

# A sector at breaking point: Justice denied for victims of trafficking

June 2020



**YOUNG  
LEGAL  
AID  
LAWYERS**

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## 1. About us

Young Legal Aid Lawyers (“YLAL”) is a group of aspiring and junior lawyers committed to practising in those areas of law, both criminal and civil, that have traditionally been publicly funded. We have around 3,500 members including students, paralegals, trainee solicitors, pupil barristers and qualified junior lawyers throughout England and Wales.

We believe that the provision of good quality, publicly funded legal assistance is essential to protecting the interests of the vulnerable in society and upholding the rule of law. One of our core objectives is campaigning for a sustainable legal aid system to ensure that those who desperately need access to legal advice and representation are able to obtain it.

## 2. Background

There are significant barriers to accessing legal aid for asylum and immigration matters in England and Wales. Research by Refugee Action<sup>1</sup> shows that sustained funding cuts to legal aid has led to a 56% reduction in the number of asylum and immigration legal aid providers since 2005. Dr Jo Wilding’s 2019 report, “Droughts and Deserts: A Report on the Immigration Legal Aid Market”,<sup>2</sup> found that there was a “market failure” in asylum and immigration legal aid, with swathes of the country having little or no access to legal aid and the legal aid “fixed fee” being entirely inadequate for lawyers to undertake high quality work on complex cases.

In her 2018 paper, “Challenges and Solutions to Accessing Legal Services and Legal Aid for Victims of Modern Slavery”<sup>3</sup>, Philipa Roberts (Director of Legal Policy at Hope for Justice) addressed how lack of asylum and immigration legal advice and representation was impacting upon victims of trafficking:

*“The current lack of specialist advice is impacting on victims having advice and making appropriate applications to stabilise their immigration status. In turn, this causes many other barriers, e.g. access to welfare assistance and housing... Our experience is often victims who do end up cliff dropping out of systems into destitution and homelessness have one key commonality; they haven’t had access within the NRM system to independent legal advice.”*

Roberts estimated that on average it was taking Hope for Justice’s Modern Slavery Advocates between eight weeks to twelve months (depending on area) to locate a legally aided immigration advisor with capacity. Her findings were consistent with those of the Anti-Trafficking and Labour Exploitation Unit (‘ATLEU’):<sup>4</sup>

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<sup>1</sup> 2018, “*Tipping the Scales: Access to Justice in the Asylum system*”, Refugee Action

<sup>2</sup> 2019, “*Droughts and Deserts: A Report on the Immigration Legal Aid Market*”, Dr Jo Wilding

<sup>3</sup> April 2018, “*Challenges and Solutions to Accessing Legal Services and Legal Aid for Victims of Modern Slavery*”, Philipa Roberts, Director of Legal Policy at Hope for Justice

<sup>4</sup> 2018, “*Legal Aid for victims of trafficking and modern slavery*”, Anti-Trafficking and Labour Exploitation Unit

*“Referrals for ATLEU’s services are high. Demand for immigration advice is the greatest and far outstrips ATLEU’s capacity. Many weeks after initially contacting ATLEU with a referral, support workers are still struggling to find a victim an immigration lawyer. Lack of provision is most acute outside London. Respondents to a recent Anti-Trafficking Monitoring Group (ATMG) scoping exercise overwhelmingly reported that capacity of legal aid lawyers to take cases was one of the biggest problems they faced in securing legal advice for victims. The lack of legal aid provision was identified as an issue across all of England and Wales, with the north of England being especially poorly served.”*

The government is under legal duties to provide access to legally aided representation to victims of trafficking.<sup>5</sup> New regulations further undermine the government’s compliance with these obligations.

