

GLA82661 – Provision of Research Services for Migrant Victims of Modern Slavery

Purpose:

The Greater London Authority (GLA) is working to deliver on the Mayor's commitment to champion migrant rights and protect them from labour exploitation¹. We understand exploitation as a continuum of experiences that culminates in modern slavery and trafficking at its sharpest end. As part of this work, we are seeking to commission research to develop an evidence-based London response to access to protection for survivors of modern slavery². This research forms part of a two-year programme ('The Programme') that will also seek to develop, and then trial new ways of working, with the aim to ensure that all victims and survivors can report crimes and access support as victim and survivors first.

Objectives:

The key objectives of The Programme are:

- To develop a blueprint for a holistic secure reporting pilot in London, that includes MOPAC, the Met and other key stakeholders across London.
- To improve statutory services' engagement with migrant communities in London, particularly people with insecure immigration status.
- To enhance London's response to the continuum of exploitation, by building up knowledge of the links between abuse and criminal forms of exploitation and human trafficking.
- To achieve a better understanding of the barriers that victims face in reporting and engaging with first responders/services in London and identify what is needed to overcome these.
- To ensure that all victims can report crimes and safeguarding issues to be able to access support as victims first.

Our main research question is:

- What is needed to ensure a successful secure reporting model for victims of all crimes and of all immigration statuses in London?

And following sub-questions:

- What are the key design principles to ensure a successful safe reporting pilot?
- What systems are needed to be put into place to ensure the pilot takes place?
- How can existing systems be adapted to ensure the pilot takes place?
- Who are the key stakeholders that need to be engaged to implement the pilot?
- What is the scope within existing policies and practice in terms of data-sharing between statutory services and immigration enforcement across London, including local authorities, health services and the police to implement the pilot?
- What are the barriers to implementing secure reporting practices across London?

¹ [Building a fairer, safer, greener London for all. \(sadiq.london\)](https://www.sadiq.london)

² [MD3223 Migration Programme | London City Hall](#)

- How can community organisations collaborate with statutory services in London to build trust with migrant communities and contribute the long-term success of a secure reporting pilot?

Background:

The UK has committed to eradicating human trafficking and modern slavery, which is enshrined in international legislation, such as the Council of Europe Convention on Action against Trafficking in Human Beings (ECAT) and the Palermo Protocol, and national legislation, through the Modern Slavery Act 2015. However, this goal cannot be achieved without ensuring that migrant survivors of exploitation are also part of building the solution.

Since the implementation of what has been known as hostile environment policies since 2012, it has been increasingly difficult for migrants to access and trust public services. In addition, continued changes to immigration policy have created additional barriers for migrants, particularly those with insecure or unclear immigration status, to report abuse and exploitation for fear of being arrested, detained, deported or having their children removed from their care. This fear, and the threat of being reported to immigration enforcement, are often used as a coercion tool by perpetrators, to keep survivors in situation of abuse.

Secure reporting (also referred to as ‘safe reporting’ or a ‘firewall’) has been proposed as a solution to address this issue. Secure reporting ensures that migrant victims of crime are able to report abuse and exploitation securely without the risk of having their information shared with immigration authorities, and that agencies are better able to deliver their primary safeguarding duties. There have been consistent calls for secure reporting throughout the years, mostly in reference to migrant victims and survivors of Violence Against Women and Girls (VAWG).

In 2018 the first ever police super-complaint was submitted by Liberty and Southall Black Sisters³, raising serious concerns about the police practice of sharing victim and witness data with the Home Office for immigration checks and the prioritisation of immigration enforcement over other crucial police duties such as safeguarding of vulnerable individuals and investigations. Similar concerns were also presented in a super-complaint submitted by Hestia in 2019 on the police response to victims of modern slavery⁴. The super-complaint highlighted officers prioritising pursuing immigration offences over protecting victims as one of the keyways in which the police are failing victims of exploitation and trafficking.

Despite recommendations from His Majesty’s Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) in their investigations, the Home Office rejected the call for a firewall and instead committed to introducing an ‘Immigration Enforcement Migrant Victims Protocol’ for migrant victims of crime that have been referred to Immigration Enforcement from the police. As of June 2024, the Protocol is yet to be published or implemented. Additionally, the Protocol would only promise temporary protection from immigration enforcement for victims involved in investigations and does not completely eliminate the fear of being reported to immigration enforcement or being detained and/or deported.

