MODERN SLAVERY & HUMAN RIGHTS | POLICY & EVIDENCE CENTRE

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Cultural competency in UK responses to modern slavery

Research Report

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Introduction to research

This project seeks to assess the value of cultural competency and practices in improving equity and effectiveness in prevention, legal enforcement, support services and identification of those affected by modern slavery. Cultural competency involves a set of related behaviours, attitudes and policies that can enable professionals to work effectively in cross-cultural situations (Cross et al., 1989). Hence, this project focused on individuals facing oppression and discrimination based on protected characteristics; it analyses how cultural competency can address modern slavery and re-exploitation risks by answering the following research questions:

1. To what extent can engagement and delivery of services to individuals be improved based on their cultural background and identity?

2. What are the cultural and identity barriers for people with lived experience of modern slavery to engage with the necessary professionals and organisations? How can these be managed/mitigated?

By gaining a better understanding of the barriers individuals face when seeking support in exploitative situations, particularly those facing oppression, the findings are presented in three interrelated levels: micro, meso, and macro. Gerassi & Nichols (2021) defined these levels as:

Micro-level – focuses on individual-level barriers that people face when seeking support in an exploitative situation. Prevention, identification and trauma-informed care given to individuals who have experienced or are vulnerable to exploitation.

Meso-level – focuses on joining the relevant stakeholders, such as statutory and non-statutory organisations, survivors and researchers. It seeks a coordinated community response and intra-agency collaboration to share knowledge, resources and coordinated services, particularly on the extent to which stakeholders recognise oppression and consider it in their analysis.

Macro level – focuses on organisational or policy work through an application of the intersectional framework to analyse existing policies.

Limitations of research

Our research has included interviews with professionals who are working with people who are being/have been exploited at the point of identification and/or shortly afterwards. What is apparent is that certain public bodies and organisations, such as the police, the Home Office, local authorities, and NGOs, are responsible for identifying victims of modern slavery. It's unlikely that other public bodies like the DVLA or HMRC will encounter victims of modern slavery during their work. This research has mainly assessed the cultural and structural competencies of the former, and our findings might not be generalised to such organisations.

Nevertheless, once an individual is identified as a victim of modern slavery and is referred to the National Referral Mechanism (NRM) or signposted to any other care and support services, they will start encountering a growing number of organisations and departments. These may include housing, benefits, immigration advice, health services, employment, DVLA, and HMRC. It is possible that those affected by modern, as well as anyone else dealing with these organisations, may also face similar challenges regarding cultural competence, as outlined in this research. Consequently, we suggest that our recommendations are implemented across the board and not solely for those who encounter survivors of modern slavery.

Acknowledgement

We extend our sincerest gratitude to the individuals and organisations that willingly participated in this research. It is important to highlight that our intention was not to conduct a review of their organisations. Instead, these individuals demonstrated exemplary cooperation by sharing their perspectives openly and honestly. Our findings reveal that both statutory and third sector organisations are facing significant challenges pertaining to the matter at hand.

Framework

Cultural and Structural Competency Framework

Cultural competency, as defined by Cross et al. (1989), involves a set of related behaviours, attitudes and policies that enable professionals to work effectively in cross-cultural situations. It emphasises the integration of knowledge, skills, and attitudes to enhance communication and interactions with culturally diverse individuals. This framework promotes cultural self-awareness, empathy, professional curiosity and respect and recognises the importance of understanding cultural differences and worldviews. By adopting cultural competency, practitioners can provide equitable and ethical care, tailor support to individual needs and exhibit understanding and empathy.

However, it is important to note that cultural competency alone is not sufficient to address modern slavery. Structural competency originated in the US healthcare sector and complements cultural competency by recognising that economic, political, and societal structures can contribute to vulnerability and oppression. We define structural competency as the trained ability to discern how a host of issues defined as micro or meso-level barriers to seeking support in an exploitative and vulnerable situation (e.g., fear, mistrust of authorities, trauma), also represents the downstream implications of some upstream decision about such matters (e.g., healthcare and allocation of resources, laws and legislative oversights, urban and rural infrastructure) (Quesada et al., 2021; Metzl & Hansen, 2024).

Structural competency acknowledges that individual encounters are not the sole source of stigma, marginalisation, and oppression and broadens the focus to include institutional policies and local contexts. It enables professionals to consider the complex relationship between exploitative situations and social, political, and economic systems.

The combination of cultural competency and structural competency can offer a comprehensive approach to addressing modern slavery. Cultural competency promotes culturally responsive and inclusive support, while structural competency encourages a deeper understanding of how macro-level structures contribute to vulnerability. By utilising these frameworks, professionals can work towards eliminating racial and ethnic disparities, improving modern slavery support, and preventing further instances of modern slavery in the UK.

Cultural competency and structural competency should be utilised as frameworks for addressing modern slavery in the UK due to their ability to address racial and ethnic

disparities, improve care quality and outcomes, and recognise the influence of societal structures on vulnerability. See Appendix A for a complete analysis.

Methodology

The research was designed into four sets of data collection and collation. We drew from both primary sources and secondary sources of data. They were:

1. **Literature review and analysis of existing research on cultural and structural competency.**

Cultural competency emerged in the United States as a response to providing relevant, effective, and culturally responsive healthcare services to the increasingly diverse US population. There is a growing body of literature on cultural competency in healthcare, and it is also a term used in the UK that aims to reduce racial and ethnic disparities in healthcare services and beyond. We explored how cultural competency and structural competency concepts could be utilised to strengthen preventative and remediation approaches for people affected by modern slavery – please see Appendix A for more details.

2. **Analysis of population, ethnicity, and deprivation data in the four geographical areas**

The research was conducted over four distinctly different geographical areas in England and Wales, comprising one coastal region, one metropolitan region, one rural region, and one area that is formed of a dense metropolitan centre surrounded by rural communities and agricultural land. These areas were chosen for this research to maximise the variance between pertinent population demographics such as ethnicity, religion, first language, access to statutory services, police force size, and number of annual National Referral Mechanism referrals in each area.

Table 1[1] - demographics of the studied geographical areas.				
	Coastal[2]	**Metropolitan**	**Rural**	**Metro/Rural**
The population recorded on the 2021 census	136,500	2,919,700	629,400	935,875
The most prominent ethnicity recorded	97.7% white	61.4% white	96.7% white	94.9% white
The most prominent faith recorded	53% Christian	40% Christian	49.8% Christian	47.7% Christian
The second most prominent faith recorded	0.7% Muslim	17.2% Muslim	0.8% Muslim	0.6% Muslim
NRM figures year-end 2022	170	1178	116	207
Note: This figure is an example comparison of population, ethnicity, the two most common faith groups (ONS, 2021), and NRM data for the year ending 2022 (Home Office, 2023).				

3. **Data collection.** To conduct the interviews and focus groups, we created a list of related first responders, charities[3], and statutory and non-statutory organisations in each case study area to be invited for interviews and/or focus group discussions. West Midlands Anti-Slavery Network, Humber Modern Slavery Partnership and the North Wales Police and Crime Commissioner distributed the research to the modern slavery workforce in their region and promoted it in related conferences and events. This helped us to work towards achieving a broad sample from the list to ensure responses can be generalised sufficiently and give the best possible results. Interviews and focus groups were semi-structured, wherein short lists of questions related to the issue were designed to guide them (see Appendixes B, C, D, and F).

    - **Semi-structured interviews with professionals from law enforcement, local government, charities and healthcare.** We interviewed 36 people across the

[1] Demographic figures represent respondents to the 2021 census who answered multiple choice questions. For example, in the metropolitan region of this study, 27.9% of respondents declared no religion, while 5.7% declined to answer.

[2] Area not specified to protect participants' anonymity.

[3] Charities included MSVCC support providers and NGOs offering other support, e.g., post-NRM support or legal advice.

four geographical areas chosen. These were designed to elicit insights into the barriers professionals face when working with people affected by modern slavery and gain insights into what culturally competent best practices could look like. We could only conduct four interviews with law enforcement bodies in the coastal area. Interviews were evenly distributed across all other three geographies. Please see Table 2 for more details.

- **Four focus groups with professionals from law enforcement, local government, charities and healthcare.** These were designed to elicit deeper insights into the challenges faced and opportunities for how cultural competency can be embedded in policies to prevent modern slavery and safeguard those most vulnerable.
- **Four semi-structured interviews with individuals with lived experience of modern slavery**. These were designed to elicit insights into the experiences of people affected by modern slavery and the challenges they have faced because of their identity, as well as the opportunities for embedding culturally competent approaches in the modern slavery sector. To recruit individuals with lived experience of modern slavery, Survivor Alliance sent an email to their UK survivor leaders, which led to the recruitment of 3 participants, and we recruited the fourth participant through the West Midland Antislavery Network. The limitation of this aspect of the methodology was that two geographies were not represented here (metro/rural and rural).
- **One focus group with four individuals with lived experience of modern slavery.** This was designed to elicit a deeper understanding of the issues facing people with lived experience of modern slavery and to validate the emergent findings from the interviews. They were the same individuals who participated in the interviews.

4. **Data analysis.** Transcripts of interviews and focus groups were organised in short paragraphs to start the data analysis. The formatted data were uploaded into Nvivo 12. Coding began when the first data set was collected and formatted (rather than waiting until all the data were gathered). In the data analysis, the data was read line-by-line to develop the first sets of codes for the first set of data. Code in qualitative research is a word or short phrase that assigns “a summative, salient, essence-capturing, or evocative attribute to a portion of language-based or visual data (Saldana, 2013).” Applying and reapplying codes to qualitative data allows for

segregating, grouping, regrouping and relinking the data until it is organised/reduced into meaningful segments, i.e. categories or themes. Throughout this step, the researchers responsible for the data analysis, Zahra Shirgholami, Philippa King and Dami Omole, met regularly to resolve consistency or different opinions.

Writing up the report. It was started as we finalised the themes. The findings articulate each theme's meaning and what they reveal about the problem. Direct short and long quotes were included, and unique identifiers were allocated to quotes to show how various research enriched the findings. Direct quotes also illustrate the validity and transparency of our approach to achieving the research outcomes.

Ethical approval for this research was granted by the University of Hull Ethics Committee on 27/06/2023. Participants signed up to participate in an interview and/or focus group by signing a consent form. They were assured of their confidentiality and anonymity regarding their involvement in the study.

Table 2 – Breakdown of interviews[4]		
Metro/Rural		
Stakeholder group	**Number of participants**	**Identifier**
Law Enforcement	2	MR-LE
Local Authority	4	MR-LA
Charity	6	MR-Ch
Metropolitan		
Stakeholder group	**Number of participants**	**Identifier**
Law Enforcement	3	M-LE
Local Authority	1	M-LA
Charity	7	M-Ch
Rural		
Stakeholder group	**Number of participants**	**Identifier**
Law Enforcement	1	R-LE

[4] To avoid risking revealing the identity of participants, we have removed the participants' positions here, and their region has not been included in quotes.

Local Authority	6	R-LA
Charity	2	R-Ch
Coastal		
Stakeholder group	**Number of participants**	**Identifier**
Law Enforcement	4	C-LA

Table 3 – Breakdown of focus groups	
Rural Focus Group 1 – Identifier: R-FG	
Stakeholder group	**Number of participants**
Law Enforcement	2
Local Authority	3
Charity	2
Government	2
Health Sector	1
Focus Group 2 – Identifier: R-FG-2	
Stakeholder group	**Number of participants**
Law Enforcement	3
Metro/rural Focus Group 1 – Identifier: MR-FG-1	
Stakeholder group	**Number of participants**
Local Authority	3
Healthcare	1
Charity	1
Metro/rural Focus Group 2 – Unique identifier: MR-FG-2	
Stakeholder group	**Number of participants**
Local Authority	5
Public body	1
Focus Group with Those with Lived Experience of Modern – Identifier: FG-LE	
Four individuals with lived experience of modern slavery	

Summary of findings

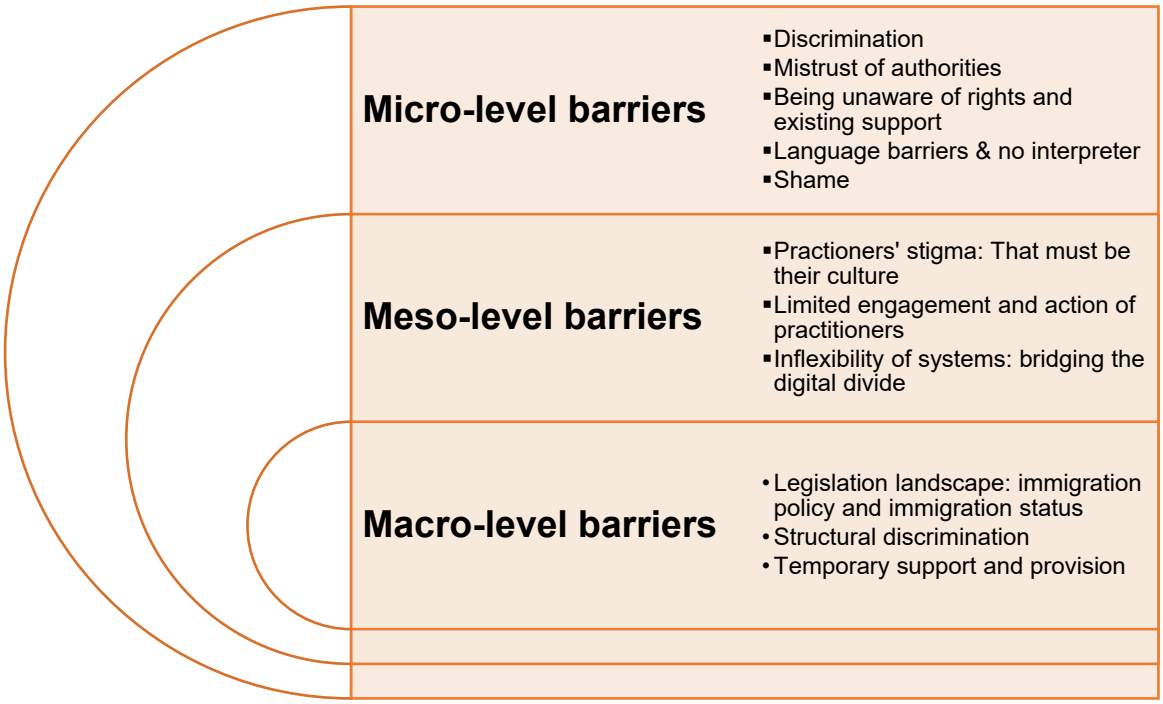


Figure 1 – Summary of barriers

In our research, we have identified barriers at different levels that hinder the support and assistance provided to individuals who experience modern slavery. By removing these barriers – through a whole system change – the following outcomes can be achieved:

At the micro/individual level[5], our research recommends implementing cultural competency approaches to address discrimination and mistrust barriers, among others, faced by individuals who experience modern slavery. This includes providing equal treatment and respect regardless of gender, sexuality, age, nationality, or class. By removing these barriers, we can create a more inclusive and supportive system for survivors.

