

Supporting the Pivot House feasibility study

Report for Woolwich Service Users Project (WSUP)

October 2025

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Introduction

The WSUP, established in 2017, is a grassroots charity driven by lived experiences of their team, committed to providing practical and emotional support to over 600 individuals per year. WSUP guests face homelessness and health inequalities, with 48% reporting mental health issues and 36% living with medical conditions. WSUP's health programme focuses on reducing these inequalities, especially among people sleeping rough and those with unclear immigration statuses.

WSUP's vision is a community free from hardship and housing instability. WSUP's ambition is to prevent and ultimately end homelessness in their local community. They are achieving this by delivering compassionate and practical support services that empower individuals to rebuild their lives with dignity and stability. They build their work on nine cornerstones which are:

No judgement. We welcome every person with openness and without stigma or prejudice.

Inclusion. We create a space where everyone belongs, regardless of their race, gender, faith or cultural background.

Dignity. We treat every individual with respect, compassion, and humanity.

Radical Listening. We listen deeply, honouring each person's voice and experience.

Empathy. We meet people where they are, seeking to understand their needs and emotions.

Kindness. We provide practical, meaningful support through kindness.

Professionalism. We act with integrity, reliability, accountability and care in all that we do.

Solidarity. We stand alongside people experiencing homelessness.

Advocacy. We advocate for change and work with trusted partners to transform the policies, systems, and perceptions that contribute to homelessness.

WSUP is seeking to pilot 'Pivot House', a trauma-informed housing model that bridges critical gaps for pre-National Referral Mechanism (NRM) survivors of modern slavery and newly granted refugees at risk of exploitation in London, particularly focused on people in the Lewisham and Greenwich boroughs. These individuals often face significant delays or exclusions from formal NRM support, leaving them vulnerable to re-trafficking and homelessness. By providing immediate safety and comprehensive care, Pivot House will help guests navigate legal and personal challenges at this pivotal moment, with support from dedicated caseworkers and a network of partner organisations.

WSUP confirm the likely location of the Pivot House project will be in Southeast London, strategically linked with WSUP's existing day centre. This location is ideal as it

builds upon WSUP's established presence and community trust in the area, providing access to additional support services. Being based in Southeast London allows Pivot House to integrate with local healthcare providers, social services, and community partners already engaged in WSUP's Community Pulse (Experts by Experience programme) initiative, ensuring comprehensive, coordinated support for individuals at critical transition points.

WSUP require support with a feasibility study to inform the development of this new accommodation provision by establishing what kind of accommodation and attached support is needed, and what arrangements are needed to ensure this is easily accessible to improve outcomes for people who are pre-NRM survivors of modern slavery and newly granted refugees at risk of exploitation in London.

This report summarises the key themes arising from;

- Desk-based research
- Engagement of people with lived experience, through in person focus groups
- Consultation with key stakeholders, through online engagement meetings

and makes recommendations to WSUP regarding the;

- Core principles on which a new housing and support service should be based upon
- Potential delivery models the organisation might wish to consider

to utilise in funding applications to mobilise this new service for survivors of modern slavery who are pre-NRM and/or newly granted refugees at risk of exploitation.

Aims

Homeless Link were asked to support WSUP with the following items:

1. Needs assessment
 - a. Conduct consultations/interviews with WSUP staff/volunteers, individuals with lived experience, and stakeholders – including public health, local authorities, anti-trafficking organisations and housing providers.
 - b. Document gaps in services and assess demand for pre-NRM housing.
2. Review of transitional supported housing model
 - a. Research and analyse existing housing models, focusing on trauma-informed approaches.
 - b. Incorporate stakeholder insights into the design of the service.

With the output of this activity intended to help inform the feasibility study and submission that WSUP presents to funders.

Methodology – the approach

Desk-based research

We completed a short desk-based study of published data and literature about existing housing provision for people who are pre-NRM survivors of modern slavery and newly granted refugees at risk of exploitation.

Focus groups

We held two in-person focus group with eight people with relevant lived experience in conjunction with the following organisations:

- The Passage
- Lewisham Refugee and Migrant Network (LRMN)

The focus groups took place at The Passage centre in Victoria, London, and a community premises used by the LRMN, with a team member from each organisation inviting attendees to take part and being present during the discussions. Travel expenses were paid for attendees along with providing them each with a shopping voucher as a small thank you for giving up their time and sharing their experiences.

Stakeholder engagement interviews

Seventeen online interviews were held with key agencies during the engagement phase to gain their insight and recommendations into the key themes to inform the study including:

- Need and demand
- Housing and support requirements
- Barriers and challenges
- Partnerships and multi-agency working
- Sustainability and future planning

Representatives came from a range of sectors including local authorities, charities, housing providers, health providers, as well as regional and national advocacy groups. A full list of the organisations who were represented is listed in the appendices.

Key findings

Desk-based research

A review of a range of subject matter publications has confirmed the need for additional housing models for people facing these difficult circumstances with insights into the principles on which they should be commissioned and provide support to individuals.

Publication	Key summary themes
<p>What are the key areas of injustice at the intersection of the migration, asylum & trafficking system(s) and housing / homelessness – and how can housing solutions address these?</p> <p>Report for Commonwealth Housing – Philip Brown – September 2024 Housing injustice facing migrants, sanctuary seekers and trafficking survivors intensifies at transition points</p>	<p>This study underscores the need for a holistic, survivor-centred approach to housing and support, ensuring security, dignity and independence for these population groups.</p> <p>Challenges in housing and support</p> <ul style="list-style-type: none"> • Homelessness risk: the short 28-day notice period for refugees leaving government-supported housing significantly increases the risk of homelessness. • Housing precarity: reduced social housing availability, long waiting lists and competition push people into poor-quality, insecure and overcrowded private rentals. • Trafficking and housing connection: survivors of modern slavery often face heightened risks of homelessness, re-traumatisation and re-exploitation due to unstable housing situations. • Barriers to support: migrants and people seeking sanctuary experience additional vulnerabilities due to socio-legal status, language barriers and fear of deportation, limiting access to services. <p>Good practice approaches</p> <ul style="list-style-type: none"> • Safe and supported housing: high-quality safe houses for survivors of trafficking and well-managed houses in multiple occupation (HMOs) can provide security and peer support. • Integrated support services: accommodation should be paired with trauma-informed support workers who understand individuals' needs, fostering recovery and stability.

	<ul style="list-style-type: none"> • Community-led solutions: hosting and lodging schemes, community navigators, and local organisations help individuals understand complex systems and access essential services. • Flexible accommodation models: combining short-term emergency housing, transitional accommodation and long-term solutions ensures stability through different life stages. <p>Strategic considerations for feasibility</p> <ul style="list-style-type: none"> • Preventing re-exploitation: early interventions at key transition points - such as asylum to refugee status - can prevent vulnerability and instability. • Utilising latent housing capacity: exploring empty homes, redundant commercial properties and unused student accommodation can expand available housing. • Partnerships with housing providers: engaging housing associations, private landlords and government bodies can increase sustainable support options. • Financial support mechanisms: rental deposit schemes, bond guarantees and assistance with delays in benefit payments can improve access to stable housing.
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<p>The Key Issue: Housing For Survivors of Modern Slavery. This report is an overview of the housing landscape for survivors of modern slavery and exploration of a Whole Housing Approach</p> <p>Published: October 2023 The+Key+Issue+Report+Oct+2023.pdf</p>	<p><i>“The Modern Slavery Core Outcome Set (MSCOS), produced with those with lived experience of modern slavery, identified secure and safe housing as one of the fundamental needs for survivor recovery, wellbeing and integration. Housing was ranked in the MSCOS study as a higher priority than ‘safety from any trafficker or other abuser’ as the two are intertwined; housing is a fundamental component for safety.”</i></p> <p><i>“Survivors should live in a place...where they feel safe and secure, and exercise freedom and independence, and live without suffering, abuse, or exploitation. Housing should offer private personal space, be hygienic, have enough peace to be able to rest and sleep, and</i></p>
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	<p><i>preclude worries about being evicted. Key outcome features include: safehouse accommodation being gender-sensitive, allowing for the proper investigation of complaints, having cooking and cleaning facilities, not being overcrowded, and being a place where survivors feel respected.”- MSCOS study descriptor. Modern Slavery Core Outcome Set, Secure and Suitable Housing https://www.mscos.co.uk/secure-and-suitable-housing.html</i></p> <p><i>“Pre-NRM accommodation is a key issue, accommodation is required before a client goes into the contract, some go into B&Bs and disappear, lost before they are able to access the system.” – West Midlands Anti-Slavery Network</i></p> <p>The document identifies several key challenges with accommodation for survivors of modern slavery and advocates for a more structured and survivor-centred housing system that prioritises stability and long-term recovery.</p> <ol style="list-style-type: none"> 1. Location: survivors are often placed in areas that are unfamiliar or lack the necessary support networks, which can affect their recovery and reintegration. 2. Stability: accommodation is frequently temporary, leading to uncertainty and repeated moves, which can disrupt efforts to rebuild a stable life. 3. Suitability: housing options may not always meet survivors’ specific needs, such as accessibility, safety from traffickers or gender-sensitive environments. 4. Personal agency: many survivors feel they lack control over their housing situation, reinforcing a sense of dependency and vulnerability. 5. Accountability: there are concerns about the oversight and quality of accommodation providers, with inconsistencies in standards and support.
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	<p>6. Challenges for local authorities: limited resources and bureaucratic hurdles make it difficult for local authorities to provide adequate housing solutions for survivors.</p> <p>These challenges highlight the need for a more holistic and survivor-centred approach to accommodation.</p> <p>Local authorities now have formal oversight of supported housing providers under the <i>Supported Housing (Regulatory Oversight) Act 2023</i>. This legislation empowers councils to introduce licensing schemes, enforce national standards (once published), and take action against non-compliant providers. However, the effectiveness of this oversight will depend heavily on local implementation, resourcing, and political will.</p> <p>At this stage, WSUP do not hold formal data on the quality or regulation of supported housing in Southeast London. WSUP’s understanding is based on qualitative evidence gathered through stakeholder interviews and focus groups, which highlighted inconsistencies in housing standards and concerns about provider accountability.</p> <p>The document also outlines the importance of using the Whole Housing Approach (WHA) and outlines a strategy for improving accommodation options for survivors of modern slavery by drawing on lessons from the domestic violence sector. Here are the key themes:</p> <ol style="list-style-type: none"> 1. Holistic framework: WHA takes a broad, survivor-centred perspective, integrating different types of housing options and support services to provide stable living conditions tailored to individual needs. 2. Benefits of WHA: this approach ensures survivors can access safe, long-term housing rather than being stuck in temporary accommodation. It promotes independence, stability and recovery. 3. Challenges and limitations: while WHA offers a promising model, implementing it for survivors of
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	<p>modern slavery faces barriers, including funding limitations, lack of awareness, and difficulties in coordination across different agencies.</p> <p>4. Recommendations for application: the report suggests adapting WHA for modern slavery, emphasising collaboration between housing providers, government agencies and anti-slavery organisations to create sustainable solutions.</p>
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<p>Unlocking the door: a roadmap for supporting non-UK nationals facing homelessness in England</p> <p>Unlocking the door - Roadmap Report 2022 final.pdf</p>	<p>This report, written by Homeless Link and NACCOM, highlights best practice to reduce and prevent homelessness and its effects on non-UK nationals. Within the report, there is some specific guidance around developing inclusive services for this group:</p>
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Figure 1 - Elements of an inclusive local homelessness system:

