



Live Fear Free Helpline
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 Providing confidential support and information on domestic abuse, sexual violence and violence against women in Wales
 Darparu gwybodaeth a chfynogaeth cymhelluol ynghylch trais domestig, trais rhywiol a trais yn erbyn merched yn Nghymru

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Cymorth i Ferched Cymru
Welsh Women's Aid
 Rhoi Merched a Phlant yn Gyntaf
 Putting Women & Children First

Response to the Home Affairs Select Committee call for written evidence into modern slavery

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These are the views of:	<i>Welsh Women's Aid (Third Sector) - the national charity in Wales working to end domestic abuse and all forms of violence against women.</i>

About Welsh Women's Aid

Welsh Women's Aid is the umbrella organisation in Wales that supports and provides national representation for independent third sector violence against women, domestic abuse and sexual violence (VAWDASV) specialist services in Wales.¹ These services deliver life-saving and life-changing support and preventative work in response to violence against women, including domestic abuse and sexual violence, as part of a network of UK provision.

As an umbrella organisation, our primary purpose is to prevent domestic abuse, sexual violence and all forms of violence against women and ensure high quality services for survivors that are needs-led, gender responsive and holistic. We collaborate nationally to integrate and improve community responses and practice in Wales; we provide advice, consultancy, support and training to deliver policy and service improvements across government, public, private and third sector services and in communities, for the benefit of survivors.

We also deliver direct services including, for example, the Welsh Government funded Live Fear Free Helpline and a National Training Service partnership. We are piloting the Survivors Empowering and Educating Services (SEEdS) project, which is empowering survivors of violence and abuse to collectively influence and inform improvements in public services and commissioning frameworks, and help change attitudes.

We also deliver the Wales National Quality Service Standards, a national accreditation framework for domestic abuse specialist services in Wales (supported by the Welsh Government) as part of a UK suite of integrated accreditation systems and frameworks. (More information on the NQSS can be found here: <http://www.welshwomensaid.org.uk/what-we-do/our-members/standards/>)



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Summary of recommendations

1. UK Government to commit to tackling modern slavery within the context of gender inequality and that women surviving modern slavery must be responded to in a gender informed way, recognising the links between trafficking and other forms of violence against women and girls.
2. UK Government to consider the threshold for businesses required to report their annual slavery and human trafficking statement. Taking into account the low number of high-turnover businesses in Wales and the gendered nature of the types of slavery that may be missed.
3. UK Government to urgently overhauled visa rules which act as a barrier to domestic servants leaving abusive employers.
4. The National Referral Mechanism (NRM) system to record pregnancy and parenthood to better support women with children.
5. Modern slavery training to recognise the gendered nature of trafficking and align with training on VAWG and CSE.
6. UK government adopt an 'end demand' legislative framework, often referred to as the Nordic model or Sex Buyer Law aligned to the implementation of the Modern Slavery Act.
7. Ensure that the commissioning of support for slavery survivors is gendered informed. Support for women who have experienced modern slavery should not be gender neutral, but recognise the unique experiences of women who have been exploited and the ongoing risks she (and any children) face.
8. Services working with women who have a vulnerability due to past trauma, disability or mental health need are aware of the risks and warning signs of modern slavery.
9. UK Government to ensure adequate support is made available for women who are refused asylum to prevent the increased risk of exploitation
10. Public authorities, including Police, Crown Prosecution Service and the Courts to receive specific instructions that they should apply the non-punishment principle to all victims of abuse.

1. The current scale and nature of modern slavery

1.1 Modern slavery is a highly gendered crime; in its causes, its nature and its consequences. The UN Women UK National Committee conference in April 2018 heard 40.3 million people across the world are held in slavery with 70% of those women, predominantly sold into forced labour, sexual exploitation and domestic servitude.¹ Additionally, 94% of the adult women recommended to the National Referral Mechanism (NRM) in the UK are referred following sexual exploitation.² In Wales, Bawso, a national organisation supporting people from BME background, found that the majority (41

¹ <http://www.unwomenuk.org/what-we-do/news-1/ending-slavery-and-trafficking-un-women-nc-uk-brunch.html>

² Ibid



out of 57) of women it had supported in regards to modern slavery, had been trafficked for sexual exploitation.³

1.2 In Wales, figures released in August 2018 revealed a 56%⁴ increase in cases of modern slavery from 2016 – 2017, according to Welsh Government. However modern slavery remains a hidden and underreported crime, the International Labour Organisation believes any estimates are conservative, given that millions of people cannot be reached if they are conflict-zones or on the refugee trail.⁵

1.3 Discrimination against women and girls is embedded across society and this is reflected in the world of modern slavery. The *Overcoming Barriers and Healing the Scars of Human Trafficking* report by Bawso found systems which discriminate against women led to some of the women they supported being trafficked.⁶ Women and girls face additional threats; domestic servants face the threat of rape and sexual exploitation and women trafficked across borders to work often experience sexual violence during the journey. The Home Office economic and social costs of modern slavery report⁷ highlights this, as well as the high costs to physical healthcare of sexual exploitation. Additionally, the report finds that domestic servants, who are predominantly women, spend longer enslaved than other victims of modern slavery, again creating high costs to the public purse.

