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Independent Evaluation of the IMSA Framework Stage One Consultation

Dr Alexandra Williams-Woods | University of Liverpool
Public Report

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Executive Summary

In 2021, Hope for Justice, British Red Cross and The Snowdrop Project began a partnership to explore the potential for a national accredited Independent Modern Slavery Advocate role. The decision was made to develop a framework to cover the key elements of the operation of the role, based on the expertise within the partner organisations and extensive consultation of the modern slavery support sector.

This report contains an evaluation of the findings from the consultation exercise, and an assessment of the consultation process and its effectiveness. The evaluation also includes a review of the inclusion of consultants with lived experience of modern slavery within the consultation process and development of the framework. It was agreed by the project board that the framework would include four sections:

1. Ethos, values, and governance
2. IMSA role and remit
3. Training and accreditation
4. Organisations employing an IMSA

It was also agreed that the role and remit of the IMSA would focus on eight key areas:

1. Health and social care
2. Housing and subsistence
3. Survivor support and NRM
4. Reducing risk/increasing resilience
5. Criminal justice
6. Civil justice
7. Multi agency and partnership working
8. Independent advocacy and the IMSA model

The consultation process included 13 workshops, survey data collected within workshops and a call for written feedback. Five 'partnership' workshops included policy level representatives from each partner organisation, consultants with lived experience and

other invited experts. Two 'frontline' workshops included individuals operating in an IMSA or equivalent role within the partner organisations. Five 'sectoral' workshops were attended by a variety of stakeholders from across the sector and other relevant areas. Finally, an event was held to launch the draft framework and take feedback on the process to date.

Methodology

Data from the workshops, surveys and written feedback were synthesised by the project lead, and having been reviewed by the evaluator underwent a content analysis process that identified different emergent topics as they related to each of the four sections and eight key areas. From this the key points of discussion and agreement were assessed. Most of the data came from the workshops as only a small number of written responses were received. Survey data was also included in the analysis.

To evaluate the consultation process and its effectiveness, the form and function of the workshops and written submissions were assessed against the agreed objectives of the overall consultation:

1. What needs to underpin the framework?
2. What needs to be adapted to ensure the model can be upscaled and replicated?
3. How can the model sit in different organisations employing an IMSA across four host nations?

UN guidance for stakeholder consultation was also used as a framework to assess the process and the methods of engagement with relevant stakeholders.

An evaluation of engagement with consultants with lived experience was also undertaken, as this was identified as a particularly important part of the consultation process, and an important areas of learning. The three IMSA model project development lived experience consultants were asked to participate in the independent evaluation of the consultation process. They were each asked to fill in a detailed report of each of the workshops they attended. These were given to the independent evaluator to form part of the evaluation. Interviews were offered to each of the three consultants, two interviews were carried out.

Key findings from consultation Data

Support for formalised IMSA role

Agreement that an accredited IMSA would be of benefit to survivors of modern slavery.

Agreement that there are significant barriers to having needs met appropriately that survivors face, and that having a specifically trained advocate is likely to bring significant benefit to the client.

IMSA role and remit

There is a need for clarity on the role of an IMSA, and how it can be distinguished from other connected roles, such as caseworker, general independent advocate or victim navigator.

Agreement that expertise within the eight key areas is necessary for the IMSA to successfully support the client.

Training and accreditation

High level training would be necessary for the IMSA to operate with the necessary level of expertise. Agreement that there are a number of benefits to accreditation.

Organisations employing an IMSA

There are benefits and drawbacks to both a local and national model, with the implication from those attending workshops that they would be prepared to support either, even if practically one may be more difficult than the other.

Protecting the independence of the IMSA and avoiding conflicts of interest emerged as a key theme. There was support for excluding law enforcement organisations as organisations that can employ an IMSA, but an open-minded approach to other organisations, as long as they could meet strict criteria.

Engagement with consultants with lived experience

- By engaging with consultants at different levels of the process, inviting LEAP consultants to attend sectoral workshops and including directly engaged consultants who had previously worked with the partner organisations to contribute more extensively to the development of the framework, different perspectives could be gained from both more involved, and more removed and objective consultees.
- The consultation of the three directly engaged consultants went significantly beyond what was referred to as 'tokenistic' involvement and created space for meaningful input and co-creation of the developing framework.

Evaluation of consultation process

The form and function of the workshops and written submissions were assessed against the agreed objectives of the overall consultation:

- The first objective, to establish what needs to underpin the framework was met by capturing a wide range of views and stakeholder insight on the values and ethos that should be foundational to the IMSA framework. This was also achieved by facilitating a series of in-depth discussions with relevant stakeholders across the sector and beyond, to establish the utility of the eight key areas of the IMSA role.
- The second objective, to establish what needs to be adapted within the existing IMSA models of the partner organisations to ensure the model can be scaled up and replicated, was met through the discussions facilitated across the workshops, with a well considered cohort of stakeholders in attendance.
- The third objective was met, although there is potentially an opportunity to develop this further. Representatives from the four nations were included throughout the consultation process.

Conclusion and recommendations

The data from the consultation demonstrated support within the sector for a formalised and accredited IMSA role. There was agreement that the eight key areas were vital parts of an advocacy model specifically focused on survivors of modern slavery, and support for the four sections underpinning the framework.

The process was well designed and executed, including meaningful engagement with individuals with lived experience of modern slavery. There was significant consultation across the sector, which was able to demonstrate support developing the IMSA framework. Stakeholders were meaningfully engaged with throughout the consultation process, at an appropriate level based on their expertise and interest in the project.

Based on the evaluation undertaken, eleven specific recommendations were made. These were based on findings from the consultation data, including a need to focus on a communication strategy to ensure the framework successfully embeds within the sector, and on ways to build on the consultation process carried out at this stage of the development of the framework.