The Civil Legal Aid (Remuneration) (Amendment) (Coronavirus) Regulations 2020 came into force on 8 June 2020 and were laid and made by the negative resolution procedure. These regulations exacerbate the “market failure” in the asylum and immigration legal aid sector. The regulations set a new legal aid fee for asylum and immigration appeals for a one year period. While the regulations increase the fixed fee for legal aid, they also significantly increase the “escape fee”, the level of work that needs to be undertaken before lawyers are paid hourly rates. This means that lawyers are less able to take on complex cases as it will be even harder for them to reach the escape fee threshold. This will have a disproportionate impact on victims of trafficking. The new fee structure also means that barristers will be paid as little as £60 for a skeleton argument, well below the minimum wage. The immigration Bar is united in refusing to accept instructions under this new system.

YLAL’s report examines the state of access to asylum and immigration legally aided advice for victims of trafficking and the impact of the new regulations. Our findings and recommendations are drawn from evidence obtained through a survey of the anti-slavery support sector.

### **3. The Survey**

YLAL undertook a rapid consultation with the anti-slavery support sector in order to gain a “snapshot” of the state of access to justice for this client group. YLAL’s survey was open for responses 15-17 June 2020, and despite being live for fewer than three days, it received 34 responses from individuals working in over 18 organisations. All responses were provided anonymously, with the option of disclosing the organisation where the individual worked.

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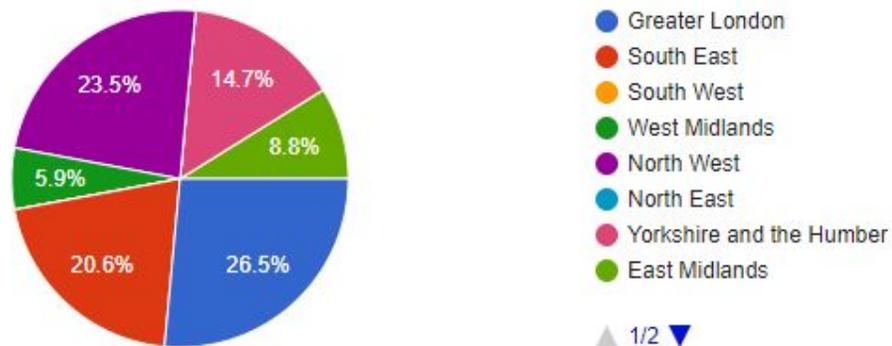
<sup>5</sup> See Schedule 1 paragraphs 32 and 32A, Legal Aid, Sentencing and Punishment of Offenders Act 2012. See also Article 12(1)(d) of the Council of Europe Convention on Action Against Trafficking in Human Beings (ECAT) and Articles 11(5) and 12(2) of Directive 2011/36/EU (Trafficking Directive).

## 4. Respondents

Respondents were individuals supporting victims of trafficking in the anti-slavery support sector across England. The survey received responses from most regions of England. The largest proportion of respondents work in the Greater London area (26.5%), followed by the North West (23.5%) and the South East (20.6%). A further 14.7% of respondents work in Yorkshire and the Humber, with 8.8% working in the East Midlands, and 5.9% working in the West Midlands.

In which area of England or Wales do you support survivors?

34 responses



However, there were no respondents from Wales, the South West, the North East or East Anglia, which may reflect lack of anti-trafficking support provision in those areas. This largely corresponds to the asylum and immigration legal aid deserts identified in Dr Jo Wilding's report.

The survey sought to capture responses from those engaged in assisting victims of trafficking to access legally aided immigration advice. Respondents disclosed their job title and role, which are summarised as follows; Independent Modern Slavery Advocate, Anti-Trafficking Officer, Case Worker, Legal Protection Caseworker, Volunteer Case Worker, Vulnerable Persons Resettlement Scheme Officer, Director of Legal Policy, Safe House Manager, Head of Services, Trustee and English teaching co-ordinator, Head of Legal Protection, Business Account Manager, CEO, Director of Care, Project Manager, Referrals Coordinator, Outreach Advocate, Support Worker/Coordinator, Head of Operations, Legal Officer, Trafficked Children's Adviser, Social Worker, Service Coordinator, Anti-Trafficking Outreach Caseworker, Outreach Coordinator, Exploitation Co-ordinator.