1.4 Sexual exploitation is estimated to cost the UK at least £247.6 million⁸ each year and is the most common form of reported slavery in the UK. At the same time sex trafficking is making criminals a significant amount of money. An inquiry into organised sexual exploitation conducted by the All-Party Parliamentary Group (APPG) on Prostitution and the Global Sex Trade in 2018 concluded that the UK currently a low risk, high value destination for sex traffickers. The report found that 85% of potential victims are non-UK nationals.⁹

1.5 As stated, the vast majority of people who are sexually exploited are women. Welsh Women's Aid would therefore argue that, given the gendered nature of this form of exploitation, a commitment to tackling gender inequality and the discrimination which can lead to vulnerability and exploitation is vital. Worryingly, Welsh Women's Aid is aware of cases of women forced into prostitution by boyfriends or spouses who then pimp them out, which highlight the cross-over with violence against women and girls.

2. The impact of the Modern Slavery Act 2015

2.1 Currently, the act requires an organisation with a turn-over of £36 million operating in the UK to publish an annual slavery and human trafficking statement. However, as the Anti-Slavery Commissioner for Wales has pointed out, few businesses in Wales have a turn-over at this scale, so

³ <http://www.bawso.org.uk/assets/Uploads/Files/PDF/Bawso-Trafficking-Nov-2012.pdf>

⁴ <https://cymru-wales.unison.org.uk/news/2018/08/dramatic-increase-modern-slavery-wales/>

⁵ <https://www.theguardian.com/global-development/2017/sep/19/latest-figures-reveal-more-than-40-million-people-are-living-in-slavery>

⁶ <http://www.bawso.org.uk/assets/Uploads/Files/PDF/Bawso-Trafficking-Nov-2012.pdf>

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729836/economic-and-social-costs-of-modern-slavery-horr100.pdf

⁸ Ibid

⁹ <https://appgprostitution.uk/wp-content/uploads/2018/05/Behind-closed-doors-APPG-on-Prostitution.pdf>



are exempt from publishing, therefore presenting a loophole for the vast majority of businesses in Wales. Additionally, Welsh Women's Aid is concerned that as women are more likely to be held in domestic servitude and sexual exploitation this is more likely to be run by an individual or small criminal gangs and so are far less likely to be picked up via this route. Arguably, this requirement of the Act discriminates against women who will not be identified via this route and therefore kept in servitude for longer.

2.2 Welsh Women's Aid is concerned about the current visa rules¹⁰ which prevent overseas domestic workers from leaving abusive employers if they do not receive a positive decision from the NRM confirming they have been trafficked. Additionally, End Violence Against Women Coalition is concerned that women who may be here on a work visa face the perceived and real risk of being detained and deported if they report abuse.¹¹ This clearly acts as a barrier to domestic workers experiencing abuse from coming forward, ultimately leaving them to suffer abuse in silence.

2.3 The plight of slavery victims who are pregnant or have children is also concerning us. Parents who are trafficked are vulnerable to further exploitation as traffickers may make threats to children to further control and exploit them. As Slavery.org highlights, currently the UK Government isn't recognising the particular vulnerabilities of victims who are pregnant or have children. Additionally, the NRM system does not include a question on pregnancy or parenthood. The support available is also patchy, with a lack of safe and appropriate accommodation, childcare, healthcare and support for children.¹² In Wales, Bawso, provide 13 units of secure accommodation and 20 outreach units across Wales for survivors of human trafficking, as well as offering support to children.¹³

3. How to increase understanding and reporting of modern slavery offences

3.1 Under the Anti-slavery commissioner for Wales, front line police officers are being trained in spotting the signs of modern slavery. Welsh Women's Aid would urge any training to include the additional vulnerabilities faced by women who are enslaved and the gendered nature of modern slavery. As well as aligning it with other VAWG training and ensuring it is linked with training on prostitution and child sexual exploitation.

