

Modern slavery policy in the UK: evidence- informed priorities for the UK Government

Policy report

October 2024



A Summary of this Policy Report is available on the Modern Slavery and Human Rights PEC website at modernslaverypec.org/resources/modern-slavery-policy-in-the-uk-priorities-for-the-uk-government.

Introduction

This Modern Slavery and Human Rights PEC Policy Report aims to inform the new UK Government's response to modern slavery. It is based on evidence and insights generated by PEC analysis and funded research projects, as well as analysis of wider relevant academic research, government and NGO reports, and administrative data. The Policy Report also draws on the PEC's first-hand experience of working to influence the development of modern slavery policy and engage lived experience experts. The Policy Report and accompanying Summary were produced by the Centre's policy impact team and have been reviewed by the Centre's lived experience engagement team, members of the Centre's Lived Experience Advisory Panel and academic researchers from the Centre's collaborative research partnership with expertise in modern slavery.¹ Given the rapid nature of this analysis, the Policy Report is not based on a systematic review of all available evidence on modern slavery.

Evidence suggests the terms 'survivor of modern slavery' and 'people with lived experience of modern slavery' are generally preferable when talking about the people most directly affected by this form of exploitation.² This briefing uses the terms 'potential victim' and 'victim' in places, given they are used in the Modern Slavery Act 2015, the Council of Europe Convention on Action against Trafficking in Human Beings (ECAT)³ and many other official documents and statistics.

1. The Policy Report has benefitted from review from researchers at the Centre's co-lead and partner institutions: Prof Alex Balch and Dr Wendy Asquith, University of Liverpool; Dr Sofia Gonzalez de Aguinaga, Bingham Centre for the Rule of Law; Dr Marija Jovanovic, Bonavero Institute of Human Rights at University of Oxford; and Dr Alicia Heys, Wilberforce Institute at the University of Hull. We are grateful to Jane Lasonder and other members of the Centre's Lived Experience Advisory Panel (LEAP) for their expert review of the accompanying Summary Policy Brief.

2. Modern Slavery and Human Rights Policy and Evidence Centre (2024) '[Framing Modern Slavery](#)'

3. ECAT (2005) '[Council of Europe Convention on Action against Trafficking in Human Beings](#)' Warsaw, 16 May 2005. Cm 7465 (entered into force in respect of the United Kingdom 1 April 2009)

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The issue of modern slavery

It is challenging to accurately quantify the prevalence of modern slavery in the UK. While a range of prevalence estimates exist,⁴ the scale of modern slavery identified across the UK is continuing to increase:

- Between 2015, when the Modern Slavery Act was introduced, and 2023, there has been a 421% increase (from 3,263 to 17,004) in the number of potential victims identified by First Responders and referred to the UK's National Referral Mechanism (NRM), the identification and support system for survivors of modern slavery.⁵
- Between 2017/18 and 2023/24, there has been a 139% increase in modern slavery offences recorded by the police in England and Wales (from 3,447 to 8,255).⁶
- While an underlying increase in incidence cannot be ruled out, evidence suggests that these increases are more likely due to greater awareness of modern slavery among frontline professionals with statutory responsibilities to refer potential victims to the NRM.⁷

Modern slavery is an umbrella term that encompasses a wide diversity of different forms of exploitation:

- In 2017, a Home Office research report identified 17 different types of modern slavery across four broad categories of exploitation: labour exploitation; sexual exploitation; criminal exploitation and domestic servitude. The research highlighted the diversity across these different types in terms of the methods of offending and the experiences of those affected. Also, that many survivors experience more than one type of modern slavery. It concluded that different tools and policies may be needed to identify, address and disrupt the different forms.⁸
- Research found that talking about specific forms of exploitation was more effective in explaining what modern slavery entails to members of the British public than talking about an umbrella term of modern slavery. Members of the public also found it easier to understand what needs to be done to address it when offered specific solutions matching specific forms of exploitation.⁹

4. See Modern Slavery and Human Rights Policy and Evidence Centre (2021) 'UK Government Modern Slavery Strategy review briefing' paragraph 4.

5. Home Office (2023) 'Modern slavery: National Referral Mechanism and Duty to Notify statistics UK: end of year summary 2023'

6. Home Office (2024) 'Police recorded crime Police Force Area Open Data tables, from year ending March 2013 to year ending March 2024' Data is for years ending March 2018 and March 2024.

7. Office for National Statistics (2020) 'Modern slavery in the UK: March 2020' and National Crime Agency (2024) 'National Strategic Assessment 2024 of Serious and Organised Crime'

8. Cooper, C., Hesketh, O., Ellis, N., and Fair, A. (2017) 'A Typology of Modern Slavery Offences in the UK'. Home Office Research Report 93.