Introduction

This evaluation was commissioned by Hope for Justice, The Snowdrop Project, and the British Red Cross, to independently evaluate the consultation process for the development of the Independent Modern Slavery Advocate (IMSA) framework. The process of developing the framework was initiated in 2020, in response to the independent review of the Hope for Justice IMSA model and discussions between Hope for Justice and partner organisations British Red Cross and The Snowdrop Project. A need was identified for a formalised model of advocacy in the human trafficking and modern slavery survivor support sector. The objective of the first stage of the development process is to produce a framework for a national IMSA model, consulting relevant stakeholders and exploring the opportunities and challenges of replicating and scaling up the existing independent models of independent advocacy operating within the three partner organisations. The three partner organisations recognised the need for meaningful engagement with the framework from across the sector, and in response developed a comprehensive program of consultation, and commissioned this independent evaluation of the process to ensure the validity of the engagement.

The author of this report also carried out the review of the Hope for Justice IMSA model 2020/2021. Consideration was given to any potential effect on independence, as the first report had recommended the expansion of the model. It was agreed that there were significant benefits to the evaluator having an existing detailed knowledge of the model, and as there were now three partner organisations this also mitigated potential independence issues.

Development of the Framework

From initial discussions between the partner organisations, four sections of the framework were developed:

1. Values, ethos, and governance
2. IMSA role and remit
3. Training and accreditation
4. Organisations employing an IMSA

Alongside the four sections, eight key areas of the remit and role of IMSA were developed:

1. Health and social care
2. Housing and subsistence
3. Survivor support and NRM
4. Reducing risk/increasing resilience
5. Criminal justice
6. Civil justice
7. Multi agency and partnership working
8. Independent advocacy and the IMSA model

The consultation process took the form of workshops with relevant stakeholders, survey data and an invitation for written feedback. Four 'partnership' workshops that included project leads from the partner organisations, stakeholders with lived experience and external experts took place, each workshop focusing on one of the four sections.

Two workshops that focused on the role and remit of the IMSA that were attended by frontline staff from each of the partner organisations also took place. Finally, five workshops that each focused on different areas of the role of the IMSA took place, inviting representatives from across the sector to attend and contribute. The first four workshops were held online, the fifth workshop was held in person with the option of attending online. Data from each of the workshops was captured, including completed worksheets and minutes, which have formed the basis of this review. At the end of each workshop attendees were also given time to complete an online questionnaire, with the intention of capturing anything missed within the workshop, and to elicit feedback on the workshop itself that could inform future workshop planning. An invitation to submit

written feedback was published on 20th June 2023, circulated through the extensive contacts and networks of the partner organisations, within the modern slavery support sector and beyond.

During the course of the consultation, funding was secured for two additional workshops. One partnership workshop was held on 24th January 2023, the second event was the presentation of the framework to all participating organisations on 28th September. The additional partnership workshop focused on key questions within the developing framework, and the event presented the key features of the framework and updated attendees on the consultation process. Analysis of these two events has not been included within the evaluation, as it was decided they fell outside the scope of work; which was focused on the collection of consultation data.

Three review workshops took place between June and September as part of the process of developing the framework. These were attended by partnership organisation representatives, and the three lived experience consultants. Prior to each workshop, a draft of the framework would be distributed for review, with the opportunity for all attendees to add comments and questions to the document before and after the session. The aim of these sessions was to ensure there was agreement on the overall content of the framework, but also to workshop the specific wording used to ensure it conveyed the intended meaning as clearly as possible.

Engaging meaningfully with individuals with lived experience of modern slavery in the development of the framework was a priority for the partner organisations. Consultants with lived experience were therefore involved at multiple levels of the consultation and framework development process. To reflect the importance of this element of the consultation, a section of the report will focus specifically on this engagement and how effectively and appropriately it was undertaken.

Part I: Analysis of Consultation Data

Independent evaluation methodology: content analysis

From scoping discussions with the Hope for Justice project lead and monitoring and evaluation lead, several key questions were identified as underpinning the consultation:

1. What needs to underpin the framework?
2. What needs to be adapted to ensure the model can be upscaled and replicated?
3. How can the model sit in different organisations employing an IMSA across four host nations?
4. Are the four sections and eight key areas of the IMSA role an appropriate basis for the framework?

The evaluator attended each of the sector workshops, to present a summary of the previous independent review, as well as acting as scribe or facilitator during some group sessions. By being in attendance, it was possible to observe the functioning of each workshop and the engagement of those in attendance with the developing model. These observations will be included in the discussion of the content of the sectoral workshops and in the analysis of the methodology used. The analysis will also draw on:

- Completed worksheets filled in during the sessions by each breakout group
- Additional minutes of the sessions completed by other staff members
- A synthesis of the data from the above completed by the project lead for each workshop, including the survey data from that workshop and any relevant written feedback.

The syntheses of data were reviewed against the raw data for completeness and accuracy and was found to be an appropriate collation of the documents. Therefore, for simplicity and to avoid duplication the synthesis document was primarily used for further analysis. The written feedback questionnaires had mirrored the topics covered in the workshops to allow for a wider consultation with those unable to attend the workshops. However, only a small number of responses were received (three), and two of the people

who submitted the feedback also attended the workshops. It was therefore decided to synthesise this data within the workshop data as it was too small a sample to merit individual analysis. It was suggested that the response rate was particularly low as more people than anticipated were able to attend the workshops, meaning completing written feedback was not necessary.

Key Findings

Support for formalised IMSA role

There was evident agreement across the workshops that there are a significant number of barriers faced by survivors of modern slavery and human trafficking when accessing entitlements, support, or justice. It was clear from the experiences of those in attendance that an individual attempting to access these systems without additional support would struggle to have their needs met.