In summary, respondents provide the following types of support to survivors of slavery:

- 1) National Referral Mechanism (NRM) safehouse and case work support
- 2) NRM outreach support
- 3) Case work (outside of the NRM)

- 4) Post NRM support
- 5) Advocacy and advice
- 6) Independent supported accommodation/safehouse
- 7) Independent holistic support
- 8) Legal protection
- 9) Drop in and befriending
- 10) Local Authority support

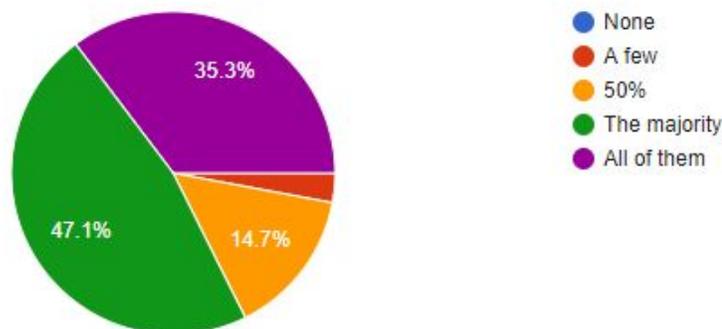
## 5. Why access to legal aid for asylum and immigration matters is important

Respondents were clear that access to legal aid for asylum and immigration matters is essential for victims of trafficking to recover from their trauma. As one respondent put it, “it is everything.”

All respondents stated that at least some of their clients needed legally aided asylum and/or immigration advice and representation. 82.4% of respondents said that on average ‘all’ (35.3%) or ‘the majority’ (47.1%) of their clients (non-British) want support with a referral to and/or help accessing immigration representation. Not one respondent answered ‘none’, and only one respondent answered that ‘a few’ of their clients want this support.

On average, how many of your clients (non British) want support with a referral to/accessing immigration representation?

34 responses



Many respondents noted that regularising immigration status is a prerequisite to accessing key support needed for their clients’ recoveries:

- *“The stability that comes from secure status, such as access to housing, welfare benefits and no risk of removal is often what allows the client to process their trauma.”*

- *“...regularisation of status is often key to victims being able to access wider support to assist with recovery, increase resilience and reduce risks of re-exploitation including housing, welfare benefits, community care assistance and the ability to work which are all key aspects of empowering recover and reintegration.”*
- *“It’s often one of the only routes that someone has to regularising their stay, accessing their rights and entitlements, and being able to take meaningful control over their situation.”*

Respondents observed that securing immigration status is a complex process and that victims of trafficking face additional barriers to navigating the asylum and immigration systems:

- *“[their] cases are complex, and they need more evidence as they may have given conflicting accounts due to effects of trauma on memory. This trauma means that they are in no state to represent themselves.”*
- *“Victims also need advice and representation to argue their residence periods in the UK because they do not have the usual evidence as a result of their trafficking.”*
- *“Victims of trafficking often face deportation in relation to criminal convictions during their trafficking”*
- *“...legal representation is vital, this is made especially difficult when you don’t speak the language.”*
- *“[Victims of trafficking] who claim asylum [often] have an interaction in the nexus between asylum and National Referral Mechanism decisions.”*
- *“Most of my clients will have complicated case, due to being a victim of human trafficking/modern slavery - often without any documents, any support networks, sometimes destitute and not understanding the system (often not speaking the language) of the country they are currently in”*
- *“There are usually multiple credibility issues that have not previously been properly addressed. Many of our clients therefore are on at least their first fresh claim. These ‘complex’ cases have proven very difficult to find new reps for”*
- *“The majority of my clients who can access legal aid require immigration advice that takes into account their experiences of trafficking, and/or an existing NRM referral.”*
- *“Due to the complexity of clients we take on as an organisation, their legal cases are often extremely complex and usually require expert evidence, [Exceptional Case Funding], interpreters, and familiarity with working with vulnerable clients.”*

