

Avon and Somerset Commissioning Intentions for the Modern Slavery Services Commencing April 2025

1 August 2024

Table of Contents

Background	2
National Context	3
Evidence Base	4
Engagement Feedback	6
Budget	8
Commissioning Intentions	9
Engagement	9
Proposed Procurement approach	10
Procurement Timetable	10



The OPCC has commissioned services for victims of Modern Slavery across Avon and Somerset since 2015 whereby Unseen UK were awarded funding following a competitive grant process. This approach was continued under the Commissioning Plan published in July 2018 and a direct award made to Unseen UK. The service has provided direct resettlement support for victims pre and post National Referral Mechanism (NRM) decision across Avon and Somerset over this period.

Following the recent [Commissioning Intentions and Strategy for Victim Services](#), engagement period and subsequent [Commissioning Plan](#) that were published over the end of 2023 and early 2024 it was agreed that a separate process will be run to allocate funding for modern slavery support later in 2024.

This document sets out the context and OPCC’s intentions for this service due to commence in April 2025 and will form the basis for engagement with the specialist sector given the unique nature of this care pathway.

Background

The OPCC’s investment into the modern slavery support pathway is currently awarded under an annual grant with a review to determine the best use of funds, recognising that local investment seeks to augment and not duplicate national provision. As stated in our previous Commissioning Plan (2018), this grant was designed specifically to deliver:

- A. **PRE-NRM** - Support to victims as part of police / multi-agency visits before entry into the National Referral Mechanism (NRM) service (victim engagement)
- B. **POST-NRM** - Resettlement support once NRM-funded services end (victim support)

Modern Slavery Support Grant [grant]	£40,000
--------------------------------------	----------------

The evolution of this flexible resource to meet survivors’ needs has changed in response to these changes in the NRM to provide a range of local specialist support services, including:

- Support for Police operational and welfare visits to identify and signpost potential victims MSHT to support services.
- Direct resettlement support
- Survivor voice forums and Wellbeing/Community Integration Activities.
- Training and support to local agencies who require knowledge and expertise.
- Representatives to sit on Modern Slavery Scrutiny Panels

Referrals to the service have been variable since 2018/19 ranging from 1 to 18 p.a. with the total numbers of victims supported anywhere between 1 to 82 p.a., demonstrating significant fluctuations in demand.

Changes in 2021 to the nationwide Modern Slavery Victim Care Contract (MSVCC) to include ‘Move on’ and ‘Reach in’ support meant that a greater number of confirmed victims of trafficking were able to access support for longer following their NRM decision. This has resulted in a reduction in referrals and demand on the OPCC funded service. Therefore, the focus and breadth of support has adapted to this changing need over the course of the commissioning cycle. The OPCC has been pleased to observe this expansion of support funded by government to meet victims needs through national resources. Where there has more recently been an increase in referrals to the OPCC-funded services, this is a

reflection of a change in scope to include additional support for victims in the NRM rather than solely pre- and post-NRM as originally intended under the last Commissioning Plan.

At the same time, providers report that changes made to the National Referral Mechanism process in January 2023 placed additional burden in documenting evidence. Collating this evidence takes time and care which increased the length of time required to support someone.

Overall therefore, there are a complex range of factors that affect demand for locally commissioned support for survivors of modern slavery.

National Context

Definition, Legislation and Guidance

Modern Slavery is defined in the [Statutory guidance for England and Wales](#) under s49 of the Modern Slavery Act 2015. Beyond this, the following documents provide a framework for the response to these crimes:

[Modern Slavery Act \(2015\)](#)

[Nationality and Borders Act \(2022\)](#)

[Illegal Migration Act \(2023\)](#)

[Modern Slavery Statutory Guidance \(2024\)](#)

National Services

Adult victims of modern slavery under the NRM¹

In relation to supporting victims of Modern Slavery and/or Human Trafficking, the predominant means of gaining support is operated through the NRM. The NRM was introduced in 2009 and is a framework for identifying and referring victims for support and protection. Since inception, referrals to the NRM have increased drastically. The NRM framework identifies the level of support victims can access and, if applicable, a recovery needs assessment is completed and a Victim Care Contractor assigned. In April 2019 the Home Office assumed responsibility for all areas of the NRM, including referrals, decision making and data collection. Prior to this it was run by the National Crime Agency. In 2023 the Government made reforms to the NRM process with the intention of speeding up the decision making and police action against those accused of exploitation.

The Home Office [Modern Slavery Victim Care Contract \(MSVCC\)](#) enables survivors in the NRM to have access to the appropriate specialist tailored support for a period of at least 30 days while their case is considered, which may include:

- Access to relevant legal service
- Accommodation
- Protection
- Independent emotional and practical help

Support in England and Wales is currently delivered by the Salvation Army and several subcontractors. The Salvation Army will assess each potential victim to determine what support is most appropriate.