There was also agreement that due to the complexity of issues faced and the lack of awareness of modern slavery in support and statutory systems, having someone in an advocacy role that is specifically trained in the areas most relevant to a survivor is likely to bring significant benefit to the client.

IMSA role & Remit

A need emerged for clarity on the role of an IMSA, and how it can be distinguished from other connected roles, such as caseworker, general independent advocate or victim navigator. This will be vital in ensuring buy-in throughout the sector and clarity with external professionals that clients engage with.

Supporting clients who were engaging with the immigration system was discussed in significant detail throughout the workshops, but has not been included as one of the eight key areas of the IMSA role, although the importance of this area to the role was agreed throughout the workshops. While bearing in mind the different needs of UK national clients, immigration support is another area that requires extensive consideration and expertise within the role.

Training & Accreditation

There is extensive evidence from the consultation workshops that the eight key areas are relevant to the IMSA role and are areas that would need to be part of the day to day work of the IMSA, and would need to be considered extensively within training frameworks.

Organisations employing an IMSA

There are benefits and drawbacks to both a local and national model, with the implication from those attending workshops that they would be prepared to support either, even if practically one may be more difficult than the other. Particular benefits of a local model that were foregrounded include the IMSA embedding within a local support network and being able to work more closely with other professionals engaged in the support of the client.

Regarding organisations employing an IMSA, protecting the independence of the IMSA and avoiding conflicts of interest emerged as a key theme. There was support for excluding law enforcement organisations as employers of an IMSA, but an open-minded approach to other organisations, as long as they could meet strict criteria.

Ethos, Values & Governance

- The first partnership workshop focused on the ethos, values and governance of the framework. Apart from within that workshop, discussions that related to ethos, values and governance of the framework were often indirectly raised in the context of other topics.
- The number of values that the framework should include, and whether the framework should adopt existing values from related frameworks such as the advocacy charter were discussed at length within the first partnership workshop. Small groups used worksheets that gave the opportunity to review a list of potential values and suggest other possibilities. Both groups highlighted independence, empowerment, a holistic and trauma informed approach, and accountability as key values. One of the groups additionally included safeguarding, the other group also included equality and diversity.
- There was agreement across the workshops that cultural intelligence was a key value that had to be central to the framework. There was agreement that 'cultural intelligence' was the most appropriate phrase to be used, as this reflected the most equitable and inclusive intention of the value. Reflecting on how this value could be put into practice, focusing on diversity within recruitment was argued to be vital. Practically this would involve significant consideration of how recruitment processes could be as inclusive as possible, with consideration of pathways for people with lived experience to become IMSAs. This was also reflected in the decision to involve consultants with lived experience throughout the process, and what was described as 'cultural humility', an intention to not view one's own cultural understandings as the default or correct approach.
- Independence being central to the ethos of the framework and role of the IMSA was a theme that ran through each workshop. Participants in the frontline staff workshop focused on the importance of independence being built into the everyday work of the IMSA, by ensuring funding streams for embedded IMSAs did not create conflicts of interest, with this being supported by robust procedures.

- A commitment to best practice and aiming for a highest quality service was evident in the direct discussion of ethos, and was a consistent theme throughout the workshops. This was related to different aspects of the framework, such as a commitment to high quality training and extensive professional development, and through the IMSA working with a high level of expertise and professionalism. Within governance structures this was evident in the agreed emphasis on building in monitoring and evaluation, careful development of the pilot project, and building in audit and accountability procedures throughout the system, which would be designed to ensure consistent quality of service delivery and safeguarding.
- The importance of building 'structural advocacy' into the framework was also evident, as well as focusing on individual advocacy. This aligns with the development of other advocacy models, such as the IDVA model, where there is a focus on using the work of the advocate to promote structural change that will create better conditions for all survivors. This was reflected in the frontline and sectoral workshops in discussions relating to engagement with other professionals and how to 'up-skill' sectors that engaged with survivors, including educating on trauma and trauma informed practice, and through advocating for systemic change where necessary.
- The importance of governance structures in maintaining the wellbeing of individuals working as IMSAs was a frequent point of discussion. This related to oversight and supervision, both to ensure that IMSAs were not overwhelmed with particularly complex or difficult caseloads, and to address issues of burnout or vicarious trauma. It was acknowledged within the discussions that these are issues that can be prevalent within the sector, and there is a professional responsibility to mitigate these risks within the IMSA framework. It was also agreed that doing so improves the quality of the IMSA service, as staff retention is higher and IMSAs are equipped to work consistently to a high standard.

IMSA Role and Remit

- There was clear initial agreement within the partner organisations that the role of IMSA required clear delineation to distinguish it from other professionals who engage with survivors. This was in part the impetus for the development of the framework originally, and was therefore an important question to go to consultation, as it would directly impact the wider sector beyond the partner organisations. The difference between an IMSA and a support worker was discussed extensively, particularly in the sectoral workshops, where there was a dual focus on communicating the nature of the role and taking consultation on the remit of the IMSA. Methods including a composite 'case study' were used within the workshops to explore this.
- There was agreement across the workshops that a high level of skill and expertise are necessary for the role to work effectively. These skills would need to relate to a number of areas, but will necessarily involve understanding complex intersecting legal and support systems, and explaining this in an accessible way to the client to enable them to make informed decisions. Being able to communicate this complexity to a wider audience, including professionals that engage with clients but may not have expertise in the area, is another important skill, and a key part of the 'structural advocacy' that IMSAs will carry out.
- The role of the IMSA in empowering the client was raised in each workshop, demonstrating the importance of this within the framework. It was discussed in a variety of contexts that the services and systems a client may need to navigate can be particularly disempowering, and that an IMSA could help to rebalance this, by providing the client with the information they need and through advocating for them. The opportunity for the IMSA to work with the client to build confidence and self-efficacy was also discussed in a number of instances, and that this can be significant in the recovery journey of the client.
- The formal nature of the IMSA role and how this fit within the wider network of support professionals was discussed extensively within the workshops. This included whether the IMSA would act as official single point of contact for the client. The potential drawbacks and benefits to this were discussed, including the benefit to the client in reducing the burden of dealing with multiple professionals, but also the risk that this

can foster dependence and ultimately be disempowering for the client. Navigating this effectively would be part of the advanced skill set of the IMSA.

