

CLOSED DOORS

Summary Report

Inequalities and injustices in appropriate and secure housing provision for female victims of trafficking who are seeking asylum



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Hibiscus Initiatives (Hibiscus) is a voluntary sector organisation with a track record of delivering high-impact support and advocacy services for over 30 years.

Hibiscus has distinct expertise in working with marginalised foreign national and black, minority ethnic and refugee (BMER) women in prison, in the community, and in immigration removal centres, where Hibiscus also works with male detainees. Hibiscus' current work falls into these main areas: community resettlement; international resettlement; and prisons. Hibiscus' anti-trafficking work spans all three of these areas of work.

Hibiscus' Women's Centre is a safe, women-only space, where foreign national and BMER women with experiences of the criminal justice system, immigration detention, or human trafficking, can access specialist casework support and information, learn new skills or obtain specialist advice, both in groups and during one-to-one sessions. The need for this report stemmed from the everyday experiences of Hibiscus' practitioners, working with foreign national women who access Hibiscus' Women's Centre and who have been identified as potential victims of human trafficking.

Funding for this research was awarded by Commonweal Housing (Commonweal) in 2019, following Hibiscus' successful application to their Housing Helps competition. Commonweal is an independent, action learning charity working to investigate, pilot and champion housing-based solutions to social injustice. Housing Helps offered £10,000 to fund a research or feasibility study into a new, emerging or overlooked area of social injustice linked to housing.



INTRODUCTION

“For years now, the government has stated it is committed to tackling trafficking and modern slavery, but this commitment is insincere when viewed alongside its hostile immigration policies”¹

Woman seeking asylum, made destitute in the UK

This summary report seeks to highlight the injustices and gaps in housing support provision for women who are formally identified as potential victims of trafficking by the UK Government’s trafficking identification process, the National Referral Mechanism (NRM). This report specifically focuses on housing provision for female victims of trafficking who are seeking asylum, as the evidence suggests this group experiences some of the greatest injustices owing to their immigration status. The report reflects on two elements of housing provision: safe houses – safe, supported housing for victims of trafficking, where women are meant to be housed; and Asylum Support accommodation, where women too often end up being housed inappropriately.

This summary report is based on a more detailed report produced by Hibiscus Initiatives into the inequalities and injustices in housing provision for victims of trafficking. However, it contains only the key findings and recommendations of the report. To access the full report please go to hibiscusinitiatives.org.uk.



¹ “Will I Ever Be Safe” – Asylum seeking women made destitute in the UK, Priscilla Dudhia, Women for Refugee Women, February 2020

BACKGROUND

The Council of Europe Convention on Action Against Trafficking in Human Beings (ECAT) defines human trafficking 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 the 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 over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs”.

It further refers to those who have experienced human trafficking as “victims of trafficking”.²

As such in this report, Hibiscus has adopted the terminology “victim” to describe those who have or have potentially been trafficked in order to align with the ECAT definition. This decision reflects the fact that this report centres on the legal and contractual obligations of the Government and service providers towards these individuals under different pieces of legislation which adopt the word “victim”. That said, Hibiscus recognises that these individuals can and should also be recognised as survivors, and where the decision has been made to adopt this terminology by sources this report has referenced, the report reflects the original terminology adopted.

The need for physical shelter is an essential requirement for people who have experienced trauma³, such as trafficking and exploitation. If a victim of trafficking is homeless or is living in poor or unsafe accommodation, they may be vulnerable to: targeting by both new and familiar perpetrators of abuse; exploitation; re-trafficking; and other forms of further harm.

Trafficking victims are entitled to safe house accommodation under the VCC

Potential victims of modern slavery, including victims of trafficking, who have received a positive reasonable grounds decision from the NRM – which confirms that

there is evidence to suggest that their claim of being trafficked is valid – are entitled to a minimum of 45 days of support in England, Wales and Northern Ireland (90 days in Scotland). This is known as the reflection and recovery period. Under Article 12 of the ECAT, the UK is required to provide “appropriate and secure” accommodation to all potential victims of trafficking.⁴ This is provided through the Victim Care Contract (VCC). The VCC is designed to provide a comprehensive package of support to victims of trafficking to assist in their recovery. This includes access to safe house accommodation, outreach support, and medical care including counselling, as required. However, as this report shows, under the current five-year contract with The Salvation Army there were some significant gaps in the provision of, and injustices within, the VCC support services, particularly around suitable accommodation, with women all too often not being placed in the safe houses they were entitled to under the VCC.