3.2 Robust training to other services is also vital to increasing understanding. Commissioning of services for slavery victims should also be long-term and gender informed. Crucially recognising the overlap with other forms of violence against women and girls, such as women being pimped/trafficked by partners and rape and violence experienced through prostitution, domestic servitude and during transportation into and around the UK. In Wales, the Welsh Government Delivery Framework on violence against women, domestic abuse and sexual violence references an alignment between modern slavery and VAWG including raising awareness at both events and transport hubs and promoting training on both within organisations.

¹⁰ <https://www.antislavery.org/analysis-modern-slavery-act/>

¹¹ <https://www.endviolenceagainstwomen.org.uk/wp-content/uploads/FINAL-living-in-a-hostile-environment-for-Web-and-sharing-.pdf>

¹² <https://www.ecpat.org.uk/News/trafficking-victims-who-have-children-are-systematically-overlooked-new-report-says>

¹³ <http://www.bawso.org.uk/our-services/women/human-trafficking-diogel-project/>



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4. The impact of 'county lines', and how this issue can be tackled

4.1 Reports have highlighted that drug running and dealing is increasing in smaller towns, as gangs target new areas away from the major cities. This is a particular concern for north Wales due its proximity to Manchester and Liverpool. Young people are targeted and coerced into dealing and drug running, Welsh Women's Aid is also concerned about added risk young women face; they may be sexually groomed and coerced into relationships with gang members and then exploited sexually or pimped out to settle drug debts. Welsh Women's Aid is also concerned about the act of 'cuckooing' (taking over a person's home as a base for drug dealing), where dealers form a 'relationship' with a vulnerable woman in order to exploit her home. This can lead to domestic abuse, rape and sexual exploitation as well as imprisonment, domestic servitude and/or homelessness.

5. What success in tackling modern slavery would look like, and what benchmarks should be used to measure progress

5.1 Wales led the way in appointing an Anti-Slavery Coordinator and as part of the role, the Coordinator has established an all Wales anti-slavery leadership group. Key to the work in Wales is coordinating efforts to tackle slavery across public, private and third sector across devolved and non-devolved areas. Clearly a coordinated approach to tackling slavery and training to recognise the signs are essential to tackling the hidden nature of this crime.

5.2 In order to tackle demand for sex trafficking, it is necessary to tackle demand to pay for sex. As a 2016 European Commission report on trafficking highlights, "trafficked persons are located within existing sex industries... there is no separate or specific market for trafficked persons".¹⁴ In Wales, there is welcome reference made in the Welsh Government National Strategy for Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2016-2021 and its subsequent delivery framework to alignment between modern slavery and women exploited in the sex industry. However we would recommend the adopting by the UK government of an 'end demand' legislative framework, often referred to as the Nordic model or Sex Buyer Law.

5.4 Welsh Women's Aid would urge that tackling modern slavery must address experiences of gender discrimination as a precursor to slavery and the consequences beyond when exiting. Gender inequality leads to more women living in poverty. Gender expectations can result in women being ostracised from communities, for not living up to those expectations, leading to the risk of grooming because of isolation. Women who have fled forced prostitution may be at risk of further exploitation, other forms of VAWG including so called honour crimes, if they have no support available. Welsh Women's Aid would urge a response to be gendered, to ensure the causes of inequality are tackled as part of the fight against modern slavery. Support for women who have experienced modern slavery should not be gender neutral, but recognise the unique experiences of women who have been exploited and the ongoing risks she (and any children) face.

6. Current levels of support for victims, and how it can be improved

¹⁴ 'Study on the gender dimension of trafficking in human beings, European Commission', European Union, 2016.



6.1 Welsh Women’s Aid understands support is patchy, with an emphasis on policing rather than long –term support for survivors. Commissioning for safe-houses should consider gender, ensuring it is safe for women and not leave them open to further abuse.

6.2 In a report produced in Wales by Bawso¹⁵, the majority of women interviewed reported some kind of vulnerability before experiencing modern slavery which can go some-way to explaining the root causes of how they became a victim of human trafficking. It is therefore important services working with women who may already have a vulnerability due to past trauma, disability or mental health need etc are aware of the risks and warning signs. Migrant women are at increased risk of violence and exploitation because of insecure immigration and the risk of deportation¹⁶ and Welsh Women’s Aid is concerned about the risk to women whose application for asylum has failed. Women for Refugee Women found 67% of those whose asylum was turned down were made destitute, with 56% of those forced to sleep outside and 16% experiencing sexual violence while destitute and a similar number working unpaid for food or shelter.¹⁷ EAW highlights the risk of the ‘Hostile Environment’ where women face barriers in accessing support because internal border controls sit within maternity, housing and education settings ‘The hostile climate exacerbates the fear and unwillingness of women subject to immigration control to disclose abuse, as women are forced to balance their need to access services such as a refuge or homeless shelter, the police, or a doctor against well-founded fear that their own or their family’s residency status could be impacted’¹⁸ Clearly a risk indicator for exploitation is losing an asylum application. Welsh Women’s Aid would therefore urge UK Government to ensure adequate support is made available for women who are refused asylum while they appeal or decide on their next steps to prevent the risk of exploitation during this incredibly vulnerable time.