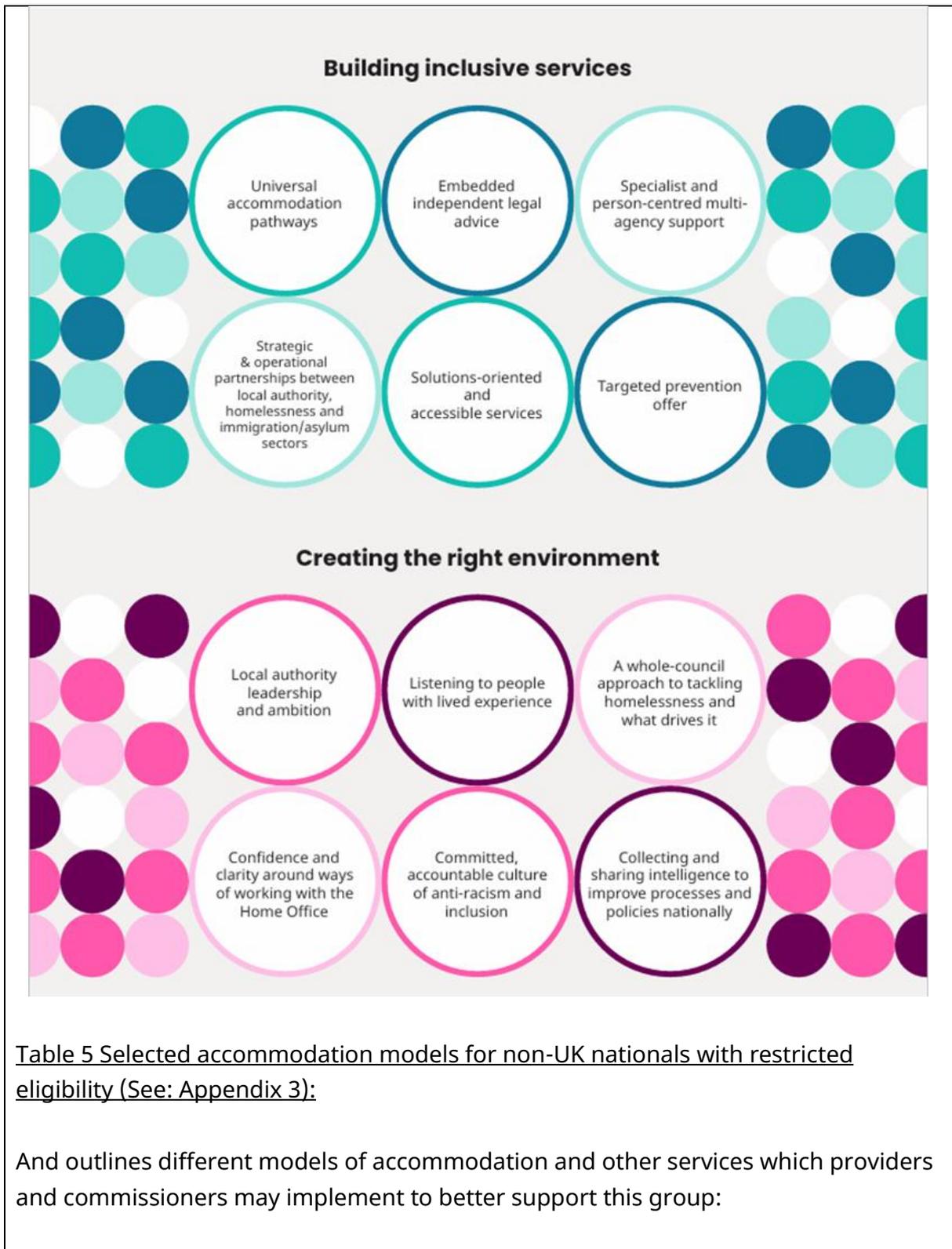


Table 5 Selected accommodation models for non-UK nationals with restricted eligibility³¹

Model type	Description	Funding arrangements	Target cohort	Model in action
The local authority has a funding role				
Use of meanwhile premises by local authority	Unused land or properties owned by the local authority and earmarked for future developments are made available rent-free for a specified period	Temporary development of site and support can be funded or part-funded by local authority budgets.	n/a	Used by Haringey and Redbridge councils to accommodate non-UK nationals with restricted or uncertain eligibility. Redbridge Council made Malachi Place available to The Salvation Army on a 5-year lease to create a 'pop up hostel and workshop' prior to the Ilford town centre regeneration. It consists of converted shipping containers that can accommodate 42 people, including 15 with restricted eligibility. ²¹
'Rent-free' bedspaces in local authority-commissioned accommodation	These bedspaces are provided and funded without the expectation of Housing Benefit. They are often utilised as short-term 'assessment beds' to bring people off the streets while their entitlements are being determined, but can also be used while applications are being made and processed.	Funded or part-funded by local authority pots that are not 'public funds', e.g. Rough Sleeping Initiative (RSI), or by charitable fundraising coordinated by the local authority, e.g. the Greater Manchester Mayor's Charity.	Often targeted at non-UK nationals with uncertain status or those expected to have positive immigration decisions, and therefore prospects of relatively speedy move-on.	A Bed Every Night, Greater Manchester, provides 60 bedspaces for people with NRPF and in 2021-22 accommodated 204 people with NRPF who were rough sleeping or at risk. It is funded by the Mayor's Charity and other statutory partners, and delivered by the region's constituent councils. ²² Since 2011, the GLA has funded No Second Night Out hubs across London. They provide a rapid response assessment and triage, supported by emergency accommodation for people sleeping rough. The GLA's Holistic Assessment Service (HAS) also provides wrap-around assessment alongside emergency accommodation to rough sleepers with medium to high support needs and unclear entitlements. ²³ City of London provides three RSI-funded bedspaces within a larger hostel for rough sleeping EEA nationals who are work-ready and eligible to apply for the EUSS, with a move-on target of eight per annum. Elsewhere in London, Lambeth Council provides eight beds for non-UK nationals with a history of rough sleeping who are addressing their immigration issues and are work-ready.
Accommodation for public health purposes	Apart from COVID-19, some local authorities have long-used public health powers (and funding) to accommodate non-UK nationals with restricted eligibility in order to protect them and their communities from risk of infection.	Funded by the local authority (public health and/or housing budget)	Non-UK nationals with restricted eligibility being treated or protected from an infectious disease	Since 2009, Homerton Hospital TB team has worked with Hackney Council to house tuberculosis patients with restricted eligibility in temporary accommodation, rather than having them stuck in hospital. The project dramatically improved treatment adherence and, given the high cost of acute hospital beds, made significant savings for the system. ²⁴
The local authority has a facilitative role, in partnership with the voluntary sector				
'Peppercorn rent' or reduced fee schemes	Social landlords or private individuals can offer existing properties to charities for little or no rent. This is more likely in low rent areas.	The rent may be funded by RPs via grants, donations or rental surpluses from other properties. ²⁵	n/a	A number of housing associations fulfil their charitable mission in this way. These include Soha Housing's provision of 12 beds to the Oxfordshire Homeless Movement/NRPF project and Arawak Walton's provision of two houses to the Boaz Trust for a discounted lease fee. ²⁶
Cross-subsidised housing schemes	Cross-subsidy models allow the provider to offer 'free' rooms to people with NRPF by covering their costs from other rental income or funding. Typically, this means providing rooms within a house or portfolio to refugees who can work or claim Housing Benefit) or families being housed by social services.	The costs of accommodation for people with NRPF may be covered by rental income from other residents (e.g. refugees) or funding from social services.	n/a	The Boaz Trust runs a cross-subsidy model that houses 40 single adults with NRPF following refused asylum claims and 34 refugees separately across 20 houses in Greater Manchester. Open Door North East operates a similar model in partnership with Stockton on Tees Council. Praxis and Commonwealth Housing's NRPF project secured seven properties to offer to local authorities to house destitute non-UK national families who they have a duty to accommodate under Section 17 of the Children Act 1989. Income received is used to provide free rooms, either in a house shared with families or elsewhere. ²⁷
Hosting schemes	A range of formal and informal, emergency and long-term schemes where individuals make a room available in their home for a specified time.	Costs typically covered by associated charity, but support services may be provided by the local authority.	Often but not always aimed at refused or homeless asylum seekers.	Housing Justice's London Hosting Network, Hope at Home, Homes for Refugees and Positive Action in Housing all operate prominent and long-running hosting schemes. ²⁸ Safeguarding, supervision and monitoring are crucial aspects of such schemes to protect hosts and hostees. ²⁹
Properties or bedspaces provided by charities or faith groups, e.g. non-commissioned shelters or hostels	Properties may be owned by the charity/faith-based organisation or provided to it	Costs typically covered by associated charity, but support services may be provided by the local authority.	n/a	A range of charities and faith-based organisations across the country make accommodation available to non-UK nationals with restricted eligibility, often in close collaboration with the local authority, e.g. The Salvation Army, St Mungo's.

