



Immigration and Asylum Bill: Impact on Victims of Trafficking and Modern Slavery

Hope for Justice Briefing for Second Reading, July 2026

About Hope for Justice

Hope for Justice works to bring freedom from human trafficking and modern slavery by identifying victims, supporting survivors and preventing exploitation. Founded in the UK in 2008, we work directly with victims and survivors and engage with governments, law enforcement, business and the public to secure long-term change. We are piloting a national model for [Independent Modern Slavery Advocacy](#)® (IMSA®) with partners across the UK.

Summary: The Immigration and Asylum Bill Will Weaken Modern Slavery Protections

The Bill risks undermining efforts to tackle modern slavery by impeding prevention, weakening victim identification, restricting protection and recovery, and limiting accountability for those responsible. In doing so, it strengthens the conditions in which traffickers and organised criminal networks operate; harming victims, harming communities and harming the economy.

The Bill prioritises immigration control over survivor protection, creating further barriers for victims seeking help and justice.

Undermining Cross-Government Priorities

The Bill will undermine a range of shared policy objectives and cross-government priorities, including:

1. *Building Safer Communities*: restricting survivors' rights to access support and protection strengthens traffickers' control and impedes law enforcement, reinforcing organised crime rather than disrupting it.
2. *Preventing Homelessness and Destitution*: insecure immigration status and abrupt loss of specialist support increase risks of homelessness and further exploitation.
3. *Tackling VAWG*: women and girls who have experienced exploitation may be excluded from protection, increasing risks of further violence and re-trafficking.
4. *Supporting Sustainable Economic Growth and Responsible Business*: modern slavery is estimated by Unseen to cost the economy £60 billion.¹ The Bill improves transparency requirements for business and public authorities, but fails to take the necessary step of introducing Mandatory Human Rights and Environmental Due Diligence and forced labour bans, leaving the UK behind emerging EU standards.

Recommendations

Hope for Justice would welcome support in highlighting the Bill's negative impact on survivors of modern slavery and people at risk of exploitation during Second Reading on 13th July. We recommend that the Government:

1. Remove clauses that harm survivor identification and support, and undermine efforts to tackle organised crime, specifically Clauses 36–39 and 43.
2. Work with lived and learned experience experts to draft and implement a cross-government strategy to prevent modern slavery and improve identification and long-term recovery.

Key Concerns

Penalising trauma through disclosure deadlines: The Bill introduces time limits for disclosing experiences of exploitation after arrival in the UK. **Clause 36** states that a person's credibility will be diminished if there is a delay in 'making a claim to be a victim' of slavery or trafficking, or if they fail to comply with deadlines set out within a Claim Notice (**Clause 11**).

¹ [The high price of exploitation: modern slavery's £60bn hit to the UK - Unseen](#)



Survivors should not be penalised for behaviours that are a normal response to exploitation. Delayed disclosure is a well-recognised consequence of trauma, fear, coercion and lack of trust in authorities. According to the Helen Bamber Foundation:

*'The only truly effective way to obtain full, detailed and accurate accounts of trafficking histories is by establishing a working relationship of mutual trust...Supporting survivors to gain the confidence to discuss their history, and permitting them as much time as they need to do so, is the best way of obtaining detailed disclosure.'*²

In the Statutory Guidance published under the Modern Slavery Act 2015, the Home Office recognise that:

*'some traumatised individuals can struggle to verbally express distressing experiences, may appear numb or disconnected from their words or display other trauma-related responses.'*³

Imposing deadlines on disclosure is not trauma-informed and, as a result, the Bill risks reducing identification and pushing vulnerable people further underground.

Perpetuating the myth that individuals can submit a 'modern slavery claim': Victims cannot self-refer to the Home Office for identification; they depend on First Responders to refer them into the two-stage identification process. The Bill wrongly places responsibility on vulnerable people for something over which they have no power or influence, rather than authorities with safeguarding duties under Article 4 ECHR.