At the meso/organisational level, our research suggests addressing practitioners' stigma, biases, and assumptions that hinder our understanding and response to individuals in

[5] It is important to note that barriers at the three levels are interconnected and may overlap. For example, discrimination and language barriers are relevant at all three levels.

vulnerable situations. It is crucial to recognise the multiple issues people in vulnerable situations may be facing and avoid reducing them to labels. By promoting cultural competence and challenging negative narratives, policymakers can provide appropriate assistance and prevent further harm.

At the macro/legal and policy level, our research highlights the role of current immigration policies and political narratives in the prevalence of modern slavery. To counteract this, legislation and structures need to be rethought to be more survivor-focused and culturally competent. By addressing structural discrimination and improving structural competency, policymakers can create an environment that prioritises protection and prevention.

Overall, by removing these barriers, the aim is to create a more supportive and responsive system for individuals who experience modern slavery. This includes providing appropriate training, promoting awareness, and allocating resources to ensure that victims have access to the support and provisions they need. By implementing these recommendations, we can work towards preventing and combatting modern slavery more effectively.

Findings regarding barriers to seeking support for people with lived experience of modern slavery.

Barriers at the Micro-level

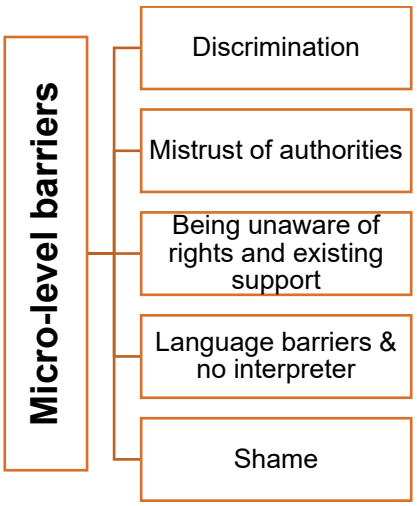


Figure 2 – Micro-level barriers

As mentioned above, micro-level findings focus on individual-level barriers to seeking support, prevention, identification and trauma-informed care given to individuals who have experienced or are vulnerable to exploitation. Our findings discuss the NRM support and post-NRM support (e.g., employment, education, and opening bank accounts).

Specifically, within this research, micro-level barriers refer to the challenges an individual may face that could make them vulnerable to exploitation or when attempting to leave an exploitative situation. It is also important to note that while all people could face these barriers, the focus of this research is on people who face oppression based on protected characteristics.

Discrimination

Based on the UK Equality Act 2010[6], "A person (A) discriminates against another (B) if, because of a protected characteristic, A treats B less favourably than A treats or would treat others[7]." Based on discussions with our research participants, individuals who experience modern slavery can experience discrimination in a range of factors, including gender, sexuality, age, nationality and class; they often face discrimination and oppression, particularly in their interactions with law enforcement and NRM support systems and beyond. Cultural competency can play a significant role in addressing these barriers and providing equal treatment and respect to people who are being exploited.

Discrimination against migrants

One interviewee highlighted the mistreatment of migrants, especially undocumented individuals, by both local and national statutory bodies, including first responders. For example, participant 2 in our focus group, with individuals with lived experience, reported: "I support quite a few handfuls of Albanian young men and the way they get treated [by the police]…. it's appalling." The participant argued that the "lack of respect" from the initial point of contact hinders trust in the system and makes it difficult for people affected by modern slavery to seek help.

[7] Equality Act 2010

Gender disparities

Gender disparities were also identified by focus group participants, with girls being considered more high-risk missing persons compared to boys. As boys transition into adulthood, participants asserted that they are often framed as criminals rather than people who are being exploited, leading to disparity in responses. Participants in the roundtables noted the absence of a transitional safeguarding framework within the National Referral Mechanism (NRM), which could significantly impact the lives of young people – our participants raised concern about this additional layer of vulnerability. Existing research (MS PEC, no date) has also reported the absence of proper transition to adult services and safeguarding, especially for children with disabilities, increasing their vulnerability to exploitation.

Further, our findings support a charity report (Missing People, 2020) based on freedom of information requests to police forces and local authorities across the UK. The primary focus of the report is on discrimination experiences of people of colour in police responses to missing people; it also provides some evidence of discrimination in media coverage of missing people. The report suggests that missing person cases involving black and Asian people are less likely to be resolved by police than those involving white people. The report also refers to “missing white woman syndrome”: the extensive coverage of white, often middle-class women and girls who have gone missing. Other research (Stillman, 2007; Zack, 2016) has also reported the issue of missing white woman syndrome.

Racial prejudice and adultification of children

Racial prejudice and the adultification of children were noted by our research participants as significant barriers to prevention and receiving support at the point of identification. Research (Stillman, 2007; Zack, 2016) has shown that adultification means risk can be misidentified or exploitation signs can be missed. Participants also stated that, in their experience, non-white children, particularly those aged 16 and 17, are often treated as adults and arrested instead of being protected. Black boys, for example, are labelled as offenders, troublemakers, or gang members, which impacts safeguarding responses. Black children are also not considered as high-risk when missing. While research regarding gender and racial disparities within the UK remains limited, the existing research (Stillman, 2007; Zack, 2016) shows the over-representation of people from BAME communities in the criminal justice system as well as their adultification.

Discrimination against LGBTQ+ individuals

Furthermore, LGBTQ+ individuals may face discrimination and unfair treatment by agencies, and one lived experience participant mentioned that they were discriminated against and treated differently because of their homosexuality. They described their experience with law enforcement as follows:

> *When I first went into the police, the two lead officers throughout the case were very supportive, it was the other officers who treated me with no dignity[8].*

Discrimination contributes to disparities in how different groups, including those based on culture, background, religion, nationality, and gender, are treated. Nevertheless, there has been limited research on this area. Further, individuals might be reluctant or uncomfortable criticising NGOs or other first responder agencies due to their charitable status.

In conclusion, cultural competency approaches are crucial in addressing the barriers to people with lived experience of modern slavery receiving support caused by discrimination. The Equality Act of 2010 provides legal protection against discrimination in the workplace and in society as a whole. It is important that law enforcement and support systems receive comprehensive training and education to ensure they understand the UK's legal framework and are able to treat everyone equally and fairly, regardless of their gender, sexuality, age, nationality, or social class.

Additionally, efforts should be made to address gender disparities, racial prejudices, and the lack of transitional safeguarding frameworks within the NRM. Please see the recommendations section at the end of the report for more detailed guidance on roles and responsibilities for implementing these proposed efforts.

[8] The Universal Declaration of Human Rights recognizes the inherent dignity and equal and inalienable rights of all members of the human family as the foundation of freedom, justice, and peace in the world.

Mistrust of authorities

> *If [I] tell my story… If I am honest, would I be punished for being honest (Participant 3, FG-LE)?"*

According to policy documents, mistrust of authorities is considered an indicator of victimhood (Home Office, no date). It is also seen as a hindrance to the development of trust between practitioners and people who have experienced modern slavery, where trust can prevent further exploitation (MS PEC, 2023). The importance of addressing mistrust is emphasized throughout the Trauma-Informed Code of Conduct (Witkin & Robjant, 2022) developed by the Helen Bamber Foundation.

Research participants also put forward the argument that mistrust of authorities in both the individuals' home country and the UK context poses significant barriers for individuals who are being exploited. This mistrust stems from a variety of factors, including corruption and discrimination in the individuals' country of origin, the possible collusion of authorities with traffickers, and a presumption of guilt. One participant explained that individuals fear sharing information due to the potential consequences, such as deportation or punishment. These concerns prevent individuals from seeking help and building positive support relationships with professionals – "there is fear that [if] they come forward, they must be removed somewhere else (MR-LA-3)."

The research participant regarding the possible collusion of authorities with traffickers also argued that:

> *You get shown, you can't do anything to me because look who my friend is kind of thing I'm sat next to the chief of police in Romania, Latvia, wherever it might be, so you often get that. So, therefore, that mistrust of policing is there right from the very start (MR-LA-3).*

Cultural competency can play a crucial role in addressing these barriers. By acknowledging and addressing the mistrust of authorities stemming from their home countries, practitioners can work towards building trust and confidence in the UK. This can be achieved through increased engagement and communication with these communities, as well as providing information about the legal and support systems in place to guide them.

Creating a supportive and empathetic environment is essential, as it allows individuals to feel safe and understood when sharing their experiences. Practitioners should invest

time in building rapport and developing trusting relationships, recognising that this process may take time due to the ingrained mistrust. By doing so, individuals are more likely to open up and share their stories rather than telling law enforcement what they assume is wanted.

Case study 1:

The experience of a Police officer regarding lack of trust due to corruption in the country of origin – R-FG 2:

As a Romanian police officer working in the UK, they've encountered Romanian victims who have a barrier because of the corruption in their home country – she argued that she knows this barrier exists because corruption does exist in Romania. So victims don't easily trust law enforcement in the UK either, and it takes time for them to understand that the police here are different. They argued that this isn't just a problem in Romania, it's common in many other countries where law enforcement is corrupt. By spending more time with the victims, they start to open up and trust you. It might take several attempts for them to finally tell the truth because they often tell law enforcement what they think they want to hear.

Furthermore, efforts should be made to address structural issues that contribute to individuals' fear of authority, such as the fear of being reported to the Home Office and facing imprisonment or deportation. Participants' experiences indicate that providing legal guidance to individuals who come forward can help alleviate these fears. Additionally, acknowledging the threats and coercion faced by individuals and their families was crucial for participants in reducing survivors' fear of authority.

Case study 2:

MR-Ch-1 provided the example of a woman who had been in a trafficking situation for two years, and their constant fear:

> *I recently supported a woman who had been in a trafficking situation for 2 years… I think the main thing was the reporting to the Home Office that prevented her from being able to escape that situation and fear. I mean people are just so frightened, people fear the unknown, they don't have the knowledge that we have about the systems in the UK and the law and everything to guide them….fear of authority seems to be one of the biggest reasons why people don't try to escape or get out of that situation because there's this constant fear.*

In summary, mistrust of authorities in both the individuals' home country and the UK presents significant barriers to engaging with relevant bodies and disclosing their experiences for individuals who are being exploited. Cultural competency approaches can help address these barriers by building trust and confidence in authorities. This can be achieved through increased engagement, communication, and creating a supportive environment that promotes open and honest dialogue. Efforts should also be made to address structural issues, such as the fear of deportation, to alleviate individuals' fears and encourage them to seek help and bring perpetrators to justice, which we explore further in the section on macro-level barriers.

Being unaware of rights and existing support

> *The principles of NRM are not ideal by any means… As a concept, it is quite a difficult thing for people to understand. So if you are from a culture where the government does not necessarily step in and would not assist people, there could be suspicion around it, especially where there is debt bondage (MR-LE-1).*

During the interviews, participants reported that they had heard of anecdotal instances[9], where young Vietnamese individuals (who had experienced debt bondage and were in or went through the NRM) ran away from foster homes as they had assumed that by staying there, they were accumulating more debts that had to be repaid. People do not always comprehend their rights or how the system works, as noted by participant 3 in the lived experience focus group: "I would think it's the fact of not knowing what you will meet on the other side." It is important to note that, as discussed in macro-level barriers, there are instances where the lack of structural competency and the government systems, including the NRM system, have failed to support individuals with lived experience of modern slavery. So, individuals who are already apprehensive because of their cultural experience are even more sceptical because of their lived experience.

In our lived experience focus group, participant 4 provided a thorough explanation of her experience after exploitation, and how she would oppose receiving any help at the beginning – she had assumed that she would not be eligible for any help whatsoever due to her status in the UK. But she had agreed to receive support as soon as she heard the Salvation Army provides the support. This point strongly highlighted that an individual's knowledge of their rights and available support can make a difference in the decisions they make:

> *She said can we accommodate you? I openly told her, look, you can't because I'm not documented… I'll be in trouble with Home Office… then, they said Salvation Army will accommodate you. Because I know Salvation Army accommodate people… I said okay … they give me £65, and then I will say no, I can't because I'm not documented (Participant 4, FG-LE).*

R-LA-3 also argued that "if somebody comes from a culture where there aren't community resources, social services…, would they know that if they went to their GP or they went to a clinic, for example, they could be asked to be referred to or seek support from Adults or Children Services." Based on the findings, providing such knowledge could potentially prevent further harm from happening. Additional research could reveal the correlation between re-exploitation and other forms of further harm and a lack of knowledge.