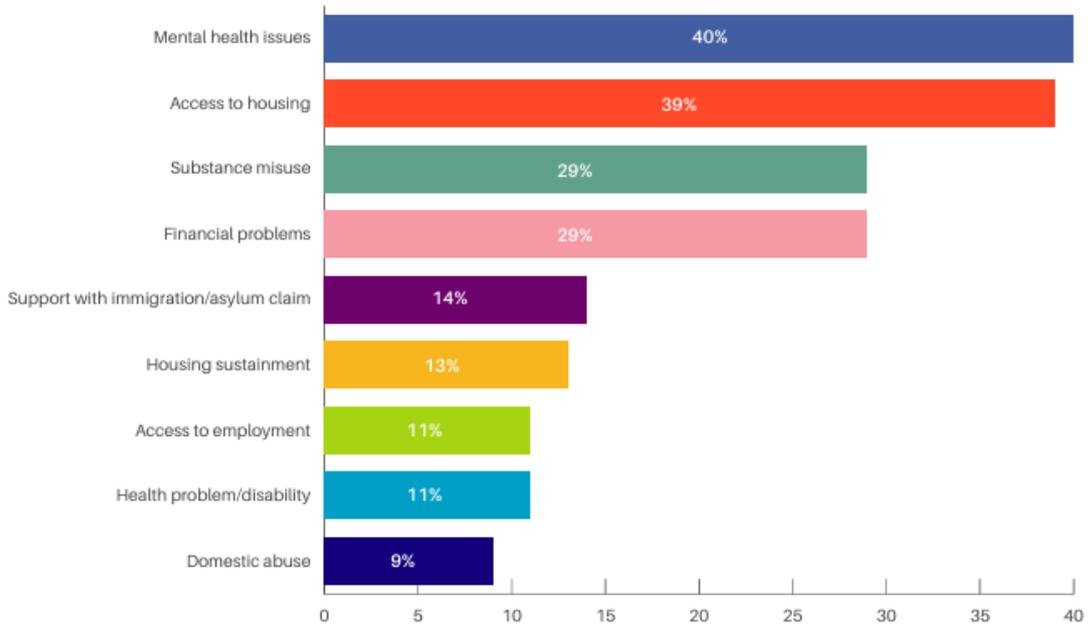
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 28. NACCOM (2019) Housing Toolkit. Available at: https://naccom.org.uk/wp-content/uploads/2019/10/NACCOM-HousingToolkit_FINAL.pdf
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 30. NACCOM (2020). Hosting Toolkit. Available at: <https://naccom.org.uk/wp-content/uploads/2020/10/NACCOM-HostingToolkit-2020-03-11-final-digital.pdf>
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No way out and no way home: modern slavery and homelessness in England, Wales and Northern Ireland.
 Published by Crisis as part of Project TILI.
 Sam Parker - May 2021
[no-way-out-and-no-way-home-final-designed.pdf](#)

In this 2021 report, Crisis provided an overview of the needs of people experiencing modern slavery and homelessness across the country to better inform service design and provision.

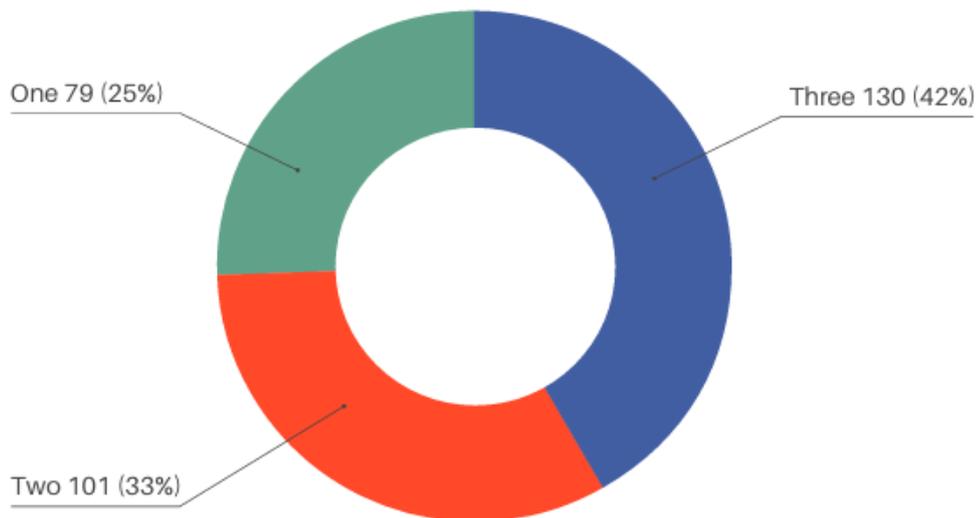
Specific information on support needs confirms mental ill health and housing as the most common support need followed by substance use and financial issues:

Figure 11 Most common support needs by percentage of survivors
(n=310)



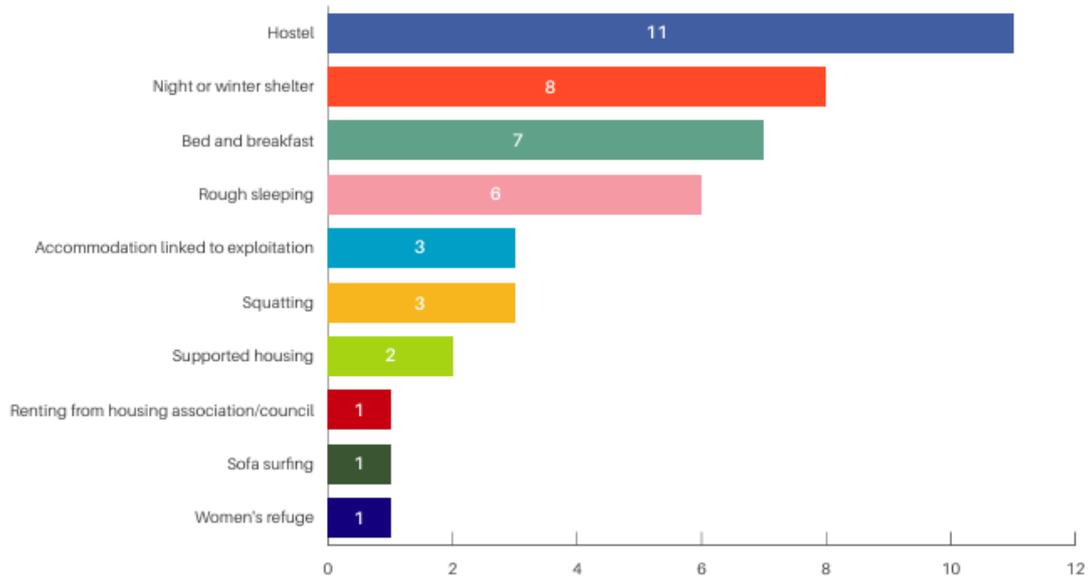
with it being common for an individual to have more than one support need at a time:

Figure 12 Number of support needs recorded for survivors
(n=310)



The report also researched the needs of people who had refused an NRM referral, confirming that most were subsequently living in insecure temporary accommodation (hostels, night shelters, B&Bs) or sleeping rough:

Figure 21 Living situation of survivors after refusing an NRM referral
(n=43)



From its findings, the report confirmed how a housing-led approach should be central to supporting survivors of modern slavery, enabling rapid transition from unsafe or exploitative accommodation into stable, permanent, and affordable homes.

Given that many survivors have lived in housing directly tied to their exploitation, safe and secure housing must be a foundation for recovery. Temporary accommodation often prolongs instability, worsens poor mental health and creates barriers to essential support, particularly when survivors are moved between local authorities. Solutions should include greater use of private rented sector (PRS) access schemes and Housing First models, especially for those with complex needs, ensuring that housing is not a reward after recovery but a prerequisite for it.

<p>Principles that underpin early support provision for survivors of trafficking British Red Cross, the Human Trafficking Foundation, the Anti-Trafficking Monitoring Group, and Anti Trafficking and Labour Exploitation Unit (ATLEU).</p> <p>November 2018 Places-of-safety-principles.pdf</p>	<p>This publication confirms how providers of these key, trauma-informed services need to evidence capacity and capability and demonstrate compliance with legal standards and best practice, noting 10 core principles all providers should base their definition of ‘competence’ on:</p> <ol style="list-style-type: none"> 1. Freedom 2. Open access to all 3. Needs-based assessments 4. Meeting health needs 5. Meeting basic material needs 6. Early legal advice 7. High quality advice and support 8. Enabling choices and options for pathways of referrals and support 9. Confidential data management 10. Organisational transparency
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Focus groups: people with lived experience – informing the design of a safe housing and support service

As part of the study into a new housing and support service for people who have exited modern slavery or are at risk of exploitation following a recent granting of refugee status, two focus groups were held in April 2025. The sessions brought together participants with lived experience of modern slavery, trafficking and insecure immigration status. They were invited to share their experiences, challenges and recommendations for shaping a safe, trauma-informed housing model that allows space to recover and consider whether to enter the National Referral Mechanism (NRM).

The following summary draws together the key themes and learning points.

Current housing and challenges

"Since 2019, I've been sleeping on the floor... I've asked for help, but no one came back. I just needed somewhere safe to lie down."

Participants described significant challenges in securing and maintaining safe, stable housing after leaving exploitative situations. Many had lived in overcrowded or unsafe shared accommodation, often with strangers or individuals they did not trust. These

experiences re-triggered trauma and, in some cases, resulted in further risk of exploitation.

Key challenges identified:

- Unsafe housing environments, including male workers entering rooms unannounced.
- High levels of anxiety, sleeplessness and deterioration in health due to fear and lack of control.
- Discrimination and racism from landlords and statutory services.
- Limited access to housing due to lack of immigration status or required documentation.
- Poor follow-up or long-term support from statutory or voluntary services.

Participants recommended:

- Clearer safeguards in shared accommodation (e.g., visitor policies, staff protocols).
- Avoiding shared housing unless strictly managed with clear rules.
- Increased availability of affordable, accessible housing (i.e., with fewer barriers such as document requirements or high rent).
- Ongoing, reliable support to help residents maintain housing and progress toward independence.

What makes housing feel safe and supportive?

"I don't feel safe when men come into the house without notice. I need to know when someone is coming — I've been through too much already."

