *Provision of interpreters:* Face-to-face interpreters should be used wherever possible. Interpreters who are trained to understand the needs and circumstances of people who may present at reception centres would be of benefit, and people recovered to reception centres should be informed when interpreters are present, so information is not passed to police of other authorities without their knowledge/consent.

# b. Steps that should be taken before a reception centre

- For each reception centre, the lead police force should, at least one week before the police action takes place, hold a briefing for all agencies that will be present in the centre: This briefing will provide organisations with information about the reception centre, allow organisations to ask questions about the operation and clarify roles, and ensure that the minimum standards will be met.
- The police force should clearly identify the operational lead for the reception centre, who will have responsibility for coordinating the organisations during the operation.

# c. Steps that should be taken during a reception centre

- The operational lead should, when the reception centre is first set up, brief the organisations present to ensure all agencies are clear on purpose, roles and responsibilities: Every individual should be aware of their own role as well as that of others present.
- Individuals who have been removed from situations of exploitation should have the purpose of the reception centre and their rights clearly explained to them by an organisation that isn't the police: This should include information about who the organisations present in the reception centre are and what their roles are.
- The focus of the organisations present within a reception centre should be to support an individual who has left a situation of exploitation to access support that will help the individual have the time and space to make a longer-term decision about their future: While it may be suitable for a person to enter the National Referral Mechanism, this should not be the assumption. Instead, individuals should have the option of accessing Places of Safety, where they can receive the support and information they need to make an informed decision about their next steps or the option to accept alternative support from other agencies such as Local Authorities.
- Individuals representing organisations should be clearly identifiable: While full, formal uniforms may not be suitable for creating an environment that is conducive to providing protection for individuals who have just left a situation of exploitation, people should still be identifiable.

### d. Steps that should be taken after a reception centre

- After a reception centre, all organisations that were present should take part in a debrief: This is to allow organisations to provide feedback on the operation and identify any improvements that could be made for future operations.

# 4. Reception centres should be properly resourced to meet these minimum standards.

To achieve this:

- The Home Office should ensure that police forces and Local Authorities receive adequate funding to be able to meet the minimum standards. This includes police forces being able to run reception centres for as long as necessary and in appropriate venues.
- 5. Individuals who have been removed from situations of exploitation should be assisted with accessing support at the end of the reception centre, and not left with the choice of either entering the National Referral Mechanism or facing destitution.

To achieve this:

- All agencies present should be aware of the rights and entitlements of potential survivors of human trafficking and exploitation. This should include awareness of the National Referral Mechanism as well as the role and duties of Local Authorities.
- 6. Individuals who have been removed from situations of slavery and exploitation should be provided with greater certainty about their future if they enter the National Referral Mechanism.

To achieve this:

- The Home Office should introduce a status of 'Survivor of Modern Slavery' for individuals who receive a positive conclusive grounds decision that grants leave to remain for a minimum of 30 months, with access to public funds.

## 7.2 Recommendations for further exploration and research

A number of areas emerged over the course of the fieldwork and analysis as areas for further exploration and research. The first of these areas speak to the potential risk of trauma as a result of the execution of warrants and reception centres themselves. A retrospective look at people's firsthand experiences of anti-trafficking operations and reception centres would help develop our understanding of the long-term impact, whether positive or negative, of experiences at reception centres. Moreover, exploring the possibilities of welfare checks and different approaches to the recovery of people who are at risk of trafficking could point to ways of avoiding the potentially traumatising impacts of the current approach.

Overall, more exploration is needed to understand the alternative approaches to managing reception centres, to understand which approaches are best suited to creating the atmosphere and outcomes most beneficial to people who have experienced exploitation. Moreover, further research on the impact of the government's Places of Safety initiative on the reception centre model is recommended.

# Voices of people who have attended a reception centre

Undertaking first-hand research with survivors of trafficking and slavery and people who have experienced exploitative situations can prove a challenge for ethics, access and consent. This research project looked at how people recovered from exploitative situations experience reception centres, what help is on offer, what forms of support are taken up and what factors stop people getting help. It is hoped that the research will go some way to improving understanding of reception centres and how people recovered interact with them.