Because of their clients’ vulnerabilities and complex histories, respondents emphasised the importance of high-quality and consistent legal advice and representation from an early stage:

- *“Having specialist, timely, thoughtful representation from the beginning of someone’s journey can make all the difference between someone being granted a form of leave to remain and starting to make steps to recovery, or someone being stuck in an endless cycle of fresh claims and threat of detention and deportation.”*
- *“...access to legal aid immigration advice is essential throughout the process for survivors of slavery, from pre-National Referral Mechanism immigration advice, to legally aided advice on longer term applications such as applications for Further Leave to Remain, because there are multiple points at which a survivor can otherwise become destitute as a result of their immigration status, and subject to re-exploitation.”*
- *“...the need for legally aided immigration advice is vital in their access to a leave of protection.”*
- *“The law is complex and good advice from an early stage can help clients’ cases and reduce the cost of NASS support. We have some clients who have been going through the system for ten years or more. It is both inhumane and costly”*
- *“...disclose sensitive information fully to strangers and so having sufficiently specialist legal representation free of charge is likely to be the only way for survivors to explain what has happened to them. Issues such as debt bondage, juju rituals, rape and forced complicity in offending would often not come to light or be properly explained without a legal representative taking proper instructions.”*

Many respondents were clear that legally aided asylum and immigration advice was the only way that their clients could access the legal advice and representation that they need.

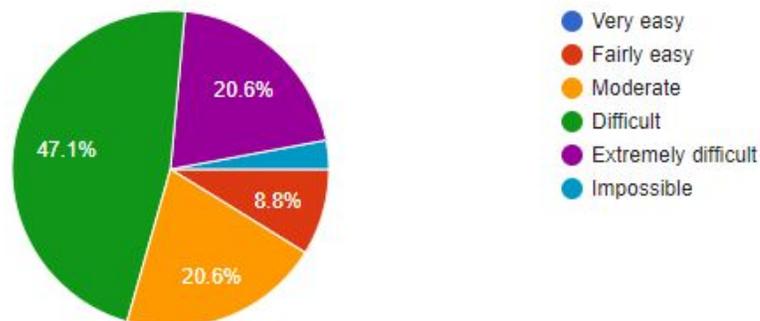
- *“None of our clients have the means to pay for representation.”*
- *“The cost of a non-legal aid solicitor would just not be affordable for an asylum seeker given the current cost of living and financial support received from the Home Office.”*

## **6. Availability of legal aid for asylum and immigration matters**

YLAL asked respondents how hard, in their experience, it was to find a legally aided asylum and immigration representative for a client.

In your experience, how hard is it to find a legal aid immigration representative for a client?

34 responses



No respondents answered that it was 'very easy' to find legally aided immigration representation. 20.6% of respondents said it was 'moderate' in difficulty, and 8.8% said it was 'fairly easy':

- *"Generally immigration advice is easy to obtain. A basic leave to remain application, or first asylum claim is easy to find immigration representation for. As we have long standing links with solicitors. For anything more complex, like advice on visas and legal status options, or fresh claims and appeals, it's hard to find anyone. Also in other regions where we don't have established links, it's hard to find legal representation."*
- *"Fortunately we have a relationship with a local firm who will take legal aid cases. If this firm ceases for any reason it would be extremely difficult to find an alternative."*
- *"We are fortunate to have access through our partner[...] who facilitate legal aid access with local solicitors."*

Out of those that responded that it was 'fairly easy' (8.8%) or 'moderate' (20.6%) in difficulty to find a legally aided immigration representative, 70% work in Greater London or the South East of England, indicating a greater availability of legal aid provision in those areas.

Overall, the responses demonstrate that the majority of support providers have difficulty in accessing legally aided immigration representation for their clients. 70.6% of respondents said it was either 'impossible' (2.9%), 'extremely difficult' (20.6%) or 'difficult' (47.1%) to find such a representative for a client.

