



Independent Modern Slavery Advocacy:

Working Together for
Lasting Change

IMSA®

Independent Modern Slavery Advocate®



Every survivor of modern slavery would benefit so much from having an independent advocate.

The IMSA can provide crucial support, help navigate systems and ensure that survivors' rights are respected. They can also connect survivors with resources like counselling, legal aid, and safe housing.

Having someone who understands your situation and can advocate for you makes a big difference in recovery and rebuilding in survivors' lives. The only person in the last 5 years of my life who has been proactive, fought my corner and gone through my bad times with me has been my IMSA.

**Emily Vaughn,
LEAP Consultant**



1 Introduction

Access to independent advocacy is crucial to helping survivors of modern slavery access the systems and support they require to achieve sustainable recovery, prevent re-trafficking and improve access to justice.

The Independent Anti-Slavery Commissioner said in her Strategic Plan that *“it would be of great benefit to improving survivor outcomes, especially long-term outcomes, to formally introduce and recognise Independent Modern Slavery Advocates”*.¹

The Home Office has stated its vision for survivors to be supported through “independent advocacy to navigate complex systems”. We look forward to working with the Home Office to deliver on this ambition.

As the UK Government and Governments across the country consider reforming the system of support for survivors of modern slavery, this paper details the insights gained from over 15 years of delivering and improving independent advocacy programmes based on survivor feedback. Over this period, we have seen the immense impact of independent advocacy, complementing existing services, to improve outcomes for survivors of modern slavery, prevent re-trafficking, and facilitating access to justice. This paper makes clear the crucial role that independent advocacy plays as part of a package of support which must be available to all survivors to facilitate their recovery from exploitation throughout the UK.

¹ antislaverycommissioner.co.uk/media/s0gltqbx/e03284260_iasc-strategic-plan-24-26_web-accessible_v2.pdf

2 What is an Independent Modern Slavery Advocate[®]?

Survivors of modern slavery and human trafficking navigate complex systems, services and legislation during a period of profound isolation and vulnerability. An Independent Modern Slavery Advocate[®] (IMSA[®]) works alongside the survivor to help them understand their rights and navigate this landscape. This collaborative approach enables the survivor to overcome barriers, make informed decisions about their recovery, and ultimately reduce their risk of re-exploitation and re-trafficking.

As trained experts, IMSAs partner with survivors to ensure their socio-legal rights and entitlements are realised. This often includes collaborating with survivors to:

1. Access legal aid advice and understand legal documentation
2. Navigate court processes
3. Access health services and mental health support
4. Secure safe accommodation
5. Apply for compensation
6. Apply for asylum or other forms of immigration status

Independence is critical. IMSAs operate independently from law enforcement and other frontline service providers to avoid conflicts of interest arising. This ensures they are free from the funding limitations of other services and are able to prioritise survivors' needs at each stage in their journey of recovery. IMSAs therefore remain a consistent presence during transitions, for example, if the support services are time-limited or locality-based or if there is a relationship breakdown with the support provider.

"The police have their criminal justice agenda, social care have their thresholds, housing have their agenda. There is also a fear to work with the police, social care and housing, so many policies, so many processes, so much professional jargon. Survivors are left navigating a complex system and it feels like another battle, another fight."

"An IMSA recognises that a survivor's agenda is central to their work. If I had had an IMSA at the time of my exit from exploitation, I believe I would have got access to the services I was entitled to without drift and delay. Survivors are not only trying to survive but the power dynamics in requesting services can be scary and intimidating."

"I would never have been brave enough to challenge a service, they seemed so powerful. So even if I felt they were not listening or dismissed my support needs, I would leave it. Having an IMSA, someone to talk it through with me, would have helped equip me to speak up for myself."