[9] This may have resulted from participants' mistrust of the researchers they spoke with, and they may have felt more comfortable sharing their stories in the third person.

The participants suggested that there should be more education of rights and entitlements for survivors[10]– people who are trafficked are vulnerable and do not have accurate knowledge about the systems available to support them, such as the NRM. They stated that they need to know about their protections under the law and what help is available so that if they become trapped in an exploitative situation, it is more likely that they will trust authorities and seek support (MR-Ch-1). This participant highlighted the necessity of people's knowledge about their rights to be able to look for and access support. The lack of awareness of support or of how to access their rights is explained further in the next section.

Language barrier & no interpreter

> *Language is always a barrier" which adds to frustration and nervousness (MR-LE-2).*

Language is a major barrier for individuals who have been exploited and are seeking support. This barrier causes frustration and nervousness, making it even more difficult for people who have been exploited to access the help they need.

Case study 3:

MR-Ch-1 shared an example of the challenges faced by a Vietnamese survivor who has been living in the UK for over 20 years – during several of which he was being exploited. When he left hotel accommodation, MR-Ch-1 supported him online to access housing and a bank account – even opening a bank account was not a straightforward process for him. She advised him to go to a bank and sent him a text message to show the bank teller that he did not speak English. However, the bankers he encountered were unhelpful, ignorant, and disrespectful towards him, MR-Ch-1 argued. Despite visiting multiple banks, he struggled to open a bank account until he finally found a helpful one after a few days of running around and MR-Ch-1 contacting the banks to assist him in the process. MR-Ch-1 argued that the process of applying for Universal Credit was also quite difficult. This happens because places such as banks and the Job Centres do not always have interpreters available.

[10] Education often comes as a key theme in research around people's vulnerability to exploitation. However, the extent to which education can be helpful where there are systemic or structural issues is worth being explored.

The case study above shows how mundane tasks can become impossible without culturally competent services. Services often assume that individuals can bring family members who speak English, including children (Oznobishin & Kurman, 2016), but this is not always the case for people who have been exploited and who are generally alone or with young children. Moreover, there were anecdotal instances where services reserved the right to refuse a client or customer if they had not brought a translator with them (Griffiths & Trebilock, 2021). Additionally, based on our findings, people may receive "random calls" about their cases from first responders without understanding the information or appointments being communicated. This lack of communication support can significantly impact their ability to navigate the systems they are involved in, leading to missed opportunities and important information and the potential for re-exploitation; traffickers can use the uncertainty or missed communication to their advantage.

Furthermore, the disjointed nature of service providers can contribute to the re-traumatisation of people who have been exploited, e.g., individuals with lived experience have to tell their stories multiple times. This lack of coordination and communication among various support services can exacerbate the already challenging experiences of individuals who have lived through modern slavery. This challenge extends beyond those with language barriers, with British national participants in the project also reporting confusion and uncertainty after being referred to the National Referral Mechanism (NRM) due to the complexity of the process.

To address this barrier and provide effective support, a culturally competent framework is crucial, which ensures that the information is available in a range of languages and can be interpreted to stop language from being a barrier to accessing support. As case study 3 shows, limited access to essential services post-NRM might delay an individual’s integration within society. Hence, the framework should prioritise the availability of interpreters in all stages of NRM support as well as essential services like banks and Job Centres post-NRM, ensuring that survivors have equal access to support and information. To do this, assisting access to essential services for other aspects of their lives post-NRM could be within the remit of statutory and non-statutory organisations.

Shame[11]

One individual from the Netherlands shared their struggle with "shame" due to the existing taboo regarding sex work:

> *I'm Dutch… this is a word I really struggle with… because prostitution is legal in Holland. I was also extremely embarrassed by that because people would have thought, 'well because you're Dutch, it's going to happen to you'." Definitely not professional services. Probably just people around. It just implants something from society that makes you more reluctant to act upon it (Inv-3, Lived experience).*

This example highlights the need to understand the societal context and its impact on creating shame. It also emphasises the importance of ensuring that services are designed to address the specific needs of individuals.

A participant mentioned the significance of addressing shame through dedicated training courses for modern slavery practitioners, particularly for women from countries like Albania and highly religious countries such as Pakistan. Shame was identified as a major obstacle preventing people from seeking support. For example, shame within Vietnamese culture could hinder individuals from discussing their experiences of exploitation, as it may be viewed as bringing shame to their family.

> *So the Vietnamese culture is very much about talking about success and achieving and making money, not talking about where things have gone wrong and potentially where they might perceive that they are bringing shame on the family (MR-LE-1).*

Considering shame as a significant barrier, it is essential to conduct further research to gain a better understanding of how it manifests among survivors of modern slavery from different countries. This research can shed light on how shame impacts their ability to report their experiences and seek help. Furthermore, culturally competent practices can play a vital role in addressing these barriers effectively.

[11]. The Inclusion of this section in our report should not be misunderstood as stereotyping certain nationalities and communities. This is not our aim. We understand that Shame is arguably understood, interpreted, and experienced in various ways. It depends on an individual's positionalities, including the cultural lens through which they experience the world. For more details, see Abu-Lughod, L.'s (2015) book about Muslim women.

As shame can stem more from certain backgrounds, it is important for service providers to understand which nationalities are impacted by modern slavery in different regions across the UK so they can understand the barriers to potential survivors engaging with their service. This knowledge will help them develop targeted strategies to address the specific challenges faced by survivors of each nationality, such as shame. By overcoming shame, survivors will be more likely to report their experiences, which will lead to more effective prevention and support services. However, it is important to be culturally competent in this approach to avoid stereotyping and stigmatization. We will explain this point further in the following sections.

It is important to note that shame, in comparison to other barriers, is more internally facing. Although shame is also impacted by external factors, as outlined in this section. While other barriers were about how a service provider and law enforcement bodies' immediate attitudes, behaviours and policies facilitated or hindered individuals' access to support, shame tends to be concerned with perception and how that influences the decisions they make, which could be rooted in individuals' past and childhood rather than the law enforcement bodies' current attitudes, behaviours and policies. Shame is a barrier, hence highlighting the importance of not treating groups from one community as a monolith. The prevention of such barriers might also require fundamental and structural changes in the care provided to children in the UK and beyond. People's challenges in seeking support are inevitably linked to meso- and macro-level barriers, which are explained next, respectively.

Barriers at the Meso-level

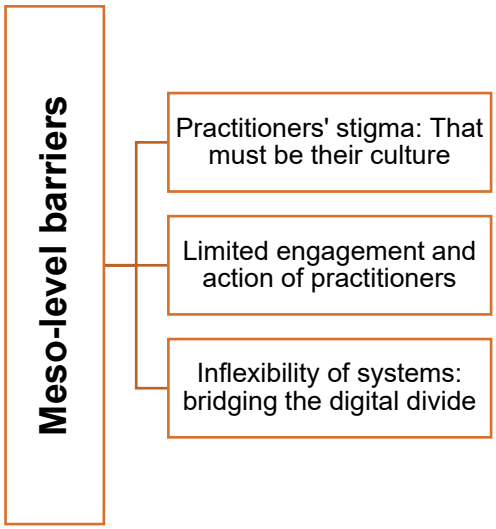


Figure 3 – Meso-level barriers

While our discussion primarily focused on barriers at the micro and meso levels, it is important to note that our intention has been not to shift blame onto individuals. Instead, we aim to highlight how institutional structures can restrict access to necessary support.

Practitioners' stigma: That must be in their culture

> *We make [a survivor] into a typical person, and we don't look at the other things that might be going on with them and what's put them in that position (participant 4, MR-FG 1).*

Stigma[12] hinders our ability to understand the complex factors that contribute to vulnerability and exploitation. Instead of reducing individuals to labels, we must recognise the multiple issues they may be facing. However, there are instances where services fail to provide culturally competent support and overlook potential opportunities

[12] It is also important to note that stigmas and stereotypes may not always seem negative. But even rather positive ideas of work ethics and hard work, which are associated with some racial groups, could be damaging. However, the research participants often brought up the negative examples.

to prevent harm. This is evident in the experiences shared by participants in the discussion groups.

Professionals' stigma about certain groups of people can impact the plans that they put in place for individuals. For example, a focus group member, MR-FG 1, shared how hospital treatment for vulnerable individuals could be an opportunity to support them and prevent further harm. But when it comes time for discharge, there is sometimes a hesitance to support them as they may be deemed unfit for certain areas or communities because of perceived issues with them or their behaviour. One of the participants in the focus group described this situation as "trying to fit a square peg into a round hole."

Further, participants highlighted that even certain geographical areas are stigmatised and overlooked for interventions: "'Oh, well, what do you expect it is that area'. There is a cultural expectation that if it [exploitation] is going to happen in that area … it's that area. That's what you expect. Don't go down this area'." (Participant 4, MR-FG 2). This narrow perspective on certain geographical areas perpetuates problems faced by individuals living there, such as the prevalence of drug misuse and homelessness. It is important to address the underlying social problems such as poverty, inequality and access to education rather than simply accepting issues such as drug misuse and homelessness as the norm of a community – stigmatising. Such issues might be community-wide but structural and could be outside of individual control.

Stereotyping and prejudice also play a role in perpetuating stigma. The research participants emphasised that certain nationalities and communities, such as the Roma and Albanian communities, are over-criminalised and over-policed and "plays into how hard people are prepared to engage those communities beyond the criminal justice system (M-LE-1)". Comments made by politicians can reinforce negative stereotypes and further marginalise these communities. Participants refer to how comments made about Albanians by former Prime Minister, Rishi Sunak, and former Home Secretary, Suella Braverman, could perpetuate stigmas. For example, Prime Minister Rushi Sunak made a statement to the parliament on "illegal immigration", singling out Albania (Walsh & Oriishi, 2023). In 2022, the Albanian ambassadors to the UK called for an end to the "campaign of discrimination" and warned against reinforcing negative stereotyping, stating that Albanian children face racism and bullying because of the debates about the small boat arrivals (Guardian , 2022).

The case study from another area provides an example of how a lack of cultural understanding and stigma by officials can hinder access to support for survivors of

exploitation. In this case, police officers dismissed domestic servitude as a cultural practice without recognising it as a criminal offence. This kind of bias and assumption based on cultural practices can oppress individuals and prevent them from receiving the help they need.

Case Study 4:

The interviewee provided the example of women who were brought to the UK on Spousal Visas, predominantly from Pakistan and Bangladesh. She stated that the issue is not unique to the rural area, but this was where the initial investigation began. These women come and live in the family home, often with multiple generations, expecting a traditional arranged marriage, and actually, “what transpires is you are our slave.” She explained that the lack of cultural understanding of the first responders hindered survivors’ access to support because they interpreted signs of exploitation as cultural norms. Consequently, she and her team have delivered a lot of training and awareness raising activities, and one the things she used to be confronted with was police officers predominantly saying, ‘it’s their cultural practice, and it’s acceptable in that culture,’ and without recognition that domestic servitude is actually a criminal offence amounting to modern slavery. The research participant described the situation as almost perpetuating that exploitation by setting different standards in terms of people from different cultures, depending on their own preconception is on what the kind of cultural norms are (MR-LE-1).

It was also noted in MR-FG 1 that similar biases and assumptions are present in the treatment of the traveller community. Common beliefs about their way of life and lack of engagement with authorities – that they “almost police themselves if that’s the right terminology (MR-FG 1)” – also perpetuate systemic oppression. As a result, when someone from the traveller community is presented as someone who is being exploited, participants stated that the argument often arises among service providers or police officers that ‘you can’t be because that’s the way that community is’. This has led to (and is evidence of) systemic oppression as these assumptions have been ingrained in generations of understanding or misunderstanding. In some cases, participants reported people receiving Negative Reasonable Grounds decisions from The Single

Competent Authority because they argued that it is a cultural phenomenon due to “the cultural kind of blinkers”.

Another example from a rural area showed assumptions about cultural norms can enable exploitation. There was reluctance to intervene or question individuals' living conditions and access to health and social care. This acceptance of cultural differences can delay the identification of exploitation and harm and further isolate vulnerable individuals[13].

Case study 5:

“This case happened in a rural area in relation to modern slavery where there was an individual with learning disabilities who was being exploited on a farm. They had fallen, broken their shoulder bone, and they came into the hospital with some people claiming to be his friends. The “friends” didn’t leave the patient at any point. They stayed at their bedside throughout. Then, when they were well enough to be discharged, they were supported with immediate discharge and said they would follow conservative management. They were offered follow-ups by orthopaedic services, but they declined that follow-up on behalf of the patient. They were saying that they were his friends, but actually, they were the people who were employing him. Still, they were saying that they do all the care. *Because of their geographical area, living in rural location, it was accepted that actually, that’s what those communities do, what people in those communities do, provide for their own*. It wasn’t until the gentleman presented about 18 months later with paralysis from the waist down that they called an ambulance, and things were looked into further. They realised that this gentleman had been exploited and was continually being exploited. When they looked at his living conditions when the ambulance came to pick him up, he was living in a piggery like an outside shed that would have been used for pigs. There was no heating, he didn’t have free access to any bank accounts, and he didn’t have the means to live as a human, really.”

[13] Conservative management in case study 5 refers to “non-invasive procedures (i.e. surgery). The consultant may offer a watch-and-wait approach to see how one manages or to monitor how one's condition progresses. They may be advised to take analgesia (pain medication) or offered physiotherapy/hydrotherapy (University Hospitals Bristol and Weston NHS Foundation Trust, no date).

It is crucial to acknowledge and address biases that professionals may have, as they can hinder their understanding and response to potential victims. Stigmas that assume someone has come to the UK for a better life or that certain behaviours are part of their culture are biases that could impact the prevention, identification, or support of someone with lived experience of modern slavery. Sometimes participants articulated stereotyping and stigmas as "unconscious biases". However, it is important to note that presenting biases as unconscious can create a non-blame view and lead to a normalisation of prejudice[14].