Respondents commented on the difficulties that they face in finding legal aid immigration representation for their clients:

- *"There are areas within England and Wales (we operate in both areas) where finding representation is very difficult, as there either aren't any legally aided ones or they cannot take*

*another case due to already being inundated with cases . Additionally, not everyone has an experience in assisting victims of human trafficking/ modern slavery.”*

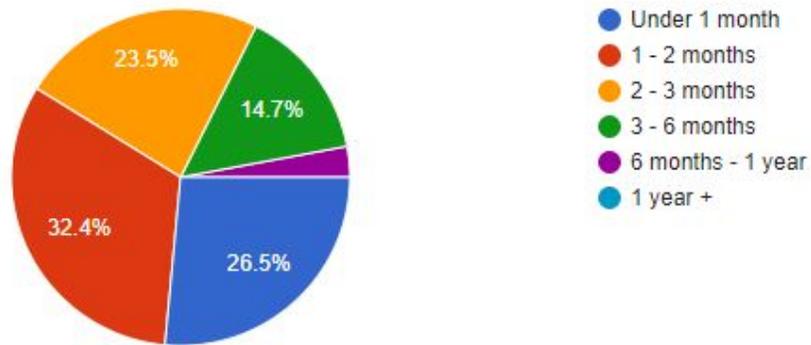
- *“We have a list of all legal services that say they accept legal aid clients. I have rung each of these and have been told that they are not currently accepting clients. I have done this numerous times and gotten the same response.”*
- *“We find it difficult to find a solicitor who has experience of working with trafficking victims and is funded by legal aid who has capacity to take the case on.”*
- *“It is really difficult, and becoming increasingly so. We struggle to find legal aid solicitors who have capacity on their caseload as it is, let alone solicitors who have the expertise to specifically work with survivors of trafficking. We generally only have a handful of firms to approach locally, and that depends on caseloads.”*
- *“There are significant legal aid deserts across the country.”*
- *“We do work across the UK and we find there are difficulties in obtaining advice on all areas of the UK but this is particular acute in terms of legal aid deserts in the Northeast, Northwest, West Midlands, Southcoast”*
- *“When we are searching for general immigration solicitors, it is always a struggle to find capacity within legal aid firms OR there are no legal aid firms in the local area. For example we had clients in the North East where this was particularly a problem.”*
- *“It always feels like luck. When great firms have the capacity that is a relief, but if they don't then that brings a lot of stress and anxiety to the client. Finding suitable immigration advice is fundamental, and always a priority. I try very hard to always connect clients with organizations that have an understanding of their complex cases and needs to avoid re-traumatizing.”*
- *“At the moment it is extremely difficult as almost all of the solicitors I regularly work with have been furloughed. Pre-Covid it was also difficult, particularly in the north east where capacity and quality are low. Solicitors who do good quality work will limit how many cases they take so often won't accept referrals and those who will always accept referrals are much less likely to put in the amount and type of work often needed by trafficked children to get good outcomes as their caseloads are too high.”*
- *“This is an issue which keeps arising as there are so few Legally Aided solicitors who have 1. the necessary expertise in trafficking and 2. have capacity to take on new clients. This one of the main issues for our clients, aside from significant mental health concerns.”*

We also asked respondents how long it takes to refer a client for legally aided immigration advice. The majority of respondents stated that on average it took 1-2 months to refer a client for legally

aided immigration advice. Out of the 26.5% that said it takes under one month, 66% of respondents were from the Greater London and South East areas, again indicating greater availability in these areas.

How long (on average) does it takes to refer a client to legally aided immigration advice?