Alicia, Lived Experience Consultant

Survivors of other complex crimes such as domestic abuse, sexual abuse and stalking have access to accredited, dedicated professionals to advocate for them, working with them to navigate systems and services essential to their recovery. In May 2025, the Ministry of Justice published guidance for Independent Sexual Violence Advisors and Independent Domestic Violence Advisors, and announced plans for guidance on Independent Stalking Advocates. In light of the intersectionality between modern slavery and other crimes, it is important that there is alignment between these services and systems. However, **there is currently no accredited, standardised independent advocacy provision available to adult survivors of modern slavery and human trafficking in the UK.**

Action is urgently needed to address this well-recognised gap in the UK's response to adult survivors of modern slavery.³

² [REFUSAL TO CONSENT](#)

³ See in particular Human Trafficking Foundation Day 46 Research (2016) sourced at [day-46.pdf \(antislaverycommissioner.co.uk\)](#); St Mary's University Research "A Game of Chance: Long Term Support for Survivors of Modern Slavery" (2018) sourced at [A Game of Chance? Long-term Support for Survivors of Modern Slavery - St Mary's University Open Research Archive \(stmarys.ac.uk\)](#) and Nottingham Rights Lab Research (2023) "Pathways through Liberation Revealing Survivor Support Journeys Outside of the UK National Referral Mechanism" sourced at [Pathways Through Liberation: Revealing Survivors' Support Journeys Outside of the UK National Referral Mechanism \(nottingham.ac.uk\)](#)



Chad Madden | unsplash.com

2.1 Remit of an IMSA

IMSA programmes have been delivered by NGOs over many years. In Hope for Justice's case, IMSAs have been working with survivors for over 15 years. This provides vast expertise from which to draw in delineating the IMSA's role in relation to other services and systems.

An IMSA is not designed to replace or compete with existing service providers or support workers. Rather, **the IMSA's role complements these other services, working with a survivor as they interact with and transition through numerous time-bound services and systems.**

As a demonstration of the range of issues on which an IMSA might work with a survivor, throughout 2023/24 the Snowdrop Project's independent advocates worked with 80 clients and reported:

- 97% engagement with casework over 6 months
- 71% received advocacy with housing, 25 individuals were supported into permanent accommodation
- 60% received advocacy to access immigration advice
- 74% received advocacy regarding benefits
- 40% were supported to and gained employment

The Home Office has recognised in its 2025 Action Plan on Modern Slavery the importance of independent advocacy as part of a holistic system of support for survivors:

"Victims will be supported through a trauma-informed and needs-based framework, providing culturally responsive care, long-term recovery pathways, and independent advocacy to navigate complex systems."

There are no restrictions placed upon the point at which a survivor can start working with an IMSA. The IMSA Model recognises that the earlier a survivor can access independent advocacy, the quicker they can access their rights and entitlements and, therefore, progress through recovery.

Increasingly potential victims of trafficking are refusing to consent to be referred to the National Referral Mechanism, in part due to fear of repercussions and lack of understanding about the NRM. According to research by the Independent Anti-Slavery Commissioner and the Rights Lab: 25% of participants reported potential victims refusing to provide consent to an NRM referral as they believed that they would be better off in exploitation.² In this context, access to independent advocacy becomes even more important.

3 Impact of Independent Modern Slavery Advocacy®

An [independent review](#) of Hope for Justice's IMSA programme found that:

"by providing a single point of contact, high-level expertise, long-term support and a commitment to advocate for their clients has a consistently positive effect on the outcomes of their clients including (but not limited to):

- *Receiving appropriate housing and housing benefit*
- *Receiving compensation*
- *Overtaking convictions resulting from their exploitation*
- *Receiving welfare benefits*
- *Gaining immigration status".* ⁴

Addressing these issues is critical to reducing the risks of re-exploitation and re-trafficking.

Evidence from other sectors shows that outcomes for survivors of other complex crimes are significantly improved when they work with an independent advocate or advisor, and similar models have been developed in response to domestic abuse, sexual violence and stalking. ⁵

3.1 Improving engagement with the criminal justice system

Access to independent advocacy can significantly improve survivors' ability to engage with the investigation and prosecution of their traffickers.