Removing leave to remain for recovery: Under **Clause 39** survivors of modern slavery will no longer be entitled to temporary immigration status to assist with their physical or psychological recovery from exploitation. Instead, they will only be granted leave to facilitate compensation claims or to support investigations or prosecutions.

Secure immigration status is often essential for survivors to recover, access housing, healthcare and employment, and avoid re-trafficking. Without long-term certainty or stability, many survivors may be reluctant to seek assistance, or may struggle to make decisions about engagement with police investigations, prosecutions and compensation, thereby limiting perpetrator accountability. Temporary permission to stay is already rarely granted: in 2024, only 4% of eligible survivors received it, and 96% of those grants were made to assist recovery.⁴ Through the [IMSA Model](#), Hope for Justice and our partners have worked with 101 clients who have requested advocacy regarding their immigration status since September 2025, the most common priority identified by survivors during that period. Removing this route will increase insecurity and vulnerability among survivors.

Expanding disqualification from support: The Bill makes mandatory the application of Public Order and Bad Faith Disqualifications in **Clause 38** and expands the scope of disqualification to any victim who has been convicted of an offence. This risks excluding victims from identification and support, including those whose criminal convictions arose directly from their exploitation: in respect of children 50% of referrals into the National Referral Mechanism in 2025 were due to criminal exploitation, in respect of adults and children this makes up at least 23% of all referrals last year.⁵ More survivors therefore face being left without protection and at greater risk of re-trafficking.

The Bill reflects a hostile and unevicenced narrative of system misuse to justify reform to modern slavery protections.⁶ According to the Home Office's own figures, in 2025, of 23,411 potential victims of modern slavery were referred into the National Referral Mechanism (NRM), only 6 of whom were

² [HBF Trauma Informed Code of Conduct 2nd Edition.pdf](#)

³ [Modern slavery: how to identify and support victims - GOV.UK](#), Para 14.11, see also page 114

⁴ [RoadtoNowhere_FINAL_150725.pdf](#)

⁵ [Modern slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2025 - GOV.UK](#)

⁶ For example, see 'Reform to the modern slavery system' within Restoring Order and Control (Nov 2025) [Restoring Order and Control: A statement on the government's asylum and returns policy \(accessible\) - GOV.UK](#)

disqualified on the grounds that their claims were made in ‘bad faith’ – which equates to just 0.02% of cases.⁷ Despite the persistent rhetoric, the system of support for survivors of modern slavery has not been overwhelmed with fraudulent claims necessitating reform. In our experience of working with survivors for over 16 years, we have seen that many people face significant barriers to entering the system intended to safeguard them and support their recovery from exploitation.

Clause 43 also grants the Secretary of State the authority to determine whether support for an individual is ‘necessary’ to assist their recovery from any physical, psychological or social harm arising from their exploitation. This includes the ability to override a frontline professional’s judgement regarding what support or assistance is necessary for recovery. Once again, victims face having access to support withdrawn and being left at risk of further harm.

Creating a cliff edge in support: A person’s recovery and reflection period will end if they receive a negative conclusive grounds decision, under **clause 37**, even if the conclusive grounds decisions comes within 30 days. This is incompatible with the Council of Europe Convention on Action Against Trafficking in Human Beings (ECAT) which guarantees a minimum recovery and reflection period of 30 days.

Recent years have seen both a high rate of negative conclusive grounds decisions and high rate of those decisions being overturned when reconsidered: in 2025, 79% of reasonable grounds decisions which were reconsidered received a positive outcome and 77% of conclusive grounds decisions which were reconsidered received a positive outcome.⁸ Under this Bill victims who have been trafficked but have received a negative decision face being left without protection, accommodation or support at very short notice perhaps with no ability to challenge the decision in practice, placing them at risk of further harm. In turn, this risks creating other social challenges, such as homelessness.⁹

Insufficient protection for children: **Clause 41** is a welcome step forward in strengthening the Independent Child Trafficking Guardian role. However, the success of these reforms will depend on ensuring Guardians have meaningful influence in decision-making, maintain direct relationships with children, and are available consistently to all trafficked children. Strong independent advocacy remains essential to ensuring children’s voices and best interests are at the centre of responses to trafficking.