Participants described "safe and supportive housing" as private, stable and culturally and emotionally sensitive. It must be a space of recovery, dignity and personal control.

Key components of safe housing:

- A secure, private space – ideally self-contained or with en-suite facilities.
- Female-only environments for survivors of sexual exploitation or trafficking.
- Staff trained in trauma-informed practice.
- Freedom to come and go without seeking permission.
- Access to practical, emotional, legal, immigration and employment support.

To reduce the risk of re-traumatisation or further harm, participants recommended:

- Regulated access to rooms (no unannounced visitors).
- Support staff available and appropriately trained.
- Clearly communicated protocols for reporting incidents or concerns.
- Respect for privacy, including no CCTV in bedrooms or bathrooms.

Location and living arrangements

"I don't want to share a toilet or bathroom with anyone — I need my own space, somewhere I can lock the door and breathe."

Location was less about geography and more about safety and access to services. While Lewisham was mentioned, participants prioritised proximity to support services, transport, healthcare and employment opportunities.

Living arrangement preferences:

- Strong preference for individual living spaces (studio or 1-bed flats).
- If shared housing is used:
 - Shared kitchens must include lockable storage and set cleaning/use rotas.
 - Shared toilets/bathrooms are strongly discouraged; en-suites are preferred.
 - Visitor rules should be strictly controlled.
- Social interaction was not a sufficient reason to share; privacy and control were paramount.

CCTV use:

- Accepted at entrances or communal corridors (record-only, not live-monitored).
- Not acceptable in private rooms or spaces.
- Seen as beneficial for external security and recording incidents.

Designing the housing and support model

"We need a house that helps us recover — not one that reminds us of the past. Somewhere with rules, support, and respect."

When asked what an ideal housing and support model would look like, participants emphasised flexibility, control, dignity and holistic support. Services should be tailored to individual needs while maintaining firm boundaries that protect wellbeing and safety.

Key design features:

- Self-contained housing where possible; shared housing only with clear structure and safeguards.
- Clear visitor policies and address protection for residents.
- Female-only accommodation with female staff where appropriate.
- Integrated wraparound support: immigration advice, trauma and mental health support, employment and training, benefits advice.
- Clear house rules and expectations set in advance.
- Support with future move-on planning.

Different levels of support by housing type:

- Shared accommodation: higher support needs, more staff presence, structured routines.
- Self-contained units: greater independence with on-call support available.

Service delivery considerations:

- Services should be delivered in a trauma-informed, culturally appropriate manner.
- Staff should reflect the diversity of the residents and undergo ongoing training (See: Appendix 4).
- Involving people with lived experience in service design, delivery and monitoring was seen as essential.
- Residents need assurance that this support is more than a temporary fix and will lead to lasting stability.

Final reflections

"Sometimes I feel, should I even die? That's how bad it gets when you're not listened to, and you've got nowhere safe to go."

Participants shared the psychological toll of insecure housing and unresolved immigration issues, including instances of contemplating suicide. They expressed a strong desire for stability, respect and recovery. They emphasised the importance of:

- Housing being a refuge, not an extension of institutional control.
- Being treated with dignity and heard with respect.
- Having 'breathing space' to recover before making critical decisions like entering the NRM.
- Ensuring this engagement leads to real change.

Stakeholder online engagement: shaping a safe and supportive housing model

This section summarises the views and recommendations gathered from the local and national organisations engaged through structured online stakeholder sessions in April 2025. These organisations advocate for or work directly with people who have experienced modern slavery or recently gained refugee status and are at risk of exploitation, homelessness or re-traumatisation. The insights presented here are central to designing a trauma-informed housing model that provides stabilisation, breathing space and onward pathways into safety and independence.

Need and demand

"Without safe housing, people we support are at serious risk of returning to exploiters. We've seen it happen repeatedly - no other option means going back to what they know."

Stakeholders were asked about the main risks faced by people without stable housing and their insights on the scale and nature of need for supported housing in southeast London and beyond. Across all meetings, participants confirmed a clear and growing need for safe, supported housing. The absence of such provision is seen not only as a welfare issue, but also a serious safeguarding and public protection concern. Risks include re-exploitation, homelessness, disengagement from services and harm to health and wellbeing.

Main risks without stable housing:

- Re-exploitation and trafficking, including survivors returning to previous abusers due to lack of alternatives.
- Mental health crises, including suicidal ideation and trauma relapse.
- Destitution, rough sleeping and vulnerability to gang exploitation or transactional survival strategies.
- Loss of engagement with legal processes (e.g. asylum claims, police investigations) due to instability and fear.
- Barriers to accessing support due to distrust, fear of authorities or system complexity.

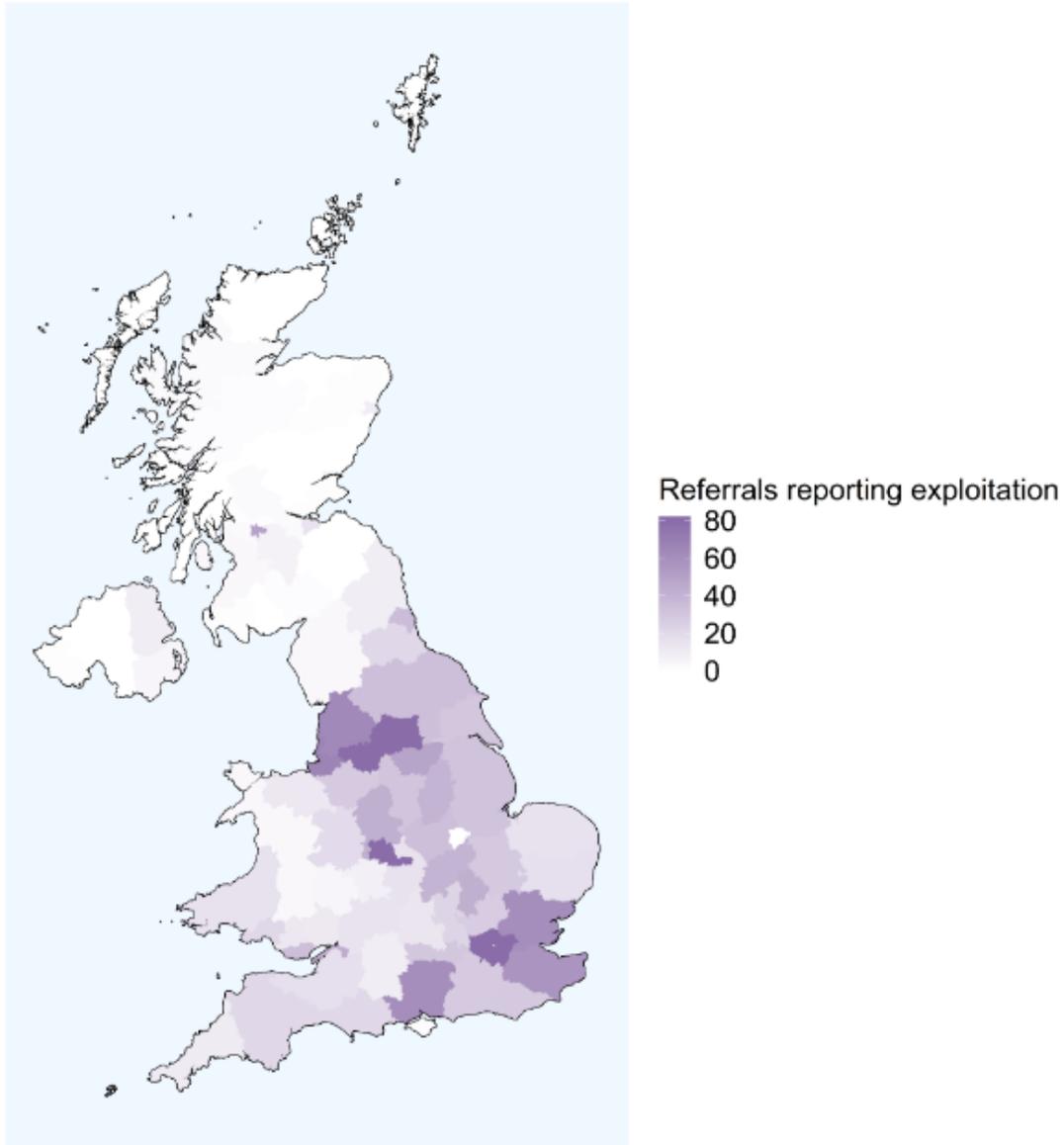
Data and insight:

- While robust data is limited, case-based evidence and project demand data are compelling.
- CHAIN data, Home Office records and service statistics show large numbers of people rough sleeping or in night shelters post-refugee status or NRM exit.
- Examples from The Passage, Justice and Care and Hope for Justice confirm housing is a near-universal concern across their caseloads.
- Some boroughs acknowledge gaps in identifying survivors, highlighting the need for more proactive engagement.

Most recent Home Office report informs us that:

From April to June 2025, the NRM received 5,690 referrals of potential victims of modern slavery. This represents a 7% increase in referrals compared to the preceding quarter (5,295) and a 32% increase from April to June 2024 (4,312). The number of referrals received this quarter is the highest number of referrals received in a single quarter since the NRM began in 2009.