It is essential to challenge these biases and promote cultural competency in professionals. This is neither an easy task nor a silver bullet. But it could be a step in the right direction. There are already individuals that try to encourage the people they work with to do so. For example, one interviewee, MR-LA-2, argued that persuading individuals she works with to see people as vulnerable people and understand trauma[15] and how it affects people is the biggest challenge for her. Also, as case study 4 showed, there have been some internal training and awareness-raising activities in some organisations to confront colleagues with how their biases can perpetuate exploitation and hinder early identification and prevention of further harm for individuals in an exploitative situation.

Assumptions about cultural norms, as well as fear of appearing culturally insensitive, were also shown to hinder intervention and support for potential victims. The reluctance to intervene because they fear that they might get things done culturally wrong, and so exposing their own ignorance, which can prevent vulnerable individuals from accessing the help they need.

In conclusion, stigma, biases, and assumptions hinder our understanding and response to individuals in vulnerable situations. It is crucial to recognise the multiple issues individuals may be facing and avoid reducing them to labels. Culturally competent support is essential in providing appropriate assistance and preventing further harm. Challenging biases and fears of cultural insensitivity can lead to more effective intervention and support for victims of exploitation.

[14] While unconscious bias has attracted huge attention, its underlying assumption and validity have been called into question, e.g. please see Bourne, J. (2019).

[15] Trauma is an important topic; however, its in-depth discussion is beyond the scope of this research.

Limited engagement and action of practitioners

> *Collectively, I think all we are doing is lifting it [finding cases of exploitation] up … and then putting it back again. That's the prevention that we don't want to address it because we don't know what we're going to find when we uncover it (Participant 2, MR-FG 1).*

Lack of engagement of voluntary and non-statutory organisations in reporting cases of modern slavery is a pervasive issue that stems from several factors. Participants from a voluntary organisation expressed concerns about uncovering uncomfortable truths and potentially damaging relationships with clients or colleagues. This was highlighted by participant 2, MR-FG 1 "In some cases, caseworkers working for non-statutory agencies may be hesitant to report to the police as they could be "scared" that they "damage" their relationship with their clients".

Furthermore, there is a lack of understanding and professional curiosity among some frontline staff regarding their statutory obligations in tackling modern slavery, with some viewing identification and reporting of modern slavery as merely the police's role. "That's not my job. That's the police job, and it's that language all of the time", when they encounter individuals who are potentially being exploited.

> *It's convincing people that they actually have a job and taking a bit of responsibility. It's difficult to get that message to people other than police officers. That's a given for police officers, whereas everybody that sits outside that criminal justice system, it's often difficult to make them appreciate that they've got a role in all of this (MR-LA-3).*

This highlights the need for a shift in mindset and greater awareness of the role of non-statutory organisation staff in identifying and reporting exploitation.

The disjointed approach and lack of collaboration among different agencies and services also contribute to the disengagement. Participants expressed frustration with the fragmented services and the difficulty in finding appropriate support for vulnerable individuals. This often leads to a "ping-ponging" effect, where individuals are treated temporarily and passed from service to service but left without long-term support. The lack of coordination and communication among providers of various services exacerbates the problem and creates a sense of frustration among stakeholders.

It is worth noting that we do not aim to undermine the good practices of many individuals who want to be culturally competent; however, they could be limited by resources and macro-level barriers; there is a need for a whole system change based on our findings – we explain this point further in the macro-level barrier section below. Additionally, inflexible systems can make accessing basic needs difficult and increase vulnerability to exploitation. Addressing vulnerabilities has been automated and commodified, causing individuals, their identities, and backgrounds to get lost within the system. This can lead to a cold and impersonal approach, which is the opposite of the antecedents and attitudes of culturally competent practices.

Inflexibility of systems: Bridging the digital divide

> *Our desire to move people to online services, to access via computers, does not lend itself to somebody who is a potential victim (MR-LA-2)?*

The inflexibility of essential services, such as healthcare and social care, can create a digital divide, making it difficult for certain individuals to access online services. This issue is especially problematic for potential victims of exploitation, who may feel intimidated by the authorities and struggle with language barriers.

The COVID-19 pandemic has accelerated the shift towards digitalisation and online services. While these services offer convenience, they also require digital skills and access to devices like laptops and smartphones. Without these resources, people may have limited access to important services (MS PEC, 2023) and are at a higher risk of exploitation. Research suggests that individuals with lived experience of modern slavery need access to technology, internet safety training, and digital skill development to aid in their recovery and reintegration into society to technology, internet safety training, and digital skill development to aid in their recovery and reintegration into society (MS PEC, 2023).

Lack of tailored services

Even for native English speakers born and raised in the UK, navigating these systems can be challenging. This difficulty could be magnified for migrants with limited English proficiency and individuals with disabilities in the absence of online systems designed with accessibility in mind. Participants in MR-FG 1 shared their experiences of being asked to log into computers and complete forms at the City Council. These activities were expected regardless of whether they could write in English, and no support was

provided. Participants also highlighted the need for tailored services for individuals with learning disabilities, as accessing these services can be particularly challenging for them.

“Hard to reach” groups?

Often, communities at high risk of exploitation are considered “hard to reach”. Hard to reach is a contested and ambiguous term that is commonly used in health and social inequalities discourses (Flanagan & Hancock, 2010). A guide published by Nottinghamshire Country Council (no date) defined hard to reach individuals or communities as those who “find it difficult (or are unable) to take advantage of available opportunities. For example, this could be because of a disability, language or cultural differences, social expectations, time limits or financial constraints (page 4).” The guide stated that groups that are hard to reach may lack confidence in the system, and sometimes hard to reach groups are relatively easy to find – what is more difficult is how to engage with them. Based on our research findings, the assumption that some communities are hard to reach may be inaccurate and culturally insensitive – it could imply blaming on the communities themselves, rather than questioning why services are not easily accessible (Ali, 2020).

Our participants indicated that the problem lies with the inflexible systems that lack the ability to adapt and meet the needs of these communities. Efforts to engage these communities need to be reevaluated and focus on human contact, as participant 2 MR-FG 1 said, “Everything is run via a system that limits you to a certain language – we’re excluding so many people – we need to go back to that human contact, actually having someone there” rather than solely relying on a system that limits accessibility to those who speak a certain language.

Barriers at the macro-level

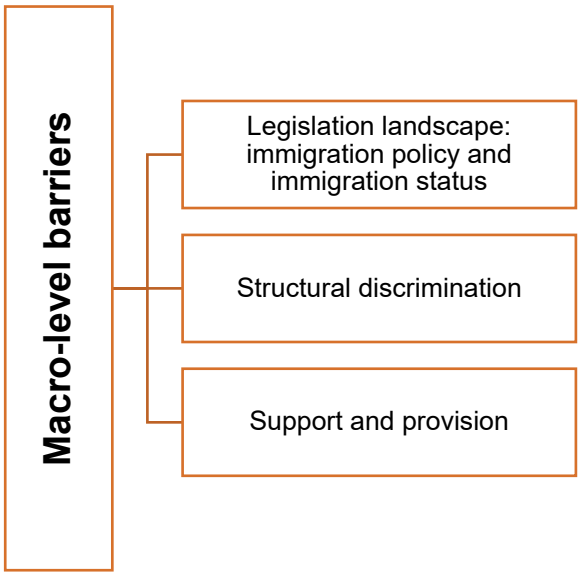


Figure 4 – Macro-level barriers

Legislation landscape: immigration policy and immigration status

Based on the discussion with participants, it is clear that modern slavery is closely connected to the political narrative around migration, i.e., policies that impact people affected by modern slavery as well as those that can perpetuate exploitation. The current policies around modern slavery and immigration were considered "the big elephant in the room", with a massive concern amongst participants about how to genuinely provide support for people affected by modern slavery in light of restrictions imposed by recently introduced policies and legislation. A law enforcement representative from rural/metropolitan area showed concerns around the impact of the Nationality and Borders Act and the Illegal Migration Act[16] on an individual's eligibility for NRM support and Conclusive Ground decisions:

> *The victim is first, and we'll never deviate from that. But you've got to navigate that difficult landscape of new legislation makes all that so much harder.*

[16] The Illegal Migration Act 2023, when the UK has a return agreement with another country or a safe third-country agreement, puts a duty on the Home Secretary to remove everyone who arrived in the UK irregularly, including victims of modern slavery.

She also argued that “they [practitioners] don’t really understand it. So how would somebody in that vulnerable position understand it?” This perpetuates certain “myths” and “fears” that surround ambiguous legislation. “We are trying to get the confidence [user’s confidence] and properly safeguard victims (MR-LE-1)”. She argued that immigration status is the number one challenge that service providers have in building a trusting relationship with potential victims of exploitation (MR-LE-1).

Participants in MR-FG 1 also criticised the politicisation of the issue and the prioritisation of immigration enforcement over the protection of people being exploited. They reported feeling restricted in their ability to offer support to potential victims of modern slavery by red tape and government policies that do not consider their on-the-ground expertise. The question arises whether current policies are being created with cultural competence, as participants perceive that the experience of professionals directly working with people affected by modern slavery is not being incorporated, e.g., the IMA was drafted and passed without ample time for consultation (UK Parliament, 2023).

The primary concern of “an awful lot of victims, if not all of them [is]: ‘am I going to get deported, what is going to happen to me?’ Probably with debts to pay and still in that position of needing to send money home or pay off debts in some other way, and the shame factor of being deported and all those other things” (MR-LE-1). Temporary permission to stay for victims of human trafficking or slavery is provided for by the Immigration Rules and the Nationality and Borders Act, but very few people can be eligible[17], and the recent media report around the Home Office’s secret policy to withhold leave to remain from victims of modern slavery (Lenegan, 2024). Given this context, a participant from law enforcement, MR-LE-1, suggested that it might not always be sensible to tell the potential person affected by modern slavery to be referred to NRM because of risk of deportation:

> *Come onboard with our investigation, come and help us and look what we can offer you, here is your British passport[18] within your hand within six months; it is not going to happen (MR-LE-1).*

[17] Please see the following link for more information: Home Office (2023).

[18] It is important to clarify that Temporary Permission to Stay is not a British passport or citizenship; it is a form of limited leave to remain.

Their immigration status has facilitated exploitation for victims, considering the absence of rights (Broad & Gadd, 2023) for undocumented workers within the UK, and continues to hinder their access to support, as they might not want to leave in an exploitative situation if they were going to be deported – macro-level barriers and structural issues hinder early prevention of harm.

MR-LA-3 called for the reform of some legislation and structures pointing to the public stance of the Welsh Government against the Illegal Migration Act (Hutt, 2023). This interviewee argued that the "UK legislation and some very systematic structures definitely are not the best and could be reformed." They referred to the Nationality and Borders Act, the National Referral Mechanism itself (and how long it takes for survivors to receive a Conclusive Grounds decision), and the Modern Slavery Act. They suggested that the legislation and systems should be more survivor-focused rather than producing structural vulnerability. Indeed, policy changes are needed to move towards structural competency; however, structural discrimination continues to exist and fuels some of the existing vulnerabilities.

Structural discrimination

Structural discrimination greatly impacts the experiences of survivors of modern slavery. One participant shared their observations regarding individuals with positive Conclusive Grounds decisions being swiftly deported after their asylum claims were rejected. Blaming news channels and social media for making it challenging for trafficked individuals from Albania to receive the necessary support, they highlighted how negative perceptions and treatment drove these individuals underground – the practitioner here assumed that the structural discrimination would stop individuals from seeking support and they chose to live in the UK undocumented.

Similar concerns were raised by interviewees in the focus groups with practitioners, who believed that the governmental approach towards migrants contributes to prejudice against Albanians. M-Ch-2 argued that "Albanians are the highest nationality that they are recording figures for those that are exploited[19]". M-LA-1 also called into question the "very negative political agenda" toward migrants, which is affecting the responses of law enforcement bodies to modern slavery for foreign nationals, e.g., it has resulted in

[19] Albanians made up the highest proportion of NRM referrals in 2022 (Gower & Sturge, 2023).

Albanians being viewed as involved in drug dealing rather than people who may be exploited. In micro-level barriers, we explained how discriminatory behaviour of practitioners could hinder individual access to support; this section and the argument put forward by M-Ch-2 show that such behaviour could be reinforced by structural discrimination. This suggests the possibility of a vicious circle whereby individual-level discrimination of senior-level officials could lead to structural discrimination, and structural discrimination and the policy and legislative response to modern slavery and migration can lead to individual-level discrimination.

In the rural area, a participant, R-Ch-1, recounted a distressing incident involving an Albanian woman who had been trafficked to the UK but feared deportation due to her rejected asylum claim. The participant noted that, in her professional experience, the current political environment surrounding immigration, asylum, and small boats has instilled fear in genuine victims of modern slavery.

These research findings highlight that the current political agenda focused on immigration enforcement and deterrence policy complicates the understanding and access to support for individuals who have experienced modern slavery, particularly for those without legal immigration status. For individuals already vulnerable to exploitation, this heightened fear and uncertainty can be extremely daunting. The following section expands on the issues surrounding inadequate structural support and provisions. It is important to note that while some of the cases mentioned may not meet the threshold for modern slavery, they have been included to provide a comprehensive view of broader available support beyond the NRM.

Support and provision

The government's NRM support policy is overwhelming and difficult to navigate. Professionals expressed frustration and disappointment with the lack of structural competency within the systems and believed that the NRM was insufficient in addressing underlying vulnerabilities. They also referred to the difficulty some individuals have accessing decent work because of their immigration status within the UK.