This is significant as it was announced on 29th June 2020, that The Salvation Army has been awarded the new five-year Modern Slavery Victim Care Contract (MSVCC). In the Government announcement on the matter, they have claimed that the new contract will “provide a service that better meets the needs of each victim, including those with specialist and complex needs” and that the new contract will “allow for more specialised services to meet those needs, including varied accommodation and improved support for those with complex requirements”.⁵ As such, in the transition period between the current and the new contract (which is scheduled for implementation in winter 2020/21), Hibiscus is calling upon the Government and The Salvation Army to address the injustices and inequalities of the previous contract outlined in this report.

² Council of Europe Convention on Action Against Trafficking in Human Beings, Article 12, p.3

³ Elizabeth K. Hopper, Ellen L. Bassuk, Jeffrey Olivet, “Shelter from the Storm: Trauma-Informed Care in Homelessness Services Settings”, The Open Health Services and Policy Journal, 2010

⁴ Article 12, Council of Europe Convention on Action Against Trafficking in Human Beings (ECAT)

⁵ <https://www.gov.uk/government/news/new-contract-to-deliver-improved-support-for-modern-slavery-victims>

CASE STUDY

DORA'S* EXPERIENCE OF ASYLUM ACCOMMODATION

When she joined Hibiscus, Dora, a young mother of a baby daughter going through the NRM process, explained that she was living with a friend and was happy with that arrangement. However, while still waiting for her conclusive grounds decision, she was forced to apply for asylum accommodation, as she could no longer stay with her friend.

While in asylum accommodation, Dora had ongoing problems with her housemates. On one occasion, she received a warning letter from the house manager stating that she had broken the terms of her tenancy agreement by allowing overnight guests to stay with her. Dora was very upset and explained this was not true and likely to be a malicious report by one of her housemates who she has had previous disagreements with.

Dora sought help from Hibiscus to dispute the facts of the warning letter and to report various problems both that her housemates had caused her and some general complaints about the poor state of the property.

Dora was still waiting for the NRM decision when she gave birth to her second child. She notified the asylum housing provider about this change of circumstances and was assured that she would be moved to more suitable accommodation. However, she remained at that same accommodation for over a year, resulting in her feeling continuously low due to its unsuitability. During this time, she was sharing a small room with her two children, and she had her baby-walker, which she had left in the storage area, stolen.

There was a clear failure to meet her needs (such as providing her with a suitable cot for the new-born baby or a new mattress for the toddler) unless her support workers chased the housing provider.

When Dora received the happy news that she was granted refugee status, she was unable to rejoice as she was immediately evicted from asylum accommodation and, despite having submitted a homelessness application to the local authority in the London borough she was residing, she was dispersed to Leeds for [temporary] accommodation, where she had no support network.

This negatively impacted Dora's mental health and she had to instruct a housing solicitor to assist in this matter.

She is still waiting to be relocated back to London.

As this case study and the findings demonstrate, challenges regarding accommodation under the VCC are at least two-fold. Firstly, though there is not a clear policy regarding decisions around safe house allocation for asylum seekers, the data gathered in this study suggests that safe house places are allocated primarily for individuals without pending asylum claims. Secondly, large numbers of women who are recognised as potential victims of trafficking, are residing in asylum accommodation owing to a dearth of safe house places. This suggests that asylum accommodation is deemed secure and appropriate for the recovery and reflection period of these women.

**name changed to protect identity*

FINDINGS

Housing challenges for women accessing Hibiscus' Women's Centre

Potential victims of modern slavery, including victims of trafficking, who have received a positive reasonable grounds decision from the NRM – which confirms that there is evidence to suggest that their claim of being trafficked is valid – are entitled to a minimum of 45 days of support in England, Wales and Northern Ireland.⁶ This is known as the reflection and recovery period. Through Hibiscus' experiences and research, it is clear that many women who have been identified as potential trafficking victims live in accommodation unsuitable for the purpose of their reflection and recovery period, such as in asylum accommodation.

Only 2% of Hibiscus' clients referred to the NRM were allocated a place at a safe house

In 2018/19, 145 women accessing Hibiscus' Women's Centre were identified as being potential victims of trafficking after entering the NRM. Of these

women, just three (2%) had been allocated a government-funded safe house during their NRM process. The other women were usually housed in asylum accommodation, other forms of temporary accommodation, or stayed with friends and family. Four of these 145 women were identified as homeless.