9. Modern Slavery and Human Rights Policy and Evidence Centre (2024) 'Framing Modern Slavery'

Modern slavery leads to significant harms for people and communities affected by it, and wider society:

- Experiences of exploitation, escaping the influence of traffickers, seeking redress, and working towards recovery are traumatic¹⁰ and can have far-reaching consequences for survivors' sense of safety, self, and agency.¹¹ Alongside modern slavery, many survivors experience forms of violence, including psychological abuse, sexual abuse, and grievous bodily harm, often over months or years.¹²
- Evidence shows that many people who have experienced exploitation develop post-traumatic stress disorder (PTSD).¹³ Survivors of modern slavery can also experience severe physical health symptoms of illness and pain,¹⁴ and health needs that often remain unmet.¹⁵
- In 2018, a Home Office research report estimated that the social and economic costs of modern slavery in the UK were £3.3bn-£4.3bn per year.¹⁶ These estimates include costs associated with healthcare, victim support and law enforcement services, and lost outputs and time.
- The International Labour Organization (ILO) has estimated that globally, forced labour in the private economy generates US\$236bn in illegal profits per year.¹⁷ This figure reflects wages stolen from workers.

The nature of modern slavery *identified* in the UK has shifted significantly in recent years.

- **Age:** the *proportion* of children referred by First Responders to the UK's National Referral Mechanism (NRM) has increased over time, from 29% in 2014, to 44% of referrals in 2023.¹⁸ Increased referrals for boys exploited through criminal exploitation appear to account for a large proportion of these increases.¹⁹
- **Gender:** The *proportion* of women and girls referred to the NRM has decreased from 61% of all referrals in 2014 to 24% of referrals in 2023, though the *number* of referrals of women and girls in 2023 (4,088) was the highest

10. Dang, M., Bradbury-Jones, C., Thomas, S., Rinaldi-Semione, J., Wright, N., Brotherton, V., Esioywa, N., Barrow, J., Johannes, K. (2023), 'Placing survivor wellbeing on the policy and evidence map'

11. Grant, M., Fotopoulou, M., Hunter, S., Malloch, M., Rigby, P., and Taylor, K. (2023), 'Survivor-informed support for trafficked children in Scotland' Scotland: survivor-informed support for trafficked children'

12. Home Office (2018) 'The Economic and Social Costs of Modern Slavery'

13. Evans, H., Sadhwani, S., Singh, N., Robjant, K., Katona, C., (2022) 'Prevalence of complex post-traumatic stress disorder in survivors of human trafficking and modern slavery: a systematic review'

14. Such, E., Laurent, C., Jaipaul, R., Salway, S., 'Modern slavery and public health: A rapid evidence assessment and an emergent public health approach'

15. Dang, M., Bradbury-Jones, C., Thomas, S., Rinaldi-Semione, J., Wright, N., Brotherton, V., Esioywa, N., Barrow, J., Johannes, K. (2023), 'Placing survivor wellbeing on the policy and evidence map'

16. Home Office (2018) 'The Economic and Social Costs of Modern Slavery'

17. International Labour Organisation, (2024), 'Profits and poverty: The economics of forced labour'

18. Home Office (2023) 'Modern slavery: National Referral Mechanism and Duty to Notify statistics UK: end of year summary 2023'

19. From quarter 1 2017 referrals could be flagged identifying them as involving 'county lines'. Since January 2020, a 'flag' within the NRM digital casework system identifies county lines referrals.

annual number since the NRM began.²⁰ Women and girls were most commonly referred to the NRM for sexual exploitation in 2023 (36%; 1,470). The proportion of NRM referrals for males has increased to 76% of all referrals in 2023 (12,903 individuals), a large proportion of whom are boys referred for criminal exploitation.

- **Nationality:** The nationality composition of people referred to the NRM has changed over time. Between 2014-2016, and in 2022, Albanian was the most common nationality for NRM referrals. Between 2017-2021 and in 2023, UK nationals were most commonly referred to the NRM.²¹ In 2023, UK nationals accounted for 25% (4,299) of all NRM referrals; the majority (78%; 3,350) of UK nationals were children.²²
- **Exploitation types:** In 2023, potential victims were most commonly referred for criminal exploitation only (28%; 4,715), and just over one-fifth (22%; 3,816) of potential victims referred reported they had experienced multiple exploitation types.²³ The way that 'exploitation types' are recorded by the NRM changed in 2019, meaning it is difficult to compare trends between 2023 and pre-2019.

