

Hello,

Welcome to **Week 22 MSCOS Community of Practice (MS-CoP) update.**

This week's feature on licencing (below) is based on the two MSCOS core outcomes, [Safety from Traffickers](#) and [Suitable Housing](#). It explains the need to utilise existing licencing frameworks to prevent and combat modern slavery. We would like to thank **Phillipa King, Managing Director of Shiva Foundation**, who spoke to us about the recent report, [Understanding the Potential of Licencing Frameworks and Teams to Tackle Modern Slavery in the UK](#). Also, **Keith Lewis, MSCOS Research Advisory Board Member and Committee Member of the British Standards Institute** and **Louise Crisfield, Partner, Miles and Partners**. As usual we also feature recent news, resources and reports which are rooted in practice.

Following our ongoing series of forums based on the core outcome, [Finding purpose in Life and Self Actualisation](#), we have forthcoming online expert forums on the core outcomes [Safety from Traffickers and Abusers for Young Adults \(January 2024\)](#) and [Secure and Suitable Housing \(March 2024\)](#). These forums are by invite only, please contact us if you are interested in attending or sharing your information.

We are in the process of updating our website and email updates, so they are more accessible for (very!) busy people. A warm welcome to **Arnas Tamasauskas** our **MS-CoP Facilitator**.



MODERN SLAVERY PEC ARE HIRING! (Deadline 5 November)



Lived Experience Engagement Coordinator (Maternity Cover)

An exciting opportunity for a person with lived experience to join Modern Slavery PEC and play an important part in supporting the development of MSPEC's survivor engagement work.

We asked [Jane Lasonder](#), a member of **MS-PEC's Lived Experience Advisory Panel (LEAP)** what it is like to work at Modern Slavery PEC: *"It is a friendly, positive working group with amazing staff. The new Engagement Coordinator will be warmly welcomed."*

THIS WEEK'S FEATURE:

LEVERAGING LICENSING TO COMBAT MODERN SLAVERY



"Modern slavery can be identified across a number of council areas including, licensing, environmental health and trading standards, housing, procurement, community safety and social services. There are 333 local authorities in England and approximately 1.4 million private sector businesses ([Federation of Small Business](#)) which support the efforts of licensing frameworks.

Phillipa King, Managing Director,
Shiva Foundation,



Shiva Foundation's latest report ['Understanding the Potential of Licensing Frameworks and Teams to Tackle Modern Slavery in the UK'](#) identifies key principles for leveraging existing frameworks which are already used by licensing and enforcement teams to embed anti-modern slavery responses and provide practical solutions for enhancing anti-modern slavery provisions across licensed sectors. We believe that this approach could be applied to existing licensing frameworks on a far wider scale internationally.

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The untapped potential of licensing provides a promising pathway for modern slavery prevention. With collaborative efforts from national and local authorities, we can transform routine procedures into powerful tools.

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Licensing teams visit towns and cities and rural/remote/agricultural areas throughout the year: To combat modern slavery they need:

- **On-going training** to identify and act upon signs of modern day slavery in all forms;
- **Regular meetings with responsible authorities** to address any concerns that arise at the earliest stage.
- **Comprehensive mechanisms** by which they can flag up indications of modern slavery to trigger prompt and sensitive exploration.

We recommend:

- Strengthening the [Revised Guidance issued under section 182 of the Licensing Act 2003](#) by adding modern slavery and human trafficking to the list of serious crimes and clarifying that prevention of modern slavery is a valid consideration under the 'prevention of crime and disorder' licensing objective.
- Practical guidance issued on modern slavery which is specifically tailored for licensing teams
- Modern slavery provisions incorporated into existing licensing policy
- Modern slavery questions and enquiries included in the standard licensing policy, licensing application process and inspection forms.
- Licensing teams raising awareness of modern slavery during their consultations.
- Licensing arrangements provided in detail within [Modern Slavery Statements](#).

Key to this approach is partnership working between licensing teams and law enforcement: Cross-agency collaboration and intelligence-sharing should be systematized and strengthened to swiftly disrupt and dismantle modern slavery operations. By undertaking joint operations, the relevant law enforcement organisations and partners can be present together to discuss areas or premises of concern. They can work more quickly to deal with the crimes and is an effective way to pool capacity and resources to ensure an efficient response.”

