



## Policy Statement

The Nationalities and Borders Bill has now passed its reading in Parliament. The Salvation Army believes that it is vital that any legislation impacting survivors of modern slavery puts their wellbeing at its heart and any positive steps are not undermined by changes which would put barriers in the way of accessing help through the Modern Slavery Victim Care Contract (MSVCC).

The Salvation Army has raised concerns around aspects of the Nationalities and Borders Bill within [our response to the New Plan for Immigration consultation](#). Our experiences working with survivors for almost a decade as holders of the Modern Slavery Victim Care and Coordination Contract (MSVCC), has provided us with insight to feedback constructively to the new bill. Key issues raised by The Salvation Army include:

### *1) The raising of the credibility threshold for Reasonable Ground decisions:*

The Salvation Army believes we should be seeking to encourage people currently fearful and hidden in slavery to come forward for help. However, measures which could raise the threshold of credibility will limit the number of people able to seek essential support and safety within the MSVCC.

### *2) The introduction of time limits to disclose experiences for Reasonable Grounds decisions:*

All claims for support must be met with sensitivity so that survivors are able to receive necessary support and protection. Introducing a time frame for survivors to disclose their experiences risks prohibiting survivors accessing the support they are entitled to. As holder of the MSVCC and as a designated First Responder organisation, The Salvation Army has first-hand experience of the impact of trauma on survivors and knows it often takes time for survivors to feel sufficiently safe to disclose their experiences.

### *3) The introduction of public order grounds exemptions:*

Many survivors entering the NRM and MSVCC have been subject to criminal exploitation. It is vital that survivors who have been forced to break the law are able to access the support they need to begin to recover from their experiences. By limiting access to the NRM according to a survivor's criminal record, the government risks pushing survivors back into positions of vulnerability which will strengthen the hands of traffickers themselves.

The UK must live up to its commitments made to survivors of modern slavery found in essential legislation such as the Modern Slavery Act (2015). The Salvation Army will continue to work with parliamentarians and other organisations in the sector to ensure that survivors' access to support is not disadvantaged by any new legislation.