The Bill does not provide a comprehensive approach to tackling child exploitation. We recommend that the Government consult with lived and learned experience experts on a child exploitation strategy to ensure a coherent cross-department approach to child protection.

Creating additional risks of vulnerability: Additional reforms introduced by the Bill will have a significant impact upon survivors and create vulnerability amongst other at-risk communities. The restrictive interpretation of Article 8 ECHR contained in **Clause 19** means that a person’s right to private and family life may be limited if certain criteria are met, including if they have relied on public funds, been convicted of an offence or failed to adhere to immigration rules.

Survivors risk having Article 8 grounds for remaining in the UK limited due to factors linked to their exploitation and/or beyond their control. Many survivors are reliant on assistance throughout their recovery journey, for example, when exiting a safehouse they may be reliant on housing assistance, or when gradually returning to work may require welfare support.

Clause 23 grants the Secretary of State the power to require refugees to repay financial or material assistance received. This may create risks of exploitation as people face the financial burden of re-

⁷ [Modern slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2025 - GOV.UK](#)

⁸ [Modern slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2025 - GOV.UK](#)

⁹ For more on the link between homelessness and modern slavery see [Enhancing modern slavery prevention within the homelessness sector in the UK](#)



paying the state, and may accept exploitative work in desperation. For many survivors, financial stress may hinder their recovery.

Supporting Survivors, Tackling Traffickers

Combatting trafficking and modern slavery requires a safeguarding-first approach. Fear of detention, removal, disqualification or disbelief deters victims from coming forward and can be exploited by traffickers as a tool of coercion.

An effective response should prioritise prevention, victim identification, recovery, safe accommodation, healthcare, legal advice and long-term support. Protecting survivors is not only the right thing to do—it is essential to disrupting criminal networks and bringing perpetrators to justice.

Transparency In Supply Chains

The Bill strengthens the Transparency In Supply Chains (TISC) sections of the Modern Slavery Act 2015 (**Clauses 44-49**). Whilst we welcome these improvements, the reforms fall short of what is required to effectively mitigate risk of exploitation in business and public sector supply chains. By failing to introduce Mandatory Human Rights and Environmental Due Diligence and forced labour bans, the UK risks falling below international standards and becoming a dumping ground for goods produced through exploitation.

Financial penalties for non-compliance: Failing to comply with reporting obligations now carries the possibility of a fines of up to £1 million or 1% of turnover, whichever is higher (1% of budget for public bodies). Until now, the risks of non-compliance have been primarily reputational and commercial, but with these reforms the risk is now also financial.

Mandatory reporting content: Companies and public authorities will now have less discretion as to what is included within their Modern Slavery Statements. The Bill requires that statements follow a specific structure and cover specified topics.

Greater accountability: The senior person at the organisation whose signature is attached to the Modern Slavery Statement would have to declare that they believe the statement to be true and accurate (to the best of their knowledge and belief).

Public sector organisations brought into scope: Public authorities of a certain size would have the same obligations as commercial organisations.

Statements to be submitted, not just published: The Bill introduces a requirement for companies and public authorities to submit their statements to a central portal, rather than simply publishing the statement on their own website.

Conclusion

The Immigration and Asylum Bill moves the UK further away from an evidence-based, survivor-centred response to modern slavery. By weakening protections, limiting support and creating new barriers to identification, it risks leaving more people vulnerable to exploitation at a time when trafficking networks continue to adapt and expand. These measures fail survivors while benefiting traffickers.

Building safe, resilient communities requires effective prevention, early identification, trauma informed and long-term support and independent advocacy for survivors and access to justice. Parliament should oppose these provisions and instead support policies that prioritise prevention, protection, recovery and justice, helping to reduce trafficking and create safer communities.

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