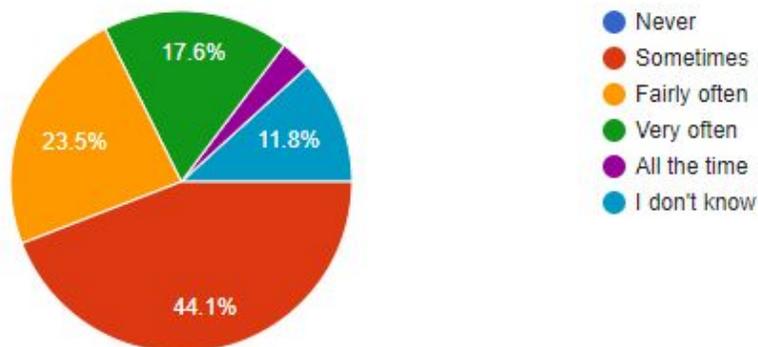
34 responses



Respondents noted that it is particularly difficult to find legal aid lawyers with specific expertise in advising and/or representing victims of trafficking. 17.6% of respondents said that the representative had this expertise 'very often', while 23.5% of respondents answered 'fairly often'. Only one respondent said that representatives have the necessary skill set 'all the time'. 44.1% of respondents said that representatives had the required skill set 'sometimes'. 11.8% of respondents said they didn't know about the level of expertise of representatives.

How often does the legally aided immigration representative involved have expertise in trafficking/modern slavery cases?

34 responses



Respondents commented that:

- *“It is very rare to find an immigration solicitor on legal aid who has a good knowledge of trafficking (or even some knowledge).” Another stated “there are enormous shortages in sufficiently specialist legal representation. This is even in areas where there are legal aid contracts in place.”*
- *“We find it difficult to find a solicitor who has experience of working with trafficking victims and is funded by legal aid who has capacity to take the case on. In reality we are referring work to a small pool of solicitors with this experience and therefore capacity is always an issue.”*
- *“It can be very difficult to find female immigration advisers who are comfortable to advise on both NRM and asylum/other immigration applications, particularly where the cases have a long immigration history or are complex and require lots of nuanced work with women who have experienced significant trauma.”*
- *“Unfortunately we do have cases where individuals have already signed legal aid agreements with solicitors who do not go to these lengths and it either takes a lot of advocacy to engage the solicitor to take appropriate action on a client’s case or we need to resort to formal complaints so the client can instruct a new solicitor.”*
- *“The situation for our client base, victims of human trafficking and other forms of modern slavery is much more critical as this is often a specialism within a specialism so there are across the country only a handful of firms who have expertise particularly in this area.”*

The evidence provided by respondents demonstrates that there is a serious market failure in the provision of asylum and immigration legally aided advice for victims of trafficking. This failure is particularly acute in certain areas of the country. YLAL concludes that this failure is a prima facie breach of the government’s legal duties to victims of trafficking, inter alia, under the Council of Europe Convention on Action against Trafficking in Human Beings (ECAT) and the EU Trafficking Directive<sup>6</sup>.

## **7. Consequences of market failure**

The market failure in the asylum and immigration legal aid sector often means that victims of trafficking are either unable to access the specialist legal advice and representation that they need or they are forced to go to a private provider.

44.1% of respondents stated that clients had left their service before they were able to find them an immigration representative. We also asked respondents whether they had supported clients who

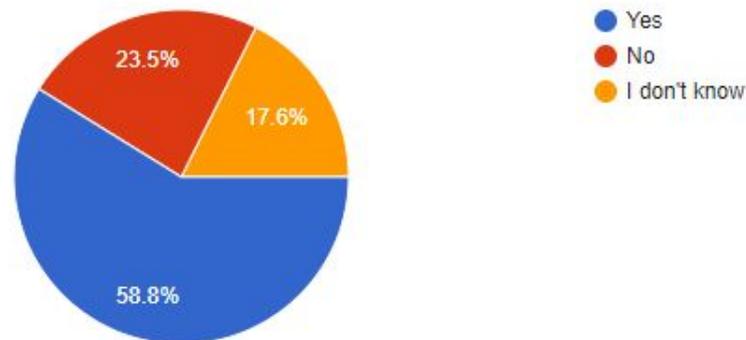
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<sup>6</sup> The UN Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime (“The Palermo Protocol”) Article 6(3)(b), Article 12(1)(d), Article 13 and Article 17 of the Council of Europe Convention on Action Against Trafficking in Human Beings (ECAT), Article 11(5) and Article 12(2) of Directive 2011/36/EU (Trafficking Directive).

had engaged a non-legal aid provider in order to get representation even though the client did not have the means to do so. The majority of respondents (58.8%) confirmed this was the case. 23.5% of respondents said they had never had clients in this position, and 17.6% of respondents said they did not know.

