



EXPLOITATION AND ITS LINKS TO HOUSING AND HOMELESSNESS: THE EXPERIENCE OF ROMANIAN AND ALBANIAN NATIONALS IN LONDON

MAY 2024

**STOP THE
TRAFFIK** 

1.

INTRODUCTION & METHODOLOGY

Utilising the power of people and technology, STOP THE TRAFFIK Group is working to prevent human trafficking globally through our innovative intelligence-led approach. By shining a light on this hidden crime, and by building resilience in communities and businesses, we can change the low-risk high-reward environment of which traffickers take advantage.

Between October 2023 and January 2024, STOP THE TRAFFIK Group (STTG) undertook a research study into understanding the ways in which Romanian and Albanian nationals are being exploited in the London Boroughs of Hammersmith & Fulham, Royal Borough of Kensington & Chelsea and the City of Westminster, and how this exploitation is linked to their housing situations. The aim of the study was to produce meaningful and actionable findings, learnings, and recommendations concerning how Romanian and Albanian nationals are being exploited and how this is linked to their housing situation, as well as to identify injustices faced by target communities in relation to housing. This is particularly pertinent, given that Albanian and Romanian nationals account for the second and third highest nationalities of persons who experienced MSHT and homelessness.¹

Based on the Pan-London data sharing project conducted by STTG with local authorities, health authorities, law enforcement agencies, and frontline organisations since January 2022, Romanian and Albanian nationals were identified as being at high risk of homelessness and trafficking in these three London boroughs. In response to this, STTG launched a prevention

campaign targeting Albanian and Romanian individuals in Hammersmith & Fulham, Royal Borough of Kensington & Chelsea and the City of Westminster with safety information about what labour exploitation looks like, how to adopt preventative measures to keep themselves safe, and details for support organisations in London. This took the form of geo-targeted social media advertisements on Facebook and Instagram targeting Romanian speakers aged 18-44 in the three boroughs. STTG also created an offline digital and printable resource available for Albanians in the three boroughs.

This report was made possible due to funding and support from social justice charity Commonweal Housing. Its content was formed through interviews and discussions with key stakeholders, with the goal to present findings that identify opportunities for change. STTG carried out 14 interviews with survivors, case workers, non-governmental organisations and law enforcement between October 2023 – January 2024. Information from survivors has been collected, anonymised and represented in this report only through the identification of general trends relating to their experiences of exploitation and its intersection with housing situations. Interviews were conducted using a trauma-informed approach.

We cannot stop trafficking alone. These insights have been converted into a shareable research report distributed across actors who can make a difference, including local authorities, law enforcement, and charities.

¹ Crisis and Project TILI (2021), No Way Out and No Way Home: Modern Slavery and Homelessness in England, Wales and Northern Ireland.

GLOSSARY

i. Modern Slavery

Modern slavery is an umbrella term which encompasses human trafficking, slavery, servitude, and forced or compulsory labour. The Modern Slavery Act 2025 is the primary legislation in the UK to combat modern slavery.

ii. Human Trafficking

Human Trafficking is an offence that involves the recruitment, movement or receipt of people for the purpose of exploitation through the use of threat, force, fraud or the abuse of vulnerability.

iii. National Referral Mechanism

The National Referral Mechanism (NRM) is a framework for identifying and referring potential victims of modern slavery. A referral can only be made by a First Responder. Victims under the age of 18 must be referred to the NRM, whereas adult victims of modern slavery must provide their consent to be referred.

iv. First Responder

In England and Wales, a 'first responder organisation' is an authority that is authorised to refer a potential victim of modern slavery into the National Referral Mechanism. The current statutory and non-statutory first responder organisations are: police forces; certain parts of the Home Office; UK Visas and Immigration; Border Force; Immigration Enforcement; National Crime Agency; local authorities; Gangmasters and Labour Abuse Authority (GLAA); Salvation Army; Migrant Help; Medaille Trust; Kalayaan; Barnardo's; Unseen; NSPCC (CTAC); BAWSO; New Pathways; Refugee Council.

v. Reasonable Grounds Decision

A Reasonable Grounds decision is an initial, objective decision within the NRM process that determines whether the government deems there to be "Reasonable Grounds" that the referred individual is a victim of modern slavery or human trafficking.

vi. Conclusive Grounds Decision

A Conclusive Grounds decision is the final determination under the NRM process by which the competent authority either accepts or rejects that the referred individual is a victim of modern slavery.

vii. Asylum

Asylum is the protection that a country grants to a non-citizen in its territory. An asylum-seeker is someone who is seeking asylum (international protection). Their request for refugee status, or complimentary protection status, has yet to be processed, or they may not yet have requested asylum, but they intend to do so. These persons still require protection whilst waiting for the outcome of their refugee status.

viii. No Recourse to Public Funds (NRPF)

Section 115 of the Immigration and Asylum Act 1999 states that a person will have 'no recourse to public funds' if they are 'subject to immigration control'. A no recourse to public funds (NRPF) condition precludes individuals from claiming most benefits, tax credits or housing assistance provided by the state.