- The wider structure of the framework and how this would affect the role of individual IMSAs was discussed extensively in the workshops. This particularly related to the question of IMSAs being embedded locally or operating nationally, and the level of centralisation there would be in terms of decision making. Arguments for local or national models were made throughout the workshops, with general agreement that regarding the role of the individual IMSA there were benefits and disadvantages to both.

Training and Accreditation

- Training and accreditation was the specific focus of one partnership workshop, but was addressed through the various topics of discussion within each workshop. The focused partnership workshop included representatives from the IDVA sector, who were able to inform the group about processes and learnings within that model.
- A theme emerging across all workshops was the need for a high level of training if the IMSA was to carry out the role as suggested, and continuing professional development and training updates to enable the IMSA to keep to an up to date best practice standard. Maintaining standards for training and CPD would help ensure that service was standardised and consistent, ensuring the 'kitemark' of an IMSA was meaningful. Discussions with the IDVA representatives on the benefits of accreditation found a number of benefits to having an accredited role within a support sector.
- It was suggested that having accredited status allowed for them to be distinguished from other caseworkers when engaging with professionals from outside of the sector, and allowed them to quickly communicate their expertise and role in relation to the client. It was also noted that accreditation allows for the upskilling of the whole sector, as it is accepted that the IDVA training framework is high quality, and most people working in the sector will complete some IDVA training, even if they do not complete the full training necessary to be an IDVA.
- Discussions within the frontline workshops suggested that training focusing on key areas of the IMSA role should include preparing draft CICA applications, case study scenarios, and template letters. Within the partnership workshops, it was suggested that content should focus on the eight key areas, with additional focus on trauma, consent, confidentiality, relevant legislation, the NRM, first responder role and mental health. Other training areas that were included within the partner organisations included health and social care, anti-racism, case management and risk management. It was agreed that an audit of the training within the partner organisations would be carried out to identify any gaps.

- Within the sectoral workshops, it was suggested that training should focus on safeguarding and data management, as inappropriate data sharing (or failure to share) can create significant issues. The Tara NRM toolkit or the Contextual Safeguarding toolkit were also suggested as examples of best practice training that could be built into the IMSA training framework.
- The importance of training on immigration issues was discussed, alongside the importance of understanding the needs of UK national clients. Also discussed were areas that may not generally be considered, such as Care Act assessments, learning disabilities and domestic abuse.
- How training would be funded was a significant part of the partnership training and accreditation workshop discussion. It was discussed that IDVA training is now funded by the government, which is sustainable financially but would mean that potential impacts on independence would need serious consideration. Other options would involve organisations employing an IMSA funding training, although this could preclude smaller organisations from employing an IMSA, which would not be sustainable.
- The role of specialisms within the IMSA training frameworks were also discussed, with debate about whether these would emerge naturally and informally, or whether these would be formalised with specific training pathways. This was seen as a potentially beneficial development, however it was important not to undermine the general specialist nature of IMSAs, and that specific training would need to be seen as additional, rather than specialists being the only IMSAs who could deal with particular issues. One suggestion was that for a specialism in immigration, the IMSA could do the OISC qualification, which may be more detailed than required for most IMSAs, but useful at a specialist level.

Organisations Employing an IMSA

- Ensuring that the right organisations were chosen to employ an IMSA was a key theme throughout the partnership workshops. Two main features of this discussion were ensuring that independence could be maintained, and that conflicts of interest could be minimised or mitigated. There was an open discussion throughout the workshops as to types of organisations that could generally apply to employ an IMSA, although there was early agreement between the partner organisations that law enforcement organisations should be excluded. There was no strong disagreement on this within any of the workshops.
- Within the partner organisations, agreement was reached that rather than being excessively prescriptive about who could apply or not, having a clear and transparent set of criteria would allow organisations to self-exclude if they could not meet the requirement, or would enable a transparent process for rejecting an organisation if they could not meet the required standard. Practically, it was suggested that part of this would be based on the ability to provide a safe and trauma informed environment, and that the values of the organisation did not oppose the values of the IMSA framework.
- There was a significant focus within frontline workshop discussions on how to ensure the independence of the IMSA could be protected within the organisation. Ensuring that income streams were separate was a potentially important way to do this, as well as ensuring that the processes and procedures that the IMSA and employer would operate within were designed to reduce potential conflicts of interest experienced by the IMSA. This may also mean there has to be additional consideration given to data systems and the maintenance of client records, particularly where the organisation maintained a government contract such as the Victim Care Contract. It was suggested on this basis that having a robust case management database and data processes may be an exclusionary criteria for potential employers.
- It was acknowledged that whether the framework operated on a local or national level would make a significant difference to the operation of organisations employing an IMSA. In a franchise model, it was suggested that employing organisations would

pay the IMSA salary, and an additional 16–17% to the central hub to fund centralised activities. It was noted that if this was the case, it would give the organisation a sense of ownership, but would also mean that they could ask for greater input into decisions about the IMSA framework. When asked in the feedback form following sector workshop 5 whether having an IMSA in their locality would be beneficial, nine responded yes, four replied maybe and one replied no, which was said to be due to a lack of engagement in their local area.

- To maintain high standards and to ensure that organisations maintain compliance with the values and processes of the framework, intermittent auditing of organisations employing an IMSA was argued to be a necessary part of the accreditation process.
- The importance of clear delineation of responsibilities between the employing organisation and the hub was raised in several workshops. For example, the process for handling complaints by or against the IMSA would need to be carefully outlined within the terms of agreement between the employing organisation and the hub.