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Implementing these measures, can raise awareness and establish clear fostering a vigilant and informed society.

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[Shiva Foundation](#) has [3 webinars](#) you can watch on **YouTube**:

[Empowering licensing teams](#); [How to raise awareness amongst license holders](#) and [Partnership working with law enforcement](#).

The Shiva report will be presented at the [Institute of Licensing National Training Conference](#) on 15th November.

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Keith Lewis


MSCOS Research Advisory
Board

“My trafficking for forced labour was ‘in plain sight’ of hundreds of people in the UK. It made me realise that health and safety licensing should be strengthened to include us”

At the recent [Cyprus Forum](#) speaking a on a panel focused on business and human rights, [Keith Lewis](#) described being ‘trafficked *‘in plain sight’* and explained how he connects this experience to his proposal for the strengthening of existing health and safety licensing.

© [Keith Lewis at mscos@kcl.ac.uk](mailto:mscos@kcl.ac.uk)

As a person entrapped in modern slavery for 8 years in the UK, I laboured in landscaping private properties, building conservatories and patios, making driveways, pathways, walls, or doing any cleaning or other work the trafficker could profit from,



I qualified as a chef at college, it was a vocation I loved. However, immediately after leaving college, I became homeless. I was sleeping rough in the streets, unable to claim benefits or to get a job because I didn't have a fixed address. By the time I was offered a rough place to stay by the traffickers and work as a builder, I was desperate for help. Gradually the control and the working hours ramped up – they don't show you this side for a while. Soon the traffickers were controlling me in forced labour 10-12 hours a day, 7 days a week. Then the violence began after about 6 months, when I thought I was having my first day off. The main trafficker called me out of the shed I lived in with other men and asked me what I had been doing. He then punched me in the face and landed other blows, beating me. From that point the violence and control stepped up. After the first violent incident, my working hours were stepped up to a point where we were labouring between 12-16 hours a day, because the trafficker told us not to come back unless the work was finished. There was always fear in us about what would happen to us if we returned 'too soon'. Over the course of 8 years, I tried to escape 3 times, and each time I was kidnapped by men, thrown in a lorry, beaten up and brought back.

It is not only about doing a normal job without being paid, which is a terrible thing. It is also arduous work, using dangerous tools and labouring over long periods of time in which you feel exhausted. The potential for injury is high. We were given hazardous work tools and conditions with no health and safety regulations, and we were not given protective clothing or equipment of any kind. From day to day, I couldn't wash myself on the site where I lived; I had no access to a toilet and no running water. We had to use public rest rooms or toilets. Washing on the site meant being able to get water and boil a kettle. I slept in small caravans or sheds which I was forced to share with strangers, sometimes I had to share a bed with a stranger as well: we had to lie top to tail.

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To me, licensing for health and safety, says it all – on any site or in any venue if you are not healthy and you are not safe because you are in modern slavery, it should apply to you

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I met thousands of ordinary people while this was happening to me: customers for these building services, their family members multiple people in the local communities, and members of the public, wherever we went. When I say ‘*trafficked in plain sight*’, we were in people’s own private houses, and we were making driveways, patios, walls, conservatories, being seen by others outside. We were dressed in filthy clothing, which was completely inadequate for the work we were doing, and our skin was dirty from one day to the next. Our shoes were falling off our feet. The traffickers would turn up in a really smart suit and nice car – but the customers did not see this difference – all they would see was the *cheap job they were getting*.

We had encounters with the police during this time. Sometimes the jobs would get ‘boosted’ by the traffickers, meaning that they would fraudulently put the price up in the course of the job and make us try to extort the customer. The people in the house would sometimes call the police and the police would arrest us and take us to the police station. There would always be a lawyer waiting there for us, who was paid on retainer and sent by the trafficker to ‘represent’ us, or in other words, to keep us silent. We never got the chance to speak to the police, and despite our vulnerability and shabby appearance, they did not ask us any questions about our circumstances. We were instructed by the lawyer what to say and what not to say. I remember the lawyer and the traffickers laughing about this afterwards; they had got away with it.