¹ [National referral mechanism guidance: adult \(England and Wales\) - GOV.UK \(www.gov.uk\)](#)

At a local level, councils are expected to identify and refer victims to the NRM, and where possible provide support to victims through their services (i.e., through safeguarding, social care, and housing). **Independent Child Trafficking Guardians (ICTGs)²**

Independent Child trafficking Guardians (ICTGs) are an independent source of advice for trafficked children, somebody who can speak up on their behalf. The service was formerly known as Independent Child trafficking Advocates (ICTAs), but this was amended following the recommendations of the independent review of the Modern Slavery Act.

From May 2021, ICTGs are available in two-thirds of local authorities in England and Wales, locally this includes Bristol.

Evidence Base

This section provides a brief overview of the information that the OPCC has taken into account to form our commissioning intentions:

a) Evidence gathered from the Victim Needs Assessment and Victim Voice headlines.

As part of the Victim recommissioning process, the OPCC asked [TONIC](#) to conduct a Victims' Needs Assessment and a Victims' Voice Project. To achieve this, TONIC engaged and consulted 674 victims of crime and professionals from Avon and Somerset.

The Victims' Needs Assessment was undertaken first to inform the OPCC's draft commissioning intentions, which was shortly followed by the Victims' Voice Project. Relevant extracts from these reports are included below:

Victims Need Assessment (Tonic, 2023)

National crime trends

It should be noted that the CSEW does not cover modern slavery, thus the following data is taken from the UK Modern Slavery and Exploitation Helpline Annual Assessment 2022¹:

- There were 6,516 potential victims indicated to be in situations of modern slavery – this is a **116% increase**.
- The Helpline further raised 2,588 cases of modern slavery and received 9,779 calls, webforms, and app submissions.
- Of the potential victims identified, there was a relatively equal split between male and female victims with 3 potential transgender victims.
- The most common nationality of potential victims was Romanian, followed by Indian and Vietnamese.
- The UK National Referral Mechanism suggests that there were 16,938 victims of modern slavery referred to the Home Office in 2022³, a **33% increase** from the previous year. Of these referrals, 52% were for potential victims who claimed exploitation as adults while 41% claimed exploitation as children.
- For adult potential victims, labour exploitation was the most reported and for child potential victims' criminal exploitation was most common.

² [Independent Child Trafficking Guardians](#)

³ [Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2022](#)

- Following a rapid increase in 2020, county line cases have risen at a lower rate, accounting for 13% of all referrals in the year.

Local crime trends

Incidents of modern slavery in Avon and Somerset have remained at a consistent level over the 4-year reporting period, **averaging 222 incidents per year**. If recent trends continue then incidents of modern slavery would be expected to number between 200 to 250 p.a.

Demand for Support

The current provider have identified a growing level of need for their [overall] service, in line with increasing referrals and report continuing to see a high percentage of British nationals, Vietnamese and Eastern Europeans represented.

Through their police welfare visits [funded by the OPCC], the provider has predominately engaged with eastern European women, but this is primarily due to visits relating to potential sites of sexual exploitation.

Survivor Needs

Evidenced from the Centre for the Study of Modern Slavery the needs of survivors include:

- Safe houses for immediate protection⁴
- Support gaining independence e.g., enrolling on education courses, volunteering at charities
- Legal, housing, health, and mental health advocacy
- Training to navigate legal employment.

Overall

The evidence and findings gathered from the needs assessment encourage[d] the OPCC to continue to put funding towards support for victims of Modern Slavery. The feedback received in relation to the current support for those affected by Modern Slavery was largely positive and although the OPCC funded offer is limited the research suggests it addresses the current need.

Victim Voice Report (Tonic, 2024)

Recommendations from Report

Continue to fund Targeted Modern Slavery Support: The feedback received in relation to the current support for those affected by Modern Slavery was largely positive and although the OPCC funded offer is limited the research suggests it addresses the current need.

⁴ Centre for the Study of Modern Slavery

There was very little engagement with individuals who had experienced Modern Slavery, or accessed the modern slavery support provision, and the feedback TONIC received was not directly related to the OPCC commissioned service within the organisation. This is predominantly due to the relevant support offer being reactive to the police need, and the length of support provided being short in comparison to other services the modern slavery support provision can offer. As a result, the engagement in relation to the Victims' Needs Assessment and Victims' Voice Project was low. Therefore, the OPCC may wish to consider a further dedicated review of all support services available to victims of Modern Slavery and Human Trafficking, working closely with Avon and Somerset Police, as well as support providers, to ascertain the needs surrounding this cohort, along with the current service support uptake. This could be conducted as 'action research' by the future commissioned provider.

