



UK BME ANTI-SLAVERY NETWORK



AN AFTER THOUGHT:

Report on Modern Slavery; Equality, Diversity, and Inclusion; and Cultural Sensitivity Training in Local Authorities



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FOREWORD

*DEBBIE ARIYO OBE,
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Modern slavery is a complex and harrowing issue, demanding more than just reactive measures. It calls for a proactive commitment to justice, equality, and respect for all individuals, especially those from ethnic minority backgrounds who are disproportionately affected. The After Thought report offers a timely and thorough examination of the current state of modern slavery training across local authorities in England and Wales, revealing critical gaps in how training on modern slavery, cultural sensitivity, and equality, diversity, and inclusion (EDI) is delivered.

As highlighted in BASNET's Race EDI Action Plan, "modern slavery and human trafficking policy must be humane and meet the needs and priorities of all victims and survivors, regardless of race, ethnicity, or nationality." This report underscores the pressing need for standardised, recurring, and comprehensive training that addresses the cultural and racial dynamics at play within the modern slavery landscape. It is not enough for local authorities to offer training; they must ensure that this training is inclusive, up-to-date, and sensitive to the needs of Black and Minority Ethnic (BME) communities. This includes eliminating stigmatising language, outdated training materials, and inconsistent training delivery, which the report so clearly documents.

The findings of this report, backed by the BASNET Race EDI Action Plan, call for systemic changes that go beyond surface-level improvements. In particular, the BASNET Action Plan emphasises the importance of engaging affected communities, using data to ensure equitable decision-making, and implementing cultural sensitivity at every stage of service provision. These principles should guide the modern slavery training provided by local authorities to ensure that the needs of all survivors, especially those from marginalised backgrounds, are met with dignity and respect.

It is my hope that the recommendations in this report will inspire local authorities to adopt more effective and inclusive practices, ultimately ensuring that all survivors of modern slavery receive the support they deserve.

DISCLAIMER

This report is based on the responses to Freedom of Information (FOI) requests made by After Exploitation on behalf of BASNET. The findings and recommendations presented are intended to provide an overview of the current state of modern slavery training, equality, diversity, and inclusion practices among local authorities in England and Wales.

The data may be subject to limitations, including the accuracy and completeness of the responses received. The recommendations are proposed to enhance training practices and do not constitute legal advice. BASNET and After Exploitation disclaim any liability for actions taken based on the content of this report. For specific legal guidance, please consult a qualified professional.

GLOSSARY

Modern Slavery: A term encompassing slavery, servitude, forced and compulsory labour, and human trafficking.

Human Trafficking: The recruitment, transportation, transfer, harbouring, or receipt of persons by improper means for an exploitative purpose.

Equality, Diversity, and Inclusion (EDI): Practices and policies that promote equal opportunities, respect for diversity, and inclusive environments.

Cultural Sensitivity: Awareness and respect for cultural differences and the impact of these differences on behaviour and practices.

E-learning: Training conducted via electronic media, typically over the internet.

Classroom Learning: Traditional in-person training sessions, which can be held remotely or on-site.

Nationality and Borders Act: Legislation introduced in 2021 that affects immigration laws and policies in the UK.

Freedom of Information (FOI) Request: A request for access to information held by public authorities.

ABOUT BASNET

The UK BME Anti-Slavery Network (BASNET) is a part of AFRUCA Safeguarding Children (AFRUCA). BASNET promotes race equality, diversity and inclusion in the UK modern slavery and human trafficking sector. We are a collective of over 60 BME led charities and community based organisations working to address modern slavery and human trafficking. We also have a lived experience panel that informs the work of BASNET.

Over the past five years, BASNET has made substantial strides in advancing advocacy around race equality, diversity, and inclusion within the UK's modern slavery sector. Key achievements include:

- Establishing an active network of over 60+ BME-led organisations, engaged in modern slavery advocacy and service delivery,
- Producing a sector-wide Race Equality, Diversity, and Inclusion Action Plan in July 2021, with a progress report forthcoming,
- Implementing capacity-building residential programmes for BASNET members in November 2022 and May 2024.
- Implementing a research residential programme to enhance members' capacity for peer and community-based research
- Successfully partnering with academic institutions on two major modern slavery research projects