IMMIGRATION REGULATION AND CONTEXT

The experience of Albanian and Romanian victims and survivors of modern slavery and human trafficking (MSHT) is differentiated due to their immigration status and immigration trends, with immigration status and MSHT being increasingly intertwined. Public narratives have also promoted a conflation of the two issues – a narrative that ultimately plays into the hands of traffickers. Changes to legislation combined with an increasingly hostile rhetoric around immigration and asylum has impacted the operating environment for first responders and service providers, as well as the political will to engage on the topic. The Albanian community has been particularly stigmatised, with Albanian Prime Minister Edi Rama accusing former Home Secretary Suella Braverman of fuelling xenophobic attacks. Organisations working with the Albanian community report that they remain particularly hidden from services as compared to the Romanian community, largely as Albania is not a member of the European Union (EU), and thus Albanians are more likely to have entered the country irregularly.

As Albania is not part of the European Economic Area (EEA), immigration controls are placed on Albanians which mean that they are more likely to hold a no recourse to public funds (NRPF) condition. Such a condition removes their entitlements to benefits and housing assistance. This increases their risk of homelessness, which traffickers use to their advantage.

Traffickers use the fact that Albania is now deemed a 'safe country'² by the UK government to control their victims by telling them that they cannot seek asylum in the UK, and that their only option is to remain in their exploitative situation.

Where MSHT victims apply for asylum and receive a negative decision in relation to their claim, this can be exploited by traffickers who convince their victims that they have no further legal recourse and that they will be subject to removal, which often terrifies their victims to go underground. As such, re-exploitation is common among those who receive a negative decision, as they are more likely to become disillusioned and feel failed by the systems around them. They may also consider their traffickers as the only community they have. Victims and survivors have reported that various community support groups have been the only thing preventing them from this fate.

For Romanian individuals, there is a general lack of understanding of the EU Settlement Scheme and what entitlements come with different statuses within the scheme. The Illegal Migration Act 2023, while not yet in force at the time of writing, has the potential to dramatically inhibit the ability of victims and survivors within the Albanian and Romanian communities to access support. The Act makes anyone who enters the UK irregularly subject to potential detention and removal, even with a positive Reasonable Grounds decision, i.e. if they have been identified as a potential victim of MSHT. The Act also disappplies any obligation to grant such individuals limited leave to remain. Significant anxieties exist among practitioners and those working with the target communities around the legislation and on the ability of first responders to engage with potential victims. Uncertainty surrounding when its provisions will come into force also inhibits the ability of service providers to adapt or provide guidance on what the changes will be.

² In September 2023 the Government issued a response to the Home Affairs Committee's Second Report of Session 2022-23, 'Asylum and migration: Albania', in which the Government stated that "Albania is a safe country and we have seen little evidence that its citizens should need to seek political asylum in the UK".

There is well-founded concern that an increasingly hostile environment, and in particular the forthcoming enforcement of the Illegal Immigration Act will create a situation where potential victims cease to present themselves to authorities. This will, STTG believes, mean a corresponding drop in the number of referrals to the National Referral Mechanism (NRM). Such a scenario will have severe implications for the ability of victims and survivors within the Albanian and Romanian communities in London to access services, and on the ability of local authorities to gather accurate data in order to inform their programming. Where local authorities are already massively underfunded, a drop in referrals from the target communities and a corresponding drop in data on their exploitation will almost certainly impact local authorities' abilities to allocate resources for the issue.

HOUSING FOR MSHT VICTIMS AND SURVIVORS ACCORDING TO THE NRM PROCEDURE

As per the Department for Levelling Up, Housing and Communities' Homelessness Code of Guidance for Local Authorities, the following is the procedure for local authorities to allocate accommodation to homeless victims of MSHT.

i. Pre-NRM

In cases where victims are not referred into the NRM, they are disadvantaged by a lack of practical and emotional support to recover from the experience of MSHT.