Part II: Analysis Lived Experience Consultant Engagement

The modern slavery and human trafficking support sector has become increasingly aware in recent years of the importance of co-producing support programs with individuals with lived experience. The process for engaging with survivor consultants has also come under scrutiny, as if done insensitively or without due care there is the potential for significant harm. A report produced by the Modern Slavery Policy and evidence centre¹ on the involvement of individuals with lived experience, stated that all engagement should be based on three principles: being non-tokenistic, trauma informed, and preventing harm. The engagement of consultants within this consultation will therefore be considered in the context of these three underlying principles.

Independent Evaluation methodology: consultants with lived experience

The three Hope for Justice consultants were asked to participate in the independent evaluation of the consultation process. They were each asked to fill in a detailed report of each of the workshops they attended. These were given to the independent evaluator to form part of the evaluation.

Interviews were offered to each of the three consultants. Two interviews were carried out, the third had to be postponed until after the completion of this report due to scheduling difficulties. Interviews took place with the independent evaluator, following an introduction from the project lead. Findings from interviews have been anonymised, and the information given during the interviews has been treated as confidential.

It is acknowledged that this evaluation is limited to engaging with the experiences of the three consultants who were engaged directly by the partners, further engagement with all lived experience consultants should be considered in future work.

¹ <https://modernslaverypec.org/assets/downloads/Engagement-lived-experience-research-summary.pdf>, p. 3.

Process for involving consultants with lived experience

- Three consultants with lived experience who had previously acted in an advisory capacity for Hope for Justice participated throughout the process. They were paid for their time and work.
- These consultants were invited to participate in all partnership workshops and given access to the developing framework document to add comments and make suggestions.
- Introductory sessions were held prior to each workshop, to brief consultants on the content of the sessions, and debriefing sessions were held after each session.
- Communication was maintained between the consultants and the project board between sessions.
- Lived Experience Advisory Panel (LEAP)² members were invited to attend sectoral consultations. LEAP consultants received the same information as other attendees prior to the sessions, and were offered debriefing sessions after the workshops. These consultants were also paid for their time and expenses.

Findings

- Responses regarding involvement in the process were generally very positive within anonymous feedback questionnaires and in evaluator interviews. Extensive effort was made to send preparatory documents in advance of the sessions, to give the opportunity to discuss them and to do a full debrief after the sessions.

2 <https://www.humantraffickingfoundation.org/leap>

- It was stated in all interviews that contributors felt that they had made a meaningful contribution which had been taken into consideration, and opportunities given at equal level to partnership organisations to add comments to the developing framework and offer feedback. There was also feedback that it felt like engagement within this process had not been 'tokenistic' and that their contributions had meaningfully shaped the developing framework.
- Wider questions around the involvement of people with lived experience can be considered within this context, which were raised within the interviews by consultants:
- Consideration of the expectations regarding consultants' contributions – guidance is often given that using personal examples or sharing of their personal story is not necessary, but as this personal experience is part of their expertise it can feel unclear to the consultant on what basis they are contributing.
- To enable meaningful contribution on all aspects of a discussion, and to allow the consultant to apply their own knowledge and expertise without detailing their own experience directly, it could be helpful to give overview documents on the systems that are likely to be under discussion.
- Mitigating imbalances around access to technology that aren't always considered.
- Possibility of encountering in a small group setting an individual that may have acted in a support capacity previously for the consultant. It was expressed that being informed of attendees prior to group workshops could be a helpful way to navigate this.

Evaluation of project inclusion of lived experience consultants

- There was a positive engagement with Hope for Justice consultants who were involved throughout project and LEAP consultants who attended workshops.
- Steps were taken throughout the process to ensure that consultants were informed of the expectations of the consultation, to inform and debrief consultants around workshop events and to elicit feedback throughout the process on the experience of the consultants.
- By engaging with consultants at different levels of the process, inviting LEAP consultants to attend sectoral workshops and including directly engaged consultants who had previously worked with the partner organisations to contribute more extensively to the development of the framework, different perspectives could be gained from both more involved, and more removed and objective consultees.
- The consultation of the three directly engaged consultants went significantly beyond what was referred to as 'tokenistic' involvement, and created space for meaningful input and co-creation of the developing framework.

Part III: Evaluation of consultation and framework development

Ensuring that an appropriate, functional, and equitable methodology for the consultation is used is crucial in validating the findings from the workshops and written data. To inform the analysis of the evaluation methodology, the UN Office for Project Services (UNOPS) guidelines for effective stakeholder participation³ will be used to develop a framework to assess form and function of the consultation overall, and within each set of workshops.⁴

Objectives and methodology

The form and function of the workshops and written submissions were assessed against the agreed objectives of the overall consultation:

1. What needs to underpin the framework?
2. What needs to be adapted to ensure the model can be upscaled and replicated?
3. How can the model sit in different organisations employing an IMSA across four host nations?

From the completed worksheets from each of the workshops, minutes taken, and observations taken by the evaluator during the sectoral workshops, it is evident that the questions prompted detailed responses to the relevant issues. By having dedicated sessions on each of the four sections of the framework within the partnership workshops, in-depth strategic discussions were possible that documented the development and consideration of the four sections. By focusing on the role and remit of the IMSA with frontline staff from the partner organisations, the opportunity was given

3 UNOPS ICAT (Initiative for Climate Action Transparency) (2020). Stakeholder Participation Guide: Supporting Stakeholder Participation in Design, Implementation and Assessment of Policies and Actions, J.C. Durbin and S. Vincent, eds. Washington, D.C.: Climate, Community & Biodiversity Alliance and Verra; Bonn: ICAT. <https://climateactiontransparency.org/icatguidance/stakeholder-participation/>

4 Ibid pg 38-42.

to capture detailed evidence on the operation of the partner models currently, and the effectiveness of the operation of these models. Finally, the focus of the sectoral workshops being split between the eight key areas allowed for an effective gathering of evidence on each area, and an in-depth consideration of how the IMSA role should address the challenges therein.