In March 2024, research from the Victims' Commissioner found that:

"The most notable benefit of advocacy identified in our research was that it helps victims engage with, and remain engaged in, the CJS [Criminal Justice System] process." ⁶

Engagement with the criminal justice process requires considerable trust on the part of survivors which cannot be taken for granted. Survivors may have deeply-held concerns about working with police and prosecutors for fear of the implications for themselves and their loved ones.

By ensuring that survivors understand their rights and have access to the support and time they require, survivors can determine what justice and accountability mean to them and how they want to engage with law enforcement.

As survivors' needs shift over time, IMSAs are vital in navigating their evolving circumstances. This approach fosters empowerment, enabling survivors to engage meaningfully with criminal justice on their own terms, whenever they feel ready within their recovery process.

"As a survivor, I understand that some processes may not wait for me to be ready mentally, psychologically, before responding to them, but with an IMSA beside me who is helping me to understand what is required of me before a court proceeding or a mental health medico-legal report assessment makes a big difference."

Nancy, Lived Experience Consultant

Survivors who work with an IMSA are far more likely to engage meaningfully with the criminal justice system. There are many reasons why a case may not proceed to trial, many of which are not within the survivor's control, but Hope for Justice reports that, for survivors within their service since 2013, of the prosecutions which have made it to court:

- 100% of the survivors who had an IMSA and were called to give evidence in criminal proceedings were able to attend trial
- all but two of the cases that were prosecuted resulted in successful criminal convictions of offenders, often for multiple offences
- in these cases, 89% of the offenders were prosecuted and convicted of offences which include trafficking / exploitation offences, including conspiracy to traffic

The College of Policing has recognised the value of independent advocacy by including reference to Hope for Justice's programme within their [directory of services](#).

³ [Independent evaluation](#)

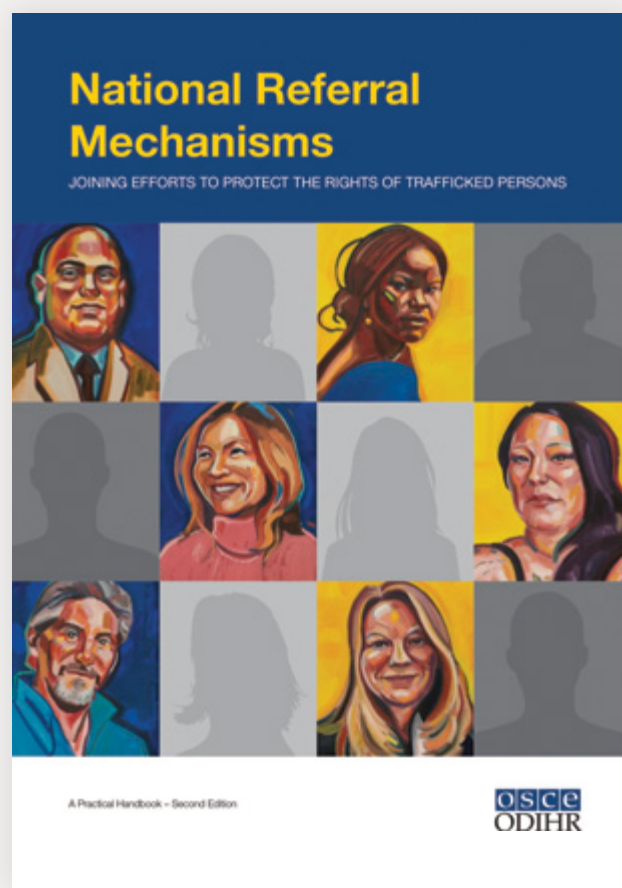
⁴ [Sexual violence services Insights data - SafeLives](#); <https://bills.parliament.uk/publications/51938/documents/3718>

⁵ [Going above and beyond: Mapping the provision and impact of Victim Advocacy in the Criminal Justice System - Victims Commissioner](#)

The OSCE has also highlighted the importance of systems of support for survivors, including advocacy, being independent of law enforcement:

“One argument for a criminal justice-based identification system is that making assistance contingent on co-operation can be an incentive for co-operation, which will lead to more prosecutions. In reality, however, such a coercive approach to assisting victims can actually have the opposite effect. It can discourage victims by not giving them immediate support, making them hesitant to co-operate and leading them to avoid the criminal justice system altogether.”⁷

