24th November 2025

Rt. Hon. Shabana Mahmood MP 2 Marsham Street, London, SW1P 4DF

Subject: Impact of immigration changes on survivors of modern slavery

Dear Home Secretary,

We write as organisations supporting, working with, or led by, survivors of modern slavery in the UK. We are concerned that immigration plans, announced by the government last week, would weaken protections for refugees, make it harder to seek asylum, and potentially make it more difficult to be recognised as a victim of modern slavery.

Whilst many survivors of modern slavery and human trafficking are UK nationals, many others are not. Survivors sometimes <u>need to claim asylum</u> because they are persecuted or at risk, often due to factors related to their exploitation. Others are workers made vulnerable to exploitation due to immigration rules. For example, those forced to work in <u>one sector</u>, or tied to an <u>employer</u>, due to <u>visa rules</u>, or those put at risk of destitution, immigration detention, and removal or deportation if they report exploitation by an employer.

We believe the government's plans would make life much worse for survivors of modern slavery and human trafficking seeking asylum in the UK. Whilst we await details on planned changes to modern slavery policy, we are concerned by the government's claim that the system for recognising survivors may be made even stricter. Survivors are already put under the microscope by a system which expects them to drum up more and more detailed evidence, earlier and earlier in their recovery with few chances to have a decision overturned. If the government attempts to make life even harder for survivors of modern slavery and human trafficking, survivors and the sectors supporting them will remain united in opposing these plans.

Many of these measures would also rob survivors of security. People who have been recognised as refugees will be expected to keep applying for a short-term status called 'core protection' for at least twenty years (once every 2.5 years) until they are given permanent status. Each time they apply to extend, those affected will have to live with under threat of refusal and being returned to their country of origin if the Home Office deems it to be safe. This state of limbo seriously undermines recovery and integration, leaving people seeking asylum with fewer rights while they wait and increasing people's risk of exploitation. The government's plan to weaken responsibility to provide shelter for people seeking asylum, would also **put more people at risk of homelessness** and leave survivors seeking asylum with the risk of having support withdrawn. Research shows exploiters often target those without housing, yet this policy pushes even greater numbers into homelessness.

These plans also force people deeper into deprivation. Financial support for people seeking asylum is already low, set at only £49 a week or £9 a week for people in catered accommodation. Stripping back support even further puts more people at risk of poverty without tackling very real barriers to working. Currently, people seeking asylum are already banned from working for the first year and, after this, only allowed to apply for roles on a list of permitted jobs which is very short. Around 111 roles, including vital jobs such as teaching assistants to medical technicians, were removed from the list of professions asylum seekers are allowed to do in July this year. There have never been more barriers preventing people seeking asylum from working.

Lastly, aiming to 'increase removals and deportations' ignores the fact that the number of people in danger due to conflict and persecution is growing, not falling. Worryingly, countries like Syria are being re-branded as 'safe' in order to speed up removals. Many countries deemed 'safe' already, such as Albania, pose a particular risk to survivors of trafficking if returned. Reinterpreting important protections under the European Convention on Human Rights (ECHR) on the grounds of inhumane and degrading treatment (Article 3) and right to private and family life (Article 8) to allow for more deportations will put survivors of modern slavery amongst those targeted for removal. This would significantly disrupt survivors' recovery and obscure access to justice.

We call on the government to:

- Commit to strengthening, not weakening, support for survivors of modern slavery. This means
 guaranteeing support (legal advice, counselling, subsistence and safe housing) for those recognised as
 potential victims, and reversing unrealistic evidence burdens ushered in via the Nationality and Borders
 Act (NABA) and Illegal Migration Act (IMA).
- Remove barriers to work and recovery, allowing people seeking asylum to work and apply for refugee status on day one. People on the move, including those seeking asylum and those who have come to the UK on work visas, should have a clear pathway to settlement.
- Make asylum decisions based on evidence and safety needs, not populist ideas of 'deserving' and 'undeserving' refugees.
- **Prevent homelessness** amongst people seeking asylum, including survivors of modern slavery, recognising the government's responsibility for their housing needs without exception.
- Move away from deportation and immigration detention as a first resort, in recognition of the harm caused by these practices.
- Ensure the goal posts are not moved for people already in the UK and subject to immigration
 controls, ensuring any changes to law or guidance are not made retroactively or applied to people
 already awaiting an asylum decision

Signed:

After Exploitation, AIRE Centre, Anti-Slavery International, Anti-Trafficking and Labour Exploitation Unit (ATLEU), Basis Yorkshire, BAWSO. Ella's, English Collective of Prostitutes (ECP), Focus on Labour Exploitation (FLEX), Freedom United. Hibiscus Initiatives, Hope at Home, Immigration Law Practitioners' Association (ILPA), Kalayaan, Medaille Trust, No-One Above. Refugee Action, Rene Cassin, Secrets Worth Sharing, Social Workers Without Borders, Sophie Hayes Foundation, The Vavengers, The Voice of Domestic Workers, The UK BME Anti-Slavery Network (BASNET)