Number of NRM referrals reporting exploitation in UK counties – Q2 2025



Source: <https://www.gov.uk/government/statistics/modern-slavery-nrm-and-dtn-statistics-april-to-june-2025/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-quarter-2-2025-april-to-june>

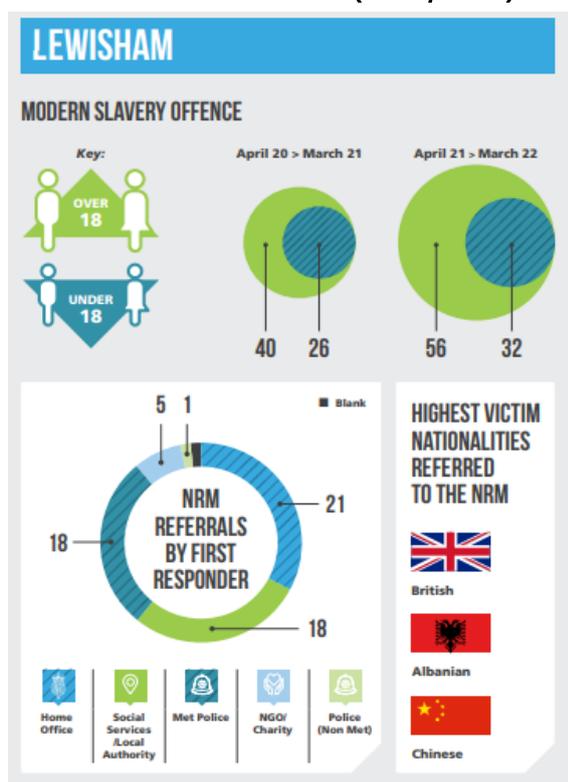
NRM referrals by first responder (local authority in London) and age at referral. Period – Q2 2025

First responder	Adult (18 or over)	Child (17 or under)	Not specified or unknown	Total
City of Westminster	13	5	1	19
London Borough of Barking and Dagenham	0	10	0	10

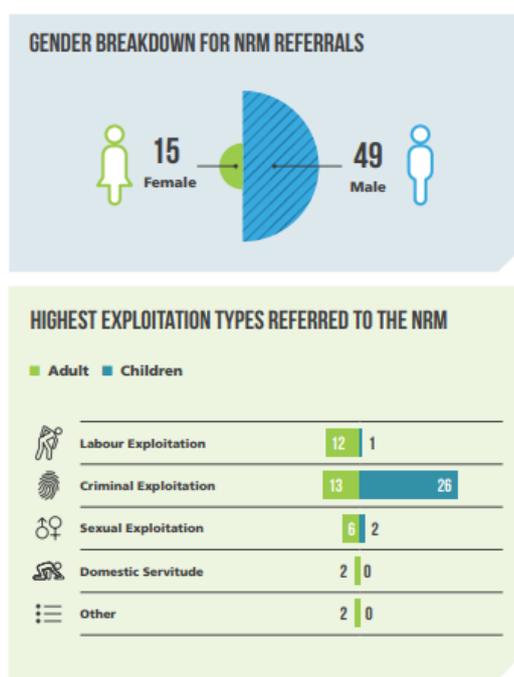
London Borough of Barnet	0	23	0	23
London Borough of Bexley	0	12	0	12
London Borough of Brent	1	8	0	9
London Borough of Bromley	1	4	0	5
London Borough of Camden	0	4	0	4
London Borough of Croydon	1	17	0	18
London Borough of Ealing	0	3	0	3
London Borough of Enfield	3	7	0	10
London Borough of Hackney	1	7	0	8
London Borough of Hammersmith and Fulham	1	6	0	7
London Borough of Haringey	2	7	0	9
London Borough of Harrow	0	3	0	3
London Borough of Havering	1	6	0	7
London Borough of Hillingdon	0	5	0	5
London Borough of Hounslow	1	3	0	4
London Borough of Islington	0	15	0	15
London Borough of Lambeth	2	11	0	13
London Borough of Lewisham	1	4	0	5
London Borough of Merton	1	2	0	3
London Borough of Newham	1	9	0	10

London Borough of Redbridge	0	3	0	3
London Borough of Richmond upon Thames	1	1	0	2
London Borough of Southwark	5	11	0	16
London Borough of Sutton	0	4	0	4
London Borough of Tower Hamlets	3	4	0	7
London Borough of Waltham Forest	0	8	0	8
London Borough of Wandsworth	1	4	0	5
Royal Borough of Greenwich	0	8	0	8
Royal Borough of Kensington and Chelsea	0	6	0	6
Royal Borough of Kingston upon Thames	0	2	0	2

Local data for Lewisham (2021/2022)



LEWISHAM CONTINUED



Source: Responding to Modern Slavery and Human Trafficking in Lewisham, Human Trafficking Foundation 2023

Housing and support requirements

"You need something that's not just a roof — it's about giving people the space to breathe, recover, and decide what they want next, without pressure."

Organisations were asked what type of housing and level of support is most appropriate for this population, including length of stay, staffing and referral models. There was widespread agreement that a flexible, trauma-informed service is essential, rooted in safety, privacy and recovery. Stakeholders were clear that the model must support stabilisation and reflection, not simply 'process people through' the NRM or housing system.

Key requirements identified:

- Self-contained or en-suite units prioritising dignity, safety and control.
- Gender-specific provision and culturally competent staff.
- 24/7 staffing (or blended models) based on the resident profile and recovery stage.
- Trauma-informed support structure, with the potential to clearly define and separate roles, alongside Caseworkers, for:
 - Support workers (day-to-day and emotional support).
 - Independent Modern Slavery Advisors - IMSAs (legal advocacy and navigation).
- Embedded partnerships for mental health, legal and immigration support.
- Shared spaces, where used, should foster community but never compromise privacy or safety.

Support services must include:

- Immigration and legal advice at an early stage.
- Mental health counselling and therapeutic activities.
- Employment, benefits and training support.
- Language interpretation and cultural mediation.

Good practice examples:

- Bakhita House (Caritas): independent, trauma-informed, women-only housing with a no-time-limit stay and daily therapeutic structure.
- Ella's and Praxis: known for empowering housing models built around lived experience and peer/community support.
- Hope at Home: nationally networked host accommodation with wraparound light-touch support.

- West Midlands Anti-Slavery Network: demonstrated flexible staffing and law enforcement collaboration.

WSUP has established links with local immigration advice service provider, who provided the costings for this provision. The costs for an Immigration Advisor are included in the project budget, and both a Service Level Agreement (SLA) and Data Sharing Agreement (DSA) between WSUP and service provider have been agreed in principle.

WSUP does not currently have in-house staff to provide all specialist elements of the model. The initial plan includes using services such as Tarjimly for interpretation and seeking external expert support from organisations already working with specific population groups to deliver culturally and linguistically appropriate services.

Next steps

From here, the next steps are to formalise these agreements and begin integrating immigration advice into the wider service model as an early milestone toward implementing Pivot House. Alongside this, WSUP will be submitting grant applications to secure start-up funding for the IMSA and immigration support elements of the programme, ensuring readiness for delivery in the next phase.

Housing management practice – key components for a sustainable, trauma-informed model

"Good housing management means clarity, fairness and consistency — you can't ask people to recover from trauma if the basics aren't stable."

Stakeholders highlighted that housing management is a critical success factor in any supported housing scheme, particularly for people who have experienced trauma, exploitation or displacement. Poor housing management – including inconsistent staffing, unclear rules, slow repairs or inflexible tenancy practices – can cause further harm or push residents back into unsafe environments. Stakeholders called for a housing model where management and support are aligned but distinct, with clear policies, partnership agreements and accountability.

Managing the accommodation

Stakeholders advised that housing management policies must be trauma-informed, fair and consistently applied to maintain safety, dignity and trust. Suggested principles include:

- On-site or regular visiting WSUP staff who are trained in trauma-informed and culturally competent practice.
- House rules co-developed with residents, covering issues such as visitors, shared space use, cleanliness and quiet hours.

- Clear communication of tenancy/licence agreements in accessible formats, with translated materials and verbal explanations.
- Safeguarding policies that are proactive rather than reactive, including early identification of risk factors (e.g. signs of control or exploitation).
- Conflict resolution protocols to manage tensions in shared settings while minimising evictions.

Supporting move-on and transitions

Planning for move-on must begin at entry. A trauma-informed move-on strategy allows residents to build confidence and independence while reducing dependency and bottlenecks in the system.

- Individual move-on plans developed in partnership with support workers, Victim Navigators and IMSAs, revisited regularly.
- Use of local connection negotiation and partnership with boroughs, where possible.
- Housing navigators or tenancy support services to help secure and sustain future housing (e.g. private rented sector, social housing, hosting schemes).
- Preparation for practical aspects: budgeting, benefits, furnishing grants and setting up utilities.
- Time-limited stays with flexible extension mechanisms to prevent abrupt exits.

Repairs and maintenance

Responsive and respectful repairs processes are vital for resident wellbeing and safety.

- Providers must ensure repairs are logged, tracked and responded to promptly, with emergency repairs resolved within 24 hours.
- Residents must receive advance notice of any visits from contractors and ideally have the option to request female-only contractors.
- Use of a named contact for repairs, supported by digital reporting tools or a housing officer.
- A focus on preventative maintenance to reduce repair needs and disruption.
- Written and visual information to help residents report faults and understand responsibilities.

Minimising void spaces and turnaround times

Void loss undermines financial viability and delays access for those in urgent need.

- Keep close integration between referral and housing teams to allow swift allocation.
- Maintain an active waiting list with pre-screened referrals ready to move in when a room becomes available.
- Pre-referral process to be established with identified agencies (First Responders) and/or homelessness agencies (day centres, NSNO, Housing

Inclusion Teams/Outreach teams). Training to be provided for referring agencies.

- Flexibility to offer emergency places where safeguarding risks are identified.
- Efficient turnover protocols (cleaning, repairs, reassessments) to reduce downtime between placements.

Relationships with housing providers

Stakeholders emphasised that strong relationships with housing providers – including housing associations, local authorities and private landlords – are foundational to delivery.

- Consider formal management agreements or leases with registered providers to secure property access.
- Housing partners should be engaged early in service design to shape property type, location and layout to meet support needs.
- Provide training and briefings for providers on modern slavery, trauma-informed practice and resident safeguarding.
- Joint monitoring and review frameworks to ensure housing standards are upheld and issues resolved collaboratively.
- Use of trusted intermediaries (e.g. support providers or housing managers) to bridge relationships between landlords and residents.

Barriers and challenges

"The biggest barrier is funding for NRPF clients. We patch together support where we can, but we're constantly firefighting. It's unsustainable."

Stakeholders were asked to identify the biggest challenges in delivering this model of supported housing in southeast London and how these challenges might be overcome. Consistent issues emerged around funding, move-on housing, property availability and complexity of need. Importantly, many organisations also highlighted systemic challenges, including the pressure for throughput, lack of flexibility and funding models not aligned with trauma-informed practice.

Key barriers identified:

- Long-term funding insecurity, particularly for people with no recourse to public funds (NRPF).
- Scarcity of move-on housing, especially in boroughs with high housing demand.
- Reluctance from landlords and housing providers due to perceived tenant complexity.
- Local authority restrictions based on connection rules or misalignment of commissioning priorities.