Case Study 6

> *"I was drowning in this so-called support policy from the government. And when I say drowning, it did feel like I was drowning. I was just trying to get to swim to the surface of the ocean. I could see the surface, but I could never reach the surface, and I was drowning what made me think about people that are being brought over here for a better life and not getting it. Imagine how they felt. It just petrified me for other people, so the support was just appalling (Inv-1, Lived experience)."*

Case study 6 shows the support provided via MSVCC for our participant with lived experience of modern slavery; rather than helping them to recover from the trauma they had gone through, the inadequacy of the support had possibly, at best, delayed their recovery, and at worst, had re-traumatised them.

Case study 7 and other examples we included in this section are concerned with situations of exploitation that might not meet the threshold of modern slavery. So, the lack of support refers to the absence of basic rights, e.g., minimum wages and limited access to local services or access to council housing or universal credit. Case study 7 and the quote reveal not only the structural issues and the limited rights entitled to some individuals living in the UK due to their immigration status but also the potential biases and stigma of some research participants. While recognising, understanding and challenging the existing structural issues is crucial for creating positive change, the conclusion brought forward by MR-LA-1 in the example below can risk making exploitation normalised (please see Case Study 7).

Case study 7:

"Literally, if we go, we're going to remove you from the nail bar… we can't actually give them a better life by putting them into the NRM because actually, whilst we're taking them out of that, do you know what else, we're not actually giving them a job, we're not doing anything like that… we'll take you out of that we'll give you a bit of support or your support ended, you know good luck. Do you know it's not, it's better than nothing but it's no better necessarily, they're probably better off staying where they are, paying off that debt (MR-LA-1)."

R-FG-2 made a similar point: "Ultimately, financially, if they [people being exploited] are debt bonded or the money is going back to family at home, they don't really want to be in the position where they're going to lose that employment. So, they're walking a very fine line, really."

Our project echoes previous research findings (OHCHR, 2020; Reliefweb, 2019; US Department of State, 2021) that individuals may willingly take on exploitative work due to limited options and economic necessities – due to structural inequalities and systemic racism. R-Ch-1 gave the example of a Romanian woman working in a car wash along with her husband:

> *I was worried that she's standing out there in the rain washing a car but she's told me this is a better life than back home and so and I've said it already to you I think many of my contacts that I've known over the years would love to come and just work really, really hard to raise enough money and I know families that have left Romania and gone to Italy for example, yeah definitely exploited but definitely not trapped. Not had their passports taken off them, not getting beaten up but there's this fine line as to yes they are being treated badly but they're willing to do it.*

This example, similar to Case Study 7, also reveals both structural issues and the potential biases of research participants themselves. When faced with structural inequalities that are so deeply entrenched, practitioners may be led to the misguided conclusion that individuals who have endured modern slavery and human trafficking were in a relatively better position when they were being exploited, as they were, at the

very least, earning some income, however unacceptable and abusive the conditions. This perspective, which has arisen from witnessing the lack of viable alternatives faced by survivors, underscores the imperative need for comprehensive, victim-centred support services, economic empowerment initiatives, and societal reforms to dismantle the root causes perpetuating vulnerabilities to such practices.

Further, it is important to note that being a victim of modern slavery does not necessarily mean physical confinement. Instead, it can involve coercion, threats, deception, or abuse of power. This is different from situations where individuals voluntarily engage in exploitative work due to limited choices (the cases mentioned above). There are three key experiences at play here: (1) decent work, (2) exploitation or exploitative practice (3) modern slavery. The cases brought up by our participants are still important as they are evidence that some communities in the UK have less access to decent work due to their immigration status or education.

The findings contribute to a growing body of literature (Singh, 2022) generating an increasing amount of evidence on the linkages between current immigration policies, the political narrative around migration, and vulnerabilities to exploitative practice, including exploitation amounting to modern slavery. The prioritisation of immigration enforcement over the protection of individuals in an exploitative working condition and the complexity of new legislation poses challenges to providing NRM support to people affected by modern slavery. The fear of deportation and the negative perceptions surrounding immigrants hinder their access to support and can contribute to their continued exploitation.

It is a challenging situation, but raising awareness and addressing these issues are promising steps towards achieving cultural and structural competency. The next section will delve deeper into these findings.

The value of cultural and structural competency in practice

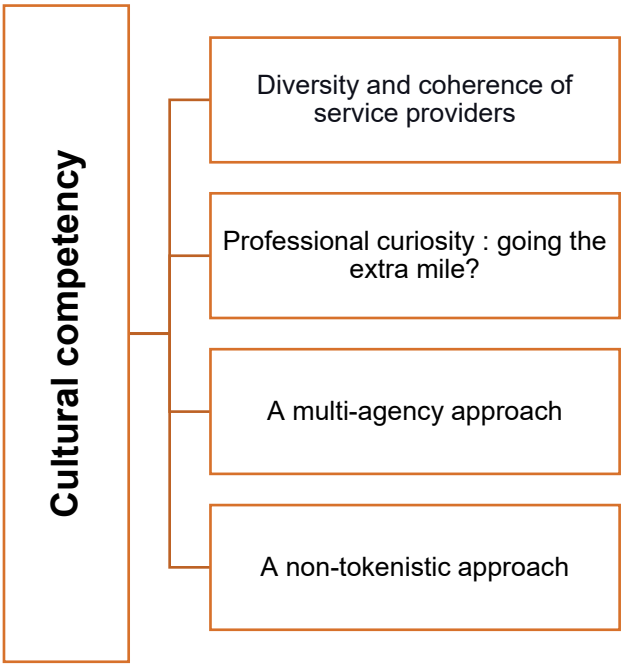


Figure 5 – Cultural competency

> *We're kind of this old Victorian building that doesn't change very much, and we need to change because only then will we have a better cultural awareness of how that change has impacted our city, and we can then respond to that differently (MR-LA-2).*

Cultural competency was a new topic for most participants, and during data collection, they tried to make sense of it and understand how it could enhance modern slavery responses by considering the existing barriers. M-Ch-3 argued that it is an ongoing question within their team how to define cultural competency in the first place:

> *Is it like someone knowing about every culture, or is someone's ability to listen to every culture?*

By listening to every culture, the participant possibly meant attentive listening, which is a cultural competency attribute. Some participants emphasised the importance of learning about different cultures, while others raised concerns about how to achieve this. For some, cultural competency meant being open-minded, compassionate, and

curious, as well as having the ability to listen actively. For example, R-LA-1 defined cultural competency as:

> *...the ability or competency of an individual or an organisation to recognise, to display empathy for the different cultural factors that might influence how modern slavery represents in the context of modern slavery. Recognising the diversity of factors of people out there and also tackling inherent assumptions and tackling forms of discrimination, negative perceptions and forms of involuntary bias that might exist.*

While highlighting some of cultural competency's importance and attributes, such a definition could lead to a superficial level of understanding.[20] Nonetheless, cultural competency cannot be achieved without such elements.

The rest of the report highlights the findings regarding what cultural competency (and structural competency) meant to our research participants and how it could prevent modern slavery and improve the responses and support available to those with lived experience of modern slavery.

Inclusivity and diversity of service providers

Based on the findings, achieving cultural competency requires diversity in staff. While inclusivity and diversity can improve responses to modern slavery, it is not a straightforward issue with a one-size-fits-all solution.

[20] This could be driven by the desire to appear socially desirable. Simply knowing cultural differences is not enough to improve relationships with people from different cultures or reduce racial, ethnic or cultural discrimination.

Represent the community that is being 'served'

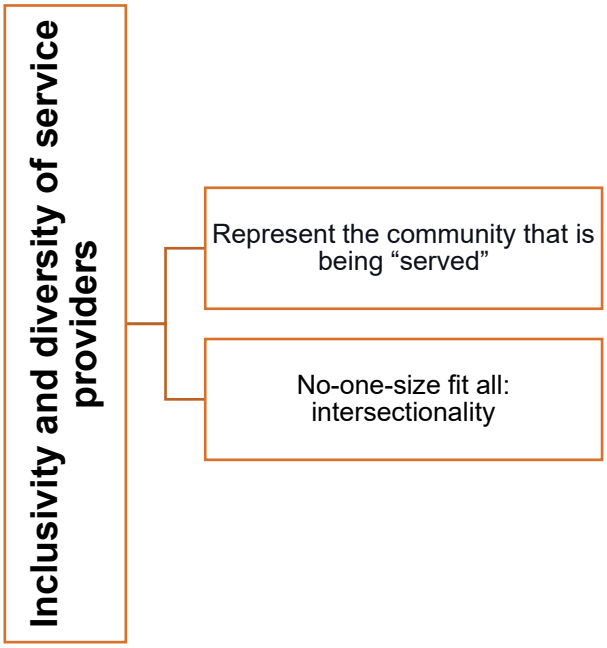


Figure 6 – Inclusivity and diversity of Service providers

> *The services need to be more inclusive; they need to recruit and employ more staff from diverse backgrounds, particularly reflecting the countries that people are from in the community that they're working with (MR-LA-1).*

Research participants emphasised the importance of having staff from a diverse range of backgrounds. This included examples of team members having specific knowledge of local communities that they were a part of and being able to build rapport with members of these communities. In doing so, they were able to better identify potential victims of the micro-level/individual barriers to engaging with services, such as the police, as shown by the example below:

> *He [the worker from Eastern Europe] has done nothing for my figures[21] because he's found lots of Eastern Europeans that we did not know were rough sleeping (MR-LA-4).*

[21] The individual they recruited was able to build rapport with the Eastern European community in the M/R area, and as a result, many cases of people in vulnerable situations, particularly rough sleeping, were revealed.

Diversity can also help build trust and rapport, as demonstrated in case study 8, where a community representative made a positive impact.

Case Study 8

And I remember even when I was back in [police] uniform and still having that uniform, that kind of makes them keep a distance. Just explaining that, look, I know I'm Romanian, and I'm in the police here and trying to explain that we work differently than back home. It just made them literally, even though I spent in that first meeting, I spent six, or something like that, hours with the victim, they actually opened up. And it happened so many times when they actually told me, well, if you weren't here, I wouldn't have spoken with your colleague sat next to you who was British…. explaining that, look, your exploiter made threats that they know someone in the police, it doesn't work like that and trying to explain the process. Then even more so explaining what's going to happen next and just, you know, like all the support and everything and if they want to go back home, obviously, you know, they have the decision, you know, they can make the decision themselves. But I think it helped a lot having myself or you know any other like Romanian, especially in law enforcement, and speaking with them and explaining the process.... (A female Romanian Police Officer).

Despite the positive examples, most interviewees expressed disappointment with the lack of diversity within their teams, both in terms of staff and senior leadership, and recognised that this lack of diversity can hinder the ability to effectively serve communities and understand their unique needs. Moreover, some interviewees have faced resistance to employing people with diverse backgrounds. Participant 5 in MR-FG 1 manages a specialised team that works with women, and she recently introduced a male worker, and “everyone really doesn’t like me for it”. They further argued that “…but it is not about us as what we want; it’s about our women and about giving them a choice and not making the assumption that they want to be managed by a female worker, and my male staff member now had a waiting list.” Similarly, Participant 2, MR-FG 1 argued that she managed to introduce a man into the team and “you would have thought I’d have committed the worse crime ever… it’s boundaries.” These examples also show

that the concepts of inclusivity and diversity should be understood as broadly inclusive paradigms that go beyond narrowly defined group identities.

While diversity should be embraced, it's important to recognise that diversity alone is not enough. Prejudice towards individuals from one's own country can still exist – this can be a result of the pervasive media and government messaging around migration and modern slavery. For example, participant 4 in MR-FG 2 mentioned this concern:

> *He's a Lithuanian guy, a great guy doing really well, but he's not a fan of the Lithuanians…it must be ideal having you breaking down that language barrier and he says 'oh I'm called on all the time… but they're all wasters, I say to them why are you here... they're here for benefits.*

Furthermore, diversity should not lead to a culture of "us" and "them", i.e., advocating for diversity only for the sake of diversity, but the characteristics that make someone culturally competent need to be underlying values. Interviewee, R-Ch-1, explained there is such a risk[22]. It should also be noted that the success of the Romanian police officer in building relationships (Case Study 8) is linked to their cultural competency attributes, including passion, curiosity, and listening skills.

No one size fits all - intersectionality

There is also a need to consider intersectionality when providing support. Vulnerable individuals are often disadvantaged in multiple ways. For example, "the fact that you are Polish does not lead you down that path of being sexually exploited – the circumstance in which you find yourself. Drug and alcohol dependence and homelessness could all be part of that" (Participant 1, MR-FG 1). Drug and alcohol dependency and homelessness are vulnerability factors that perpetrators of modern slavery are known to exploit. It is important for those working to prevent modern slavery to understand how these vulnerabilities can intersect. Such vulnerabilities, as well as individuals' unique circumstances, must be taken into account when allocating support workers.

> *You've got the cultures' culture, you've got the tribal culture, you've got the family culture, and then you've got the individual culture. That can be very different; even within the same family, there are different attitudes; within the same tribe, there are*

[22] Considering that even the question of "where are you from" has sometimes conveyed such an idea: us vs them.

> *different attitudes, and within the same, you know, yeah, and people aren't the same people. The person who left Sudan, for example, or Afghanistan, is not the same person who arrived in this country, and it's not the same person […] in 10 years' time people, change their attitudes, change their understanding, change their experiences, change* (MR-Ch-3).

Further, culture is dynamic and individual, and it's crucial to recognise and respect these differences. Individuals who have experienced exploitation should not be seen as homogenous groups, even if they are from the same country. On the surface level, this might make the success of any prevention initiatives more challenging because authorities cannot make assumptions about the vulnerability of populations or groups. However, if prevention focuses on addressing structural issues and macro-level barriers that produce vulnerabilities, such as immigration policies and legislation. Then, at the micro-level, each person's experience can be considered individually. This means that practitioners should undertake individual assessments where they understand a person's circumstances, and support should be tailored to the individual's needs.