This includes a lack of housing support. It is therefore vital that first responders enact their legal duty to report suspected victims of MSHT to the NRM so that they can claim the support they are entitled to which are intended to lift them out of a situation of exploitation and onto a pathway to rebuild their lives.

ii. During-NRM

As designated first responder organisations, local authorities should refer any individual suspected to be a victim of MSHT to the NRM. The adult has to provide informed consent to be referred. If the adult does not give consent to be referred, the housing authority has a duty to notify the Home Office under section 52 of the Modern Slavery Act 2015.

Following the referral of an adult into the NRM, an initial 'Reasonable Grounds' decision will be made by the Single Competent Authority, where possible, within 5 working days. In reality, this process takes much longer.

If an adult receives a positive Reasonable Grounds decision through the NRM, they are entitled to support through the Government-funded Modern Slavery Victim Care Contract (MSVCC). This includes safehouse accommodation, financial support, a support worker to help facilitate access to wider services, and support provided by local authorities and asylum services. The Salvation Army is the Prime Contractor of the MSVCC and will undertake an initial Risk Assessment for a potential adult victim once they have received the referral. This will determine the potential victim's immediate needs and identify if accommodation is required.

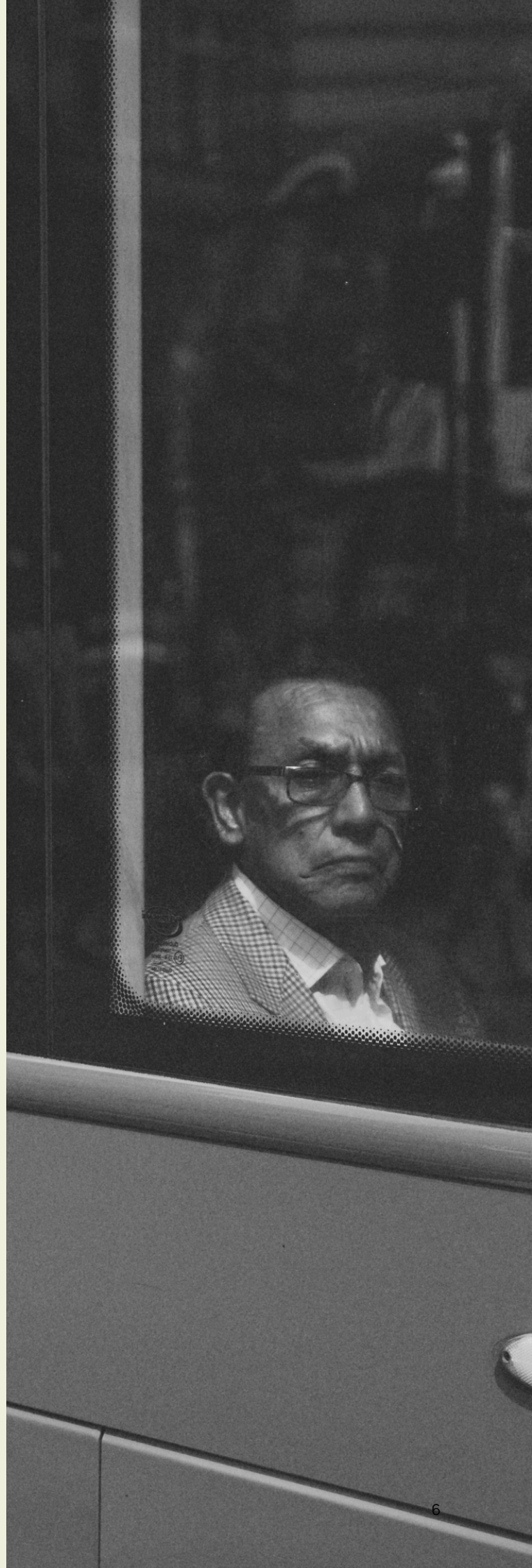
Emergency accommodation is available under the MSVCC where potential victims are destitute and have no safe accommodation, which can be provided prior to a Reasonable Grounds decision being made.³

Where a potential victim is already in suitable accommodation, such as accommodation secured by the local authority or asylum accommodation, and there is no risk to them remaining at their current location, they will usually continue to remain there unless a MSVCC needs-based assessment reveals a specific need for MSVCC accommodation.

iii. Post-NRM

After a Reasonable Grounds decision, a Conclusive Grounds decision will be made which determines whether the individual is a confirmed victim of MSHT. Following a positive Conclusive Grounds decision, victims are entitled to at least 45 calendar days of 'move-on' support and will only be removed from MSVCC support when it is appropriate. The MSVCC support providers may support the victim to make a homeless application and/ or make a voluntary referral to the housing authority. Housing authorities become responsible for securing housing and should establish local, joint working arrangement with MSVCC support providers where appropriate, to help identify people at risk of homelessness as early as possible and maximise the opportunities to prevent homelessness and the risk of re-exploitation.

