



University of  
**Nottingham**  
Rights Lab

# Nothing about us, without us

**Survivor involvement in anti-slavery policy  
making: Guidance for policy makers**



## What is the purpose of this guidance?

This guidance is intended to support local and national policy makers in government, business and public services who wish to involve survivors of modern slavery<sup>1</sup> in their work, whether that be in developing policy, legislation and guidance, or shaping and delivering services. Although this guidance was produced in the UK and has a UK focus, it is intended for adaptation and use in other country contexts.

The purpose of this practical guidance is to provide an overview of some of the key issues and questions that you may wish to consider before embarking on this work. Whilst this guidance aims to provide a useful starting point for professionals working in the anti-slavery and anti-trafficking sector, it is not intended to be the definitive guide to working with survivors and is not a substitute for face-to-face training. Links to further resources can be found in Annex 1.

## What do we mean by survivor involvement?

In line with the National Institute for Health Research (NIHR) INVOLVE guidelines<sup>2</sup>, we use the term ‘involvement’ to mean the development or delivery of a process or project that is being carried out ‘with’ or ‘by’ survivors rather than being ‘for’ or ‘about’ them.

Survivor involvement can range from *consultation* – seeking survivor views and using them to inform design-making – to *co-production* – where survivors are equal partners at all stages of the process. In the context of policy making, survivor involvement can include survivors acting as members of an advisory or steering group, or survivors commenting on, developing or evaluating guidance and policies.

## Why is survivor involvement in policy making important?

Having lived experience of modern slavery and human trafficking, survivors have invaluable insights into how these human rights violations manifest and the impact they have on individuals and communities. However, to date, survivor voices have been notably absent from policy development in the UK. Too often, survivors have been asked to share a testimony of their experiences of trauma, but then are excluded from conversations about the impact and effectiveness of relevant policies and services and how they could be improved. This means that policies are being created without the input of those who will be directly impacted by them.

Whilst there is increasing recognition in the UK that policy and programme development should be more survivor-informed, and emerging examples of good practice globally<sup>3</sup>, the UK is yet to develop an embedded approach to survivor involvement, in which survivors play a central and consistent role in policy making. Developing this will take time and will be a learning process.

Providing survivors with opportunities to shape policy based on their lived experience should result in the development of policies and programmes that reflect what survivors truly need; increasing the likelihood that they will achieve their intended purpose. Moreover, if done well, involving people with lived experience in shaping policies, strategies and services has the potential to contribute to feelings of empowerment, social inclusion and connectedness, higher self-confidence and self-esteem i.e. can contribute to a person’s recovery.

<sup>1</sup> In line with the UK Government’s typology (2017), we use the term ‘modern slavery’ as an umbrella term that encompasses the offences of human trafficking and slavery, servitude, forced or compulsory labour, as set out in the different anti slavery legislation in place across the UK.

<sup>2</sup> <https://www.invo.org.uk/>

<sup>3</sup> Such as the United States Advisory Council on Human Trafficking, which provides a formal platform for trafficking survivors to advise and make recommendations on federal anti-trafficking policies to the President’s Interagency Task Force to Monitor and Combat Trafficking in Persons (PITF). Further info here: <https://www.state.gov/u-s-advisory-council-on-human-trafficking/>

# Before

Points to consider prior to involving survivors

**1** **Necessity**  
Are you clear why you are seeking survivor input?

**2** **Timeframes**  
Has sufficient time been allocated to enable survivors to fully participate?

**3** **Scope for change**  
To what extent can the policy or practice in question be changed based on the feedback you receive?

**4** **Process**  
Have you provided survivors with a clear explanation about why you are seeking their input, what is expected of them, and what they can expect from you?

**5** **Language**  
Is the language you're using easily understandable and jargon-free, and are translation services required?

**6** **Training and mentorship**  
Do survivors require training and mentorship to engage with the consultation and can you build this into the process?

**7** **Remuneration**  
What resources have you allocated to compensate survivors for their time and expertise?

**8** **Inclusion**  
Have you sought the input of a range of survivors?

## 1. Necessity: Are you clear why you are seeking survivor input?

Do you have clarity about what you are trying to achieve through involving survivors and whether the input you are seeking, and consultation methods you are using, will achieve these aims?

Consider whether the information you are looking for is already available. Have you undertaken a literature review to ascertain whether similar or relevant projects involving survivors have already been undertaken?