The first objective, to establish what needs to underpin the framework was met by capturing a wide range of views and stakeholder insight on the values and ethos that should be foundational to the IMSA framework. This was also achieved by facilitating a series of in-depth discussions with relevant stakeholders across the sector and beyond, to establish the utility of the eight key areas of the IMSA role.

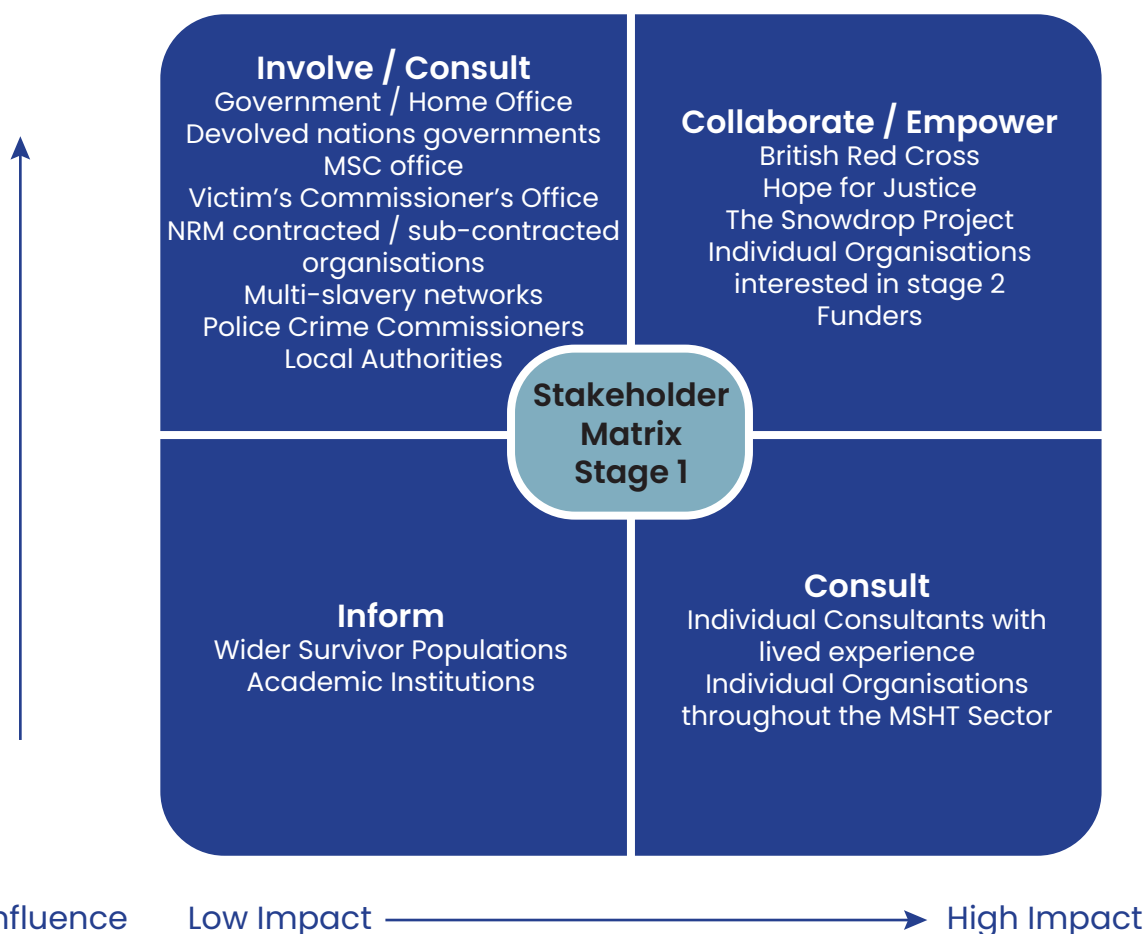
The second objective, to establish what needs to be adapted within the existing IMSA models of the partner organisations to ensure the model can be scaled up and replicated, was met through the discussions facilitated across the workshops, with a deeply considered cohort of stakeholders in attendance. Through consideration of what functioned well within existing partner models, and contextualising this within the findings from the five sectoral workshops, a wide variety of evidence was gathered on the ways the IMSA model could function in different contexts and organisations, and how the model would need to operate to be successful in these different environments.

The third objective was less directly discussed during the workshops, which was possibly a reflection of those present at the meetings. A more detailed discussion about differences in the Welsh and English systems took place in the third partnership workshop, where a representative of the Welsh assembly was present. At this stage of the consultation, which was largely focused on learnings from partner organisations with input from consultants with lived experience, bringing in more stakeholders to represent the four nations may not have allowed time and space for the in-depth discussions on the specifics of the model that took place. However, ensuring that other stages of the consultation specifically engage with this will be necessary to ensure this objective is achieved.

Stakeholders

The following stakeholder matrix was produced by the project lead to summarise the rationale for the types of involvement of different groups. The purpose of the matrix is to establish the level of interest in the process held by different stakeholder groups, and consider the level of influence they have throughout the process. Each quadrant, depending on the relative levels of interest and influence, suggests a role within the consultation and level of involvement that should be given to stakeholders identified within it.

High Influence



The Involvement of project leads and other individuals with relevant expertise from the partner organisations in decision making is appropriate as these are found within the collaborate/empower quadrant. As each partner organisation operate a model that is feeding into the developing framework it is appropriate that practitioners from each are given a collaborative function in its development.