³ Further details can be found in Annex F of [the Modern Slavery Act 2015 Statutory Guidance for England and Wales](#).



2.

FINDINGS

EXPLOITATION OF ALBANIAN AND ROMANIAN NATIONALS IN LONDON

i. Types of exploitation

As identified by this research and previous campaigns run by STT, Albanian and Romanian individuals continue to travel to London on the basis of promises made by traffickers of safety, a better life, or employment opportunities, with traffickers specifically targeting vulnerable communities. As reported by survivors within both communities, in many cases the offers promised do not materialise, and instead individuals experience a range of exploitation at the hands of traffickers and their affiliates. Within the three target boroughs, it is commonplace for victims and survivors of MSHT to be working in one or more boroughs and living in another, making it challenging for local authorities to respond.

The types of exploitation experienced by victims and survivors interviewed during this study varies depending on a range of factors, including nationality and gender. Forced labour on construction sites and car washes, forced begging, sexual exploitation, and – increasingly – forced labour on cannabis farms are all forms of exploitation experienced by the target communities for this report. With many types of exploitation, survivors report it being commonplace to live in accommodations owned by traffickers, with living conditions often incredibly crowded and with controlled/ limited movement. These situations give traffickers a high degree of control over their victims, who are often forced to pay high amounts of rent to the property owner.

Women – Albanian and Romanian alike – are more likely to be exploited sexually and represent a particularly vulnerable sub-sect of the target demographic.

Victims of sexual exploitation, including sex trafficking, are more closely controlled by their exploiters and given little exposure to the outside world, making them more isolated and less likely to encounter information campaigns or opportunities for intervention. Stigmas surrounding sex work in Albania and Romania mean victims are less likely to return to their countries of origin voluntarily. In some cases, clients of sexually exploited individuals have recognised the signs and referred the situation to authorities.

ii. Recruitment

Albanian and Romanian individuals exploited in London are almost exclusively targeted by individuals from their respective nationalities, often while still in their countries of origin. Experiences in both the Albanian and Romanian communities show that exploiters particularly target individuals from vulnerable populations, and in particular from rural areas. Individuals who do not speak English, and in some cases who can't read or write in their native language, are especially vulnerable.

Traffickers use deception, including false promises relating to employment prospects and immigration regulations, to recruit victims. Albanian victims are more likely to have been brought into the UK irregularly, while Romanian victims are sometimes brought in on a tourist visa following the end of freedom of movement due to the UK leaving the European Union.

iii. Control

Once their victims enter the UK, traffickers tend to confiscate their victims' identification documents and use their immigration status as a means of control, including the threat of reporting them to the authorities to have them removed from the country. Organisations working with the Romanian community report traffickers misleading their victims by telling them that they have the right to work in the UK when in fact only an application for a work permit has been submitted, leaving their victims in an irregular situation once they arrive in the UK. Traffickers will often charge their victims extortionate "visa application" fees, which are frequently used, alongside money paid to get individuals to the UK, as a form of debt bondage to control victims and exact forced labour from them.

iv. Experience of leaving exploitation

Victims and survivors of MSHT can be made homeless after escaping their exploitation or after being "dismissed" by their traffickers. While data across the country shows a significant portion of homeless populations having a history of being trafficked, community groups working with Albanian and Romanian victims and survivors share that they rarely stay on the streets. Instead, they either go into hiding, return to their country of origin, or enter the NRM system. Victims of MSHT who are left homeless rarely self-refer due to a lack of awareness of homeless services. They are thus more likely to be referred through law enforcement, healthcare providers or local authorities. Their willingness to present themselves to authorities as potential victims of MSHT depends on their knowledge of the signs of exploitation, with

victims reporting a lack of awareness that what they were experiencing was indeed exploitation. Hesitancy to present to authorities also derived from fear over their immigration status and the risk of deportation. Victims who are identified do not always share their stories fully with service providers for a number of reasons, such as lack of trust.