We went into a lot of rest rooms, public toilets, restaurants and take-aways, garages and many other venues, to use toilets and bathrooms (although they would often refuse to let us in, due to our shabby appearance). I saw lots of signs saying ‘*Health and Safety*’ in these places. If you are being held in modern slavery against your will or working long hours for little or no pay, it is a health and safety risk. I think there is a nervous approach globally to anti-trafficking responses, and a resistance to starting up new licensing systems or going to expense.

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I feel sure that if modern slavery licensing and inspections were directly attached to existing health and safety licensing, it would be a lot easier to move forward and to get a greater understanding of a true definition of what health and safety standards must be in every workplace.

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Keith Lewis is a Consultant Advisor for [Survivor Alliance](#), and a Committee member for the [British Standards Institute \(BSI\)](#). As the first survivor leader to work with the BSI, he had a key role in the production of the [BS 25700: Organizational responses to modern slavery: Guidance](#). This is a pioneering national standard which is in the process of being made international with [International Organization for Standardization](#). It provides guidance on how to manage human trafficking risks in their operations, supply chains and wider operating environment.



The core outcome that ranked the highest in the MSCOS study was [secure and suitable housing](#). All people who work on a frontline basis with survivors know that it is one of the gravest challenges that survivors face and it connects directly to [Safety from Traffickers/Abusers](#) and every one of the other MSCOS core outcomes. Standards need to be raised urgently across the spectrum of housing provided for vulnerable people - including survivors of trafficking and people at risk of trafficking within low socio-economic populations, migrants and people seeking asylum. Below, [Louise Crisfield](#) from the law firm [Miles and Partners](#), explains the UK Government's changes to the multiple occupation housing for asylum applicants, which in our view, takes them even further into a 'hostile environment' and further situations of risk.

Why is poor quality, shared housing a trafficking risk?

There are multiple, complex reasons for this.



In a nutshell: Traffickers seek out and target vulnerable people – especially when people are trapped in isolated and marginalised housing and dangerous or crime-ridden areas, and especially if they are too afraid of the police to feel able to contact them. Mixed gender sharing or sharing private spaces with unknown strangers, particularly bedrooms is disturbing frightening, especially for people who have been trafficked. For people who have suffered sexual exploitation the obstacles are huge. Dirty conditions, infestations and lack of hygiene is horrible for any human being, as is lack of safety and comfort, and is detrimental for people who are traumatised and/or have experienced violence and abuse. People who are too afraid to live in provided accommodation for any of these reasons may leave and live on the street rather than face it. This greatly increases the risks to them; people can be targeted by traffickers and other criminals due to their straitened circumstances and vulnerable location; those who become desperate due to being ‘in limbo’ and waiting for years for legal decisions in poor, cramped conditions may succumb to the threats and incentives offered to them by traffickers. Traffickers know all of this For detail on needs and risks in housing see [NRM HANDBOOK](#).



Louise Crisfield, Partner



The loss of licensing safeguards for people in asylum accommodation in the UK

The draft [Houses in Multiple Occupation \(Asylum Seeker Accommodation\) \(England\) Regulations 2023](#) will amend section 254 of the *Housing Act 2004* so that a building is not defined as, a house in multiple occupation...if...it is occupied solely or principally by asylum-seekers or members of their household.

“Without any consultation, the UK Government has laid a draft statutory instrument which will deprive people who are in asylum accommodation from the protective measures regulating multiple occupation housing (HMOs) under the [2004 Housing Act](#). In simple terms, asylum seekers’ accommodation will not be licenced or have any outside regulation in relation to its condition. This means that the only regulation people claiming asylum will have is contained in the contractual terms between their accommodation provider and the Government’s Home Office.

Normally the landlord of an HMO is required to obtain a licence by meeting a number of conditions about fire, electrical, carbon monoxide and gas safety, size of the rooms, number of people in rooms, facilities etc. The enforcement of HMO licencing lies with Local Authorities and not the state, and many councils go further to require landlords to meet enhanced conditions.

HMO licencing is a vital safeguard for people living in poor, overcrowded and insanitary housing. Asylum applicants are often living in the very worst conditions and HMO enforcement is one of the few tools available to local authorities and representatives of asylum seekers to help raise conditions. If this tool is removed, there is a very real risk that conditions will deteriorate further and become actively dangerous for occupants.”