The OSCE/ODIHR NRM Handbook strongly recommends that independent advocates be ‘resourced, and accredited or officially recognized by national authorities, law enforcement authorities, statutory social services, and national child protection systems’.⁸



⁷ OSCE Paper Putting Victims First the Social Path to Identification and Assistance page 19 sourced at [538452.pdf \(osce.org\)](#)

⁸ OSCE/ODHIR Second Handbook see in particular page 71 sourced at [510551_2.pdf \(osce.org\)](#)

Case Study: Maureen*

Maureen is a 50-year-old Nigerian national. She was referred to the Snowdrop Project by her accommodation provider. Following a disclosure request by Snowdrop to the Single Competent Authority, she was found to have had a negative Reasonable Grounds decision on the basis that she had not provided sufficient evidence to support her claim that she had been trafficked for the purpose of sexual exploitation.

When Maureen met with an independent advocate, she explained that she had lied about the nature of the exploitation she had experienced as the perpetrator had told her what she had to tell the Home Office. She was very scared of the perpetrator and believed she would face serious repercussions if she disclosed the truth that she had been exploited in domestic servitude.

Maureen was then arrested for working using a false passport and placed on bail. The alleged events occurred whilst she was being held in a situation of domestic servitude. She decided she needed to tell the truth to the investigating immigration official. She was supported by Snowdrop to do so, and they advocated to immigration enforcement, providing evidence and opinion on Maureen's circumstances, presentation, and the reasons she was unable to give an account of the real nature of the exploitation she experienced.

A reconsideration request was submitted based on her actual experience and she received a positive Reasonable Grounds decision. She has since received a positive Conclusive Grounds decision and been granted Refugee Status.

She underwent an Achieving Best Evidence (ABE) interview with a specially trained advocate, and has agreed to give evidence against the perpetrator who is being investigated for multiple claims of trafficking and exploitation. Snowdrop intends to provide support and advocacy throughout this process to try and reduce the potential impact on Maureen's already fragile emotional health.

*Maureen's name and country of origin have been changed to protect her identity.



Dotun Sangoleye | unsplash.com

Case study: Operation Fort

Hope for Justice assisted West Midlands Police and the National Crime Agency in a complex, long-running investigation. As a result of this collaboration 92 victims were identified, although it is suspected the gang involved may have exploited up to 400 people. The investigation ran from 2014-2017, with criminal trials in 2019, 2021 and 2024. This was the biggest modern slavery prosecution in the UK with 11 people convicted.

The victims, many of them with existing vulnerabilities, were recruited in Poland, and brought to the UK on the promise of work and accommodation. But when they arrived, they were put to work in factories, on farms, at recycling centres and parcel sorting warehouses. Their products entered the supply chains of some of the UK's largest retailers.

In 2019, 51 victims testified against their traffickers, leading to their conviction and the dismantling of the serious organised crime group. Hope for Justice's IMSAs played a crucial role in advocating for a number of the victims, including supporting them through the criminal justice process, and testifying in court. Some of the victims identified in this case continue to work with Hope for Justice's IMSAs in ongoing compensation claims.

In cases such as these, the IMSA's independence from law enforcement avoids a situation in which they may be called as witnesses and their relationship with the individual survivor could be compromised.



Squalid conditions that the victims were forced to live in



Squalid conditions that the victims were forced to live in



Seized cash and cards

3.2 Facilitating transitions

An IMSA remains a consistent presence in a survivor's journey of recovery as they transition between different systems and services which may be subject to geographic, funding or time limits.

The transition to adulthood represents a significant point of vulnerability in a young survivor's journey of recovery. As they turn 18, young people face multiple challenges in accessing ongoing support. In England, those who do not qualify as 'relevant children', meaning they have been in care for less than 13 weeks, often face a 'cliff edge' as assistance from their local authority comes to an end.