There have been significant, recent changes in the UK and globally that increase the risk of people being exploited in modern slavery in the UK:

- Global issues such as the Covid-19 pandemic, climate change, poverty, and conflict have all increased vulnerability to modern slavery, and affected the political will necessary to address modern slavery.²⁴

Modern slavery is a complex issue, encompassing a range of different exploitative offences and practices with multiple underlying root causes and drivers, meaning it is inherently connected to wider policy agendas:

- Evidence shows that individual and structural vulnerabilities to modern slavery include poverty, inequality and discrimination, irregular migration status, power imbalances between workers and employers, gender-based violence, forced displacement and weak rule of law – which in turn are drivers of other issues, such as conflict.
- In addition, certain business models and government approaches to regulation and enforcement increase risk of forced labour in supply chains such as migrant workforces with limited labour rights, complex international supply chains that lack transparency or informal value chains supplying domestic markets.²⁵

20. Home Office (2023) 'Modern slavery: National Referral Mechanism and Duty to Notify statistics UK: end of year summary 2023'

21. University of Oxford Migration Observatory and Modern Slavery and Human Rights PEC (forthcoming) 'Migrants and the modern slavery system in the UK'

22. Home Office (2023) 'Modern slavery: National Referral Mechanism and Duty to Notify statistics UK: end of year summary 2023'

23. Home Office (2023) 'Modern slavery: National Referral Mechanism and Duty to Notify statistics UK: end of year summary 2023'

24. Schwarz, K., Valverde Cano, A., Williams-Woods, A., and D. Ogunniyi (2021) 'The top 20 non-UK source countries for modern slavery in the UK'; Modern Slavery PEC (2022) 'Assessing the Case for a Global Commission on Modern Slavery'; Hesketh, O. and Johnstone, O. (2021) 'Modern Slavery and Human Rights Policy and Evidence Centre Policy Brief: Impact of the Covid-19 Pandemic on Modern Slavery'

25. Hesketh, O. and Balch, A. (2021) Modern Slavery PEC Policy Brief: 'Modern Slavery and International Development'

The state of play: UK Government modern slavery policy

The new Government is faced with a challenging policy agenda on modern slavery:²⁶

- While there are many positive aspects of the UK's response to modern slavery, including the Modern Slavery Act 2015 and the NRM, over recent years there has been a sense of reduced political momentum. For example, the disbanding of a Prime Minister-led Taskforce on the issue, and limited concrete developments in policy areas such as prevention of modern slavery and in activity to address modern slavery in supply chains.
- The policy approach to addressing irregular migration through new immigration legislation in recent years has undermined the effectiveness of the response, by removing protections for victims. This legislation is also likely to reduce survivors' ability and willingness to support criminal prosecutions,²⁷ and has damaged the UK's international reputation for global leadership on modern slavery.
- Internationally, the Home Office Modern Slavery Fund (£24million, 2022-2025) is funding programmes aimed at reducing modern slavery in the UK and overseas.²⁸ In April 2023, the UK actively supported²⁹ the new Global Commission on Modern Slavery and Human Trafficking, which aims to re-invigorate global political will on modern slavery.³⁰ The previous UK Government also pledged to champion survivor leadership in international partnerships and support the inclusion of survivors of modern slavery in international programmes.³¹ However, these international efforts take place against the backdrop of the greatly reduced international aid budget,³² which has implications for programmes to address underlying causes of modern slavery, such as poverty and inequality.

26. House of Commons Home Affairs Committee (2024), 'Human trafficking: First Report of Session 2023-24'

27. Modern Slavery and Human Rights Policy and Evidence Centre (2023) 'Explainer: Modern slavery clauses in Illegal Migration Act'