[Sheroy Zaq of Duncan Lewis Solicitors](#) is representing three families seeking asylum in the UK in a [legal challenge against the regulations](#):

“The draft legislation threatens the safety of asylum seekers including families with children placed in unlicensed accommodation. This removal of vital regulatory protections is a charter for unscrupulous landlords.”

APPLYING A 'WHOLE HOUSING APPROACH' FOR SURVIVORS OF MODERN SLAVERY


Human Trafficking Foundation

The Key Issue: Housing for Survivors of Modern Slavery



commonweal housing

An overview of the housing landscape for survivors of modern slavery and exploration of a Whole Housing Approach



LEAP
LIVED EXPERIENCE
ADVISORY PANEL

The Key Issue: [Housing for Survivors of Modern Slavery](#) is hot off the press! This report is a collaboration between the **Human Trafficking Foundation** and **Commonweal Housing Trust**, the **Lived Experience Advisory Panel (LEAP)** and other partners.

It aims to raise the profile of the housing injustice that both British and foreign national survivors of modern slavery experience in England and Wales and examines whether the **Whole Housing Approach (WHA)** to domestic abuse could be used as a framework to provide solutions to improve housing options for survivors of modern slavery.

It offers a series of solid recommendations for significant improvements to policy and practice across the housing spectrum. This includes the recommendation, relevant to this week's feature, that:

“ The Government should fund a Modern Slavery Lead role for each local authority. In the interim, the statutory guidance should be updated to require each local authority to identify modern slavery Single Points of Contact (SPOCs) in the safeguarding, housing, community safety and licensing teams to fill the gap and work collaboratively with local partners to ensure smooth transitions for survivors. ”

ANTI-SLAVERY DAY AWARDS



Each year HTF, with the support of [Marsh Charitable Trust](#), hosts the Anti-Slavery Day Awards to celebrate work done by the media to highlight important issues of human trafficking, and those who have made an outstanding contribution to the fight against modern slavery.

It is always a fantastic evening at Speakers House, and a chance for people in anti-trafficking practice to meet and celebrate through triumphs and challenges! All the winners and photos from the night can be viewed [here](#).

The MS-COP would like to congratulate those recognised for their practice in this field:

- ✓ Reducing Vulnerabilities Award: [Shalini Patel](#), [Duncan Lewis Solicitors](#)
- ✓ Rebuilding Lives Award: [Emily Chalke and Maria Rente](#), [Ella's](#)
- ✓ Empowering Survivor Voices Award: [Olessya Glasson](#), [MSPEC](#) and [Modern Slavery Survivor Collective](#)
- ✓ Statutory Services Award: [Harjeet Chakira](#), [West Midlands Police](#)

LOOK OUT FOR:

THE NEW ANTI-SLAVERY COMMISSIONER



The UK must have been reading our last, [MS-CoP Week 21 update](#) on the yawning gap left where an [Independent Anti-Slavery Commissioner](#) should be! [Eleanor Lyons](#) has been selected to take up the role of [Independent Anti-Slavery Commissioner](#). We hope that she will follow the lead of her predecessors, [Kevin Hyland](#) and [Dame Sarah Thornton](#), by engaging in in-depth consultation and collaborative work with practitioners. The best knowledge and experience in this field, is found with survivors themselves and those who are working frontline.

DID YOU KNOW?

The MS-CoP is a forum for practitioners working in all fields and discipline, [to share perspectives and link practice](#). Our criteria is based upon the delivery of the [Modern Slavery Core Outcome Set \(MSCOS\)](#), which comprises the 7 core outcomes that survivors of human trafficking have told us must be in place for their well-being, recovery and integration. If you would like to feature **your** work in any context or geographical region, please contact us! mscos@kcl.ac.uk.

You can access all of the previous MS-CoP updates in PDF [here](#).

Rachel Witkin
Director
MSCOS Community of Practice (MS-COP)



*The **MSCOS Community of Practice** is hosted by the Helen Bamber Foundation, working in collaboration with **MSCOS project partners:** Kings College London, Survivor Alliance, University of Nottingham Rights Lab and the University of East London. It was devised as an integral component of the MSCOS study at Kings College London by Dr Sian Oram and Dr Sharli Paphitis, with the MSCOS Research Advisory Board. It was designed, devised and established by Rachel Witkin and Queenie Sit.*