Suggested solutions:

- Work with registered providers and secure exempt accommodation status to access enhanced housing benefit.
- Use mixed cohort models where viable to cross-subsidise NRPF placements.
- Invest in training and reassurance for landlords and housing staff to address concerns.
- Embed trauma-informed principles in housing management policies to reduce conflict and prevent punitive enforcement.
- Develop clear criteria for referrals and transparent communication to avoid misuse or drift in service purpose.

Partnerships and multi-agency working

"We need a joined-up referral process - something that stops people falling through the gaps and avoids the trauma of repeating their story over and over."

Stakeholders consistently stressed that this service cannot operate in isolation. Survivors of modern slavery and at-risk refugees often face complex and overlapping needs, which no single organisation can address alone. Effective, joined-up partnerships are essential, both in service delivery and in establishing clear, accessible referral pathways.

Essential partners:

- Local authorities (housing, social care, commissioning and safeguarding).
- Police force
- NHS and mental health services.
- Statutory and non-statutory first responders (e.g. Police, Border Force, NGOs).
- Specialist organisations (legal aid, immigration advice, anti-trafficking charities).
- Community and faith-based groups to provide culturally sensitive engagement.
- Housing providers and associations (for stock, leasing or joint development).

Features of an effective system:

- Central referral coordination (ideally tri-borough or pan-London) to streamline access and avoid duplication.
- Caseworker-led models to maintain trusted relationships through transition.
- Joint training across agencies to build a trauma-informed approach.
- Clear eligibility criteria and move-on expectations from the outset.
- Formal structures for communication and review (e.g. referral panels, service level agreements).

Sustainability and future planning

"Don't build something that only lasts 12 months — we need a model that local authorities and funders can invest in long-term because it saves money elsewhere."

When asked about what would make the service viable long-term, stakeholders shared a range of financial, operational and strategic insights. There was consensus that the service should start with a clear, contained model and scale cautiously based on need, outcomes and funding security. The value of preventing crisis, and the cost savings associated with stable housing, was also highlighted as a compelling case for funders.

Financial and operational sustainability:

- Use a mixed funding model: grants, statutory funding, housing benefit (for eligible clients) and philanthropy.
- Cross-subsidise with clients who can contribute rent via DWP claims or employment.
- Partner with housing associations or local authorities to access existing buildings or long leases.
- Use outcome-based metrics tied to health, safety and longer-term independence rather than just throughput.

Risks and mitigation:

- Move-on blockages: address through early planning and broad partnerships (private rented sector, social housing, hosts).
- Funding gaps: build multi-year funding bids and involve diverse donors.
- Staff burnout: invest in reflective practice, training and supervision.
- Expectation management: be clear from the start about what the service can and cannot do.

Recommendations – key principles of a housing with support model

Based on the combined findings, the following summary outlines the key overarching principles that should guide the development and delivery of a new trauma-informed housing and support service. This model aims to provide stabilisation and breathing space for individuals to consider whether to engage with the National Referral Mechanism (NRM), or, if not, to recover and move forward with holistic support.

A housing and support service for pre-NRM survivors of modern slavery and newly granted refugees must be rooted in safety, stability, dignity and personal agency. The model should not only provide a roof over someone’s head, but create the foundation for trauma recovery, practical progression, and long-term independence. These principles offer a blueprint for a model that is safe, inclusive and delivers lasting impact.

Core principles	Overview
1. Understanding demand and urgency of need	<ul style="list-style-type: none"> • There is a significant, unmet and growing demand for trauma-informed housing among people at risk of exploitation or re-exploitation post-modern slavery or post-refugee status. • Many people disappear or return to unsafe environments when no housing is available, particularly pre-NRM. • Stakeholders confirm that housing instability increases mental distress, reduces engagement with support and undermines recovery efforts. • Survivors themselves reported years of instability, re-traumatisation in unsafe shared housing and being overlooked by formal services.
2. Holistic, trauma-informed support	<p>A safe housing model must be accompanied by wraparound support, tailored to the needs of each resident. Key features include:</p>

<p>based on individual needs</p>	<ul style="list-style-type: none"> • Access to legal and immigration advice, health care, mental health and trauma counselling plus support with employment and training. • Practical assistance with benefits, budgeting and daily living skills. • Staff trained in trauma-informed and culturally competent practice, with gender-sensitive options (e.g. women-only spaces and staff). • Different levels of support depending on resident need and housing type (higher support in shared settings, lower in self-contained units with outreach).
<p>3. A clear and compassionate referrals process</p>	<ul style="list-style-type: none"> • Centralised or co-ordinated referral pathways are needed to prevent duplication, confusion or loss of contact. • Referral criteria must be transparent, inclusive and linked to safeguarding and recovery - not just immigration status. • Residents must not need to retell traumatic histories multiple times - referral and triage processes should be streamlined and sensitive.
<p>4. Flexible length of stay based on recovery</p>	<ul style="list-style-type: none"> • Accommodation should not be time-limited arbitrarily but flexibly designed around people's readiness to move on. • Initial placements might be short-term (7-28 days) to offer breathing space, with options to extend based on trauma recovery and legal progress. • Exit planning should begin early, with residents supported to build independence and confidence.

<p>5. Strong housing management standards and policies</p>	<p>Good housing management is essential to recovery, ensuring the physical environment supports safety, stability and wellbeing. Key practice principles include:</p> <ul style="list-style-type: none"> • Residents should have private, secure spaces (ideally self-contained or with en-suite facilities). • Repairs must be handled quickly and respectfully, with prior notice and, where appropriate, gender-sensitive contractors. • Rules (e.g. around visitors or shared space use) must be co-created with residents and consistently applied. • Evictions or ‘enforced’ move-outs should be rare and managed supportively through early conflict resolution and planning.
<p>6. Strong multi-agency partnerships</p>	<ul style="list-style-type: none"> • Collaboration with local authorities, health services, anti-slavery NGOs/charities, legal experts and housing providers is essential. • Effective information sharing and joint care planning reduces risk and builds resident trust. • Local knowledge and community partnerships help tailor services to cultural needs and increase engagement.
<p>7. Move-on pathways must be built in</p>	<ul style="list-style-type: none"> • One of the biggest risks to sustainability is residents having nowhere to go after initial support. • Move-on options must include social housing, supported independent living, private rented sector (with floating support) or community hosting. • Dedicated staff (e.g. housing navigators) can help bridge people into sustainable, affordable options.

<p>8. Sustainable and diverse funding</p>	<ul style="list-style-type: none"> • The model must blend different income streams to be viable long-term, especially for residents with NRPF. • Options include: <ul style="list-style-type: none"> ○ Statutory funding (housing benefit via exempt status for eligible clients) ○ Charitable grants or philanthropy ○ Private rented sector partnerships ○ Social investment or public land use partnerships • Services should be able to demonstrate cost savings for health, criminal justice and homelessness systems.
<p>9. Planning for long-term impact</p>	<ul style="list-style-type: none"> • The service should start with a clear, focused offer that can be scaled or adapted based on learning and local need. • Measurement should focus on meaningful outcomes: improved wellbeing, housing stability, engagement with legal processes and reduced risk of re-exploitation. • Involving people with lived experience in governance, design and evaluation is key to staying relevant and accountable.
<p>In summary</p>	<p>To be effective, a housing and support model for pre-NRM survivors and at-risk refugees must be more than emergency shelter - it must be a launchpad for recovery, choice and long-term stability. That requires:</p> <ul style="list-style-type: none"> • Trauma-informed housing management. • Integrated, person-centred support.

	<ul style="list-style-type: none">• Sustainable funding and property partnerships.• Strong multi-agency collaboration.• Real, flexible move-on options.
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Recommendations – potential options

Based on the findings and core principles outlined in the recommendations, it is proposed that WSUP consider the following three housing and support options for inclusion in the feasibility study submission to funders. These models vary in scope, delivery approach and funding assumptions, enabling flexibility for the lead organisation and clarity for funders. Each includes an outline of the model, delivery configuration, target group and benefits/risks to inform decision-making process and also provide the opportunity for WSUP to select different aspects from each to formulate an alternative solution based on the strengths, position and future strategic objectives of the organisation.

Option 1: Accommodation-based service with onsite support – "Safe Start House"

Overview	Key features	Benefits	Risks
<p>A small, staffed, self-contained supported housing project (8–10 units) for pre-NRM survivors and newly granted refugees at risk of exploitation, focused on those with moderate to high support needs. Delivered in partnership with a housing association (e.g. leased property) with support services provided by WSUP and potential links to Victim Navigators and/or IMSAs.</p>	<ul style="list-style-type: none"> • All residents live in a single property (e.g. converted house or HMO). • Onsite staff available daily (with on-call support overnight). • Target group: mixed cohort of those with and without recourse to public funds. • Trauma-informed housing management with clear house rules, 	<ul style="list-style-type: none"> • Directly responds to highest needs (e.g. recent trauma, no access to housing). • Greater control over support environment and safety. • Enables daily relationship-building and intensive support. • Easier to evidence cost avoidance (A&E, rough sleeping, policing). 	<ul style="list-style-type: none"> • Only viable for those with recourse to public funds or via cross-subsidy. • Staff-intensive model; requires trained housing/support staff. • Need to secure a suitable property partner and lease agreement.

	<p>visitor protocols and safeguarding policies.</p> <ul style="list-style-type: none"> Residents supported for 3–6 months before planned move-on. Delivered in partnership with a housing provider who owns/manages the property. 	<ul style="list-style-type: none"> Enhanced housing benefit income if eligible as exempt accommodation. 	<ul style="list-style-type: none"> Longer mobilisation (due to property sourcing and setup). Financial sustainability relies on careful occupancy and case mix.
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For model 1 (accommodation-based service with onsite support), the referral pathway would be shaped by the funding source. For example:

- If funded by MHCLG (Ministry of Housing, Communities, and Local Government) via local authority, referrals may be restricted to local outreach teams, potentially routed through the sub-regional rough sleeping coordinator.
- If funded by the NHS, the service may be expected to prioritise referrals from hospital discharge teams, focusing on individuals being discharged into homelessness or at risk of exploitation.