There does, however, remain a gap: the voices of the people themselves. All too often, research about trafficking is dominated by the voices of researchers or the professionals working alongside people who have experienced trafficking. If possible, a retrospective study with people who have experienced anti-trafficking operations could deepen our understanding of the immediate and longer-term effects of reception centres for the people recovered to them.

# Advocacy Advice Support

Tool BOX Immediate Practical Support

> Psycho-Social Support

HELP

Physical needs



# Information AND Communication

ARTWORK by Federicaciotti.com

# 8. Appendices

# 8.1 Appendix A: Glossary

The following key terms and acronyms, used throughout this report, are defined as follows:

Anti-trafficking operations refers to operations carried out by the police and other law enforcement agencies in response to intelligence about suspected human trafficking, exploitation and slavery. This can include raids and welfare checks on locations where intelligence suggests that people are being exploited.

**Exploitation**, in this report, is used as a short form to describe people who have experienced trafficking, modern slavery or other exploitative situations, including forced and compulsory labour, sexual exploitation and forced criminality.

**First responder**, in the UK, organisations that are authorised to refer a potential victim of modern slavery to the National Referral Mechanism are officially known as 'first responders'. There are a range of agencies that are authorised as anti-trafficking first responders, including the police, Local Authorities, parts of the Home Office and several voluntary sector organisations. First responder responsibilities include recognising indicators of modern slavery and identifying potential victims, gathering information about modern slavery and referring victims to the NRM.

**Freedom of movement**, in the context of this report, refers to the right of people to attend and leave a reception centre when and if they choose.

**Gangmasters and Labour Abuse Authority (GLAA)** is the investigative agency for labour exploitation in the UK. The GLAA's role is to work in partnership with police and other law enforcement agencies to protect vulnerable and exploited workers.

**Human trafficking** is defined under the Palermo Protocol as "the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control of another person, for the purpose of exploitation".

**Independent specialist support** refers to those organisations providing support for people referred to reception centres independent of public authorities such as law enforcement and Local Authorities.

**Interviewees** are people from law enforcement, Local Authorities and VCS organisations spoken to during this research.

Law enforcement professionals are representatives of the police, immigration authorities and the National Crime Agency who may attend reception centres to gather information from people who have been recovered to the centre.

**Modern slavery** takes many forms and refers to slavery, servitude and forced or compulsory labour. The UK government defines modern slavery as requiring both "means" involving "being held, either physically or through threat of penalty – e.g. threat or use of force, coercion, abduction, fraud, deception, abuse of power or vulnerability" and "service" where "an individual provides a service for benefit, e.g. begging, sexual services, manual labour, domestic service".<sup>viii</sup>

**Multi-agency**, and multi-agency teams, refers to several organisations working together in cooperation. In this context, organisations including law enforcement, Local Authorities, voluntary and community sector and others work together to set up, staff and manage reception centres.

The **National Crime Agency (NCA)** is a national law enforcement agency in the UK. It is the UK's lead agency against organised crime; human, weapon and drug trafficking; cyber-crime; and economic crime that goes across regional and international borders.

The **National Referral Mechanism (NRM)** is the framework for formally identifying survivors of modern slavery, including those who have been trafficked. It was first introduced in 2009 to meet the UK's obligations under the Council of Europe Convention on Action against Trafficking in Human Beings (2005).

**People**, refers to people who have experienced trafficking or other forms of exploitation who have been recovered to a reception centre.

**Places of Safety**, in 2017 the government announced its intention to implement a Places of Safety initiative where adults leaving immediate situations of exploitation are given help and advice for up to 3 days before deciding to enter the NRM.

**Professionals**, refer to the range of professionals attending reception centres. This could include health professionals, Local Authority professionals, interpreters and representatives of voluntary or community organisations who are able to support people recovered to the centre. **Reception centres**, in this context, are temporary places that are set up to support people recovered during anti-trafficking operations. These centres are often set up by multiple agencies, primarily the police and connected law enforcement agencies, and support provided generally includes emergency provisions such as food, clothes and blankets as well as first aid, access to information and, in some cases, specialist advice and support.

The **Single Competent Authority (SCA)** is the UK's decision-making body responsible for making decisions concerning individuals referred as potential victims of modern slavery.