## 2. Timeframes: Has sufficient time been allocated to enable survivors to fully participate?

Involve survivors in the consultation process as early as possible. If seeking feedback on a draft document, provide realistic timeframes for survivors to review it and respond to it. As with any other stakeholder, survivors will have other commitments around which this work will have to fit. Some may have had to request time off work, or vocational or educational classes to attend.

Reach out to organisations that support survivors and survivor-led groups to build trust and relationships far in advance of the consultation starting.

## 3. Scope for change: To what extent can the policy or practice in question be changed based on the feedback you receive?

Avoid tokenism; only ask for survivor input if there is realistic possibility that the policy or practice in question can be changed. If only certain parts of a policy are open to amendment, be clear about this from the outset, and provide an explanation as to why this is the case. Manage expectations and be clear about where your 'red lines' are i.e. the extent to which you are prepared to change the policy or service in question. Survivors can

then make an informed decision about whether they wish to be involved. Repeatedly asking for survivor input but failing to incorporate this feedback will lead to disappointment and frustration, and may damage relationships.

Avoid asking for feedback on documents that are effectively completed. Involve survivors prior to commencing the drafting process i.e. seek their views on what a policy should include, in addition to asking for feedback on the draft itself. Involving survivors at an earlier stage is likely to result in greater buy-in and uptake of the policy in question. What will be the mechanism for feeding back to survivors?

## 4. Process: Have you provided survivors with a clear explanation about why you are seeking their input, what is expected of them, and what they can expect from you?

Explain at the outset why you are asking for survivor involvement and your expectations for the process, both in terms of what is required from survivors, for example, time commitments, and what they can expect from you in return, for example, training, payment, and type and frequency of communications. Develop a role description for survivors and develop terms of reference for any type of advisory group, steering group or committee. Be transparent about additional parties that will need to be consulted or people who might have final authority to approve or reject recommendations.

Where possible, be flexible and open to discussing the terms of the consultation. This flexibility may enable more survivors to participate.

## 5. Language: Is the language you're using easily understandable and jargon-free, and are translation services required?

Use clear and non-technical language, and avoid policy and sector-specific language where possible. Where it is necessary to

use policy language, make sure to spell out acronyms and consider whether you need to build in additional time to explain terminology (see 'Training and mentorship' below).

Consider whether participants require documents to be translated or interpreters to be present during meetings, and ensure sufficient budget has been allocated for this.

## 6. Training and mentorship: Do survivors require training and mentorship to engage with the consultation and can you build this into the process?

Consider whether survivors require any support or training to be a part of the consultation process. For example, if you work for a Government department, are you confident that all survivors in the room will know what your department does, how it works with others, and what your individual role is within your organisation? If not, consider whether you need to run an introductory session ahead of the main consultation. Equipping survivors with this knowledge ahead will help to build trust and should enable the consultation to run more smoothly and on time.

If a meeting is planned, ask survivors whether they wish to have someone accompany them, such as a colleague or their caseworker, in case support is required during and after the meeting.

## 7. Remuneration: What resources have you allocated to compensate survivors for their time and expertise?

Treat survivors as you would other subject matter experts and financially remunerate them for their time and input. Ask the survivor consultant to provide you with their rates of service or for a quote. Factor in the level of preparation, advanced training, and expertise that is required. If your organisation or department does not usually pay expenses for attendees travel to meetings, consider whether exceptions can be made for survivors. Unlike the majority of professionals working in the

anti-slavery sector, survivors will not be able to claim back the money spent on travel from their employers. Recognise that not everyone is able to pay for costs up front and wait for reimbursement. Think of remuneration beyond the meeting itself too i.e. time spent reading draft documents, travelling, childcare costs, answering emails etc.

NB: Some survivors will not have the right to work in the UK and therefore will be entitled to volunteer but not entitled to do voluntary work. It is important that you know the distinction.<sup>4</sup> Seek advice from survivor-led groups and expert bodies such as the National Council on Voluntary Organisations (NCVO) on appropriate payment to survivors to ensure that remuneration is compliant with the law and won't affect people's benefits or other entitlements.

In addition to honorariums, consider whether you need to provide meals, childcare and other practical supports for group or event meetings.

Can your organisation provide opportunities for more substantial, remunerated roles for survivors in terms of ongoing scrutiny and review, either now or in the future? Can your organisation provide the support that these roles would entail?