Young people in parts of the country where the Independent Child Trafficking Guardian (ICTG) service operates, will also see this support come to a close.

A Child Trafficking Transition Specialist (CTTS) provides independent advocacy support to young people to help them navigate the many complex systems and services they encounter, including making an informed decision to enter the National Referral Mechanism as an adult and ensuring continuity of support and accommodation.

The CTTS therefore helps to bridge that gap in the transition to adulthood and adult services.⁹

Case Study: Jin*

Jin was trafficked to the UK from East Asia when he was 15 years old. Traffickers forced him to travel illegally through several countries and via various modes of transport. He was then exploited for criminal purposes before the police identified Jin as a potential victim of modern slavery, referred him to children's services and he entered the NRM. He was then referred to the Independent Child Trafficking Guardianship service where he received one-to-one support and advocacy. It was at this point that Jin first made an asylum claim.

When he turned 18, Jin started working with a specialist IMSA focused on meeting the particular needs of young adults at a time when statutory support can otherwise fall away. While he waited for his asylum decision, the IMSA played a crucial role in mitigating the risk that Jin might suffer further harm, including re-trafficking, including securing safe accommodation. When Jin received a job offer, the IMSA checked the address with police who confirmed the address was a known cannabis farm.

Jin received his asylum decision almost five years after his initial claim. When he finally received his refugee status, Jin immediately started in a new job and was able to secure himself independent accommodation.

**Jin's name has been changed to protect his identity*



Rahadiansyah | unsplash.com

⁹ [Avoiding the Cliff Edge: Working with Young Survivors of Modern Slavery — https://hopeforjustice.org/wp-content/uploads/2025/06/Avoiding-the-cliff-edge-working-with-young-survivors-of-modern-slavery-as-they-turn-18.-June-2025.pdf](https://hopeforjustice.org/wp-content/uploads/2025/06/Avoiding-the-cliff-edge-working-with-young-survivors-of-modern-slavery-as-they-turn-18.-June-2025.pdf)

The Modern Slavery Act and the Human Trafficking and Exploitation (Northern Ireland) Act both contain a defence against prosecution for offences which a person has been compelled to commit as part of their exploitation.¹⁰ In Scotland, the Lord Advocate's instructions contain a 'strong presumption' against the prosecution for offences which victims of trafficking have been compelled to commit.¹¹ Nevertheless, it is not uncommon for survivors to be prosecuted and convicted. According to research from the University of Essex:

*"Shockingly, given how few convictions there are on modern slavery charges, it's not out of the question that there might be more survivors than perpetrators in UK prisons."*¹²



Emma Wang | unsplash.com

The transition out of prison represents another moment of significant risk of further exploitation or harm. The traffickers prosecuted under Operation Fort, described above, recruited people coming out of prison.¹³ IMSAs can play an important role, working with prisons and probation services to help survivors to re-enter society safely.

3.3 Addressing the postcode lottery

The availability of support services for survivors of modern slavery varies quite considerably across the UK. For example, according to research from the Human Trafficking Foundation:

*"Approximately 9 out of 339 local authorities in England and Wales have specialist Modern Slavery Coordinators (MSCs), creating a damaging "postcode lottery," where a modern slavery victim's access to support depends entirely on their location - an unacceptable disparity."*¹³

The IMSA model has been developed to allow advocates to work remotely, bridging the gap between services. This enables IMSAs to work with support services and systems within the survivor's local community; to work with a survivor even in parts of the country without adequate specialist services; and remain consistent as and when a survivor moves locality.

The model also aims to build the capacity of other services, empowering and upskilling them to fulfil their responsibilities towards survivors. This helps to address the uneven availability of services, as well as helping to deliver a more sustainable response to modern slavery. Within regional Modern Slavery Partnerships, IMSAs offer insights into people's journey into exploitation, helping to identify at-risk communities and devise interventions to prevent harm occurring.