The **voluntary and community sector (VCS)** refers to organisations whose primary purpose is to create social impact rather than generate profit. It is often called the third sector, civil society or the not-for-profit sector.

# 8.2 Appendix B: Literature review

The first stage of this research project was a literature review, which included academic research and journalism containing first-hand accounts of people in exploitative situations. There is a limited amount of literature relating specifically to reception centres, so the search focused more broadly on the immediate support available to people after their initial contact with the authorities.

The review informed the development of the wider research project, helping refine the research questions and develop fieldwork tools.

### Ethics, access and consent

Conducting research with people in exploitative situations involves complex issues of ethics, access and consent. The merits of conducting research with vulnerable populations understandably have to outweigh any potential harm it might cause them. Gatekeepers such as VCS organisations and the police might limit access to potential research participants and are more likely to do so where ethical considerations have not been reflected upon.<sup>ix</sup>

Potential contributors must also give their consent to take part, which they may not wish to do for many reasons – including their particular stage of recovery, fear of traffickers and fear of being stigmatised by their communities.<sup>×</sup>

As a result, often research has relied largely on document reviews and the testimony of those working with people who have experienced exploitative situations, rather than the people themselves.<sup>xi</sup> Some recent reports have been able to include the voices of people who have experienced exploitation into the conversation, but these do not address experiences of reception centres directly.<sup>xii</sup>

# Very limited existing research about reception centres

Primary research focusing on trafficking and undertaken with people who have experienced exploitation does exist, but it rarely mentions reception centres specifically. The exceptions to this are mentions of people being 'wrongly' arrested during police operations.xiii

However, the research does often talk about the support needs of people in exploitative situations. These sources include references to the shortcomings of the National Referral Mechanism (NRM), which is the UK's system for identifying, protecting and supporting people in exploitative situations. Such shortcomings can include the negative impact of NRM wait times on the well-being of people who have experienced exploitation.<sup>xiv</sup> Some research also explores people's interactions with the first people they come into contact with – usually the police and other first responders – after being removed from their situation.

The literature points to a range of reasons why people may choose not to enter the NRM:

- authorities do not identify them as trafficked
- fear of the police
- fear of not being believed
- fear of being involuntarily removed from the country
- fear of retribution from traffickers
- fear of not being able to work while in the  $\ensuremath{\mathsf{NRM}^{\mathsf{xv}}}$
- the re-traumatising effect of re-telling experiences of exploitation
- the lack of clarity around timelines for the process
- issues with interpreters, including those who speak the incorrect language or dialect or of a different gender
- issues with the gender of police officers for instance, male officers conducting interviews when female officers have been requested.<sup>xvi</sup>

A 2019 Super-Complaint compiled by Hestia, and the accompanying report, highlighted a number of police failings which could contribute to people who have been exploited not receiving the support they need and are entitled to.<sup>xvii</sup> Key areas of concern for policing's response to trafficking and exploitation centre on a lack of knowledge of the Modern Slavery Act 2015, xviii including:

- low levels of understanding of modern slavery
- a lack of understanding of the indicators of modern slavery
- low levels of knowledge about and understanding of the NRM
- misunderstanding of S.52 (Modern Slavery Act 2015) duty to notify, leading to police officers failing in their duty to report
- immigration offences being prioritised over the protection of people who have experienced exploitation
- not keeping people who have experienced trafficking up to date about investigations and/ or not informing them when investigations have been dropped
- the S.45 (Modern Slavery Act 2015) defence not always being invoked and a lack of awareness around non-prosecution, leading to people who have experienced exploitation being convicted for crimes they were forced to commit as part of their exploitation
- modern slavery not being part of officers' continuous professional development in most police forces
- resource issues, which affect the number and quality of investigations being undertaken.