A central focus of BASNET's mission is to ensure that services within the UK's modern slavery and human trafficking sector are developed and delivered with a strong emphasis on race equality, diversity, and inclusion (EDI). This commitment is reflected in BASNET's consultancy and training offerings, where cultural sensitivity and EDI principles are embedded into organisational practices across the sector. By prioritising these values, BASNET aims to foster a service landscape that better supports and respects the diverse needs of those affected by modern slavery and trafficking. To make this approach effective, BASNET actively engages both its membership network and experts with lived experience to co-create training that is relevant, nuanced, and impactful. This collaborative model allows BASNET to address the unique challenges and perspectives that arise within marginalised communities, ensuring that training programmes are not only theoretically robust but also grounded in practical understanding. Through this approach, BASNET strives to help organisations build a more inclusive and responsive environment for both staff and service users.

To find out more about BASNET, you can access our website at www.bmeantislavery.org.

ABOUT AFTER EXPLOITATION

After Exploitation is a non-profit organisation working alongside experts with and without lived experience of modern slavery to improve public understanding of what happens after modern slavery ends.

Using investigative methods including Freedom of Information (FOI) requests, After Exploitation secures unpublished data on survivor outcomes and ensures they are available to practitioners and policy makers. Collaborating with academic, charity and press partners, After Exploitation undertakes responsive policy analysis and longer-term project work in order to pin-point areas for improvement in the UK's response to modern slavery. This includes public authorities' ability to identify and prevent exploitation, provide adequate support, ensure survivors can access their legal rights, and prevent survivors from any further depravation of liberty after exploitation ends. Their work has uncovered the scale of re-trafficking, the frequency with which survivors are detained under Immigration Powers in the UK, and barriers to survivors accessing compensation.

After Exploitation's report, *A can of worms': Challenges and opportunities in gathering modern slavery evidence* (2024), outlines key data failings on modern slavery in the UK, including limitations in public data on modern slavery, a lack of transparency surrounding the contract designed to provide support for victims, and poor disclosure rates where data is requested via Parliament or information rights laws.

Where narratives in the press or Parliament do not reflect the realities facing survivors, After Exploitation challenges misinformation through advocacy, raising formal complaints with the UK's press and statistics regulators.

INTRODUCTION

In 2021, BASNET launched its Race Equality, Diversity, and Inclusion (REDI) action plan to address significant gaps in the modern slavery and human trafficking sector. Theme 5 of the action plan specifically focused on improving access to local authority services, care, and support for survivors and victims of trafficking from ethnic and minority backgrounds. To achieve this, the plan outlined several recommendations and action indicators. One of the key recommendations was for all local authority staff to receive comprehensive training on modern slavery and its impact on victims, with the following indicator of progress:

"All local authority staff in contact with survivors of human trafficking and modern slavery should undertake yearly training on modern slavery, cultural intelligence, equality, diversity, and inclusion (ST)."

To assess the effectiveness of this recommendation, the UK BME Anti-Slavery Network (BASNET), in collaboration with After Exploitation, conducted a Freedom of Information (FOI) request. This inquiry aimed to evaluate the training provided by local authorities on modern slavery, equality, diversity, inclusion (EDI), and cultural sensitivity. This report analyses the responses from the 313 local authorities contacted, highlighting key findings and offering recommendations to enhance the effectiveness and inclusivity of these training programmes.