It is important to approach cultural competency with professional curiosity and avoid making assumptions based on someone's culture or norm. As explained in the next section, being professionally curious[23] could help safeguard when needed rather than consider a situation as somebody's culture/ norm within a community. This requires time, resources, and a willingness to understand each individual's unique circumstances.

It's important to emphasise that the practices discussed in this topic are not a cure-all solution. Treating them as such would reduce them to mere buzzwords without any meaningful impact. As we have previously explained, there are structural barriers that contribute to vulnerabilities, and it is crucial to re-evaluate these barriers. A practitioner cannot be held responsible for lacking professional curiosity if they do not have sufficient time and resources. Moreover, adopting technology to automate practices and restrict practitioner discretion, as seen in the probation setting, can also contribute to these barriers. Furthermore, there is a lack of research on concepts like professional curiosity, its effectiveness, and the challenges and barriers associated with it. Therefore, conducting more research would provide much-needed clarity and enable us to evaluate

[23] Professional curiosity is defined as the ability to explore and understand what's happening within a family, seek evidence, and remain sceptical and critical, with a focus on risk assessment and management. In England and Wales, probation, and social work sectors, professional curiosity has been used by professionals to assess risk and support change in people's lives. (Philips et al., 2022).

its effectiveness in practical contexts. The following section will delve into our findings in greater detail.

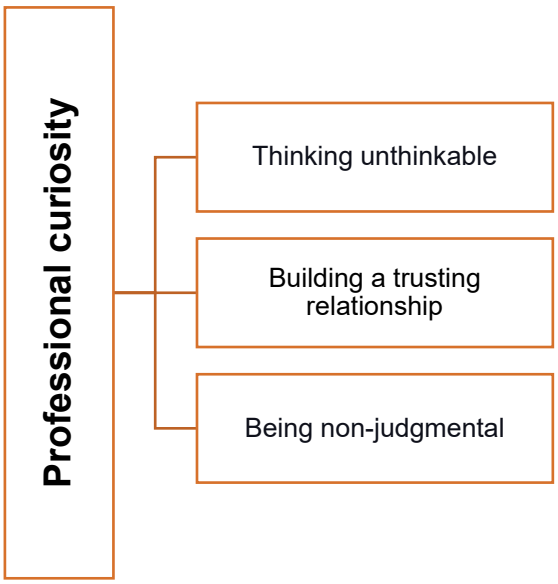


Figure 7: Professional curiosity

Professional curiosity: Doing the extra bit?

Thinking the unthinkable

> *'I've been affected by modern-day slavery, can you help me?' it [survivors self-identifying as such] never happens (MR-LA-4).*

Professional curiosity has been defined as the capacity and communication skill to explore and understand what is happening rather than making assumptions or accepting things at face value (Philips et al., 2022). Our participants emphasised that Professional curiosity is about thinking the unthinkable, thinking out of the box, and then acting on that knowledge. Our participants recurrently mentioned this term as a necessary tool for not only risk assessment but also for building relationships with people with potential lived experiences of modern slavery and exploitation. For instance, an interview (MR-LA-4) described it as being inquisitive and curious – the skill set around having curiosity, thinking out of the box, and using professional curiosity (MR-LA-4). Be professional and curious about the circumstances people find themselves in, MR-LA-3:

> *I am asking really difficult questions of you; I'm being really nosey; I'm being really professionally curious as to what journey you have been on that brought*

you here now. So, I understand the trauma, the potential trauma that you've gone through...

One participant emphasised the importance of avoiding a narrow perspective and recognising the cultural factors that may influence individuals' behaviour. For example, low attendance in education among Roma children may not indicate a lack of prioritisation but rather a cultural norm of keeping sick children at home. Professional curiosity allows professionals to challenge assumptions and better understand the context in which actions occur.

The significance of professional curiosity was also highlighted by a focus group in the rural area. They emphasised the need for training and awareness to foster curiosity about potential underlying issues. This proactive approach helps professionals recognise when something seems amiss and encourages further investigation to ensure the right actions are taken.

Unfortunately, some research participants expressed concerns about the indifference and lack of curiosity exhibited by their colleagues: Have you got recourse to public funds, 'no'. Have you got a link to the area, 'no'. And it never goes beyond that, e.g., if you have not got a local connection to the area, what actually brought you here. There should be time and empathy. Instead, people are asked to fill out a form and this hinders efforts to address the exploitation, as people affected may also be reluctant to cooperate due to fear and distrust. Encouraging professionals to embrace professional curiosity can help overcome these barriers and empower them to gather essential information and foster a culture within the entire sector involved in addressing modern slavery.

Building a trusting relationship

Professional curiosity plays a crucial role in risk assessment and management, but it is not a quick solution. It is often overlooked that establishing a good relationship with clients is also necessary. Practitioners should assess into a survivor's background and understand the root causes of people's problems; such an approach requires time as well as a high degree of professionalism, training and skills, and a safe space for reflection within supervision (Philips et al., 2022). "[T]o ask those difficult questions, you're going to take time and have time to understand people's journey and what trauma they've been through…(MR-LA-3)."

Building a trusting relationship is essential because individuals who have experienced exploitation may be reluctant to share information due to fear of retribution or dependence on their perpetrators. It is hard work, and there are also structural, relational, and emotional barriers to professional curiosity (Philips et al., 2022). Also, it should not be considered as a quick fix, as something that would help achieve “the greater good within modern slavery (MR-LA-3)”.

Cultural competence and professional curiosity are intertwined, highlighting the importance of passion, kindness, and empathy. As participant 3, MR-FG-3 noted “If you are unaware of different cultures and norms as long as you have kindness and empathy, you could be culturally competent.” While it is impossible to fully understand every aspect of someone's identity, practising unconditional positive regard, empathy, and curiosity can help avoid assumptions about their experiences.

Sometimes professionals may need to have difficult conversations with potential victims, but they need to carry it with empathy and kindness (Participant 2, MR-FG 2). For example, Participant 5, FG-LE, made the following point:

> *I wouldn't lie, she just made me forget I have issues. I totally forgot I had issues even though I was still dealing with these issues. But you know, I felt at peace, my peace was there. I felt so comfortable speaking to them.*

Participant 4, FG-LE, stated that:

> *“We've been raised to not talk about certain things. We've been raised to not look at someone straight in the eyes. That's not having respect when you're talking to someone in authority; you have to look down, but here in Britain, they want you to look them in the eyes…. A friend once told me he's got a friend with a Prosecutor. This Prosecutor said do you know why black people most of the time lose cases, he said, no, why? He said because they look down.”*

This example shows professionals need to remove certain expectations, consider the factors of a case, and understand that the behaviour of an individual is caused by many factors, including their culture, that are not necessarily relevant to the ‘truth’. If professionals have a trusted relationship, they can see someone’ patterns of behaviour.

While professional curiosity could enhance responses to modern slavery, it is important to recognise that structural changes are necessary for their effectiveness. Limited time and resources, as well as government rhetoric around migration, were raised as

concerns by professionals in the study as a barrier to them being able to have the time and space to be professionally curious. Macro-level barriers need to be addressed to create a more conducive environment for professional curiosity.

Non-judgemental approach

The non-judgemental approach was at the heart of a definition of cultural competency from the rural area focus group – not considering the dominant culture as the norm:

> *Always understood cultural competency and its permutations to refer to kind of like how or where you are of your own culture just as a culture rather than like as normal. And then your interaction with other cultures on the basis of, well, I have one culture that's another culture and, so that it's less, it's a kind of gentler and more accepting kind of mode of interaction, I suppose rather than one where more of a kind of colonisers framework where it's like my way is the right way and you need to get with that way.*

Instead of dismissing a person straight off, it would be more effective to believe that person and take the time to listen to them, and collect the information – MR-LA-1 argued “It shouldn’t matter who the person is, what their social standing, what rank they are in an organisation, none of that should matter, everyone should be treated equally with respect, but that doesn’t necessarily happen, does it.”

Another participant noted that while safeguarding coordinators may technically be inclusive, they are primarily white British individuals who may not have extensive knowledge of every culture. However, they are described as being open, non-judgmental, and accepting of different cultures and experiences.

A multi-agency approach

At the organisational/meso level, participants highlighted the importance of a multi-agency approach. A town in the Midlands was mentioned as an area that has a multi-agency approach and supportive network for survivors. For instance, MR-Ch-1 argued that it is important for professionals to “work together and collaborate together” and listen to survivors, to their voices and struggles. MR-LA-3 also argued that his “Nirvana” is a multiagency approach where survivors would have to tell their stories just once: “*vulnerability of hope* in every city where you could come and every partner would be

represented in there, and you would only have to tell your story once, and you'd get an understanding of exactly what could be done for you there and then."

Participants in MR-FG 1 suggested that while there are pockets of good practices, they are people-driven—they are not driven by organisations but by a person. They argued that one goes into a room and meets some people who will absolutely change their life because they care; however, it is neither organisational nor systemic. It is up to the individual—we have fantastic professionals who really care. Such good practices could be extended through a multi-agency approach.

Conclusion: a non-tokenistic approach

Our findings presented barriers for the potential victims of modern slavery and survivors to access support created by a lack of cultural and structural competency at micro/personal-, meso/organisation- and macro/policy and legalisation levels. The section on the value of cultural competency illustrated the findings regarding how individuals can be more competent through skills such as professional curiosity and having a non-judgmental approach. For an organisation, a more diverse workforce can be a good initial step, however, this is not a replacement for culturally competent practices, especially within an area that is so nuanced that it cannot have a standardised solution. Further, a multi-agency approach would be an effective initiative to try to tackle the time and resource issues and it could also be helpful against structural issues. However, there is always a risk that, based on the findings, the organisations' intention remains to be tokenistic – a ticking-box exercise. Any training needs to help professionals reflect on their practice, and also resources need to be developed for applying such skills in practice.

> *I mean, what am I going to get from an hour's tutorial online? So, we've gone back to our organisation and said, right, you need to switch on; we need face-to-face training, intensive training if you're going to aspire to give us these qualities as an organisation, do it properly and stop messing about. You know you're fulfilling your tick-in-the-box end of (Participant 5, MR-FG 2).*

There are also structural barriers that need to be reconsidered at the macro level to effectively tackle modern slavery. The rest of the report will provide recommendations based on our findings.

Recommendations

Recommendation 1: Embed culturally competent approaches. The research findings suggest that it would be beneficial for local-level statutory and non-statutory agencies to consider embedding culturally competent approaches into their in-house or commissioned training and development programmes. This should apply to all agencies whose staff may encounter people at risk of or who have experienced modern slavery, regardless of whether they are a first responder organisation or not. This approach to workforce development could provide an understanding of diverse cultural backgrounds and how they can impact vulnerability and exploitation.

Furthermore, the Home Office Modern Slavery Unit should consider a robust review of the current first responder training to ensure it not only fully embeds research-backed culturally competent language and information in its delivery, but also that it is undertaken by as many first responder organisations as possible. Policymakers should also ensure that frontline staff who are within first responder organisations have a clear understanding of their statutory obligations in tackling modern slavery. This includes recognising their role in identifying and reporting exploitation and providing the necessary training and resources to fulfil these obligations. To do this, first responder training should be made mandatory for all first responder organisations.

Recommendation 2: Build trust and confidence in authorities. The responses from the interviews and focus groups indicate that efforts should be made at all levels from Central Government to statutory and non-statutory local actors to address the widespread mistrust of authorities in the UK. In part, this can be achieved by collecting and acting on more feedback from individuals impacted by modern slavery about e.g., their experiences when interacting with authorities. This can be achieved by organisations who interact with survivors (as victims of crime, as service users, or in other capacities) systematically monitoring and evaluating their approach.

This research also shows that by engaging with victim-survivors and practitioners in meaningful, culturally and structurally competent ways we can gather the views of those with lived experience to inform and improve current UK practice. Finally, there already exists a substantial amount of literature (Local Government Association, 2022; Heys et al., 2022) that supports the need for building trust and confidence in authorities in the UK. Staff in local-level front-line organisations should also be trained to use reflective practice when working with people who have been exploited and regular supervision provided by their organisation to ensure accountability and the sustainability of this approach so that cultural competency approaches are embedded and upheld as best practice.

Recommendation 3: Increase awareness among victims of their rights. The research findings indicate that there is a lack of awareness among individuals who are being exploited about their rights and the support systems available to them, such as the NRM and the support provided through the Modern Slavery Victim Care Contract (MSVCC). Ensuring those experiencing modern slavery are aware of their rights and entitlements and have trust in authorities (see recommendation 2) will empower individuals to seek help and prevent further harm. To do this, the Home Office Modern Slavery Unit and the Director of Labour Market Enforcement could jointly interrogate and improve the flow of information to at-risk groups in the UK and abroad. The use of digital and print media could be utilised better to convey pertinent information to people before they travel to the UK that directly addresses what to do and what support is available should someone become trafficked or exploited. Partnership could also be built with local community organisation like faith-based groups and places of worship, community centres, food banks, and grassroots NGOs to seek their support in disseminating the information to the communities they are part of and serve. This information should also include efforts that reduce mistrust and fear of authorities such as law enforcement and reassure people that they can seek support in the UK.

Recommendation 4: Increase awareness of cultural barriers to support.