## Immediate support guidelines

There are national and international guidelines<sup>7</sup> about what support should be provided at various stages to people in exploitative situations. It is unclear, however, how far these guidelines are based on the perspectives of the people themselves – bringing into question whether they are meeting the individual and often complex needs of people who have been exploited. Hestia's report stressed the importance of 'first impressions', as when a person who has experienced trafficking has a negative experience with the police, this lessens the chance of their engaging with an investigation and, ultimately, bringing perpetrators to justice. The report characterised good practice in immediate support as:

- interviews being undertaken at the pace of the person who has experienced exploitation
- police taking the time to explain the processes
- the use of non-judgemental and clear language
- the provision of support to the person throughout the investigation process
- consideration of the additional needs of the person and not only those relating to the investigation.<sup>xix</sup>

## Features of immediate support

In 2008 the UK ratified the Council of Europe Convention on Action Against Trafficking in Human Beings (2005). According to the convention and its associated EU directive, governments have to help people in exploitative situations – in terms of their physical, psychological and social recovery. They should be given access to:

- subsistence
- legal advice
- appropriate and safe accommodation
- emergency medical treatment
- counselling
- education for children.

In 2017 the government announced its intention to implement a Places of Safety initiative where adults leaving immediate situations of exploitation are given help and advice for up to 3 days as they decide whether to enter the NRM.<sup>8</sup> In response, a group of VCS organisations<sup>xx</sup> produced a set

<sup>7</sup> Guidelines include the Council of Europe Convention on Action against the Trafficking in Human Beings, the associated EU Directive on Preventing and Combating Trafficking in Human Beings and Protecting Its Victims and the UK Home Office's Modern Slavery guidance for front-line professionals. Guidelines also include those provided by non-governmental organisations such as the Human Trafficking Foundation, the Anti-Trafficking and Labour Exploitation Unit and others.

<sup>8</sup> In October 2017 the government announced that it will fund 'Places of Safety' so that adults leaving immediate situations of exploitation are given help and advice for up to 3 days before deciding whether to enter the NRM. At the time of writing, this provision is not in operation. https://www.gov.uk/government/news/modern-slaveryvictims-to-receive-longer-period-of-support

of principles to help develop these Places of Safety and to provide early support for people in exploitative situations. These include:

- freedom
- open access to all
- needs-based assessment
- medical care
- material needs
- early legal advice
- high-quality advice and support
- choices and options for referral pathways and support
- confidential data management
- organisational accountability.

# Considerations for this research project

The literature review highlighted that the following additional questions should be explored during this research project:

- Which features of immediate support mentioned above are currently being provided during anti-trafficking operations, and which are missing?
- What can we learn from the first-hand accounts of people who have experienced anti-trafficking operations? What were they most afraid of, and how did their experiences vary depending on their individual characteristics and circumstances?
- How can those first on the scene in antitrafficking operations work to alleviate fears?
- What factors are stopping people engaging with the NRM and related support?

# 8.3 Appendix C: Research aims and methods

The broad object of this research was to explore how potentially exploited people experience the reception centres that are set up during antitrafficking operations, and how they engage with the support on offer. The research methods included observing reception centres and debriefs, interviewing reception centre staff and talking with people who have first-hand experience of being exploited.

## Aims

The research aimed to investigate:

- how people in exploitative situations experienced anti-trafficking operations undertaken by police and other authorities, particularly those operations which included multi-agency reception centres
- the support on offer for people during antitrafficking operations – including that provided by the British Red Cross – and how this support can be adapted to improve people's experiences and ongoing engagement
- why some people engaged with the immediate support on offer and some did not
- how people were referred into the National Referral Mechanism via reception centres

Before starting, the British Red Cross and the researcher successfully sought ethics approval for the research from the Institute of Applied Social Research at the University of Bedfordshire.

## **Methods**

The researcher gathered data in the following ways:

- Non-participant observation of anti-trafficking reception centres.<sup>9</sup> The researcher attended ten operations across eight different sites, spending a total of 70 hours immersed in observation.

- Anti-trafficking reception centre debriefs. Two of the ten operations were followed with debriefs. The researcher was permitted to attend one of these.
- Semi-structured interviews. The researcher selected 19 professionals who had strategic and/or operational experience of anti-trafficking operations and reception centres.
- Individual and group conversations with a panel of advisers who had lived experience of trafficking and exploitation. The members of this group were identified with support from the British Red Cross anti-human trafficking team, and they helped frame the research and guide the findings as they emerged.