³ [Safe to share? Report on Liberty and Southall Black Sisters’ super-complaint on policing and immigration status \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

⁴ [The hidden victims: Report on Hestia’s super-complaint on the police response to victims of modern slavery - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

The Mayor of London, Sadiq Khan, has consistently and repeatedly called for secure reporting over the years. In 2018, together with the Victims' Commissioner for London, he called on the Home Secretary to urgently act to protect victims of crime with insecure immigration status⁵. After this first official call for secure reporting the Mayor has continued to advocate for secure reporting at every opportunity ever since. This commitment is reiterated in the Mayor's VAWG Strategy for London 2022-25, where one of the core ambitions is to ensure safe reporting and support are available for all victims and survivors⁶. The Strategy recognises that victims and survivors with insecure immigration status and/or no recourse to public funds are less likely to access support as well as being less likely to report their experiences, out of fear that the police will prioritise immigration control over the protection of victims. It also includes a commitment for the Mayor to continue to lobby the Home Office to implement the recommendations made in HMICFRS's response to the Super-Complaint and to lobby the government to introduce a 'firewall' between policing and immigration enforcement in the forthcoming Victims' Law.

Data sharing with immigration enforcement is an ongoing issue that continues to affect survivors. In March 2023 FOI data stated that the MPS made a total of 460 referrals to Immigration Enforcement between May 2020 and September 2022 (over 27-28 months), the highest number across the country, with 50% of the referrals being made for various forms of exploitation⁷. Considering how low reported numbers already are for migrant survivors, it is important to acknowledge that this number represents a small percentage of cases that actually made it to the police despite well-known barriers to reporting. The continuous practice of data-sharing with Immigration Enforcement further undermines trust in public authorities and deters abuse from being reported.

There is already an extensive body of research and evidence from professional practice illustrating and evidencing the need for secure reporting in the UK, which we expect the successful supplier to build on rather than replicate⁸.

Description of product and service required:

We are seeking to commission research to develop an evidence-based London response to access to protection for survivors of modern slavery, in the form of a secure reporting pilot. In recognition of the combined expertise required, partnership applications are encouraged.

To achieve this aim – the successful organisation or partnership will work to:

- Research and develop a framework for secure reporting pilot in London.
 - KPI – develop research framework.
 - KPI – collection of primary data with key stakeholders including MPS, LAs, NHS and at least 5 community organisations working with migrant \Londoners that are more likely to experience exploitation (for example by being overrepresented in high-risk sectors or visas) and supporting survivors

⁵ [Protecting the victims of modern slavery | London City Hall](#)

⁶ [Tackling Violence Against Women and Girls | London City Hall](#)

⁷ [UK police referred sexually exploited children and victims of domestic abuse to immigration authorities - Investigations & Analysis - Northern Ireland from The Detail](#)

⁸ Some examples include the two super complaints referenced above, [Labour Exploitation Advisory Group, Opportunity Knocks: Improving responses to labour exploitation with secure reporting, April 2020. London: Focus on Labour Exploitation \(FLEX\)](#) and Safety before status – a series of reports by the Domestic Abuse Commissioner

in various stages of identification and recovery, including referrals to the NRM.

- KPI – design a final blueprint that includes practical steps to implement a secure reporting pilot.
- Map existing data sharing practices across key stakeholders in London (including the MPS and local authorities) and key barriers to the implementation of the pilot.
- KPI – mapping of data sharing policies and practices of key services in London, including the MPS and other statutory stakeholders.
 - KPI – identify key barriers for each service mapped to a secure reporting model in London.

The GLA Migration team will work jointly with the Mayor’s Office for Policing and Crime to facilitate engagement with the criminal justice services in London. The total budget for this piece of work is £50,000.00 for an approximate 12-month period between October 2024 until September 2024, with potential to extend for a further 12 months subject to the annual budget setting process. If secured, then an additional budget of £50,000.00 will be available for a further 12 months (between October 2025 and September 2026) to implement the pilot developed in the first year of the project.