A lack of safe houses

According to The Salvation Army's 2019 report "Supporting Victims of Modern Slavery"⁷ a total of 2,251 individuals were referred to their VCC support services between 2018 and 2019, following a positive reasonable grounds decision from the NRM recognising them as potential victims of trafficking. 1,247 of these referrals were women, and 1,118 – 95% – were foreign national women, mostly from Albania, Nigeria, China and the Philippines.⁸

The Salvation Army – insufficient safe house provision for foreign national women

A response to a Freedom of Information request to the Home Office⁹ revealed that there was a total of 581 safe house bed spaces available that same year to accommodate these referrals, of which 183 were women-only and 238 spaces were mixed/flexible spaces. Notably, only 25 foreign national women with dependent children were accommodated in safe houses over a two-year period between 1st April 2017 and 31st March 2019.¹⁰

Only 25 foreign national women were provided safe house allocation in a two-year period

That only 25 foreign national women were able to access safe house accommodation in this two-year period, despite foreign national women accounting for

1,188 of the women referred to The Salvation Army in the year July 2018–July 2019 alone, evidences the clear inequalities and bias in access to safe house provision experienced by foreign nationals. It further demonstrates that the majority of female potential victims of trafficking are not accessing the safe house accommodation which they are entitled to and suggests flaws in filling available

1,188 foreign national women accessed services under the VCC from July 2018–June 2019 – most were not allocated a safe house

beds. While it is plausible that the available spaces change according to the requirement of victims and the level of demand in the system, these figures suggest that, at best, most foreign national women, some with children, are not

accessing the safe houses they are entitled to under the VCC and, at worst, these women are being disadvantaged and marginalised owing to their status as foreign nationals.

⁶ In Scotland potential victims are supported for the period set by Ministers, currently 90 days, or until a conclusive grounds decision is made, whichever comes earlier, however in some cases support may be offered beyond the 90 days where a conclusive grounds decision has not yet been made

⁷ The Salvation Army, "Supporting Victims of Modern Slavery: Year eight report on The Salvation Army's Victim Care and Co-ordination Contract", 2019, p.6

⁸ Salvation Army, Supporting Adults Victims of Modern Slavery, 2019, October 2019

⁹ Freedom of Information Request reference: 55528 on 19th September 2019

¹⁰ Freedom of Information Request reference 53798 on 27th June 2019

Women going through the NRM who have a pending asylum claim are treated as asylum seekers instead of potential trafficking victims

Lost in the system

An additional issue of concern is the number of people getting lost in the system after initial contact with The Salvation Army.¹¹ A total of 934 individuals were not supported in their recovery and reflection

period after their referral to The Salvation Army. This was despite them being recognised as potential victims through a positive reasonable grounds decision and, thus, eligible for support. The Salvation Army notes in the same report that this is because they could no longer be reached after initial contact. However, this is a significant number of people to disappear in this process and warrants further investigation into how follow up retention rates can be improved.¹²

Asylum accommodation

A significant number of victims who have been referred to the NRM, including 64 of Hibiscus' Women's Centre service users, access housing provided through Asylum Support, provided under Section 95 (for individuals with pending asylum claims) or Section 4 (for individuals with failed asylum claims) of the Immigration and Asylum Act.¹³ This accommodation is specifically aimed at people who have an ongoing application for asylum and is designed primarily to help prevent destitution. It is not designed to provide round-the-clock support to individuals who have experienced the type of trauma associated with trafficking. As a result, this accommodation cannot be seen to amount to a safe place for people recovering from the traumatic experience of being trafficked.

What is more, poor-quality asylum accommodation can often be the type of exploitative environment that can further expose vulnerable women to the risk of trafficking and modern slavery, compounding both their vulnerability and, potentially, their trauma. This research raised significant concerns around safety, sanitation, overcrowding, and overlooked support needs in this accommodation.

There are currently no minimum standards for the management of asylum accommodation to protect victims of trafficking

One potential victim of trafficking, who was placed in asylum accommodation in East London, was housed alongside a violent tenant who was aggressive towards other tenants and who even smashed windows.

The woman had been threatened with a knife by the violent tenant and had called the police on numerous occasions. Her recovery was seriously undermined as a direct result of these unsafe living conditions. Despite all the concerns raised over safety, it took a long time for the woman to be moved to new accommodation, though she was finally moved to a studio flat.