¹⁰ [Modern Slavery Act 2015; Human Trafficking and Exploitation \(Criminal Justice and Support for Victims\) Act \(Northern Ireland\) 2015](#)

¹¹ [Lord Advocate's instructions for non-prosecution of victims of human trafficking | COPFS](#)

¹² [Modern slavery victims going undetected in UK prisons | University of Essex](#)

¹³ [Operation-Fort-Multi-Agency-Safeguarding-Debriefing-Report.pdf](#)

¹⁴ [HTF MSC 20pp v2.indd](#)

4 Consensus: support for independent advocacy

The Independent Anti-Slavery Commissioner has endorsed the crucial importance of ensuring that survivors have access to independent advocacy.

“This programme is a great example of a collaborative approach that places survivors’ needs at the heart of it. The IMSAs’ advocacy work for victims and survivors of the most appalling crimes of modern slavery and human trafficking is so important...The IMSAs demonstrate a model that works, and it is essential that more victims and survivors have access to the programme.”¹⁵

In her [Strategic Plan for 2024-26](#) the Commissioner has also pledged to:

“work with the Government and the sector to push for victims of modern slavery to have independent advocates in their recovery journey to help them navigate complex systems”.¹⁶

There is broad support for IMSAs from organisations across the UK anti-slavery and anti-trafficking sector:

“Having dedicated my career to combating modern slavery, including creating a successful and sustainable Modern Slavery Service in a homelessness charity, I can unequivocally state that Independent Modern Slavery Advocates (IMSAs) are indispensable. Survivors often face labyrinthine systems that can be overwhelming and disheartening. IMSAs guide survivors through complex systems and ensure access to vital services. National implementation is a moral imperative to empower survivors to rebuild their lives with dignity and hope.”

Dr Júlia Tomás, Human Trafficking Policy and Research Manager, The Passage

“As an organisation specialising in providing legal advice and representation to survivors of modern slavery, we often work alongside IMSAs. In our experience, the involvement of an advocate can be hugely beneficial. They have in-depth knowledge across different areas of law and support systems, which translates into powerful advocacy. They are proactive and determined to help survivors secure the right support and entitlements. They have extensive experience of working with survivors and their legal representatives, and are often able to provide advocacy over a long period of time. This is really important for survivors, many of whom have highly complex needs and lengthy legal cases. We think that a greater number of advocates working in the sector and available to survivors on a wider basis across the country could only improve standards of care and ensure stronger protections for survivors of trafficking and modern slavery.”

ATLEU



Priscilla Du Preez | unsplash.com

¹⁵ [IMSA Model Development Project | Hope for Justice](#)

¹⁶ [Independent Anti-Slavery Commissioner Strategic Plan 2024-2026](#)

"The Independent Modern Slavery Advocate (IMSA) model has been developed by Hope for Justice with the time commitment, dedication to detail and multi-expert consultation required for such a vital anti-trafficking role. The IMSA aligns with international guidelines for Independent Advocates devised for the OSCE/ODIHR NRM Handbook, and it is informed by the wide-ranging sector of modern slavery experts working in the UK.

"When a person leaves the direct control of their traffickers, they may be ill or injured, and commonly suffer mental health difficulties from trauma. They will be in poverty due to having been held in slavery and may be destitute or otherwise have nowhere safe to live. They are frightened of their current situation, anxious about their future and traumatised by their past. It is very difficult to know whom they can trust, and they are often especially fearful of coming forward to the authorities. All of these vulnerabilities can put them at risk of re-trafficking, further crime and forms of harm.

"From my own frontline work with survivors, conducting detailed assessments and providing long-term, tailored support programmes, I believe that the IMSA service is well equipped for this task and should be more widely available across the UK.