## 8. Inclusion: Have you sought the input of a range of survivors?

In the same way that one person's views do not represent those of an entire population, one survivor cannot speak for all others. Ensure that you are seeking input from a range of people who reflect the diversity of backgrounds, experiences and geographical locations of the population the policy will impact.

To maximise the chances that the consultation responses you receive are representative, provide a range of consultation opportunities and use a variety of consultation methods, for example, face-to-face meetings, online and paper surveys.

<sup>4</sup> <https://knowhow.ncvo.org.uk/your-team/volunteers/recruiting/volunteers-from-overseas#ref>

# During

## Points to consider when holding a consultation meeting

### Location

- Ask whether survivors prefer to meet you in a neutral, public space in which they feel comfortable.
- Choose a meeting location that is easily accessible by public transport, and a venue that is accessible for those with mobility issues.
- Certain workspaces can be intimidating. If the meeting has to be held in an office space, consider ways that you make the space less intimidating or less formal.



### Timing

- Consider the timing of the meeting, allowing for travel time and childcare responsibilities, and whether you need to provide accommodation.
- If accommodation is needed, liaise with the survivor and a relevant support organisation about appropriate accommodation for that person (including location and type/name of hotel).



### Attendees

- Avoid unequal numbers of survivors to organisation staff. Consider how many people you *really* need in the room to successfully run the workshop/consultation.
- Allow survivors to bring a friend, colleague, or caseworker with them to the meeting.
- Ask whether survivors will be accompanied by their children and whether crèche facilities are required.



### Introductions

- If you are inviting a survivor to a meeting, tell them in advance who is going to be in the room.
- Introduce yourself and your role. People might not know who you are, even if you are an MP or senior government official.
- Remind attendees about the purpose of the meeting, and be clear what is, and *what is not*, included in the scope of the meeting. For example, if you are unable to assist individual attendees with their cases, or can only discuss one specific part of a policy and not others, be clear about this at the outset.



## Ground rules

- Consider collaboratively developing ground rules with attendees to help shape expectations around behaviour, particularly if meeting with the same group of people on numerous occasions. Examples of ground rules include 'Arrive on time', and 'Be respectful of other people's opinions'.
- If this is a one-time meeting, consider setting the tone by stating a few things early in the meeting such as: 'I don't expect you to share details about your life that you want to keep private' and 'It is OK to ask questions'.



## Confidentiality

- Do not name a survivor to a group of people as 'a survivor'. Ask attendees if they want to use a pseudonym and what title they want to be associated with their name.
- If meeting notes are being made, be clear about how you intend to use them and with whom they will be shared. Always provide a copy of the minutes with attendees.
- If attendees wish for some or all of the conversation to be 'off the record', respect their wishes.
- Seek permission in advance of the meeting if you wish to tape or video record the meeting.



## Agenda and lines of questioning

- Share the agenda for the meeting in advance and include regular breaks if meetings are longer than two hours.
- Avoid asking questions about an individual's trafficking experience or trauma. Even if you think it's relevant, think again - how will this information be useful to the task at hand?
- Avoid asking additional personal details during small talk, such as 'Where are you from?' or 'Are you visiting family for the holidays?' These questions seem innocuous but can be perceived as intrusive and insensitive to survivors' lived experiences.
- Be mindful of the emotions in the room and allow survivors to take further breaks if needed. If possible, identify a separate room where attendees can go to have some quiet time out of the meeting.
- Acknowledge, rather than ignore, if survivors reveal personal or traumatic details, or where strong emotions are expressed. Thank attendees for their contributions.



## Power and privilege dynamics

- Be aware that some survivors may find authority figures intimidating. Some survivors may have experienced abuse and trafficking at the hands of public officials and so may be fearful or mistrustful. Take the time to introduce yourself to attendees and build a rapport. Try to keep the meeting informal but keep clear professional boundaries and maintain your role.
- Be mindful of the power and privilege imbalance that is likely to exist between you and the meeting attendees. By the nature of being in your role, even if you have struggled to get there, you may carry a much higher degree of comfort in your daily life than your meeting attendee.
- Understand that you are working with survivors during *your* work day. Survivors might have needed to take time off work to speak with you, so acknowledge this and thank attendees at the outset.
- If you have to leave the meeting early, explain why and be clear about how you intend to follow up on the points raised.



## Dress code

- Let attendees know far in advance if there is a dress code, even if it is not an explicit one.
- Consider that some may not have the resources to meet a dress code or may be uncomfortable.