In June 2020, the Government confirmed that The Salvation Army had won the contract for the new MSVCC. However, in this announcement the Government failed to address the issue of trafficking victims being placed in unsuitable asylum accommodation and in fact states "A successful contract will ensure that Service Users... requiring accommodation are accommodated in a manner that best meets their needs and reflects their level of independence".¹⁴ This indicates that at present the Government intends to continue to use asylum accommodation to house victims of trafficking despite it being inappropriate and insecure, and may even result in victims being put in danger of being re-exploited. As such, the Government must urgently address this gap in provision to ensure that the new MSVCC upholds the UK's responsibilities towards victims of trafficking under the ECAT.

¹¹ The Salvation Army, "Supporting Victims of Modern Slavery: Year eight report on The Salvation Army's Victim Care and Co-ordination Contract", 2019, p.17

¹² Ibid

¹³ Immigration and Asylum Act 1999

¹⁴ Home Office, "Modern Slavery Victim Care Contract (MSVCC)", pp. 2-4

CASE STUDY

ELLA'S* EXPERIENCE OF BEING TRANSFERRED TO ASYLUM ACCOMMODATION DURING HER NRM PROCESS

Following a positive reasonable grounds decision, Ella, originally from Cameroon, was accommodated in a Salvation Army-run safe house outside London, where she stayed for four months between 2016 and 2017. The house had four single rooms, and shared kitchen, living room and bathroom areas. One member of staff was always present in the house during the day and sometimes the staff member would stay the night when someone was ill. Staff members would also accompany the women at the safe house to appointments.

Ella explained that the house felt very safe as no men were allowed in. The women would look after the house and had created a schedule to make sure the house was clean and tidy.

Ella took English classes and counselling was also available as part of her support package. The staff also provided the women with clothes, toiletries, shoes, and basic food products.

In June 2017, Ella received a letter informing her that she had to be transferred to asylum accommodation in London, following her submission of an asylum claim. At this point she was still in the NRM process and had not yet received a conclusive grounds decision.

Ella felt isolated when she first came to Hibiscus, as the asylum accommodation in London she was moved into caused her a lot of distress due to the unfamiliar location, poor hygiene conditions and overcrowding. Understandably, she had a very hard time adapting to the new environment after leaving the safe house.

After the transfer to asylum housing, staff in the previous safe house asked Ella if she wanted to come back to the safe house on weekends, since she did not know anybody in London and had no support network – although she thought it was very nice of them to offer, she could not do this because it was too far from her new asylum accommodation and too costly for her to travel there.

*name changed to protect identity



CONCLUSION

This report has highlighted the inequalities in housing provision for potential victims of trafficking, who are also claiming asylum. These inequalities result in those with concurrent trafficking and asylum claims being housed in unsuitable accommodation during their recovery and reflection period, which is detrimental to recovery from trauma. The report demonstrates the unequal access to government-funded safe houses experienced by female victims of trafficking who are seeking asylum, with the evidence indicating that these women are being discriminated against owing to their status as foreign nationals.

The purpose of Asylum Support accommodation is merely to prevent destitution, and, so, it cannot – and should not be asked to – provide a safe and supportive housing option for trafficking victims. The outreach support provided for women in asylum accommodation is not an equivalent alternative to a place in a safe house, where ongoing 24-hour support is available from specialist, trained staff, and where the location of the safe house is kept confidential, therefore, ensuring a barrier of protection for trafficking victims from groups targeting vulnerable individual.

Despite the new asylum housing contracts and the Advice, Issue Reporting and Eligibility Contract being brought in to provide additional safeguarding protections to vulnerable individuals accessing asylum housing, the question remains whether these measures – even if implemented correctly – could sufficiently tackle the gap in provision between asylum accommodation and fit-for-purpose safe houses.

Under the newly termed MSVCC, there are some small but positive signs of improvement announced by the Government, such as confirmation that when a potential victim is referred into the NRM, they may enter the MSVCC service before a reasonable grounds decision is made if there are immediate accommodation needs. This alongside six “new” services that are being introduced such as the incorporation of Recovery Needs Assessments into the contract (which had already been introduced in 2019) and increased provision of move-on support for individuals exiting NRM services.

