

Hello,

Welcome to **Week 15 MSCOS**. Please check out this week's news, features and of course, our online pages and moderated [discussion forums](#), where you can post anonymously – we need YOUR perspectives on practice so get scribbling!

You can also find all of our previous weekly updates [here](#). All our weekly updates are best viewed on desktop versus mobile 😊

This week's feature relates to the core outcome, [Secure and Suitable Housing](#) in relation to the UK Government's changes to licensing of housing for multiple (asylum applicant) occupants, which we believe presents significant modern slavery/human trafficking risks. With our usual focus remaining on *practice*, **Keith Lewis MSCOS Research Advisory Board** member and **British Standards Institute (BSI) Committee member** provides his viewpoint on the **use of licensing and regulation as modern slavery/human trafficking prevention tool**. We would like to thank **David Adamson, Lead Standards Development Manager at BSI** who has told us about the national standard **BS 25700** and the forthcoming international standard **ISO 37200** Modern Slavery (see below with links).

**Rachel Witkin**, who is an independent consultant for **OSCE/ODIHR**, also shares an update on the **International Survivors of Trafficking Advisory Council (ISTAC)** after attending the [launch event and first meeting for the 2<sup>nd</sup> International Survivors of Trafficking Advisory Council \(ISTAC\)](#) in Warsaw.

## [THIS WEEK'S FEATURE](#)



[Secure and suitable housing](#)

[Secure and suitable housing](#) rated consistently highly throughout the **MSCOS study**: participants with lived experience of trafficking/modern slavery and frontline practitioners described situations of destitution and detention as well as dangerous and unsanitary conditions in housing, [including asylum accommodation](#). Some members of the MSCOS Research Advisory Board share their experiences of housing on our page [here](#) In the final MSCOS study, **secure and suitable housing** scored higher even than **Safety from any Trafficker or other Abuser**, however, the two outcomes are clearly intertwined: housing is a fundamental component of any safe existence after trafficking/modern slavery.

**Changes to licensing by the UK Government for new accommodation to house asylum applicants**

Mandatory licensing by local authorities was introduced (Housing Act 2004) after a fire in unregulated accommodation for asylum applicants killed 31 people. It enables an authority to know where housing for multiple occupants (HMOs) are located in its area because the landlord must inform local authorities when they apply for a licence. Among the standards required is that landlords and managers must be 'fit and proper persons'.

The UK Government, without any appropriate impact assessment or consultation with the devolved Governments (who have higher licensing standards), is making significant changes to licensing arrangements for any new accommodation which is defined as a 'house in multiple occupation' (HMO), specifically for the housing of people seeking asylum. Of course, there are many significant concerns about this related to **discrimination and marginalization, crowding, health, hygiene, safety, and profiteering landlords who might seize the opportunity to provide housing which is not appropriately licensed or regulated.** The Home Office has said that the changes are necessary because current licensing requirements are *seen as a constraint for accommodation providers* in terms of offering their housing to people in the asylum system. Under the new changes inspection teams will be comprised of Home Office employees, rather than local councils who are ordinarily responsible for enforcing HMO standards.

**From a frontline practice perspective, we are aware that:**

- Many survivors of modern slavery/human trafficking are within the asylum-seeking population and remain unidentified, while others are within the UK's **National Referral Mechanism system**. When people are marginalized and experience discrimination in terms of the standards which are applied to them, they are *more likely to remain at risk of further harm and be re-trafficked* than to feel able to report previous trafficking crime or, even more difficult and challenging, to report a specific danger that they will be trafficked.

- The vulnerability of asylum applicants is not only due to their traumatic history, but to the reality of their lives within the asylum system. Many live in poor quality and unsafe accommodation, on minimal subsistence, without the ability to work lawfully in the UK, and they commonly wait for decisions to be made on their asylum claim for years of their lives, due to significant backlog. This means that; *whether or not they have been previously trafficked, people claiming asylum may be at risk of being targeted for human trafficking/modern slavery in any situation where they are isolated from appropriate support and oversight by professionals who act in their best interests, and/or are forced to live in poor, cramped conditions experiencing fear of other strangers they must share very small and intimate space with.* As is well known, people who have been previously trafficked remain at high risk of being re-targeted if they lack appropriate individual support.

We are concerned that the changes to licensing for HMOs will mean that there are significant public health implications for society as a whole, and trafficking situations are likely to proliferate. The [OSCE/ODIHR International NRM Handbook](#) advises that, ‘*accommodation that is unsuitable or dangerous is costly at a human level, but also in societal terms because it is far more likely to result in the need for emergency services and interventions than safe and appropriate accommodation that enables victims to have settled, stable lives.*’ See: [Section 14.10 Provision of Safe and Appropriate Accommodation for Victims of](#) onwards for guidance on accommodation for adults and children.