It has the strong foundation of multi-agency training, pastoral supervision and peer support needed for sustainable quality and longevity of service. IMSAs help survivors to navigate complex legal systems and hearings; they can support survivors to access accommodation, appropriate medical treatment and specialised therapeutic care as well as social inclusion via education, training and employment. They can also provide documentary information for other professionals



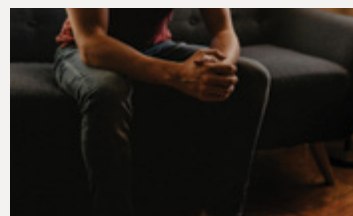
Kateryna Hliznitsova | unsplash.com

and for decisionmakers. Most importantly there is kindness at the heart of their work: IMSAs accompany survivors when it is needed and 'bridge' referrals to other agencies and practitioners rather than merely 'signposting'. A key issue for survivors is to receive a timely and thoughtful response from a professional who genuinely cares about them. They often experience weeks, months, even years, of delays and uncertainty. The connection that survivors can form with well-trained professionals can strengthen their wellbeing, continued safety and the gradual (re-) building of their lives."

Rachel Witkin, International Anti-Trafficking Consultant & Director of the Modern Slavery Community of Practice

"The work undertaken by Independent Modern Slavery Advocates is not just important but it is an absolute necessity for those victims who are able to benefit from their support. Victims of modern slavery often have a myriad of other complicating issues or conditions (many have PTSD and language barriers) and they would be at a loss navigating the complicated legal framework to allow for recovery of compensation (be that in the civil jurisdiction or through the CICA) without the assistance of an IMSA. This compensation is often key in allowing them some chance of re-establishing a 'normal' life. I was first introduced to Hope for Justice through a mutual friend (a colleague in chambers), who informed me they were looking for assistance in a CICA appeal. The quality of the work Hope for Justice's IMSA produced (sometimes with a little guidance) in support of the appeal was first-rate and made my role as counsel far easier than I had anticipated. We were successful in a very tricky appeal with various legal issues, including a significant limitation point. I have since worked with them on various other cases and I fully intend to continue supporting them pro bono in their valuable work. I would encourage anyone else who can do so to provide their services and any funder to know that every pound will be used to make a difference in someone's life."

- Arya Tabrizi, Barrister, Kings Chambers



Kelly Sikkema | unsplash.com

5 National Framework for IMSA

In 2020/21, an [independent review](#) found that Hope for Justice's IMSA model provided an effective response to the significant needs and structural disadvantages that survivors of modern slavery encounter, and led to considerably improved outcomes for survivors. The report also recommended that organisations work together to build an accredited IMSA role and framework.¹⁷

Hope for Justice, British Red Cross, The Snowdrop Project, the Bakhita Centre for Research on Slavery, Exploitation and Abuse, and SOHTIS, together with consultants with lived experience of modern slavery, developed a [national framework for Independent Modern Slavery Advocacy](#). More than 90 organisations across the UK participated in the consultation to develop this framework.¹⁸

The IMSA Model provides a framework for the national roll-out of independent advocacy for survivors of modern slavery and human trafficking. The framework envisions a governance structure which is agile to the ever-changing legislative and policy landscape, which enables the delivery of consistent best practice, and builds on learning from other advocacy models.

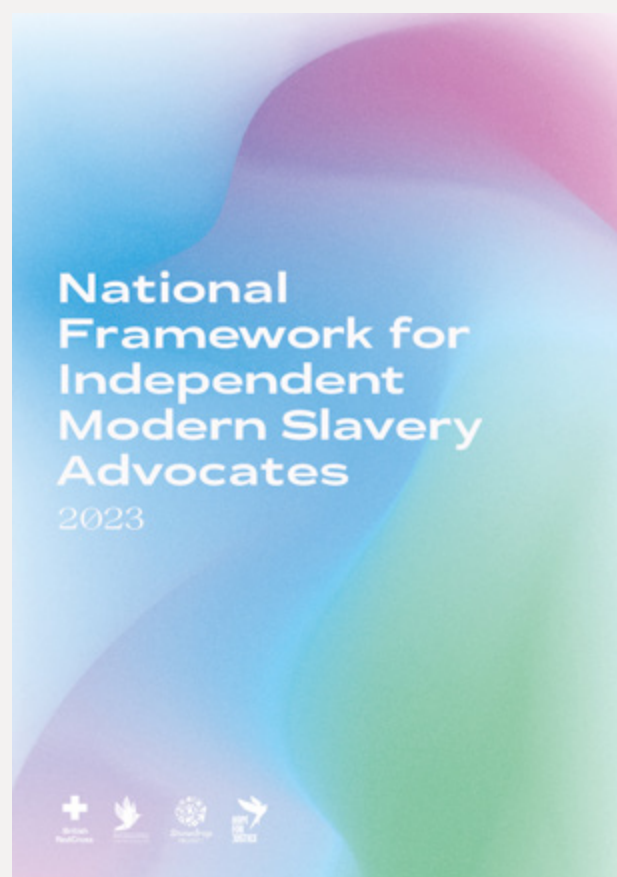
In January 2025, The National Lottery provided almost £1 million over four years to enable the model to be rigorously tested in a pilot involving more than 20 organisations throughout the UK.¹⁹ Over the next four years, the model will be tested in different sectors, localities, and types of organisations, to ensure that outcomes continue to demonstrate the power of this intervention for survivors.