Despite there being some small signs of progress in relation to the failings of the current contract, individuals with trafficking experiences, alongside anti-trafficking experts and practitioners, were hoping to see significant improvements to the support provided to trafficking victims during their NRM process. In particular, there is a clear need to address the lack of sufficient safe house places; the failure to place victims of trafficking who were also seeking asylum into available safe house places; and the substandard and potentially unsafe use of asylum accommodation for victims of trafficking during their 45-day reflection and recovery period.

In order to adequately address this, the Government must publish more detail on the proposed changes to the new MSVCC. In particular, around how it will address the failings and recommendations highlighted in this report. Importantly, this must include increased resources for contractors, with a focus on increasing safe house capacity to meet need. Furthermore, the continuing delays in the NRM decision making process need addressing, as they put significant strain on support provision and have a detrimental impact on the recovery of victims. Furthermore, the Government must provide clear guidance on how waiting times will be reduced to ensure potential victims are provided the support they need to help overcome the significant trauma they have experienced, without experiencing unnecessary and potentially harmful delays.

It is the UK Government's legal obligation to ensure all potential victims have access to appropriate and secure accommodation. More safe house bed spaces are, therefore, urgently needed as part of the new MSVCC to ensure more individuals, who are currently being forced into unsuitable accommodation either within asylum services or elsewhere, have access to the trauma-informed services which meet their particular and complex needs. Individuals who are not being provided with access to appropriate and safe accommodation have a legal entitlement under the NRM to access legal advice, which can be covered by legal aid, in order to challenge their circumstances, as they may be unlawful.

The recommendations that follow outline the steps that the Government must urgently take to ensure that the new MSVCC – and those contracted to fulfil it – adequately and fully addresses the failings of the VCC to meet the UK's obligation under the ECAT to provide the appropriate and secure accommodation needed by all victims of trafficking, including those also seeking asylum.



RECOMMENDATIONS

The recommendations in this report have been shaped and informed by a number of key principles from the Human Trafficking Foundation's Survivor Care Standards, in particular its guidance on accommodation. These standards were developed in collaboration with a range of specialist agencies with experience in supporting victims of trafficking and, as such, can be viewed as the most comprehensive guidance produced in the UK on this issue. The standards were initially introduced in 2015 and then further updated in 2018. In October 2017, the Government announced that it would adopt and include them in future VCCs. However, any mention of the Survivor Care Standards¹⁵ was conspicuously missing from the Government's June 2020 announcement regarding the new MSVCC.¹⁶

As such, the recommendations from this report are as follows:



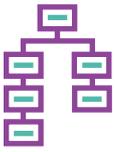
Improved Modern Slavery Victim Care Contract: The new MSVCC must include explicit policies and procedures to address failings and gaps under the current contract.

This must include:

- Written adoption of the Human Trafficking Foundation's Survivor Care Standards;
- Measures to increase gender-responsive safe house bed provision resulting in provision always exceeding the number of potential victims going through the NRM at any time;
- Comprehensive adoption of trauma-informed, gender-responsive and rights-based policies with clear procedures developed to support implementation;
- Clear mechanisms designed to support victims of trafficking, users of the NRM, and victims' groups to participate in the development and monitoring of policy, procedure, and best practice guidelines under the new MSVCC;
- Provision of appropriate and secure accommodation in line with the spirit of the ECAT. This should include a focus on ensuring victims are not housed in asylum accommodation and securing suitable, permanent homes for trafficking victims;
- Improved coordination and communication between providers in order to ensure more women entitled to space at a safe house can access beds;
- Provision of extra safety measures – beyond outreach support – for potential victims who are moved into asylum accommodation, until the required number of safe house places are established to meet need;
- Clear, best practice provisions regarding the safeguarding of dependent children to which all contractual providers of housing for trafficking victims must adhere. This must include having the stability of continuity of education, peer groups and professional relationships;
- Provision of Recovery Needs Assessments to address the ongoing and individual needs of victims of trafficking, after the recovery and reflection period and positive conclusive grounds decision; and
- Developing a mechanism to ensure a smooth transition for victims who are leaving government-funded or independent safe houses, which addresses the differing roles of various stakeholders – including the Home Office, asylum accommodation, MSVCC contractors and sub-contractors, local authorities and outreach advocates – and how they must work together during this process.

¹⁵ Human Trafficking Foundation's Modern Slavery Survivor Care Standards, Chapter 8

¹⁶ <https://www.gov.uk/government/news/new-contract-to-deliver-improved-support-for-modern-slavery-victims>



Improved training for those delivering services: Comprehensive training must be provided to all professionals and volunteers working with trafficking victims during initial needs assessments and in accommodation settings.