For victims and survivors who enter the NRM, the UK's framework for identifying and referring potential victims of modern slavery can be traumatising and difficult to navigate. For example, members of the Albanian community reported Home Office screenings as re-traumatising and not fit for purpose. Victims and survivors described a lack of empathy and lack of time given to victims and survivors to understand the questions they are being asked and reflect on their answers. Some reported being given overly technical information but not basic information about where they can stay or how to access food. A general approach of 'guilty until proven innocent' - as one survivor put it - was reported throughout interviews when discussing the NRM interview process. Interviewees also reported receiving positive Certified Grounds decisions which were later followed up with refusals. Victims and survivors generally report being treated as though they lack credibility, when in fact they are victims of, and witnesses to, serious organised crime.

⁴ Research conducted by London-based charity Hestia in 2019 suggests nearly 10% of rough sleepers alone had a history of modern slavery.

HOUSING

i. Availability and accessibility

Where accommodation is provided by a housing authority after a positive Conclusive Grounds decision, victims and survivors have reported a general instability in the provision and retention of housing. This was also reported after a Conclusive Grounds decision, which interviewees reported being a destabilising period, given the transfer of responsibility for support between organisations once a positive decision is received.

Victims and survivors reported that some accommodations require service charges – in some cases £10 per week – which can be impossible for some individuals to pay, particularly those unable to work due to their immigration status. Individuals reported being forced out of their accommodation when they could not pay the accommodation charges.

Hammersmith and Fulham, Kensington and Chelsea, and Westminster Councils all employ designated Modern Slavery Leads to coordinate the local authority's response to modern slavery and human trafficking. This is a rarity, with only a handful of local authorities nationally investing in such a role. However, as with other councils, they are under-resourced and under increasing pressure to house vulnerable populations within their boroughs.

In this context, victims and survivors of MSHT within the Albanian and Romanian communities have reported severe challenges in accessing both emergency and short-long term accommodation. MSHT is not explicitly considered 'priority need' for housing, meaning an assessment of vulnerability, essentially the NRM process, is

required before victims and survivors can be considered a priority for housing. Extending the automatic grant of priority need status to victims of MSHT has been recommended by service providers and non-governmental organisations, as well former Independent Anti-Slavery Commissioner Dame Sara Thornton in May 2020.⁵

Due largely to availability and partially as a result of deliberate policy, following a positive Conclusive Grounds decision, victims are often placed in housing far away from where they have been exploited. Accommodation within London is incredibly scarce, meaning the majority of victims and survivors are dispersed outside of London. Housing victims and survivors far away from their exploiters is generally perceived as positive for survivors. However, it also has the effect of removing people from their community and placing them in an area that is less culturally familiar and without support networks. Contradictorily, moving victims away from London (where services for survivors of MSHT are condensed) comes with its own risks for re-exploitation, as identified by organisations working with the target demographics. Organisations working closely with Albanian and Romanian communities have reported a hesitancy to approach local authorities for housing assistance if they believe they will be moved far away from these networks. The risk of homelessness is therefore increased where a victim or survivor is offered accommodation outside of London, as some refuse to go. In such cases, service workers have reported victims instead opting to find accommodation with friends, or people known to them, which in turn increases their vulnerability to being exploited again.

⁵ <https://www.antislaverycommissioner.co.uk/media/1434/iasc-letter-to-victoria-atkins-mp-may-2020.pdf>



ii. Conditions

Individuals within the NRM process are most frequently placed in B&B accommodations, shared accommodation or private accommodation sourced by the individual. Victims and survivors of MSHT interviewed for this report indicated that the quality of accommodation offered to them was often poor, both in living conditions and safety.

Young female victims reported being subject to sexual harassment in accommodation, which was upsetting and re-traumatising. Female victims and survivors, including those with a history of sexual exploitation, reported being placed in accommodation that were majority male, which was re-traumatising.

Food quality is poor and not culturally appropriate, sometimes creating health issues due to lack of nutritional value. Lack of financial support is an issue, exacerbated among victims with NRPF, leading to some getting involved in criminal activity or illegal work out of desperation. Victims and survivors reported being subject to offers of criminality by other occupants in accommodations, including drug dealing.

These conditions combined can lead to severe mental health issues. Victims reported the inappropriateness of accommodation as having serious mental health impacts, particularly where female victims had to share accommodation with male victims. Victims and survivors reported a fear of voicing their concerns or complaints with accommodation, for fear of repercussions.