Participants spoke about issues of stigma, negative stereotypes, profound feelings of shame and language barriers throughout their engagement with a broad range of support services, both statutory and non-statutory as well as with everyday issues such as opening a bank account or visiting a doctor, for example. This research highlighted that these feelings of shame coupled with strong stigma and negative stereotypes can prevent individuals from seeking support and reporting their experiences. Language barriers were a prominent topic of discussion within the interviews and focus groups. Participants indicated that these language barriers can hinder survivors' ability to navigate support systems, understand important information and attend multiple different appointments.

a) Local-level advisory panels and working groups composed of people with lived experience of modern slavery may help to address this issue, by bringing together those who have faced these challenges to support and guide local actors to amend their services and policies to be more culturally competent. The existing Human Trafficking Foundation Lived Experience Advisory Panel is a good practice example of how people with lived experience can come together and influence policy and practice. Research and programme funders should consider making funding pathways available for organisations seeking to build and maintain these local-level panels and groups. In addition, civil society organisations should consider prioritising the establishment of these panels and groups within their organisations to evaluate and improve their programmes of work.
b) All Modern Slavery Victim Care Contract service providers (safehouse and reach-in) should have access to interpreters to facilitate effective communication and prevent re-traumatization as stated in section 49 of the relevant Statutory Guidance. However, interpretation services are costly and many third-party support providers and statutory organisations such as local authorities do not have ready access to these services. Modern slavery partnerships and networks should consider prioritising supporting organisations to work together to share resources and ensure access to interpretation services when needed.

Recommendation 5: **Address the Inflexibility of Systems.** Based on discussions with our research participants, individuals who experience modern slavery can experience discrimination because of a range of factors, including gender, sexuality, age, nationality, and class; they often face discrimination and oppression, particularly in their interactions with law enforcement and NRM support systems. The research indicates that addressing vulnerabilities has become automated and commodified, causing individuals, their identities, and backgrounds to get lost within the system. This can lead to a cold and impersonal approach, which is the opposite of the antecedents and attitudes of culturally competent practices. Responses by participants indicate that many systems cannot adapt to meet the needs of these diverse communities.

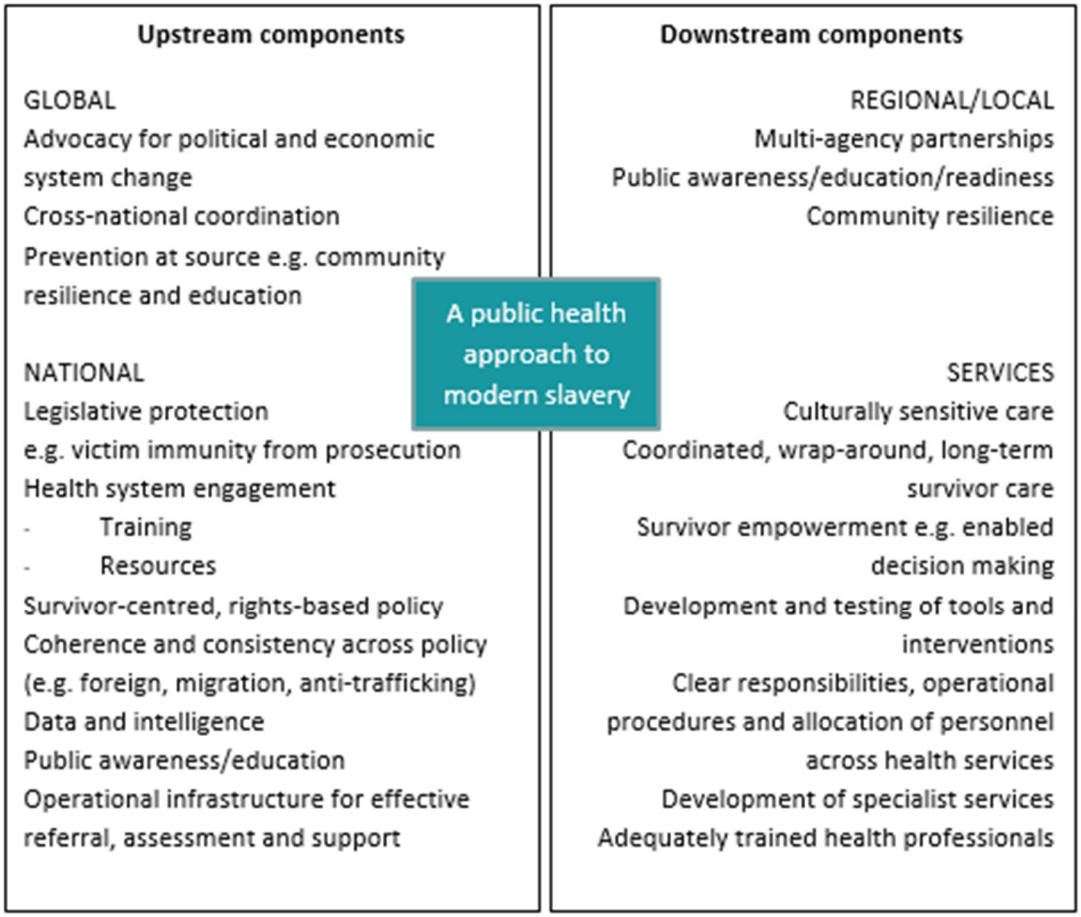
Efforts to engage these communities need to be reevaluated and focus more on human contact, diverse needs, digital illiteracy, reading and writing skills, and the lack of access to technology that creates a digital divide. The responses from both those with lived experience and practitioner focus groups indicate that digital systems such as online application forms and websites should be significantly revised and updated to be more accessible to non-English speaking people.

To achieve this, Government Departments, local authorities, banks, NHS Digital, and other service providers should incorporate the perspectives and experiences of people from diverse backgrounds into the user research that informs the design of such systems.

Recommendation 6: Embed Cultural Competency into the Public Health Approach to Modern Slavery. A public health approach to modern slavery offers an opportunity to coordinate efforts across the anti-slavery sector. The public health approach is emerging as a positive framework for prevention, and planning at a national and local level, and as a means of bringing together existing frameworks, for example, health, local authorities, industry, NGOs, and policing. The public health approach is a data-driven, community and person-focused approach, with prevention being a critical pillar of activity (Such et al., 2020). This approach needs to be informed by improved regional and national data and information analysis and, importantly, by having a clear, in-depth cultural and demographical understanding of our communities, something which is not considered in terms of modern slavery and human trafficking currently. Modern slavery has long been seen as predominantly a criminal justice issue and as such many approaches have had a criminal justice and crime control focus. The public health approach has been successfully applied in response to domestic abuse and sexual violence and is a good practice example of an equitable multi-agency approach. This approach should include micro, meso, and macro actors across government, victim care contract providers, lived experience panels/advisory groups and local statutory and non-statutory partners. This approach also builds on the existing good practice displayed by the many anti-slavery partnerships across the UK. Properly supported and funded by the Home Office, these partnerships would be ideally placed to drive culturally competent multi-agency working that not only addresses victim identification and support but also prevention and disruption.

Taking a public health approach means:

- Understanding the problem at a population level.
- Looking at what is driving or causing the problem and framing it as part of a complex, multi-level, and interdependent system.
- Collating data and evidence of what works/what happens.
- Being prevention focussed.
- Protecting and promoting health and wellbeing.
- Multi-agency/partnership working.
- Addressing inequalities, social justice, and human rights.


Upstream components
GLOBAL
Advocacy for political and economic system change
Cross-national coordination
Prevention at source e.g. community resilience and education
NATIONAL
Legislative protection
e.g. victim immunity from prosecution
Health system engagement
- Training
- Resources
Survivor-centred, rights-based policy
Coherence and consistency across policy (e.g. foreign, migration, anti-trafficking)
Data and intelligence
Public awareness/education
Operational infrastructure for effective referral, assessment and support
A public health approach to modern slavery
Downstream components
REGIONAL/LOCAL
Multi-agency partnerships
Public awareness/education/readiness
Community resilience
SERVICES
Culturally sensitive care
Coordinated, wrap-around, long-term survivor care
Survivor empowerment e.g. enabled decision making
Development and testing of tools and interventions
Clear responsibilities, operational procedures and allocation of personnel across health services
Development of specialist services
Adequately trained health professionals

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Appendix 1

Cultural competency framework

The most commonly cited definition of cultural competency is provided by Cross et al. (1989). They defined cultural competency as a "set of congruent behaviours, attitudes, and policies that come together in a system, agency, or among professionals and enable that system, or those professionals to work effectively in cross-cultural situations." Being competent does not necessarily mean mastering another culture. Instead, it means having the ability to work effectively alongside culturally diverse groups (Engseth, 2018). Practitioners can become culturally competent by adopting four orientations known as 'informed not-knowers', including Introspection and self-awareness, respectful questioning, attentive listening and curiosity, interest and caring (Dean, 2001).

A distinction between the antecedents and attributes of cultural competency could also be made. Antecedents are preconditions that must be present prior to the occurrence of a concept. Six antecedents of cultural competency were identified (Henderson et al., 2018):

Openness – or being curious enough to want to learn about other cultures;

Awareness – of the presence of other cultures than one's own culture and being able to recognise discrimination, stereotypes, and prejudice;

Desire – the motivation to become more culturally aware and knowledgeable. Service providers with high cultural desires are characterized by compassion, authenticity, openness, availability, flexibility, and commitment.

Cultural knowledge – involves understanding cultural differences, values, and behaviours. It requires learning about other cultures' worldviews, languages, and various elements of culture, including historical, political, social, and economic factors.

Cultural sensitivity – involves attitudes, perceptions and values that show an awareness of one's own culture and recognition and respect for another's culture.

Cultural encounter – is an environmental situation that must arise for cultural competence to ensue.

Cultural competency attributes include:

Respecting and tailoring support – involves a willingness to show respect for others; it includes considering power dynamics and the social and political aspects of support when working with clients as partners.

Providing equitable and ethical care – to provide fair care, service providers must avoid biases and exhibit openness and respect toward all patients. A strong foundation of ethics is necessary for moral reasoning. Cultural competence and ethics training together can improve service providers' attitudes towards equitable and ethical care.

Understanding, showing insight or empathy – Understanding and respecting the beliefs, values, experiences, and behaviours of the client to avoid stereotyping and providing care aligned with their cultural needs.

Cultural competence requires more than understanding cultural differences. It requires a higher level of moral reasoning, acquired through formal education in cultural and ethical knowledge. Practitioners need to develop fairness in social practices and engage in critical, moral self-reflection to sustain cultural competency. This helps prevent the promotion of ethnocentrism, which occurs when practitioners place too much emphasis on cultural differences (Henderson et al., 2018).

Further, cultural competency could be seen as a process-oriented approach that emphasises growth, continuous work, and action. While many professionals focus on acquiring knowledge to measure their proficiency, it does not require one to possess knowledge of all cultures in the world (Garran & Rozas, 2013).[24] The framework includes a continuum of competency where one can locate themselves. It is a continuum that includes cultural incapacity, cultural blindness on the one end and cultural awareness, cultural competence, and cultural proficiency on the other end (Engseth, 2018).

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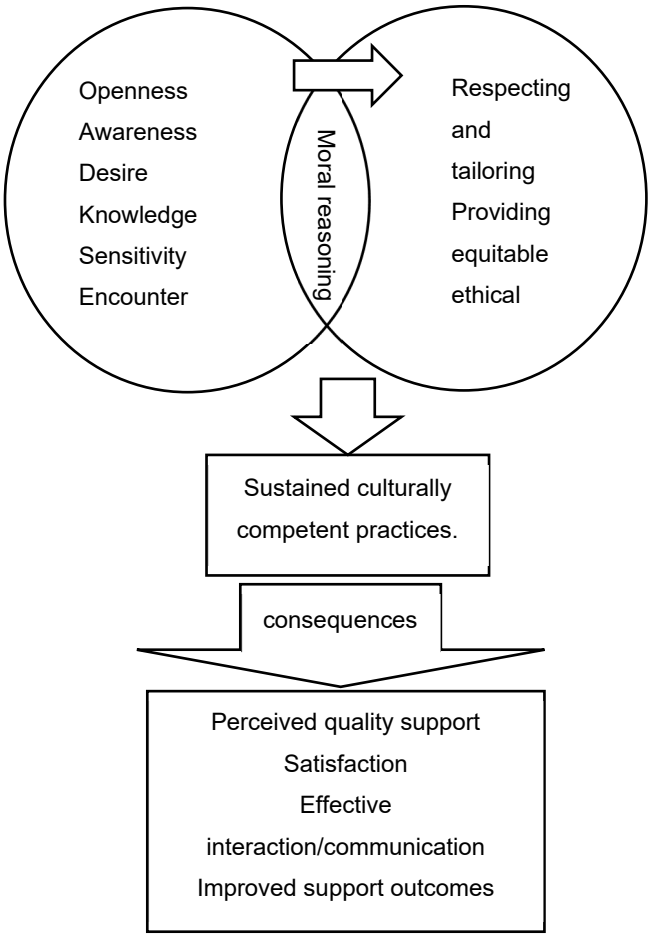

It is worth noting that cultural competency within the UK is drawn from Cross et al.'s (1989) work on cultural competency. Cultural competency has drawn attention to the significance of diversity and differences in various fields, including healthcare and social work – at both individual and organisational levels within the UK. However, as discussed in the following section, the combination of cultural and structural competency can offer a promising approach to addressing modern slavery among individuals facing oppression based on their protected characteristics.

Structural competency

The current political climate poses a challenge to the fundamental idea of cultural competency. This concept states that professionals can reduce a client's experience of stigma, marginalization, and oppression through a culturally competent approach. However, if the stigma is not primarily produced during individual encounters but is instead a result of institutional stigmatisation and marginalisation due to structural causes, then training should shift its focus from the individual encounter to include the

organization of institutions and policies that can create meaningful changes. Simply training professionals to listen to individual stories is not enough (Quesada et al., 2011; Metzl & Hansen, 2014).