7. How the police and immigration system's response to modern slavery offences could be improved

7.1 Welsh Women’s Aid is clear that training is provided to front-line officers, as well as ensuring Police and Crime Commissioners (PCC) are working together to target slavery effectively, as seen in a recent collaborating across four PCCs in Wales.¹⁹ Crucially, any training and collaborative working should ensure specialist agencies working with women are included and consulted with and the additional risks facing women who are victims is recognised.

7.2 Survivors with uncertain immigration status who report abuse to the police, rather than being dealt with under the non-punishment principle, are being questioned on their legal status, we therefore recommended that Public authorities, including Police, Crown Prosecution Service and the Courts should receive new specific instructions that they should apply the non-punishment principle to all victims of abuse and are required to always put protection of victims and pursuit of justice when

¹⁵ <http://www.bawso.org.uk/assets/Uploads/Files/PDF/Bawso-Trafficking-Nov-2012.pdf>

¹⁶ <https://www.endviolenceagainstwomen.org.uk/wp-content/uploads/FINAL-living-in-a-hostile-environment-for-Web-and-sharing-.pdf>

¹⁷ <http://www.refugeewomen.co.uk/2016/wp-content/uploads/2016/07/Finalexecsummary.pdf>

¹⁸ Op Cit – End Violence Against Women

¹⁹ <https://www.policeprofessional.com/news/wales-signs-up-to-pcc%20%92s-%20%91platform-for-change%20%92-to-assist-modern-slavery-victims-2/>



a victim seeks it ahead of immigration enforcement. This must be incorporated into training for all immigration enforcement staff.

8. What the priorities for the new Independent Anti-Slavery Commissioner should be

8.1 Welsh Women's Aid is keen that any work by the Anti-Slavery Commissioner is aligned with the work of the Welsh Anti-Slavery Coordinator. Ensuring work is joined up across the border and devolved areas of work are aligned.

8.2 Welsh Women's Aid would urge the commissioner to consider the safety of slavery victims who are pregnant or with children and ensure they are provided with the right support and not overlooked or put at risk of further exploitation.

8.3 In 2017 forced marriage, which falls under the umbrella of violence against women and girls, was recognised as a form of slavery. Fiona David, Executive Director, of the Walk Free Foundation noted 'It isn't clear why forced marriage has often been overlooked as a form of slavery in data reporting, If you have a situation where someone is sold into marriage and is providing free domestic labour and has no sexual autonomy, then when you take the label of marriage away from this situation it's often nothing less than slavery and we need to shine a light on this so that people can see it for what it is.'²⁰ Given the vast majority of the estimated 15.4 million people in forced marriage are girls and women the commissioner should ensure the response to tackling it is embedded in work around modern slavery and the resources are available to tackle it.

ⁱ Our membership of third sector violence against women, domestic abuse and sexual violence specialist services in Wales, with whom we have national partnership agreements to ensure our work is coordinated and integrated includes: Aberconwy DAS, Atal y Fro, Bangor and District Women's Aid, Clwyd Alyn Housing Association (CAHA) Women's Aid, Stepping Stones, Safer Merthyr Tydfil, Carmarthen Domestic Abuse Service, Calan DVS, Cardiff Women's Aid, Cyfannol Women's Aid, Domestic Abuse Safety Unit (DASU), Gorwel (Grwp Cynefin), Montgomeryshire Family Crisis Centre, Newport Women's Aid, North Denbighshire Domestic Abuse Service, Port Talbot & Afan Women's Aid, RCT Women's Aid, Safer Wales (including Dyn Project), Swansea Women's Aid, Threshold, West Wales Domestic Abuse Service and Rape and Sexual Abuse Support Centre (RASASC) North Wales.

Welsh Women's Aid would like to thank the Home Affairs Select Committee for the opportunity to provide evidence on this important inquiry. We would also be happy to provide the committee with further oral or written evidence, if required.

Any comments or questions regarding our response can be directed to:

Elinor Crouch-Puzey

²⁰ <https://www.theguardian.com/global-development/2017/sep/19/latest-figures-reveal-more-than-40-million-people-are-living-in-slavery>



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