3.

CONCLUSION



Current services and support available to Albanian and Romanian victims and survivors of MSHT are inadequate, which increases the risk of re-exploitation. Hostile changes to the UK's immigration policy landscape have amplified vulnerabilities and made victims and survivors within these communities more likely to remain out of the system and fearful of authorities, ultimately bolstering the status and power of traffickers. The lack of clarity around implementation of MSHT provisions within the Illegal Migration Act 2023 have left service providers in a challenging position, unable to plan for its implementation and unsure of how to engage with potential victims and survivors without contributing to their incrimination.

Victims and survivors remain vulnerable to homelessness, a vulnerability that is increased due to their accommodation being tied to their exploitative work/ trafficker. Once escaping exploitation, they face a poor quality of accommodation services and a lack of availability. Female victims face re-traumatisation by being placed in accommodations that are majority male, food quality is poor which leads to health issues, and a NRPf status drives victims and survivors into criminal activity or illegal work.

Additionally, the lack of availability of accommodation means they are placed in accommodation outside of London, in turn increasing the risk of homelessness. All these factors contribute to an increased likelihood of re-exploitation for Albanian and Romanian victims and survivors of MSHT.

RECOMMENDATIONS

This report has identified the exploitation faced by Albanian and Romanian nationals in the UK and how this is intrinsically linked to their housing situation. In addition, it has highlighted the problems faced by the accommodation services provided by local authorities and how this can also increase the risk of victims and survivors being re-exploited. As a result, STTG calls on all relevant actors listed below to carefully consider the following recommendations and take immediate action to implement their provisions, with specific sensitivity to the unique experiences of, and challenges faced by, Albanian and Romanian victims of MSHT in London:

1	<p>The Department for Levelling Up, Housing, and Communities should extend the automatic grant of priority need status to include survivors of modern slavery and human trafficking. This will allow them to access housing, thus greatly reducing the risk of re-exploitation which is exacerbated by homelessness.</p>
2	<p>The Department for Levelling Up, Housing, and Communities should fund Modern Slavery Leads in each Local Council. Local Councils should also consider the need for industry-specific training within sectors where MSHT is prevalent, in order to spot the signs of exploitation.</p> <p>Hammersmith and Fulham, Kensington and Chelsea, and Westminster Councils should share their experiences and learning with councils that do not have Modern Slavery Leads to demonstrate their impacts.</p> <p>Establishing a Modern Slavery Lead will greatly combat MSHT by ensuring there is someone responsible for driving the issue forward within councils. This includes leading work such as: collating NRM referral statistics and intelligence; convening council working groups to share work on MSHT; building an organisation-wide picture of council activity on MSHT; providing MSHT to council staff and local emergency services; and developing internal referral pathways. Such work would bolster the council's role as a First Responder and ensure it meets its legal duty of notifying the Home Office of when it identifies a potential victim of MSHT.</p>
3	<p>Local authorities should produce more targeted and accessible information campaigns translated into Albanian and Romanian, both through digital and non-digital means, to target potential victims with information on what exploitation looks like, how to adopt preventative measures to keep themselves safe, and details for support organisations in London.</p> <p>This will allow potential victims to be reached with vital information that will be pivotal in accessing the assistance they need to escape their exploitation.</p>
4	<p>Civil legal aid providers should consider producing quality, specialist and accessible legal guidance tailored specifically to the Albanian and Romanian communities. This will help them navigate a rapidly changing and complex immigration landscape, ensuring they understand what the changes mean for them and their entitlements.</p>

5

Local authorities should consider enhanced engagement with community groups supporting Albanian and Romanian individuals. This is particularly relevant in the case that traditional service providers and first responders become less able to engage with potential victims as a result of the Illegal Immigration Act 2023.

This will ensure that potential victims of MSHT are still identified and reported to the Home Office.

6

The Homelessness Guidance should be updated for all actors housing persons and communities to mandate gender-sensitive and gender-specific accommodation for victims and survivors of MSHT, particularly for victims of sexual exploitation.

This will ensure safer conditions in accommodation that will prevent victims and survivors from being re-traumatised.

7

When re-housing victims and survivors outside of London and their communities, local councils must run a solid risk-assessment due to cases of re-exploitation. Partnerships must be enacted in these areas with preventing and safeguarding aspects that ensure relocation does not lead to victims and survivors opting out of accommodation outside of London or choosing to live with those they know, which increases the risk of re-exploitation.

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