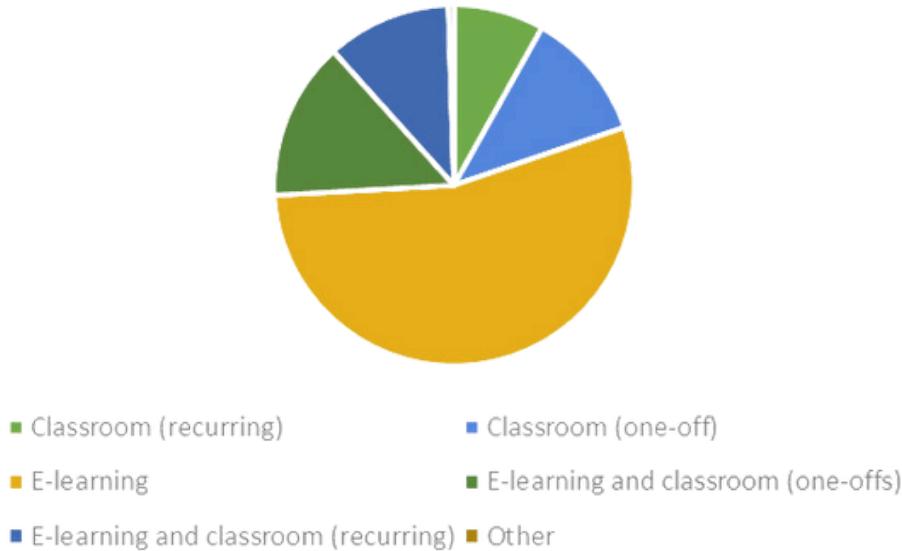
KEY FINDINGS

Modern Slavery Training Availability

- 27% of local authorities (84) confirmed they did not offer standalone modern slavery training.
- 64% of local authorities (200) confirmed offering some form of standalone modern slavery training.
- 16 local authorities did not respond to the request for information, or provided an ambiguous response. In some cases, misinterpretations of the FOI request resulted in some authorities only confirming EDI training existed.

Types of Training

- The most common form of training is e-learning (159 authorities).
- Classroom learning, both remote and in-person, is offered by 90 authorities.



Classroom training is often one-off (51 authorities) rather than regularly recurring (38 authorities). Training is considered 'regularly recurring' if it is delivered at specific intervals, such as quarterly or annually, with clearly scheduled delivery dates, or the council explicitly states the training is part of a current offering. Training is considered 'one-off' if there is only one recorded instance in which it took place.

Gold Standard Training

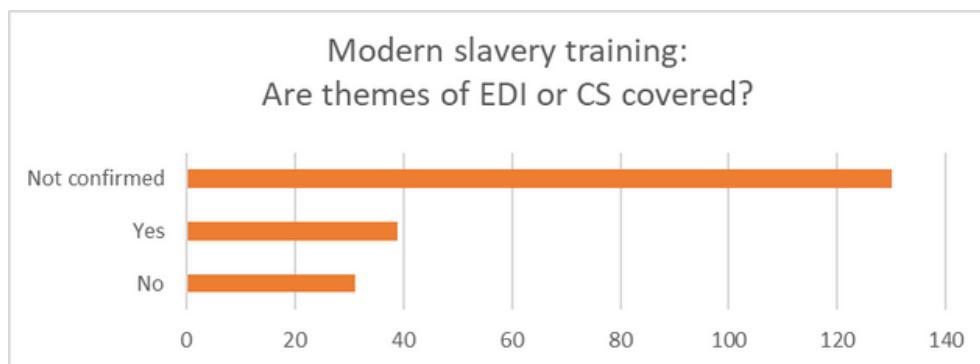
- Only 22 authorities (7%) provide a combination of both e-learning and regularly occurring classroom learning.
- Whilst e-learning tends to be available 'on-demand', bringing professionals consistent access to the information and the opportunity to learn in a self-paced way, classroom learning allows for discussion, interaction, and questions to be raised. Local authorities very rarely provide a mixture of both training options.

Training Material Outdated

- Some local authorities use outdated training materials, referencing obsolete government policies or defunct charities.
- Outdated materials were typically last updated between 2019 and 2021. Few councils provided copies of training materials as requested but, amongst those who did, we identified seven trainings offered in 2020 or longer ago.

Equality, Diversity, and Inclusion (EDI) and Cultural Sensitivity (CS)

- A significant number of authorities (130) responded to the FOI request but did not confirm whether EDI or CS themes were covered



- 39 authorities confirmed offering standalone modern slavery training inclusive of EDI and CS. Self-reporting may result in some training materials being interpreted differently depending on the council. However, ambiguity suggests councils are not prioritising protected characteristics, cultural sensitivity, or diversity when commissioning training.
- Case studies used in training sometimes relied on stereotypes and failed to address the stigma associated with those characteristics. Example case studies included that of a Thai trans prostitute, with no further information on the role that any aspects of the person's identity could play in preventing disclosure, creating distrust of authorities, or experiencing prejudice.

Terminology Issues

The immigration status of potential victims was rarely mentioned in training designed to support professionals in identifying victims. However, some local authorities who did include immigration status as a consideration used the stigmatising term "illegal immigrants" instead of more appropriate terms such as "undocumented people" or "people with irregular status."