Including people with lived experience in these workshops was also appropriate, as it was an opportunity to consult on the full scope of the model. Although consultants with lived experience were included in the 'consult' quadrant, the consultants working directly on the consultation were involved at all stages of the discussion, and invited to make direct comment on the developing framework draft, meaning they could legitimately have been included in the collaborate/empower quadrant. Bringing in relevant experts, such as IDVAs, who could provide more information on relevant topics to relevant sessions was also a useful approach, as this provided relevant information but allowed the key stakeholder groups to remain central to the consultation.

For the sectoral workshops, communication was made through various networks and contacts to invite as many organisations directly involved in the sector as possible, with specific invitations given to individuals working in relevant connected sectors or state services that engage with survivors. Those included within these consultations would fit within the 'consult' quadrant, likely to be highly interested in the outcome but may not want to be part of the development of the model.

Evaluation of consultation processes

Using the UN framework for consultation evaluation, a short summary of the effectiveness of the process based on each of the seven elements is included below. There are seven identified elements in designing a consultation process that will be used as a framework to assess the consultation.

Set clear objectives for consultations

The objectives were clearly defined by the project lead, and were communicated during consultation workshops within the introduction given during the workshop, and in the preliminary emails sent to attendees.

Identify appropriate stakeholder groups

Identifying and including appropriate stakeholder groups was carried out effectively as per the stakeholder matrix and subsequent analysis. Relevant organisations and individuals across the sector were included and given the opportunity to meaningfully contribute..

Adapt consultation methods for identified stakeholder groups

There were significant adaptations made for consultants with lived experience, as discussed in the section above. Accessibility was prioritised with a mixture of online and in person consultations, with added opportunity to submit evidence through digital surveys.

Conduct stakeholder consultations at each relevant stage of policy design and implementation

The consultation process being evaluated took place alongside the development of the framework. This meant that consultation from the workshops and other feedback could feed directly into the developing framework, rather than the full framework being presented as a finished piece of work to consultees, which could have limited engagement.

Use several complementary consultation methods

The method of consultation was through workshops, surveys within the workshops and a call for written feedback. The workshops followed different structures and covered different topics to access a broad scope of stakeholder knowledge. Digital feedback forms allowed for additional content to be captured.

Share and validate the plans for consultation

The terms of reference for the consultation were shared using established networks across the sector. There were responses from approximately 90 individuals and organisations, which demonstrates the positive engagement with the consultation process throughout the sector and beyond.

Assess effectiveness of past consultations and revise plans for future consultations

After each workshop those who had been involved in running the event were asked to submit feedback based on their experience of the event, including highlighting any issues. Based on some of the feedback from early sessions, the structure of subsequent sessions was updated, with improved feedback from facilitators.

Conclusion

The consultation exercise conducted to support the development of the framework produced clear evidence from within the sector that there are a number of structural, systemic, personal barriers that survivors of modern slavery can face on their recovery journey. The findings from the consultation also provided significant support for an accredited IMSA role, as the features of such a role can directly address many of the barriers that survivors face. The consultation engaged meaningfully with consultants with lived experience, and allowed for meaningful contributions to be made to the development of the framework. The process of consultation was shown to be robust and comprehensive, with meaningful discussion generated and good data capture of the evidence produced. A very good range of stakeholders were engaged with appropriately, therefore it was possible to demonstrate overall support for the development of the framework from within the sector.

From the partnership workshops, there would seem to be broad agreement on the principles and ethos that underpin the model, and generally aligned views on the more specific nature of the values that should be in place. The importance of getting governance procedures right was evident, and will be an important part of the framework to ensure the values and ethos are put into practice. The importance of clearly delineating the role of the IMSA emerged as a theme throughout the workshops, to ensure they are correctly equipped to carry out the right work, but also to enable positive working relationships with other professionals. How this could be communicated to the sector and beyond was not discussed in detail during the workshops. This may have been outside of the scope for this stage of the workshops, but is an important point that could also be consulted on.

While there was general agreement across all workshops on the content of training, more work may be needed on the specifics of training provision. This is relevant as the model moves towards accreditation, as this would not be possible if training were provided in house or more informally. There was also general agreement on organisations employing an IMSA, with a view that law enforcement organisations would not be included, but beyond this a very clear framework that organisations had to sign up to would indirectly exclude organisations that were not a good fit.

Based on the specific risks, vulnerabilities, and gaps in the system that survivors have to navigate, throughout the workshops it was expressed that having someone in the role of IMSA could significantly improve outcomes for clients by facilitating better engagement with the systems they have to navigate, and through creating structural change through education and awareness raising. Engaging in meaningful partnerships with agencies that can contribute to the support of a survivor and utilising their expertise was consistently raised as both an approach that could be included in the ethos and values of the model, and a practical way of ensuring that an IMSA model can function and clients receive the best support. The lack of trauma awareness, knowledge victim indicators, rights, and entitlements was reported by many attendees; and the effect that this had on survivors was agreed to be significant. Thinking about how this element could be effectively built into the IMSA framework, if this is appropriate, could be an important part of the 'structural advocacy' within the model.

This review has found that there is significant evidence from within the sector that an accredited IMSA role would be a beneficial addition to the sector, and would have the potential to significantly improve outcomes for clients. The consultation exercise undertaken has informed the development of the framework, and has engaged meaningfully with stakeholders and other experts to ensure that the project is grounded in the sector and is built on a broad understanding of the relevant issues and opportunities for best practice.