Have you had clients who have had to go to a non legal aid provider to get immigration advice and who can't personally afford it?

34 responses



Respondents raised significant concerns about their clients incurring debt and being exploited in order to pay for a private immigration representative:

- *“We work with very vulnerable clients. Those who have private solicitors and cannot afford the fees can often find themselves relying on friends, family or other people in the community to cover legal costs. In some cases of course, the client has a supportive family and this is not a problem so long as the legal representative is good quality. However, it can often result in exploitative relationships. This is particularly the case for our clients who are survivors of trafficking - several clients have ended up in exploitative relationships with other people, even their initial traffickers, to cover legal costs.”*
- *“Debt runs the risk of further exploitation and impacts on recovery by increasing feelings of shame and low self-esteem.”*
- *“I have seen Service Users spend all their savings (or compensation they may have received) in order to fund legal representation.... In these circumstances, I have seen survivors get into debt, have sex with men in order to retain a roof over their head and become reliant on communities for their basic needs.”*
- *“I know one person in particular who borrowed money to pay for a solicitor and was heavily burdened with this debt, unable to pay it off, and very anxious about it for years afterwards”*

- *“They have borrowed money which has then put them into or back into debt and debt bondage”*

Respondents also noted that lack of access to asylum and immigration legal aid lawyers put their clients at risk of exploitation from unregulated asylum and immigration providers:

- *“[Clients] sometimes turn to fraudsters who pretend to be a solicitor which means they lose all their money and receive no support.”*
- *“Many of our clients who have been charged extortionate fees by previous private reps receive cost orders (after we have found them legal aid reps). Owing to our clients’ multiplex vulnerabilities and poor mental health, such pressure to repay costs can cause considerable distress and a deterioration of their mental health. In some instances, the pressure to cover previous costs that they cannot afford has led to an increase in their level of risk to set, and has pushed others into exploitative work to repay debts.”*
- *Clients had received costs orders “in some cases without informed consent of this risk, and dependence on communities or hosts to raise funds for private fees.”*
- *One respondent discussed how one of their clients preferred to go to a non legal aid representative so she could instruct someone who spoke their language: “I have had one client who was being offered what she considered to be a better service from a non-legal aid provider (e.g. they were willing to come see her in hospital, they spoke Chinese, she was dependent on the Chinese community who organised this for her) but she could not afford it.”*
- *“We also find that the quality of the advice and representation isn't as good with non-legal aid solicitors, but clients feel trapped once they've paid.”*
- *“Clients who take the advice of friends, family, or extended circles (often religious) to find a non legal aid solicitor often find themselves with a refusal, due to the lack of expert evidence (which they cannot afford). Alternatively, we find it more difficult to liaise with solicitors who have little experience with vulnerable clients, often victims of re-trafficking with complex histories.”*
- *“A real issue is that the private lawyer does not have sufficient expertise or the client can not afford to get disbursements needed (such as medical reports) to substantiate the claim.”*
- *“None of the clients coming from this firm were ever asked what their situation was really like... poor legal advice from representatives... have longer term impacts on the client, lasting even beyond a client receiving full and comprehensive advice from a legally aided lawyer who is well equipped to support these types of complex cases.”*

YLAL is deeply concerned by these observations, which suggest that the asylum and immigration legal aid market failure puts victims of trafficking at significant risk of being re-exploited and

retraumatised as well as being unable to regularise their immigration status or receive the support needed to facilitate their recovery.