**Useful resources:**

- [NACCOM letter to the UK government opposing exemptions on HMO licensing for asylum accommodation](#)
- [Debate in the House of Lords on the Illegal Migration Bill](#), in which there are many arguments made against the HMO changes to licensing. **Baroness Lister of Burtersett** quoted **the leader of Westminster Council** as saying: *to ask people who are “likely to have been through significant and traumatic events ... to share an inappropriately sized room”—we are talking about a single room here, not some palatial five-star room— with multiple strangers defies common sense and basic decency”. Basic decency, as well as safety, is what is at stake with these regulations.*

Please get on to our housing discussion forum [here](#) (no time like the present 😊) and tell us about practice in relation to any / all forms of housing where survivors of modern slavery reside. The [MSCOS Community of Practice](#) focusses on the *holding together and sharing of practice*. We need, and value your expertise!

**We will be holding an online expert forum in February / March 2024 [Secure and Suitable Housing](#) for the MSCOS.**



[Keith Lewis](#) is a **Committee Member** of the **British Standards Institute (BSI)**. As a survivor of trafficking for labour exploitation in the UK over years, **Keith Lewis** believes that the use of licensing and regulation of standards, whether it is for public venues, workplaces, private rented housing or state-provided accommodation, offers a prevention tool for the prevention of human trafficking and modern slavery.

*“When I heard about the change in licensing of housing for multiple occupancy (HMOs) for people who are claiming asylum, I thought of people living like battery hens; it is horrible to think about. Throughout the years when I was trafficked, I had to share tiny spaces and sleep with others ‘head to toe’. It is so wrong to treat any person like this – especially those who have already suffered trauma and loss of their home and country. I know it will affect people who have been trafficked already, and others who could end up in modern slavery. It helps to explain my views on independent licensing and regulation by sharing some parts of my history:*

*When I was trafficked within my home country, the UK, everything the traffickers did was ‘cash in hand’, there was no legitimacy to any part of the traffickers’ ‘businesses’ and nothing was ever traceable back to them. This was a serious, organized criminal gang that years later were eventually convicted and served prison sentences, but the damage they did to myself and my friend – who was trafficked by them over 27 years since he was only 17 years old – has an impact that lasts a lifetime.*

*I was trapped in modern slavery, living in horrible conditions and subjected to extreme violence and incidents of kidnapping when I tried to escape. I was a skilled person and a good worker, which profited my trafficker. Previously, I had trained as a chef at college, even though at that*

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*time I was forced to live in hostels and on the streets due to my family circumstances. It was extremely difficult to get the sleep I needed, to be fed, to keep my 'Chef's whites' clean and white and afford to use slot-operated washing machines. However, I loved cooking, creating new dishes, sweets, pastries, baking, and making artistic sugar sculptures. I hoped to be a Chef in a hotel or a restaurant one day, and eventually, with some additional practical support from a kind teacher, I managed to qualify as a Chef.*

*When I was trafficked later on, my forced labour exploitation was in all aspects of building and design: conservatories, driveways, hard and soft landscaping, patios, paths... you name it. We worked only in private houses, where we could be watched and surveyed by the traffickers from parked cars in the street. Most of the clients were elderly, and therefore vulnerable in the privacy of their own homes, so they could be manipulated and inveigled out of their money. Many of them kept money in the house rather than in banks and the traffickers would overcharge them and pressure them to pay far too much for a job. As I have explained on the [MSCOS website](#), no one seemed to notice that we were very poorly and inadequately dressed and kept unclean and unshaven, while the trafficker, by comparison was well turned out, in a suit. Whenever we were arrested, a lawyer who was retained and employed by the trafficker, turned up to the police station to 'represent us' and ensure that we did not speak about the crimes happening to us. The police knew we were filthy and kept in appalling conditions quite clearly, but they didn't try to help us. The trafficker would beat us in a way that wasn't visible (i.e. repeated punching of ribs) and punish us by making us sleep on the floor, banned from using even a chair or any furniture at all. We were abducted and kidnapped by violent men working with the trafficker if we ever tried to escape.*

*I first learned about Health and Safety standards and licensing while working at a supermarket at age 15, and then later training as a Chef. I knew that these were the rules you had to follow to do your job well, and to do it safely. There were no standards, regulations or inspections at all when I was trafficked in the plain sight of so many people in the UK, even though the work we were doing was dangerous without the appropriate safety wear, and we were sleeping in cramped and squalid sheds or caravans.*

*After I finally escaped from the traffickers, I began working on a legitimate construction site and I soon realized that here, health and safety regulations were part of the fabric of our working lives. It was recognised by everyone as important: we had to wear steel cap boots, hard hats, protective glasses, flack jackets – and if you didn't, you were not permitted to work. They would*

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ask 'where is your hard hat'? as soon as you came onto the site. I probably recognised more than the others, because of my own traumatic history of labour exploitation that these regulations were in place to protect me, and they were acted upon consistently by my bosses because of penalties which could be issued via licensing and inspection.