Engagement Feedback

During the engagement period for the original Commissioning Intentions, the OPCC asked a specific question on Modern Slavery:

“Do you have any feedback on how the OPCC could best complement national provision for this cohort? Would there be value in including this in the Adults Lot, running a specific process to award funding or routing through other parts of OPCC or partner business (i.e. outside of the victim services portfolio due to the nature of the current use of this grant).”

The OPCC received limited engagement on this question overall, but received the following feedback:

- It was felt that victims of modern-day slavery (MDS) often have complex needs linked to crime types which is different to any other support service provider and as such the support shouldn't be entirely separate and isolated due to these complex needs.

- Overall, individual funding for this service was remarked as positive due to the specialist knowledge required to support victims and provide a lead advocate for their case. However, there should be more collaboration and education with other services to understand more about MDS, how it looks, and referral pathways available for support.

b) Summary of desk-based research findings

To expand on the above, the OPCC has undertaken additional desk-based research and informal conversations with stakeholders to better understand the gaps in support for victims of MSHT and current practice. This has included a review of police recorded crime data, national literature and consultation with key stakeholders (law enforcement and commissioning) to develop an understanding of:

- ✓ Victim needs;
- ✓ The requirement for specialist support;
- ✓ Possible service design options; and
- ✓ The importance of understanding the broader systems affecting survivors of modern slavery.

1. **SURVIVOR'S NEEDS** - The support needs of victims MSHT are often unique and complex, often stemming from fear, coercion, and abuse. Victims of modern slavery face numerous barriers in accessing support services. The complexity of the support landscape, with its myriad of national and local services, adds to the confusion and difficulty in navigating available

resources. This is further exacerbated due to fear of deportation, mistrust of authorities, or previous negative experiences with service providers.

While referrals to the NRM have increased nationally,⁵ referrals to the pre/post NRM support funded by the OPCC have decreased as a result of the government broadening of the scope of the national support offer. Where there have been recent increases in demand for the OPCC funded local service, this is as a result in the provider expanding its local support offer to enhance the NRM beyond the grant's original aims (with agreement from the OPCC).

2. **SPECIALIST SUPPORT OFFER** - Effective support requires specialist expertise to identify, understand, and appropriately respond to survivors' needs. This level of care ensures that the support provided is sensitive to their experiences and conducive to their recovery. The lack of specialised knowledge about modern slavery across law enforcement and support services can hinder collaboration and the provision of comprehensive support. Enhancing expertise within the sector is essential to creating a cohesive support network that addresses all facets of a victim's needs. Victims often come from diverse cultural backgrounds, which can lead to communication barriers and misunderstandings in service provision. Cultural sensitivity and language support are crucial in ensuring that victims fully understand their rights and the services available to them, as well as in building trust between victims and service providers. Support must establish a relationship of trust to diffuse myths, combat preconceptions and deliver the best outcomes for victims. Support that is independent from the police can better provide the wrap around and longer-term support often required upon exit from criminal justice processes.
3. **SUPPORT DESIGN** - Effective support services play a crucial role in helping bridge the gap between victims and the complex systems they must engage with. Tailored and holistic support services produce better outcomes in terms of mental health and reintegration compared to those who only received ad hoc assistance. Specialist support models to complement the NRM are emerging to provide survivors with a vital form of advocacy to meet their needs through a single point of contact. This includes the latest national pilot of advocate roles such as Independent Modern Slavery Advocates (IMSA) and Victim Navigator Programme which provides a standardised advocacy approach (See **Annex A**).
4. **OTHER PATHWAYS** - Many organisations lack in-depth knowledge about the NRM which is the primary framework designed to identify and support victims of human trafficking and modern slavery. This mechanism involves identifying victims, providing necessary support, and facilitating their recovery and reintegration. However, the complexity of this process requires detailed understanding and proficiency, which is often missing within local agencies. Moreover, modern slavery victims frequently encounter immigration and asylum issues that significantly impact their journey. These can include navigating asylum claims, understanding immigration status, and accessing legal rights and entitlements. Many victims are non-UK nationals who may have entered the country through irregular means, making their situations even more precarious. The intricacies of immigration law and asylum procedures add layers of difficulty for both the victims and the agencies attempting to assist them.

⁵ 17,004 potential victims of modern slavery were referred to the Home Office in 2023, similar to the preceding year (16,921) but nonetheless the highest annual number since the NRM began in 2009. By contrast, there were 6,985 NRM referrals in the year ending December 2018

[Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2023](#)

Budget

The OPCC will procure the following service if all MOJ uplifts⁶ are secured at the current level:

Lot/ budget p.a.	Final Plan
Modern Slavery Pathways Contribution	£31,406

This funding allocation was determined in the main Commissioning Plan alongside balancing the needs of other victim services commissioned by the OPCC as follows:

- Over the life of this grant, there has been an **expansion in support services** for victims engaged in the National Referral Mechanism (NRM) process, leading to a diminished necessity for local support as initially outlined in the OPCC grant. There is therefore a reduction in the support required under this grant to meet its original aims as proposed.
- This shift is attributable to modifications in the nationwide Modern Slavery Victim Care Contract (MSVCC), which sees **extended support to a larger cohort** of confirmed victims of trafficking, enabling them to access sustained assistance following the attainment of a Positive Conclusive Grounds decision at the conclusion of the NRM process.
- The reduction will still enable the provider to **continue to provide support** for vulnerable victims **pre and post NRM**.
- The funding reduction **will not impact capacity for our core aims** including specialist direct support to assist with police operations and welfare visits.
- There was **no feedback** during the engagement process of the Victim Commissioning to provide a counter proposal to this change.