For instance, cultural competency training helps doctors understand patients' stories based on cross-cultural differences. It improves clinical dialogue but does not address the complex relationship between symptoms and social, political and economic systems. "Structural competency" refers to the ability to understand how societal, economic, and political structures can make individuals more vulnerable to harm. It provides a framework to go beyond cultural explanations and envision ways to counteract harmful structural influences that affect our responses to modern slavery. By analysing these structures, we can see how various forms of oppression have led to racial and economic stratification, as well as limited opportunities (Quesada et al., 2011; Metzl & Hansen, 2014).

Appendix B

Project Title: Cultural Competency in UK Responses to Modern Slavery

List of interview topics/questions for professionals

Remind and inform participants about the following:

- Background and motivation of the project
- Introduction to the interviewer and their background
- Introduce the interview structure
- Right to pause/terminate the interview at any stage
- Any questions before the start
- Would they mind video/audio-recording the discussion

Opening questions

1. Could you please explain briefly your background and knowledge around appropriate response to/delivery of services for those who have been identified as potential victims of modern slavery or who are survivors of modern slavery?
2. What are the barriers for individuals with lived experience of modern slavery to seek help in exploitative situations?
    a. Are they related to their cultural background/ identity?
    b. How can these be mitigated?
3. To what extent could systemic oppression lead to re-exploitation of victims? And how can this be prevented?
4. Which types of exploitation or groups of people do you have experience of working with or have an understanding of in relation to modern slavery?

Background

1. How do you think cultural background and identity impacts an individual's access to support services?
2. In your opinion, are there particular groups within society that could be at a disadvantage when accessing well-being services? Can you give an example?
3. In your opinion could cultural background and identity impact an individual access to education and/or work?

Modern slavery and Identity-based oppression

1. When and why do individuals become vulnerable to each form of modern slavery?
    a. Could cultural identity lead to vulnerable working conditions
    b. Were there any support services that could have prevented this?
    c. Are there any barriers to accessing these service for certain groups?
2. Looking from the other angle, could you please explain if, in your experience, there are any specific groups who have been at a higher risk of modern slavery due to systematic oppression?

Responses/ policies / Assessment of level of cultural competency

1. What are the organisational barriers in your organisation or other organisations (e.g., police, local authorities, schools) to respond effectively to exploitation risks and prevention responses?
2. To what extent are responses to modern slavery inclusive and consider the cultural background of the victims (are culturally sensitive) considering your organisation's approach/strategy?
    a. To what extent are responses to modern slavery based on the cultural background of those at risk/ or victims of modern slavery? How can such responses be improved further?
    b. What is your assessment of cultural competency in your organisation and how does it engage or interact with different people?
    c. What do you think are the strengths and weaknesses?
    d. What training/processes/guidelines are in place?
    e. In your opinion, could these be improved?
    f. Do you think something is missing? If so, what is missing to improve your response to groups from XXXX communities?
3. Is there any related training/awareness raising regarding cultural competence of approaches/responses?
    a. Are such initiatives successful? How?
    b. How could they be improved?

4. Are there certain cultural groups/communities where you feel there are higher rates of early/preventative identification of modern slavery? Or if particular groups have notably lower rates? Why do you think this is?

Prevention

1. Are you involved in any prevention work around modern slavery (for example, involvement in local anti-slavery networks or engagements etc.,)
    a. If so, can you tell us more about how this work might have targeted particular groups and whether it takes into consideration different backgrounds and cultural identities?
    b. What was the impact of these measures?
    c. If you didn't include cultural factors, why not? (e.g., not having knowledge or experience/adequate training etc.,)
    d. What issues have arisen that might have been resolved by having culturally specific practices in place?
    e. Any case study/example within your organisation?
2. What have you done to prevent risk of modern slavery for those facing identity-based oppression within your geographical area?
    a. What are the potential barriers to these things being done?
    b. who would need to be involved for this to be successful?
    c. What would success look like in this initiative?
    d. Are there any examples of this sort of thing being done that could be drawn on?
3. What should be done to prevent the risk of modern slavery for those facing identity-based oppression within your area?
4. Do you try to gather diversity relevant info on those at risk/ or victims of modern slavery? If so, how?
    a. How do you use this information to
        i. Tailor responses
        ii. mitigate risks/improve responses?
    b. If not, why not?

Final questions

1. What more needs to be done?
2. Is there anything that you would like to add to this conversation?

3. Please also ask about access to related secondary data and if they can link us to other informants.

Appendix C

Project Title: Cultural Competency in UK Responses to Modern Slavery

List of interview topics/questions for those with lived experience of modern slavery

Remind and inform participants about the following:

- Background and motivation of the project
- Introduction to each interviewer and professional background
- Introduce the interview structure
- Right to pause/terminate the interview at any stage
- Any questions before the start
- Would they mind video/audio-recording the discussion

Opening questions

1. Could you please introduce yourself and tell us about your background?
2. What are the barriers for individuals with lived experience of modern slavery to seek help in exploitative situations?
    a. Are they related to their cultural background/ identity?
    b. How can these be mitigated?

Support & vulnerabilities within communities

1. When and why do individuals become vulnerable to each form of modern slavery?
    a. In your opinion, are there particular groups within society that could be at a disadvantage when accessing well-being services? Can you give an example?
    b. Could cultural identity lead to vulnerable working conditions?
    c. Were there any support services that could have prevented this?
    d. Are there any barriers to accessing these service for certain groups?
2. In your opinion could cultural background and identity impact an individual access to education and/or work?

3. Do you think to what extent the social and cultural norms within the communities could influence an individual's vulnerability to exploitation/harm?

Support for those who experienced exploitation

1. How do you describe the current level of support for those who are experiencing/ experienced exploitative practices?
2. To what extent are responses to modern slavery inclusive and consider the cultural background of those at risk/ or the survivors (are culturally sensitive)?
    a. How can such responses be improved further? What do you think are the strengths and weaknesses?

Prevention

1. In your experience, how communities have been empowered against identity-based oppression?
2. Do you think more training /awareness raising is needed for the service provider/law enforcement? Why?
3. In your experience, how access to well-being services and support could become more inclusive and universal within the UK?

Final questions

1. Do you think what more needs to be done?
2. Is there anything you would like to add to this conversation?

Appendix D

Roundtable Agenda - Professionals

Project Topic: Cultural Competency in UK Responses to Modern Slavery

Arrivals and networking (9:00-9:30)
Participants arrive and have the opportunity to meet other professionals before the roundtable begins.
Introduction and creating the mixed breakout groups (9:30-9:45)
Introduction The project team opens the event and covers: • Background and motivation of the project • Introduction to the project team • Introduce the structure of the roundtable • Notify participants that roundtable discussions will be recorded for the purposes of the research • Share ground rules Mixed breakout groups – each group must include a mix of frontline and operational staff from various sectors: • Everyone is separated into groups of up to 7 professionals. • Introduce themselves to the group before answering the questions in Session 1 – in online roundtables, we may ask participants to introduce themselves to everyone at the beginning. • Each session is 20 minutes + 10 minutes reconvene and debrief.
Session 1 theme: Vulnerabilities (9:45-10:15)
• When you think of the term “identity-based oppression,” what comes to mind? • When you think of the term “systemic oppression,” what comes to mind? • Is systemic identity-based oppression (e.g., based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation) an issue in your area particularly and within the UK more generally?

- Do you think specific groups/communities are at a higher risk of modern slavery due to their background/identity (e.g., based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation)? How?
- Which communities in your region could be relatively disadvantaged in accessing services that support their well-being and reduce risks of facing exploitation?
- To what extent could systemic oppression lead to the re-exploitation of victims? And how can this be prevented?

Exit questions

- Is there anything else you would like to say about the vulnerabilities of certain communities to modern slavery?

Reconvene and debrief:

- Each group is given 30 seconds to give feedback top 3 most interesting findings/discussion points to the entire group.

Session 2 theme: Prevention (10:15-10:45)

- Are there certain groups/communities where you feel there are higher/lower rates of early identification/prevention of modern slavery? Who are these groups?
- Are you involved in any prevention work around modern slavery (for example, involvement in local anti-slavery networks or engagements etc.)
    - If yes, can you tell us more about how this work might have targeted particular groups and whether it takes into consideration different cultural backgrounds and identities? What was the impact of this tailored approach? Can you share a specific example?
    - If no, why didn't you include cultural factors and identities? (e.g., not having knowledge or experience/adequate training etc.,)
        - What issues have arisen that might have been resolved by having culturally specific practices in place? Can you share a specific example?
        - If yes, what did you do?

Exit questions

- Is there anything else you would like to say about how modern slavery could be prevented in specific communities?

Reconvene and debrief:

- Each group is given 30 seconds to give feedback top 3 most interesting findings/discussion points to the entire group.

Break (10:45-11:00)

Session 3 theme: Current responses/ good practice (11:00-11:30)

- What does the term “culturally competent” mean to you, your team, and your wider organisation?
- To what extent are responses to modern slavery inclusive and consider the cultural background and identities of the victims (are culturally sensitive) (e.g., based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation)?
- What good practice examples exist from within your organisation/network or your activities?
- What training/processes/guidelines/awareness-raising initiatives are currently in place, and how could these be improved?
- Do you think something is missing? If so, what is missing to improve your response to groups from XXXX communities?
- Do responses to modern slavery consider individuals' overlapping identities? What good practice examples exist? Sexuality and age, for example.

Exit questions:

- Is there anything else you would like to say about culturally competent responses to modern slavery?

Reconvene and debrief:

- Each group feedback the top 3 most interesting findings/discussion points to the entire group.

Session 4: Sector trends/ provision (11:30-12:00)	
• How have you/your organisation embedded culturally competent practices in your organisation? How does this impact the rest of your service and the support offered to survivors? Please provide an example. • From your perspective, what is missing and/or how can these current practices be improved? • In recent years, how has your role shifted/changed in response to shifting cultural needs, if at all? Exit questions: • Is there anything else you would like to add? Reconvene and debrief: • Each group is given 30 seconds to give feedback top 3 most interesting findings/discussion points to the entire group.	
Summary from the project team (12:00-12:20)	
• Explains the next steps for the project. • How professionals can continue getting involved • Give time for Q&A	10-20 mins

Appendix F

Roundtable Agenda – Individuals with Lived Experience

Project Topic: The value of cultural competency in UK responses to modern slavery for those facing identity-based oppression.

Introduction (14:00-14:10)
Introduction The project team opens the event and covers: • Background and motivation of the project • Introduction to the project team • Introduce the structure of the roundtable • Notify participants that roundtable discussions will be recorded for the purposes of the research • Share ground rules

- Each session is 50 minutes + 10 minutes break between the sessions.

Session 1 theme: Vulnerabilities (14:10-15:00)

- When you think of the term “identity-based oppression,” what comes to mind?
- When you think of the term “systemic oppression,” what comes to mind?
- Is systemic identity-based oppression (e.g., based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation) an issue in your area, particularly and within the UK more generally?
- Do you think specific groups/communities are at a higher risk of modern slavery due to their background/identity (e.g., based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation)? How?
    - Are there certain groups/communities where you feel there are higher/lower rates of early identification/prevention of modern slavery? Who are these groups?
- Which communities in your region could be relatively disadvantaged in accessing services that support their well-being and reduce risks of facing exploitation? E.g. individuals’ access to education and healthcare.
- Could cultural background and identity lead to vulnerable working conditions?
- Do you think to what extent the social and cultural norms within the communities could influence an individual’s vulnerability to exploitation/harm?
- To what extent could systemic oppression lead to the re-exploitation of victims?

<u>Exit questions</u>

- Is there anything else you would like to say about the vulnerabilities of certain communities to modern slavery?

Break (15:00-15:10)

Session 2 theme: Prevention and responses (15:10-16:00)

• How do you describe the current level of support for those who are experiencing/ experienced exploitative practices?
• To what extent are responses to modern slavery inclusive and consider the cultural background and identities of the victims (are culturally sensitive) (e.g., based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation)?
  o What good practice examples exist based on your experience/ what are the strengths?
  o What are the weaknesses? What is missing? How can such responses be improved further?
• Do you think what training/processes/guidelines/awareness-raising initiatives should be in place?
  o Are more training/awareness raising needed for the service provider/law enforcement? Why?
• Do responses to modern slavery consider individuals' overlapping identities? What good practice examples exist? Sexuality and age, for example.
• How could access well-being services be more inclusive and universal within the UK?
• Should prevention work around modern slavery target particular groups? If so, how? If not, why not?
  o What issues have arisen/could arise that might have been resolved by having culturally specific practices in place? Can you share a specific example?
• How could communities be empowered against identity-based oppression?
• What does the term “culturally competent” mean to you/should mean?
 	
<u>Exit questions</u>
• Is there anything else you would like to say about how modern slavery could be prevented in specific communities and about culturally competent responses?

Summary from the project team (16:00-16:15)	
• Explains the next steps for the project. • How professionals can continue getting involved • Give time for Q&A	10-20 mins

MODERN SLAVERY & HUMAN RIGHTS | POLICY & EVIDENCE CENTRE

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The Centre is hosted by the Humanities Division at the University of Oxford. The Centre is a consortium of three universities consisting of the Wilberforce Institute at the University of Hull, the University of Liverpool, and the Bonavero Institute of Human Rights at the University of Oxford. Between 2019 and March 2024, the period when this project was awarded funding, the Centre was led by the Bingham Centre for the Rule of Law (part of the British Institute of International and Comparative Law (BIICL)) and was a consortium of six organisations consisting of the Rights Lab at the University of Nottingham, the Wilberforce Institute at the University of Hull, the University of Liverpool, the Bonavero Institute on Human Rights at the University of Oxford and the Alan Turing Institute.

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