***It is through this experience, and my understanding of standards obtained through my work with the British Standards Institute (BSI) that not only is licensing and regulation of standards key to the prevention of human trafficking and modern slavery, but the existing infrastructure of health and safety regulation, and other existing licensing laws and inspectorates can be used to provide a strong foundation and pathway for modern slavery prevention and inspection. It is a much easier strategy to build upon the licensing and regulations that we already have rather than 're-inventing the wheel'. This applies to all workplaces and public venues, but also it is vital for state provided housing, including asylum accommodation. I know from my own experience that wherever people are in dark rooms, hidden and frightened, and left without the rights that others have' if they are left in squalid and dangerous conditions and without support and care, they will not be identified, and they can be targeted by traffickers who thrive in these conditions because they target the most vulnerable. I believe that Inspection standards and regulation should be increased to prevent modern slavery, and it must be objectively and independently monitored to be effective. Any attempt to take it away or put it outside of independent authorities is a red flag when it comes to the risks of modern slavery.***

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**bsi.**

New British Standard on  
Modern Slavery



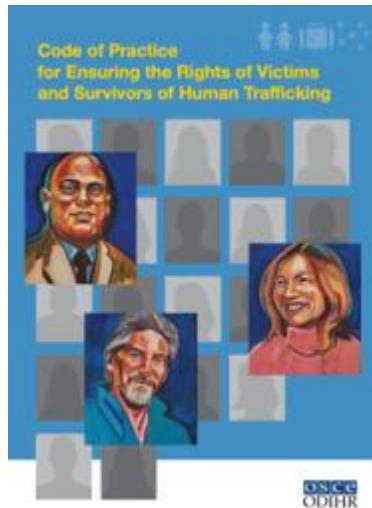
**Keith Lewis** worked on the **British Standards Institute Modern Slavery Standard [BS 25700](#)** which is the first BSI standard to be issued free of charge online. He is now working on the BSI's forthcoming international standard, **[ISO 37200](#)** on **Human Trafficking, Forced Labour and Modern Slavery** which will be developed by members of the **ISO technical committee TC309 Governance of organisations**, and is due to be published in **2026**.

**David Adamson, Lead Standards Development Manager** at the **BSI** says: "As a member of this committee, **Keith Lewis** will provide invaluable perspective as a UK expert and insight as a Survivor Leader in drafting this guidance standard, which is based on **BS 25700 - Modern Slavery**."

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**Rachel Witkin** attended the launch event and first meeting for the **2<sup>nd</sup> International Survivors of Trafficking Advisory Council (ISTAC)**. At the launch, **Tatiana Kotlyarenko** (OSCE/ODIHR Adviser on Anti-Trafficking Issues), and noted professional Survivor Leaders, **Shandra Woworuntu** (previous Chair and current member) and **Jeanne Celestine Lakin** (current Chair) spoke, and the other new members of ISTAC were introduced. ISTAC was welcomed by **Cindy Dyer** (United States Department of State Ambassador-at-Large to Monitor and Combat Trafficking in Persons), **Anna Ekstedt** (Sweden Ambassador-at-Large for Combatting Trafficking in Persons), and **Kevin Hyland OBE** (Global Strategy Director of The Santa Marta Group). The recording of the launch is available [here](#) for those who missed it.



[Code of Practice](#)



Rachel says,

*“I believe that ISTAC is a ‘North Star’ for survivor leadership worldwide. ISTAC members take my breath away: their contribution globally as Survivor Leaders is monumental, and their knowledge, expertise and achievements in so many different professional areas is awe inspiring. Collectively ISTAC members will work with the 57 OSCE participating States to combat trafficking and promote national survivor leadership across the world. You*

*can read more about ISTAC [here](#). Look out for ISTAC news and information in forthcoming updates.”*

## DID YOU KNOW?

If you’ve joined our mailing list recently, over the last 14 weeks we have covered a variety of outcomes, highlighting best practice models and frameworks. You can access them all [here](#).

Please forward MSCOS to any colleagues or network connections that you think may be interested in our work, and they can sign up to receive newsletter invites via our contact form [here](#), or by direct email to [mscos@kcl.ac.uk](mailto:mscos@kcl.ac.uk).

*The MSCOS Community of Practice content is designed and directed by Queenie Sit and Rachel Witkin.*



[Working with core outcomes as a set](#)



[Secure & suitable housing](#)



[Safety from any trafficker or other abuser](#)



[Long-term, consistent support](#)



[Trauma-informed services](#)



[Finding purpose in life and self-actualisation](#)



[Access to medical treatment](#)



[Access to education](#)