## **8. Impact of the new regulations**

The Civil Legal Aid (Remuneration) (Amendment) (Coronavirus) Regulations 2020, which came into force on 8 June 2020, set a new legal aid fee for asylum and immigration appeals lodged online through the First-tier Tribunal's new "Core Case Data" (CCD) platform. These rates were brought into force without undertaking a full consultation or impact assessment.

The standard fixed fee for a case lodged through CCD is £627 for an asylum case, or £527 for a non-asylum case. The fixed fee was previously £227. Under the "fixed fee" system, lawyers can only charge for the actual time spent on a case when their work exceeds three times the value of the fixed fee ("the escape fee"). The new proposed fixed fees mean that in asylum cases £1,881 (3 x £627) of work must be undertaken before an hourly rate is available. The new regulations have increased the "escape fee" threshold by £1,200.

Legal aid lawyers are effectively being asked to work for free if they undertake high quality and time-consuming work that falls short of the increased escape fee threshold.

Previously, barristers were paid £302 to prepare and represent an asylum seeker at an appeal. With the introduction of the CCD platform, skeleton arguments are required at an earlier stage of a case. The Immigration Law Practitioners' Association (ILPA) estimates that even in complex cases, under this new scheme, a barrister might be expected to produce a skeleton argument for as little as £60. A hearing is less likely to happen if a barrister can, through their skeleton argument, persuade the Home Office that the decision under challenge was wrong. This creates the perverse situation that the more effective a barrister's skeleton argument is, the less likely they are to be paid fairly for their work.

The new regulations make it financially impossible for lawyers to take on complex immigration and asylum cases. The immigration Bar has united in refusing to accept instructions under this new fee model as the changes pose an existential threat to the profession.

The changes exacerbate the market failure in the provision of asylum and immigration legal aid. Firms are now less likely to do legally aided immigration cases that are complex and demand more time. The new regulations therefore have a disproportionate impact on victims of trafficking as their cases are often highly complex. Survivors face increased risk that they will be unable to obtain legally aided representation, and that they will therefore be prevented from accessing the representation that they desperately need.

YLAL is concerned that the new regulations will compound the sustainability crisis that already exists throughout the legal aid sector. We believe the new fee scheme will cause further

contraction of the immigration and asylum sector, making this area of work less viable for junior practitioners.

## 9. Recommendations

The Civil Legal Aid (Remuneration) (Amendment) (Coronavirus) Regulations 2020 have exacerbated the market failure in the provision of asylum and immigration legal aid and have had a disproportionate impact upon victims of trafficking. YLAL calls on the Legal Aid Minister to:

- Immediately withdraw the Civil Legal Aid (Remuneration) (Amendment) (Coronavirus) Regulations 2020.
- Consult the asylum and immigration legal aid sector ahead of any further proposed changes.
- Acknowledge the government's specific legal obligations to ensure access to legally aided asylum and immigration representation for victims of trafficking, *inter alia* under ECAT and the EU Trafficking Directive.
- Acknowledge the market failure in the provision of asylum and immigration legal aid.
- Work with the Treasury to ensure that the legal aid sector is sufficiently funded to address the market failure and the government's ongoing breach of its duties to victims of trafficking.

YLAL believes that there should be a sustainable legal aid system that provides high quality legal help to those who could not otherwise afford to pay for it. Victims of trafficking are some of the most vulnerable people in society. We cannot support regulations that further undermine their access to legally aided asylum and immigration advice and representation.

22 June 2020

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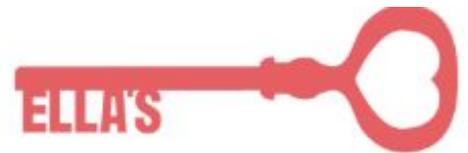
Our thanks to the following organisations who were amongst those that contributed evidence:



Asylum Link Merseyside



British RedCross



**LOVE146**  
END CHILD TRAFFICKING AND EXPLOITATION