In short, the referral pathway will be tailored to meet the priorities and conditions of the specific funding stream, and WSUP would work with key partners to coordinate access accordingly.

WSUP defines moderate to high support needs as including individuals who require structured, trauma-informed support to stabilise their housing, navigate complex legal or immigration systems, and manage risks to their wellbeing or safety. This may involve developing a risk management plan, coordinating multi-agency support, and understanding legal eligibility thresholds for wider services.

Inclusion and exclusion criteria will be finalised during the implementation phase. However, certain referrals may not be suitable for this model, such as:

- Individuals with high personal care needs who may be more appropriately supported under the Care Act 2014.
- Individuals with severe substance dependency, where access to detox services and a coordinated treatment plan from a specialist agency may be required prior to admission.

The aim is to ensure that the service can provide safe, appropriate support without compromising the stability and recovery of other residents.

WSUP aims to provide a safe and stabilising environment where survivors of modern slavery can explore a range of next steps — including entry into the NRM, access to treatment, supported housing via the local authority, private rented accommodation, clarification of immigration status, or voluntary return to their country of origin.

While 3–6 months is an indicative timeframe, move-on timing will vary depending on individual circumstances. For example, from April to June 2025, the median time from NRM referral to a reasonable grounds decision was just 6 days, meaning some residents may be able to move on within weeks. However, WSUP recognises that securing appropriate move-on accommodation can be challenging and will work closely with partners to ensure timely and suitable options are identified.

Option 2: blended model – accommodation with floating support and community-based support

Overview	Key features	Benefits	Risks
<p>A flexible, scalable model combining a small hub of supported housing (4–6 units) with a floating support service for individuals in temporary or insecure accommodation. It offers a more diverse pathway, enabling both stabilisation and outreach.</p>	<ul style="list-style-type: none"> • Core “hub” property (leased via a housing provider) for highest-need residents. • Floating/community-based support for others in local hostels, hotels, or sofa-surfing. • Support team provides casework, signposting, trauma-informed guidance. • Service includes housing navigation to support move-on. • Opens access to NRPF clients if alternative housing secured. 	<ul style="list-style-type: none"> • Supports wider group than a single building allows (including NRPF clients). • Greater reach and flexibility, including outreach to harder-to-reach survivors. • Lower cost than a full residential model. • Scalable and replicable in multiple boroughs. • Mix of housing benefit income and grant funding possible. 	<ul style="list-style-type: none"> • Managing mixed service types requires skilled coordination. • Less intensive support than full residential may not suit all. • Floating support model may be harder to fund for NRPF clients without strong charitable / philanthropic backing. • Staff caseloads need careful management to avoid burnout.

Option 3: community-based support only – "Safe Pathways" floating support and navigation service

Overview	Key features	Benefits	Risks
<p>A non-accommodation model focused on delivering specialist floating support and housing navigation for survivors already in temporary housing, hostels, or at risk of rough sleeping. Suitable for organisations with limited resources or access to properties.</p>	<ul style="list-style-type: none"> • Dedicated caseworkers provide housing advocacy, immigration / legal liaison, and wellbeing support. • Links into existing accommodation pathways (e.g. council or charity-hosted housing). • Could include partnerships with community hosts or “meanwhile” use properties. • No direct property responsibilities, reducing startup complexity. • Focused on pre-NRM and refugee-status individuals across boroughs. 	<ul style="list-style-type: none"> • Fast mobilisation and low startup costs. • Open to NRPf and those with recourse to public funds. • Complements local authority or partner housing schemes. • Builds long-term trust and guidance through case management. • Build organisational expertise and service delivery insight / risk management. • Could attract philanthropic and health-based prevention funding. 	<ul style="list-style-type: none"> • No direct control over housing quality or availability. • Relies heavily on external accommodation providers and informal housing. • Less able to generate housing benefit income (fewer chargeable costs). • Less secure environment for those most at risk or recently exploited.

Comparison table: summary of options

Feature	Option 1: accommodation-based	Option 2: blended model	Option 3: community support only
Housing provided	Yes (leased)	Yes (small hub) + outreach	No
Support type	Onsite + keywork	Onsite + floating/community	Floating only
Target group	High-need, incl. NRPF	Mixed need incl. NRPF	Broad group incl. NRPF
Funding model	Exempt HB + grants	Exempt HB + mixed	Grants/philanthropy/local funders
Setup time	Medium to long-term	Medium-term	Short-term
Expertise required	High (housing + support)	Medium to high	Moderate
Benefits	High control, tailored care	Flexible, scalable, broad reach	Fast launch, low cost, wide access
Risks	Complex setup, funding mix	Moderate staff intensity, caseload	No control over housing quality

Conclusion

This report explores the need for a new housing and support service for individuals who are either at risk of exploitation and not yet in the National Referral Mechanism (pre-NRM), or who have recently been granted refugee status and are at heightened risk of homelessness and re-trafficking. The overarching aim was to assess demand and define the core principles of an appropriate response. This included identifying the scale and nature of local need, understanding existing services, and outlining a vision for a housing model that could improve safety, stability, and long-term recovery outcomes for this vulnerable group.

To achieve this, the study triangulated evidence from three main sources:

- Desk-based research.
- Stakeholder engagement.
- Focus groups with people with lived experience.

This approach allowed the study to examine both the wider policy context and the local service landscape, while also prioritising the voices of those directly affected.

Stakeholders from housing, modern slavery support, refugee services, health and local authorities shared a strong consensus on the need for a bespoke service that bridges current gaps. Lived experience participants reinforced the urgent need for safe, timely, and trauma-informed accommodation and support tailored to the transitional phase before and after NRM decisions or refugee status grants.

The study concludes that a housing and support offer is necessary, particularly if it is flexible, multi-agency and rooted in local partnerships. Key recommendations include:

- Co-designing the service with people with lived experience.
- Prioritising psychological safety and wraparound support.
- Ensuring appropriate safeguarding protocols.
- Planning early for move-on from the service.
- Integrating the model with existing housing and voluntary sector services.

These findings confirm the original hypothesis that a dedicated response is needed to help individuals on their routes out of modern slavery and to prevent cycles of homelessness and exploitation. The right model could significantly improve recovery, engagement with services, and community integration. The report provides an evidence base, a proposed set of service principles, and delivery model options to inform funding applications and, in turn, mobilise a service offer.

This feasibility study confirms both the need and the strategic opportunity for WSUP to establish a dedicated service for pre-NRM survivors of modern slavery and newly granted refugees at risk of exploitation. To ensure sustainability, impact, and strong

stakeholder engagement, WSUP will adopt a phased approach, beginning with the introduction of the Independent Modern Slavery Advocate (IMSA) role within our service.

From September 2025, Hope for Justice's the IMSA Model Development Project is running a national pilot through which 24 IMSAs will be employed at organisations across the UK to work alongside adult survivors of human trafficking. The IMSAs will help survivors to access their rights and entitlements and work towards a sustained recovery.

WSUP has been accepted as an Employing Organisation. We will participate in the national IMSA pilot and:

- a) Employ an Independent Modern Slavery Advocate for the duration of the IMSA Pilot;
- b) Complete and maintain the IMSA Excellence Award; and
- c) Actively collaborate with the IMSA Model Hub.

Through this, WSUP will deliver IMSA Service – a dedicated IMSA working directly with survivors. The service will not be time-bound or limited by locality, allowing the IMSA and client to build a trusted professional relationship until all advocacy needs have been resolved. As many survivors must navigate multiple, complex and interrelated systems, the IMSA will provide high-level advocacy expertise and practical support, empowering each person in their recovery and progression toward independence.

By starting with this focused, evidence-based phase, WSUP can build organisational capacity, strengthen partnerships, and lay the foundation for the next phase of Pivot House – developing a sustainable housing-with-support model informed by lived experience, national standards, and tested practice. This phased route ensures that future expansion is grounded in learning, collaboration, and the shared goal of providing lasting stability and dignity for those in transition.

This work directly aligns with WSUP's vision of a community free from hardship and housing instability and reflects our ongoing commitment to preventing and ending homelessness through compassion, partnership, and advocacy.