## **Reception centre observations**

The researcher adopted a non-participant observation approach to gather data from antitrafficking reception centres where British Red Cross staff and volunteers provided support. The researcher was embedded as a British Red Cross volunteer, and access to reception centres was approved by senior investigating officers prior to attendance. This approach aimed to help us gather data while ensuring minimal impact on the people recovered to the centres. During the observations, the researcher sensitively noted the characteristics and circumstances of people who were recovered, as well as the ways people were seen to experience events. This included noting the support people accepted and that which they did not. In addition, the researcher observed how professionals interacted with people within the reception centres, the types of advice they gave and any onward referrals they made.

The observations did not involve direct contact between the researcher and the people recovered. However, it could be said that the observations themselves constituted 'covert observations of people in non-public places' because the observation was part of the datagathering opportunity. The researcher therefore abided by the following element of the ESRC Framework for Research Ethics (2010:21) that states the following: "Covert research may be undertaken when it may provide unique forms of evidence, or where overt observation might alter the phenomenon being studied [...] It is only justified if important issues are being addressed,

<sup>9</sup> During the fieldwork period, the British Red Cross was asked to provide support at 28 reception centres. Of those, the researcher attended ten. Reasons for not attending the remaining 18 included: operations stood down (8); spontaneous same-day operations, with no time to obtain permission to observe (4); permission to observe denied (4); and researcher unable to attend (2).

and if matters of social significance which cannot be uncovered in other ways are likely to be discovered."

During the six-month fieldwork timeframe, the researcher attended 10 of 28 reception centres in which the British Red Cross was asked to provide support. Figure 5 shows those that were attended and the reasons for non-attendance at others.

## **Reception centre debriefs**

The researcher also asked to attend antitrafficking operation reception centre debriefs. These took place for two of the ten observed reception centres, and the researcher was permitted to attend one of these.

### **Expert interviews**

Potential interviewees were chosen from a list of professionals already known to the British Red Cross for their expertise within the field of antitrafficking. Figure 6 provides an overview of the interviews.

## Project advisers: people with lived experience of trafficking and exploitation

The researcher held one-to-one and group conversations with people with lived experience of being exploited. They had also previously shown some interest in co-production and the research process. They were all known to the British Red Cross or its network of sector colleagues working with people who had experienced exploitative situations.

The advisers were asked to comment specifically on research plans and findings and were not asked to describe their own experiences and tell their own stories (the parameters of their involvement were made clear beforehand). There was a slight risk that people might not fully understand the nature of the project, so the

# Figure 5: Summary of reception centre operations involving British Red Cross during the research

	Reception centres requesting British Red Cross support	Attended by the researcher	Not attended by the researcher			
			Operation stood down	Spontaneous operation, no time to obtain permission	Permission denied	Researcher unable to attend
TOTAL	28	10	8	4	4	2

### Figure 6: Summary of expert interviews undertaken

Authority/ organisation	Type of interview	Number of events	Number of respondents
Law enforcement	Individual interview	3	3
Law enforcement	Joint interview	1	2
Local Authority	Individual interview	2	2
VCS organisations	Individual interview	6	6
British Red Cross	Group interview	2	6
TOTAL		14	19

research team ensured that everyone had clear information about the nature and scope of the research. At the beginning of discussions, the researcher explained the scope of the project to those involved and emphasised that participation was voluntary. Potential participants always had the right to refuse to participate or to retract participation at a later stage.

A support mechanism was in place via the British Red Cross and other charities supporting individuals, in case involvement triggered painful memories.

### **Data analysis**

The researcher kept in-depth notes during the reception centre observations and debriefs and made sketches of each venue and the surrounding environment.

Discussions with the panel of advisers with lived experience were audio-recorded and transcribed where consent was provided.

An inductive coding framework was developed through the researcher examining each piece of data for emergent concepts, actions and meanings within the data.<sup>xxi</sup> Using NVivo 12,<sup>10</sup> the researcher coded each piece of data across the framework, to support analysis of emerging patterns and themes, and subsequent findings.

<sup>10</sup> NVivo is a qualitative data analysis application that enables researchers to collect, organise, analyse and visualise unstructured or semi-structured data.

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# Endnotes

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