⁶ For further detail on the make up of the uplifts see our Commissioning Intentions <https://www.avonandsomerset-pcc.gov.uk/news/2023/11/victim-services-recommissioning/>

Commissioning Intentions

The OPCC intends to make a contribution of £31,406 p.a. towards specialist pathways for survivors of modern slavery, to complement nationally commissioned services.

This will be a dedicated and defined support offer aimed at providing specialised assistance to victims of modern slavery and human trafficking (MSHT) in Avon and Somerset to help them cope and where possible, recover.

The Service will operate across the entire Avon and Somerset footprint and proactively seek to ensure equitable access to support while remaining flexible and open to opportunities for service development. In particular the service will address:

- **Survivor Needs** - This service will address the unique and complex needs of victims ensuring they receive the right level of interventions to help them cope with and recover.
- **Specialist Support** - The support provided will be specialist and independent of the police and other law enforcement, ensuring that victims have a safe and impartial point of contact.
- **Service design** – the OPCC’s investment will be used in a way that learns from emerging good practice advocacy models.
- **Other pathways** - The service will augment, rather than duplicate other provisions enhancing the overall support network available to victims as well as have detailed understanding of relevant processes.
- **OPCC’s Vision** – The service will support the OPCC to achieve its vision for victim services in Avon and Somerset and our commissioning principles as set out in the core Commissioning Plan (p.9), namely:
 - ✓ Collaboration will improve efficiency and effectiveness of OPCC investment;
 - ✓ Where specialist resources and/or statutory services are already in place, this should be the first port of call;
 - ✓ Longer contracts will require greater flexibility from providers;
 - ✓ OPCC services are there to provide support (not out of scope services such as training above and beyond what might be reasonably expected to deliver the service);
 - ✓ The Service will be fully independent of statutory partners such as the Police;
 - ✓ The OPCC and Services shall have a flexible and collaborative working relationship; and
 - ✓ The Service will utilise co-production methods and victim involvement to shape objectives and ensure services meet their needs.

Engagement

The OPCC intends to conduct two days of market engagement with specialist providers of support for victims of modern slavery. These will take place on the 7 and 8 August 2024 and will be used to understand what the current challenges are in this support network, how support can be improved and what is/isn’t currently working well. Feedback will help inform our Commissioning Plan and specification that will be published for tender in November 2024 following approval at the October Victims Commissioning Board.

Engagement session Questions

Q1. How can local support (better) augment rather than duplicate national support provision through the NRM?

Q2. What are the key barriers for victims of MSHT engaging with support services and how can these be overcome?

Q3. How important is understandings of the national referral mechanism/ asylum/ immigration pathways as well as, foreign languages to effectively support victims of MSHT?

Q4. What specific considerations or adjustments should we make to ensure that our approach is equitable and can support vulnerable individuals and marginalised victims of MSHT?

Q5 – What can be achieved with the OPCC’s available budget? Are there any opportunities for collaboration with existing services or risks to this approach?

Proposed Procurement approach

The procurement process will be undertaken through Southwest Police Procurement Services (SWPPS) using an ‘Open Tender Procedure’ under the Light Touch Regime in accordance with the Public Contracts Regulations (PCR) 2015. The current planning assumption is that contracts would be between 5-7 years with the availability of Break Clauses for convenience (with Notice) should funding streams change or strategic direction of the OPCC change.

Procurement Timetable

The timetable below is given as a indication but may be subject to change:

Procurement Stage	Start	End
Commissioning Intentions Publication	Aug 24	Aug 24
Market Engagement period	Aug 24	10 Sep 24
Tender Published	Mid Nov 24	Mid Nov 24
Clarification Deadline	Mid Nov 24	Early Dec 24
Response to Clarifications	Early Dec 24	Early Dec 24
Tender Submission Deadline	Mid Dec 24	Mid Dec 24
Evaluation of Tenders	Mid Dec 24	Mid Jan 25
Inform Suppliers of Tender Outcome	Jan 25	Jan 25
Contract Award	Feb 25	Feb 25
Mobilisation*	Feb 25	31 Mar 25
Contract Start Date	01 Apr 25	01 Apr 25