EMERGING ISSUES

Impact of the Nationality and Borders Act

The Nationality and Borders Act, introduced in 2021, raised the standard of proof for victims referred into the UK's National Referral Mechanism (NRM) and increased the threat of immigration enforcement amongst survivors without secure immigration status. Where materials were shared by local authorities, training did not appear to keep pace with legislative changes impacting non-UK survivors. Meanwhile, one-off training mostly being dated prior to 2022 raises concerns about the impact of Government rhetoric and policy on first responders' attitudes towards modern slavery and the way they prioritise modern slavery as an issue. The Act's implications for victims of trafficking, particularly regarding their immigration status, necessitate updates to training materials to ensure alignment with current legal standards and sensitivities.

Inconsistencies in Training Delivery

There is a notable inconsistency in how training is delivered across local authorities, with a reliance on one-off sessions and outdated materials. This inconsistency undermines the effectiveness of training and the ability of staff to respond appropriately to modern slavery cases.

Challenges in Addressing EDI and CS

Despite the importance of EDI and CS in effective anti-slavery work, many local authorities struggle to integrate these themes comprehensively into their training. This gap highlights the need for enhanced guidance and resources to address diversity and cultural sensitivity more effectively.

Stigmatising Language and Perceptions

The use of stigmatising language such as "illegal immigrants" in training materials reflects broader societal attitudes that can negatively impact the identification and support of trafficking victims. Addressing these perceptions through training is crucial for fostering a more supportive environment for victims.

Technological and Resource Limitations

Some local authorities may face technological and resource limitations that hinder their ability to implement effective and regularly updated training programmes. Identifying and addressing these barriers with appropriate funding at a national level is essential for ensuring all authorities can meet training standards.

Engagement with BME Communities

Effective engagement with Black and Minority Ethnic (BME) communities remains a challenge. Ensuring that training is culturally sensitive and that authorities build trust with these communities is vital for improving reporting and support for victims of modern slavery.

RECOMMENDATIONS:

Standardisation of Training Modules

- Develop standardised training modules incorporating up-to-date information and best practices in modern slavery and human trafficking. Ensure all local authorities have access to these modules.

Regularly Recurring Training

- Encourage local authorities to implement regularly recurring training sessions. Aim for a minimum of bi-annual training to keep staff updated on current policies and practices.

Incorporate Comprehensive EDI and CS Themes

- Ensure all modern slavery training includes comprehensive modules on equality, diversity, and inclusion, as well as cultural sensitivity. Provide clear guidelines and examples to prevent reliance on stereotypes.

Use of Inclusive Language

- Promote the use of inclusive and non-stigmatising language in all training materials. Provide training on the impact of language and how to communicate respectfully about vulnerable populations.

Training Audits and Updates

- Local authorities should consider publishing details of their training offerings transparently online, for example, as part of Modern Slavery Statements
- Conduct regular audits of training materials to ensure they remain current and relevant. Establish a protocol for updating materials in response to new legislation and emerging best practices.

Collaboration and Knowledge Sharing

- Foster collaboration among local authorities and NGOs to share knowledge, resources, and best practices. Create a centralised repository for training materials and case studies that can be accessed and utilised by all local authorities.

NEXT STEPS

Development of Standardised Modules

BASNET to collaborate with After Exploitation and other stakeholders to develop standardised, up-to-date training modules by the end of the year.

Implementation Plan for Regular Training

Create an implementation plan to transition from one-off to regularly recurring training sessions. Provide a timeline and resources to support local authorities in this transition.

EDI and CS Integration

Design a comprehensive EDI and CS training framework. Offer workshops and seminars to train local authorities on how to integrate these themes into their modern slavery training.

Language and Communication Training

Develop a specific module on the use of inclusive language. Conduct train-the-trainer sessions to ensure consistent delivery across all local authorities.

Audit Schedule

Establish a regular schedule for auditing and updating training materials. Include stakeholder feedback and recent legislative changes in the audit process.

Create a Knowledge-Sharing Platform

Set up an online platform for local authorities to share resources, case studies, and updates. Encourage participation through regular webinars and discussion forums.

CONCLUSION

The findings from these FOI responses highlight significant gaps and inconsistencies in the provision of modern slavery training among local authorities. By implementing the recommendations and next steps outlined in this report, BASNET aims to improve the quality and consistency of training, ensuring that local authorities are better equipped to combat modern slavery and human trafficking while promoting equality, diversity, and inclusion.