"The Independent Modern Slavery Advocate is expected to be a significant asset for victims of trafficking in Scotland. The proposed framework will establish a connection between victims and service providers, promoting a more effective and swift healing process. As a Voices Ambassador with firsthand experience, I am pleased to learn that Scotland will introduce two Advocates in this pilot initiative."

Tejay, VOICES NETWORK
Ambassador, Glasgow

Each IMSA will be required to complete accredited training from the Bakhita Centre at St Mary's University. In May 2025, the course received Post Graduate Certificate (PG Cert) validation for 5 years. Accreditation is fundamental to the success of achieving a consistently high standard of independent advocacy throughout the UK so that every survivor working with an IMSA can know what standard to expect. Accreditation will include both the IMSA role and the organisations employing an IMSA.

A crucial element for the effectiveness and survivor-centric nature of the IMSA role is the active embedding and engagement of survivors of trafficking as IMSAs and in the governance of the framework. Their valuable expertise and lived experiences will provide unique insights, significantly enhance the quality and relevance of support offered to other survivors, and ensure the model is truly informed by those it seeks to serve.



¹⁷ [Independent Review of the Hope for Justice IMSA Model \(University of Liverpool, June 2021\), \(1\).pdf](#); [Independent-Evaluation-IMSA-Model-Framework-Development-Stage-One-Jan-2024.pdf](#)

¹⁸ hopeforjustice.org/wp-content/uploads/2024/02/National-Framework-for-IMSAs-Exec-Summary.-Feb-2024.pdf

¹⁹ [£1m National Lottery boost for IMSA® Project](#)

6 Recommendations

Every survivor of modern slavery and human trafficking in the UK should have access to an independent advocate.

Our organisations therefore recommend the establishment of a statutory right of access to independent advocacy for all individuals suspected of being victims of modern slavery and human trafficking, and those confirmed as such through the National Referral Mechanism.

UK Government

1. Amend the Victim Support (Specified Roles) Regulations 2025, produced under the Victims and Prisoners Act 2024 section 16, to facilitate the development and publication of IMSA guidance in collaboration with lived and learned experience.
2. Amend the Modern Slavery Act 2015 to guarantee survivors of modern slavery in England and Wales have access to an IMSA.

Scottish Government

1. Amend the Human Trafficking and Exploitation (Scotland) Act 2015 to guarantee survivors of human trafficking in Scotland have access to an IMSA.
2. Produce accompanying statutory guidance to provide further details of survivors' rights to independent advocacy.

Northern Irish Government

1. Amend the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 to guarantee survivors of human trafficking in Northern Ireland have access to an IMSA.
2. Produce accompanying statutory guidance to outline further details of survivors' rights to independent advocacy.



Jorge Percival | unsplash.com

Signatories



St Mary's
University
Twickenham
London



The Bekhita Centre for Research
on Slavery, Exploitation and Abuse
Slavery and Exploitation
Human Trafficking, Migration and Organised Crime
Gender Based Violence and Abuse



HOPE FOR JUSTICE



Survivors of Human Trafficking in Scotland



Snowdrop
PROJECT

IMSA

Independent Modern Slavery Advocate