## Language

- Do not use the third person to refer to survivors, for example, 'They all need better care.' Use 'survivors'.
- Be mindful to explain policy terminology and avoid using acronyms and jargon.



# After

## Consultation follow-up

- **Provide feedback to consultation participants** about how their contributions have influenced your thinking and the concrete changes you have or will be making as a result. Once you have made the changes share the updated documents with attendees.
- **Provide opportunity for participants to feedback** on the consultation process. Did attendees enjoy and value the experience, and do they have any suggestions for how the process could be improved?
- **Acknowledge survivor contributions/co-authorship.** Discuss with survivors how they would like to be acknowledged, for example, do they want their names published or is there a different workaround where you can acknowledge their contribution without naming them?
- **Share final published copies with survivors** and provide any relevant links.
- **Consider more than one meeting** to refine thinking and gain feedback and contribution on the development of the proposition.

# Annex 1: Additional resources

- **UK Standards for Public Involvement** – <https://sites.google.com/nih.ac.uk/pi-standards/standards>
- **NIHR Involve Resource Centre** – <https://www.invo.org.uk/resource-centre/>
- **Slavery and Trafficking Survivor Care Standards (2018)**– <https://iasctoolkit.nottingham.ac.uk/download/trafficking-survivor-care-standards/>
- **Helen Bamber Foundation (2018) The Trauma-Informed Code of Conduct for All Professionals Working With Survivors of Trafficking and Slavery** – <http://www.helenbamber.org/wp-content/uploads/2019/01/Trauma-Informed-Code-of-Conduct.pdf>
- **National Human Trafficking Training and Technical Assistance Centre (2018) – Toolkit for building survivor informed organizations.** Trauma-informed resources and survivor-informed resources and survivor-informed practices to support and collaborate with survivors of human trafficking as professionals [https://www.acf.hhs.gov/sites/default/files/otip/toolkit\\_for\\_building\\_survivor\\_informed\\_organizations.pdf](https://www.acf.hhs.gov/sites/default/files/otip/toolkit_for_building_survivor_informed_organizations.pdf)
- **Tips for Anti-Trafficking Professionals Working with Survivors** – A set of recommendations for non-survivors who want to engage respectfully with survivors. This was developed in the U.S. through a co-produced research study entitled: Survivor-Ally-Researcher Evaluation of the San Francisco Mayor’s Task Force on Anti-Trafficking – <https://sftaskforceeval.wordpress.com/publications/>
- **Fundamentals of Compensation and Expenses** – This document provides an overview of appropriate remuneration practices – <https://survivoralliance.org/resources-2/>
- **Survivors are speaking. Are we listening?** – A blog from Minh Dang, Executive Director of the Survivor Alliance, for the Global Slavery Index – <https://www.globallslaveryindex.org/resources/essays/survivors-are-speaking-are-we-listening>

# Acknowledgements

This guidance was developed as a collaboration between the Rights Lab at the University of Nottingham and the Survivor Alliance.

**Survivor Alliance** is a non-governmental organization (NGO) whose mission is to unite and empower survivors of slavery and human trafficking around the world. Survivor Alliance builds sustainable survivor communities that are focused on meaningful survivor inclusion, economic empowerment, and wellbeing. By supporting the development of local and regional survivor groups, Survivor Alliance ensures that survivors can connect, advocate, and support their peers in person and through online networks. It harnesses the expertise of its members to inform the antislavery field and ensure survivor voices are included in all conversations.

<https://survivoralliance.org>

The **Rights Lab** at the University of Nottingham delivers research to help end modern slavery and is home to many of the world’s leading modern slavery experts. The Rights Lab partners with the Survivor Alliance to help ensure that survivor voices are included in the anti-slavery movement; establish best practice and effective interventions; provide research that informs legislation and organisational policies; translate research for the benefit of anti-slavery professionals and organisations; and develop the capacity of anti-slavery professionals.

[nottingham.ac.uk/Rights-Lab](https://nottingham.ac.uk/Rights-Lab)

This report was authored by Vicky Brotherton, Rights Lab Policy Engagement Manager, with assistance from Minh Dang, Survivor Alliance Executive Director, Dr Andrea Nicholson, Rights Lab Nottingham Research Fellow in Survivor Voices, and Dr Nicola Wright, Rights Lab Associate Professor in Mental Health. Thanks also to Professor Zoe Trodd, Rights Lab Director, and Sarah Kerr, Rights Lab Deputy Director, for their input.

Cover image: Mural image created by Joel Bergner and community partners.





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