Approach/Supplier selection:

In order to meet the objectives highlighted above, we expect the bidders to submit their approach and plan for delivering the project. We hope to see the following considered and explained:

Research

- Design a blueprint for holistic secure reporting model across London. It is essential that all types of migrant victims are included under a secure reporting pilot to ensure trust can be built across victim groups and in recognition of the combined crimes many victims experience. The blueprint needs to include a clear understanding of how informed consent is explained and obtained and scenarios in which victims and survivors might agree to have their data shared.
- Develop a mapping of existing data sharing practices across key stakeholders, including the MPS and local authorities, in London and key barriers to the implementation of the pilot.
- We invite bidders to suggest the methodology for the research but would encourage applications which consider:
 - gathering qualitative and quantitative data from a wide range of stakeholders including those involved in identifying, advising, supporting, advocating and representing migrant Londoners facing exploitation.
 - working with a wide range of stakeholders to design, conduct, analyse and disseminate the research findings, including community organisations, immigration solicitors, funders, etc.
 - reaching and engaging migrant community organisations representing a wide range of nationalities and immigration statuses, including frontline organisations and ‘by and for’.
 - engagement with people with lived experience of this system where appropriate, demonstrating a trauma-informed approach to support

migrants with experience of exploitation to participate in the research, including clear safeguarding.

- A detailed explanation of the approach to compensating participants, and/or partnering community organisations.
- Identifying examples of international best practice in implementing secure reporting, particularly models that can be applied to the London context.

Knowledge and expertise

- Demonstrate an understanding of different communities that might be affected by data sharing practice across London, including new arrivals, and barriers they might face in reporting abuse and accessing justice.
- Demonstrate an understanding of services across London and which stakeholders should be included in the pilot and how.
 - Demonstrate specific understanding of current data sharing. policy and practice across key stakeholders, including MPS and local authority.
 - In-depth understanding of both the history and contemporary context of secure reporting in London, preferably through previous work or campaigning on the issue
 - A pro-active, solutions-focused and sustainable approach to secure reporting.
 - Knowledge and close ties with migrant communities affected by the lack of secure reporting and criminalisation of illegal working offence.
 - Good working relationships with key stakeholders (although the GLA team is happy to support in access to key contacts)
 - Understanding of the continuum of exploitation, its intersection with immigration law and policy, and how it affects migrant Londoners.

Project management

- Staffing and other resources required for programme.
- Arrangements for partnership working, if applicable.
- Approach to fair and appropriate compensation of participating organisations.
- A monitoring and evaluation strategy for sound reporting and service improvement.
 - Identify risks and mitigation strategies, including proper safeguarding and signposting policies, understanding of ethical implication for the research and inclusion of trauma-informed practices in survivors' engagement.
 - Interim report at 6 months – to present progress with evaluation project including any interim findings, and a final report at 12 months.

We are open to partnerships between different groups, including legal and advice organisations, individual consultants, training organisations, community/grassroots groups etc. If you will work with partners, only the lead partner should apply providing details of partner organisations and their role and remuneration, in the programme section of the bid.

Please note that funding for 25/26 financial year is contingent on the GLA's budget setting process and will be subject to approval in March 2025.

Price:

This is a fixed price contract of £50,000 in instalments. The initial term of the contract will be 1 year, followed by a possible extension of a further year, subject to budget. Exact milestones for each instalment will be agreed with the supplier but will likely be:

- Milestone 1 - £10,000 - contract signed, milestones agreed, and inception meeting completed
- Milestone 2 - £15,000 - research framework agreed, participants identified, data collection started
- Milestone 3 - £15,000 – interim report
- Milestone 4- £10,000 – final blueprint draft

Extension period budget (subject to annual budget setting process)

- Milestone 4 - £10,000 – setting up initial roundtable with key stakeholders for trial pilot, set up advisory panel
- Milestone 5 - £15,000 - pilot agreed and key stakeholders have agreed to participating
- Milestone 6 - £15,000 – interim report
- Milestone 7- £10,000 – final evaluation and report of pilot and all deliverables completed

Q&A Sessions

As part of the tender process, the GLA Migration team will host Q&A sessions on this programme, where organisations interested in a partnership application can share their details. You can register for the sessions on Eventbrite via the links below:

- [Information Session 1 – 18th September 10-1](#)
- [Information Session 2 – 19th September 10-1](#)

For any addition information, please email MSResearch@london.gov.uk.