Recommendations

1. Consider ways to further include perspectives from all four nations within the overall consultation.
2. For processes on management of IMSAs at organisations employing an IMSA, consider inviting outside review of draft policies by an external employment organisation to ensure legal robustness and to make them as 'workable' as possible.
3. Further consultation may be useful on whether a more formalised specialisation on immigration matters may be relevant, considering the current split of NRM referrals based on UK/non-UK nationals. Having OISC level 1 as a requirement for a senior IMSA with an immigration specialism could be a way to put this into practice.
4. Ensuring data management systems are robust, and also allow for the synthesising and analysis of information for monitoring and evaluation purposes is important as the model grows. Having clear criteria for what is necessary within the employing organisation's system (if this is to be used) will be necessary, with a possibility of using a centralised system.
5. Consider further consultation on the communication strategy to ensure clarity in the sector on the specific role of IMSA.
6. The changing nature of exploitation, and the related legal and support needs, need to be reflected in the development of the IMSA model, otherwise training and practices could become out of date quickly.
7. In view of the issues surrounding the NRM and the stated need for IMSA engagement while the client is in the NRM, consider how engagement with NRM providers could be facilitated to include a greater number within the 'consult' quadrant of the matrix, as buy in from these organisations is likely to be crucial as they may have a gatekeeping role.

8. Further consideration of how the IMSA model should be 'formalised', particularly in partnerships and professional engagement may be needed. MARAC and anti-slavery network models were generally agreed to lead to better collaborative working and outcomes for the client, how IMSAs could facilitate this in areas where they are not in place could be considered further.

9. Considering how to build into the framework the importance of upskilling the sector and other professionals using IMSA training is complex, but may be helpful in ensuring that 'structural advocacy' of the model is enshrined and put into practice.

10. From a structural advocacy perspective, further consultation with victim support groups and community representatives could be helpful in considering how this could be included within the framework, if appropriate.

11. In future consultations it may be useful to extend the first session that is attended by those that are new to the consultation to include a more detailed Q&A session focused on the specifics of the IMSA role and how it works alongside other support.

Appendix I

Summary of Workshops

Workshop	Date	Theme	Attendees
Partnership 1	10/5/22	Values, ethos and governance of the model	HFJ – 5 SD – 2 BRC – 1 Independent Consultants – 2
Partnership 2	5/7/22	IMSA role and remit	HFJ – 4 SD – 2 BRC – 2 Independent consultants – 3
Partnership 3	4/11/22	Training	NGO: 4 Government: 2 Independent Consultants: 3
Partnership 4	21/3/23	Organisations employing an IMSA	BRC: 1 SD: 1 HFJ: 4 Survivor Consultants: 3 NGO: 3 Independent Consultants: 3
Frontline	07/06/23	IMSA role and remit	SD: 2 BRC: 2 HFJ: 3
Frontline	19/07/23	IMSA role and remit	SD: 1 BRC: 2 HFJ: 4
Sectoral 1	20/9/22	Health, social care, housing and subsistence.	<u>Organisations represented at workshop:</u> Hope at Home, Adavu, Rebuild, Bakhita Research Centre / St Mary's University, Greater Manchester Police, Khai Tzedek CIC, Stevenage Borough Council, Parasol, Helen Bamber Foundation, TARA, Liverpool University <u>Organisations returned questionnaires / email feedback:</u> Bramber Bakehouse, Adavu, Barnardos, Warwickshire Police

Sectoral 2	15/11/22	Survivor support and the NRM	<p><u>Organisations represented at workshop:</u> Hope at Home, Rebuild, The Passage, Human Trafficking Foundation, Jericho, Helen Bamber Foundation, Greencore (part of MSIN), GS Fresh, Bakhita Research Centre, Greater Manchester Police, Bramber Bakehouse, Independent Consultant / Nottingham Rights Lab, Warwickshire Police, Hestia, SOHTIS, TARA, Migrant Help, Human Trafficking Foundation LEAP group,</p> <p><u>Organisations returned questionnaires / email feedback:</u> Bramber Bakehouse, Adavu, Warwickshire Police, Barnardos</p>
Sectoral 3	21/02/23	Reducing risk and increasing resilience	<p><u>Organisations represented at workshop:</u> Adavu, Rebuild, Flourish, Romanac Consulting, Bakhita Research Centre, Bramber Bakehouse, Khai Tzedek CIC, Nottingham City Council, Barnardos, Stevenage Borough Council, SOHTIS, Migrant Help, Nottingham and Nottinghamshire PCC, Ellas, Human Trafficking Foundation LEAP group, Independent Consultant with Lived Experience of Modern Slavery</p> <p><u>Organisations returned questionnaires feedback:</u> Bramber Bakehouse, Warwickshire Police</p>
Sectoral 4	18/04/23	Criminal and civil justice	<p><u>Organisations represented at workshop:</u> Bakhita Research Centre / St Mary's University, Nottingham City Council, Parasol, ATLEU, TARA, Ellas, Human Trafficking Foundation – LEAP, Victim Support, Department of Justice Northern Ireland, Policy Directorate CPS, Greater Manchester Police, Consultant with Lived Experience of MSHT, British Red Cross,</p> <p><u>Organisations returned questionnaires feedback:</u> Bramber Bakehouse, Warwickshire Police</p>

Sectoral 5	16/05/23	Multi-agency and partnership working	<p><u>Organisations represented at the workshop:</u> Hope at Home; Adavu; Jericho / Equiano Project; The Passage; St Mary's University / The Bakhita Research Centre; Helen Bamber Foundation; Romanac Consulting; Khai Tzedek; Nottingham City Council; Stevenage Borough Council; Hertfordshire Police; Welsh Government; SOHTIS; TARA; Ella's; FLEX; Nottingham Police Crime Commission; Human Trafficking Foundation LEAP; Independent Consultants with Lived Experience of Modern Slavery; West Midlands Anti-slavery Network</p> <p><u>Organisations returned questionnaires feedback:</u> Bramber Bakehouse, Warwickshire Police</p>
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Independent Evaluation of the IMSA Framework Stage One Consultation

Dr Alexandra Williams-Woods | University of Liverpool