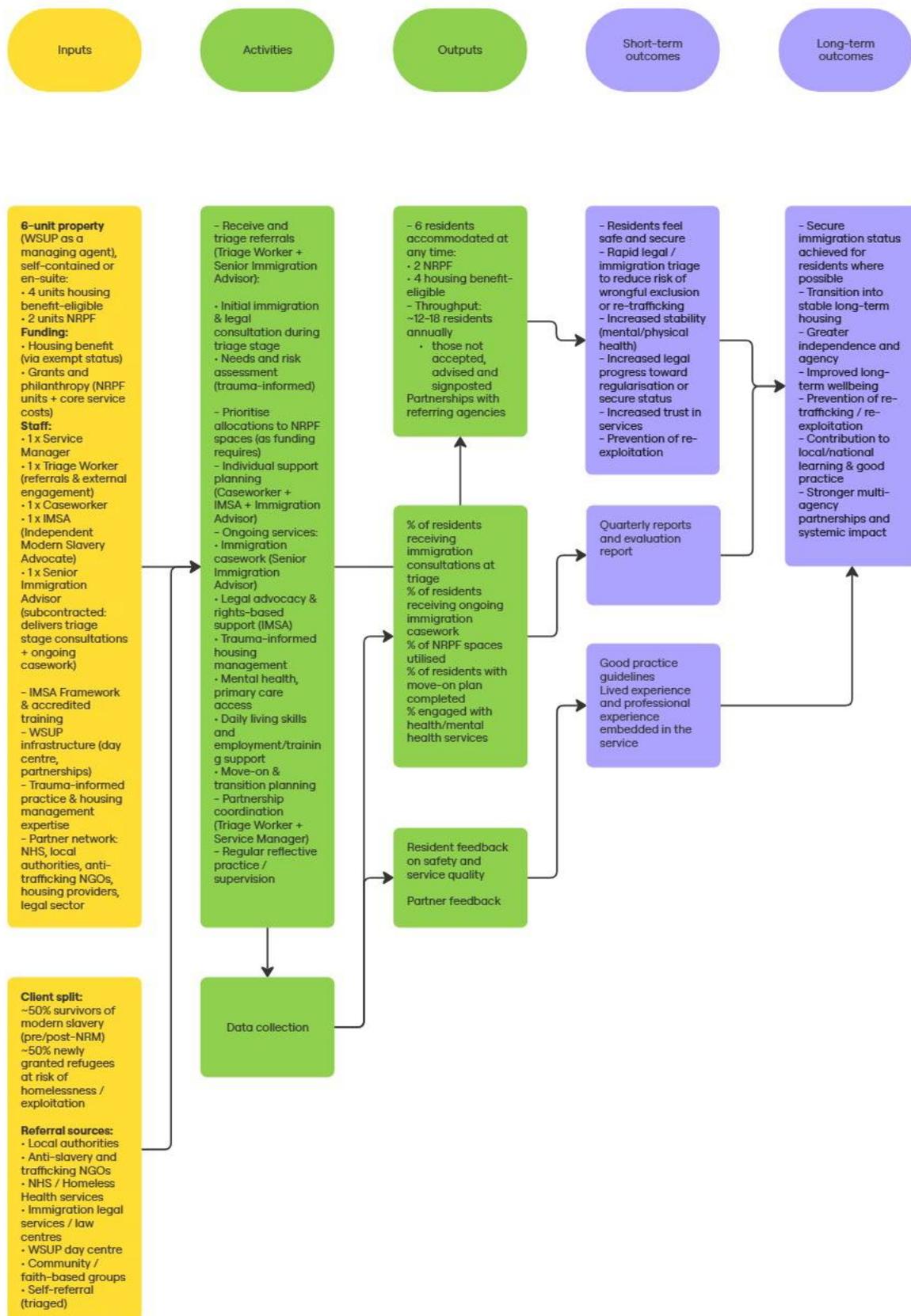
Appendix

Stakeholders engaged to formulate the key findings and recommendations:

- The Passage
- Lewisham Refugee and Migrant Network (LRMN)
- Ukrainian Support Greenwich
- Saint John of God (SJOG)
- MigrationWork CIC
- Human Trafficking Foundation
- Emmaus Greenwich
- Salvation Army
- Thames Reach
- Bromley Homeless Services
- Metropolitan Thames Valley Housing (MTVH)
- Peabody
- Enabling Assessment Service London (EASL)
- Homeless Health London (c/o Royal Free)
- Rough Sleeping & Mental Health Programme (RAMHP)
- Royal Greenwich Council
- Lewisham Council
- London Mayor's Office
- Greater London Authority (GLA)
- West Midlands Anti-Slavery Network
- Huddersfield University
- Housing Justice
- Hope at Home
- Hope for Justice
- Sub regional panel lead across Southeast London
- Caritas re Bakhita House
- Justice and Care

Appendix 1

Logic model of the service



Appendix 2

Financial analysis of the option 2: blended model – accommodation with floating support and community-based support, including housing income, funding required and expenditures. Full breakdown of the costs in the attached document.

SUMMARISED I&E PROJECTIONS	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5
	£k	£k	£k	£k	£k
INCOME					
Housing income *	40.1	40.7	41.3	41.9	42.5
Funding: NRPF housing clients	29.3	30.0	30.7	31.5	32.3
Pivot House - funding	203.5	208.6	212.6	217.2	220.0
	272.9	279.3	284.6	290.6	294.9
EXPENDITURE					
Salaries	150.1	153.4	156.2	159.0	161.8
Legal & professional fees	56.2	57.6	58.7	59.9	61.1
Services (housing) *	25.9	26.5	27.2	27.9	28.6
Comms, volunteers and activities	14.6	14.9	15.2	15.5	15.8
Office and administrative costs	22.1	22.6	23.1	23.9	23.1
	268.8	275.1	280.4	286.2	290.4
Surplus	4.1	4.2	4.3	4.4	4.4

* The projections assume WSUP will be working with an established RP. Housing income includes the management fee receivable as managing agent and the service charges receivable in respect of service to be provided by WSUP. The balance of the core rents, after deducting the management fee (and a void allowance), will be retained by the RP and it will be responsible for repairs & maintenance and other property costs.

Appendix 3

Table 5: Selected accommodation models for non-UK nationals with restricted eligibility.

Table 5 Selected accommodation models for non-UK nationals with restricted eligibility²¹

Model type	Description	Funding arrangements	Target cohort	Model in action
The local authority has a funding role				
Use of meanwhile premises by local authority	Unused land or properties owned by the local authority and earmarked for future development are made available rent-free for a specified period	Temporary development of site and support can be funded or part-funded by local authority budgets.	n/a	Used by Haringey and Redbridge councils to accommodate non-UK nationals with restricted or uncertain eligibility. Redbridge Council made Malachi Place available to The Salvation Army on a 5-year lease to create a 'pop up hostel and workshop' prior to the Ilford town centre regeneration. It consists of converted shipping containers that can accommodate 42 people, including 15 with restricted eligibility. ²²
'Rent-free' bedspaces in local authority-commissioned accommodation	These bedspaces are provided and funded without the expectation of Housing Benefit. They are often utilised as short-term 'assessment beds' to bring people off the streets while their entitlements are being determined, but can also be used while applications are being made and processed.	Funded or part-funded by local authority pots that are not 'public funds'; e.g. Rough Sleeping Initiative (RSI), or by charitable fundraising coordinated by the local authority, e.g. the Greater Manchester Mayor's Charity.	Often targeted at non-UK nationals with uncertain status or those expected to have positive immigration decisions, and therefore prospects of relatively speedy move-on.	A Bed Every Night, Greater Manchester, provides 60 bedspaces for people with NRPF and in 2021-22 accommodated 204 people with NRPF who were rough sleeping or at risk. It is funded by the Mayor's Charity and other statutory partners, and delivered by the region's constituent councils. ²³ Since 2011, the GLA has funded No Second Night Out hubs across London. They provide a rapid response assessment and triage, supported by emergency accommodation for people sleeping rough. The GLA's Holistic Assessment Service (HAS) also provides wrap-around assessment alongside emergency accommodation to rough sleepers with medium to high support needs and unclear entitlements. ²⁴ City of London provides three RSI-funded bedspaces within a larger hostel for rough sleeping EEA nationals who are work-ready and eligible to apply for the EUSS, with a move-on target of eight per annum. Elsewhere in London, Lambeth Council provides eight beds for non-UK nationals with a history of rough sleeping who are addressing their immigration issues and are work-ready.
Accommodation for public health purposes	Apart from COVID-19, some local authorities have long-used public health powers (and funding) to accommodate non-UK nationals with restricted eligibility in order to protect them and their communities from risk of infection.	Funded by the local authority (public health and/or housing budget)	Non-UK nationals with restricted eligibility being treated or protected from an infectious disease	Since 2009, Homerton Hospital TB team has worked with Hackney Council to house tuberculosis patients with restricted eligibility in temporary accommodation, rather than having them stuck in hospital. The project dramatically improved treatment adherence and, given the high cost of acute hospital beds, made significant savings for the system. ²⁵
The local authority has a facilitative role, in partnership with the voluntary sector				
'Peppercorn rent' or reduced fee schemes	Social landlords or private individuals can offer existing properties to charities for little or no rent. This is more likely in low rent areas.	The rent may be funded by RPs via grants, donations or rental surpluses from other properties. ²⁶	n/a	A number of housing associations fulfil their charitable mission in this way. These include Soha Housing's provision of 12 beds to the Oxfordshire Homeless Movement NRPF project and Arawak Walton's provision of two houses to the Boaz Trust for a discounted lease fee. ^{27,28}
Cross-subsidised housing schemes	Cross-subsidy models allow the provider to offer 'free' rooms to people with NRPF by covering their costs from other rental income or funding. Typically, this means providing rooms within a house or portfolio to refugees (who can work or claim Housing Benefit) or families being housed by social services.	The costs of accommodation for people with NRPF may be covered by rental income from other residents (e.g. refugees) or funding from social services.	n/a	The Boaz Trust runs a cross-subsidy model that houses 40 single adults with NRPF following refused asylum claims and 34 refugees separately across 20 houses in Greater Manchester. Open Door North East operates a similar model in partnership with Stockton on Tees Council. Praxis and Commonwealth Housing's NRPF project secured seven properties to offer to local authorities to house destitute non-UK national families who they have a duty to accommodate under Section 17 of the Children Act 1989. Income received is used to provide free rooms, either in a house shared with families or elsewhere. ²⁹
Hosting schemes	A range of formal and informal, emergency and long-term schemes where individuals make a room available in their home for a specified time.	Costs typically covered by associated charity, but support services may be provided by the local authority.	Often but not always aimed at refused or homeless asylum seekers.	Housing Justice's London Hosting Network, Hope at Home, Homes for Refugees and Positive Action in Housing all operate prominent and long-running hosting schemes. ³⁰ Safeguarding, supervision and monitoring are crucial aspects of such schemes to protect hosts and hostees. ³¹
Properties or bedspaces provided by charities or faith groups, e.g. non-commissioned shelters or hostels	Properties may be owned by the charity/faith-based organisation or provided to it	Costs typically covered by associated charity, but support services may be provided by the local authority.	n/a	A range of charities and faith-based organisations across the country make accommodation available to non-UK nationals with restricted eligibility, often in close collaboration with the local authority, e.g. The Salvation Army, St Mungo's.

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About Homeless Link

Homeless Link is the national membership charity for organisations working with people experiencing or at risk of homelessness in England. We aim to develop, inspire, support, and sustain a movement of organisations working together to achieve positive futures for people who are homeless or vulnerably housed.

Representing over 900 organisations across England, we are in a unique position to see both the scale and nature of the tragedy of homelessness. We see the data gaps; the national policy barriers; the constraints of both funding and expertise; the system blocks and attitudinal obstacles. But crucially, we also see – and are instrumental in developing – the positive practice and ‘what works’ solutions.

As an organisation we believe that things can and should be better: not because we are naïve or cut off from reality, but because we have seen and experienced radical positive change in the way systems and services are delivered – and that gives us hope for a different future.

We support our members through research, guidance, and learning, and to promote policy change that will ensure everyone has a place to call home and the support they need to keep it.

What We Do

Homeless Link is the national membership charity for frontline homelessness services. We work to improve services through research, guidance and learning, and campaign for policy change that will ensure everyone has a place to call home and the support they need to keep it.

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Let's End Homelessness Together