This must include:

- Comprehensive initial, ongoing and refresher training for all professionals employed as part of the MSVCC, including for First Responders and for those working in safe houses, and asylum accommodation settings (for as long as victims are housed there);
- Training provided on topics of relevance to each individual's specific role working with victims of trafficking including – but not limited to – trauma-informed practice, safeguarding, domestic violence, immigration, gender sensitivity and mental health needs; and
- First Responders being required to inform all potential trafficking victims, no matter their current housing status, of safe house provision during their initial needs assessment. Training must explicitly state that asylum accommodation and staying with family or friends cannot be automatically considered as an appropriate and secure accommodation option during the initial needs assessment process.



Improved provision of appropriate and secure accommodation: Provision of accommodation for victims of trafficking must reflect the need to be appropriate and secure in line with Article 12 of ECAT and victims must be informed of their rights and be provided opportunity to participate in decisions around their housing.

This must include:

- Sufficient gender-responsive safe house bed provision which meet the needs of all individuals going through the NRM, regardless of their immigration status;
- Provision of sufficient safe houses that are tailored towards the needs of those with complex needs, including for those with mental health conditions;
- Gender responsive accommodation placing; women victims of trafficking are to be placed in female only accommodation;
- Additional measures are to be implemented at asylum accommodation where victims of trafficking are being housed until sufficient safe house bed provision is met. This must include increased security measures to address the additional risk of re-exploitation and re-traumatisation for those housed in asylum accommodation;
- Those being provided housing must be consulted before any decisions are made about the location of their accommodation and their wishes must be taken into account in all decision-making processes on housing;
- Ensuring stability in accommodation provision for victims of trafficking and their families is a priority in any decisions around initial placement and possible changes to housing provision. This means if a person/family has settled in an area in which they wish to live, and it is free from any known trafficking-related risks, they should remain there or as near as possible to it;

- All accommodation allocation decisions are to be shared in advance with victims of trafficking and their outreach advocates to enable timely support for the move and/or support to avoid any inappropriate dispersal;
- Women with trafficking concerns and their dependent children must not be required to have to share a room or be placed in large-scale Houses of Multiple Occupancy. (Several councils, including Hull and Leeds Councils have already formally banned forced room-sharing of adults in asylum accommodation, and all providers must now follow this);
- All accommodation providers must have clear procedures to address the need of individuals presenting with complex and/or acute mental health conditions;
- All housing provided to those moving through the NRM is to be habitable, clean, and appropriate for recovery at all times;
- Properties must be adequately maintained by the contractors, and the contractor must cover the cost of bills, set up, appliances etc. so that the victim's subsistence is not spent on these items; and
- Any repairs needing to be undertaken are to be carried out quickly by the contractor, to ensure trafficking victims are not left with unsuitable housing for long periods. All repairs must be carried out in a gender-responsive way, ideally with those of the same gender as the tenants making the repairs and with sufficient notice provided in advance of any repairs to those living in the property, especially if the repair is being carried out by someone from a different gender.



Strengthened monitoring and accountability mechanisms: Clearer and stronger monitoring and accountability mechanisms must be implemented to ensure victims of trafficking and victims groups can challenge failure to deliver services under the MSVCC in line with relevant legal frameworks, policies, and procedures.

This must include:

- Development of a new and robust monitoring framework, produced in close consultation with the Care Quality Commission, victims and victims groups. This framework must incorporate learning from the current pilots running with two Salvation Army sub-contractors, with specific focus dedicated to assessing whether vulnerabilities and mental health needs are being adequately identified and supported;
- An inspection regime developed to ensure that all housing provision meets the requirements set out in the MSVCC and standards outlined under the ECAT;
- The Care Quality Commission working more explicitly with contractors on inspections of safe houses, other housing provision and outreach support;
- Regular, timely and transparent publication of relevant data relating to the performance of all stakeholders involved in housing provision for victims of trafficking, including the performance of the Advice, Issue Reporting and Eligibility and Accommodation and Support Services Contracts contract providers, to ensure standards are subject to independent evaluation and can be monitored by relevant agencies and regulators; and
- Additional transparency and ongoing information sharing between sub-contractors who provide housing under the VCC, with mechanisms designed and implemented to encourage the development and adoption of best practice interventions.



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