28. Home Office (2023) 'Serious and organised crime strategy 2023 to 2028', Paragraph 140.

29. FCD0 (2023) 'Speech: OSCE Alliance Conference on Combatting Trafficking in Persons: UK statement, April 2023'

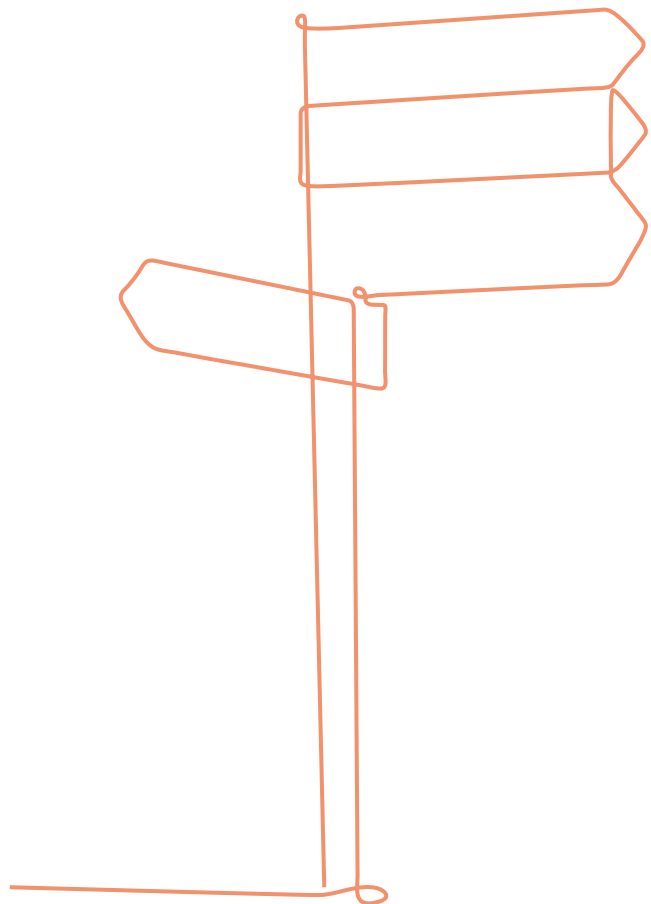
30. See [website](#) of the Global Commission on Modern Slavery and Human Trafficking.

31. Human Rights 75 (2023) 'Pledge submitted by the United Kingdom of Northern Ireland and Great Britain to the Human Rights 75 Secretariat'

32. House of Commons Library (2023) 'UK aid: Spending reductions since 2020 and outlook from 2023'

Recommended Year 1 priorities

The Modern Slavery and Human Rights PEC recommends focusing on four broad priorities in the first year of the new UK Government. Against the backdrop of pressures on the Government's overall budget and spending,³³ these recommendations are focused on preventing and reducing the harms associated with modern slavery, and ensuring there is an effective response when exploitation happens. Investment in preventing and responding to modern slavery will ultimately reduce the significant harms to individuals and communities, as well as reducing overall social and economic costs of modern slavery to the UK.³⁴ An improved domestic response will also enable the UK to regain its international leadership on this issue.

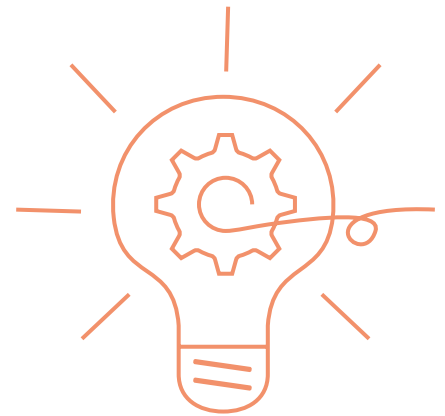


33. HM Treasury (2024) 'Chancellor statement on public spending inheritance'

34. Home Office (2018) 'The Economic and Social Costs of Modern Slavery'

Priority area 1:

Commit to a new, long-term, prevention-centred cross-Government strategy and a strengthened legal framework on modern slavery and put in place the necessary foundations to deliver these



New Strategy

The most recent Modern Slavery Strategy is ten years old, having been published in 2014,³⁵ and this Strategy is now out-dated, given global developments which have significantly increased vulnerability to exploitation,³⁶ national developments in the legal and policy response, significant changes in the scale and nature of National Referral Mechanism (NRM) referrals over the last ten years and the increase in evidence about what 'looks promising' in policies and approaches.

Prevention of modern slavery is a relatively underdeveloped aspect of the UK response,³⁷ but prevention offers a helpful overarching framework for a refreshed strategic response and represents one of the core international obligations on modern slavery and human trafficking.³⁸ One Modern Slavery PEC-funded research project proposed a definition of prevention, which demonstrates how prevention is a cycle that captures a range of policy objectives: *“Prevention is an on-going process of avoiding and minimising exploitation and harm. This can be achieved by intervening before exploitation and harm occurs, by intervening early, and by treating harms. It also includes action to prevent re-exploitation/re-trafficking. Prevention includes enabling people to exercise choice, control over their lives and to thrive.”³⁹*

35. HM Government (2014) 'Modern Slavery Strategy'

36. For further information about how global developments have impacted the drivers of modern slavery, see e.g.: The Modern Slavery PEC (2023) 'Scotland Human Trafficking & Exploitation Strategy Review submission' and the Modern Slavery PEC (2022) 'Assessing the Case for a Global Commission on Modern Slavery'

37. Modern Slavery and Human Rights Policy and Evidence Centre (2021) 'UK Government Modern Slavery Strategy review briefing'; Such, E., Aminu, H., Barnes, A., Hayes, K., Ariyo, M., Brierley, R. (2022) 'Prevention of adult sexual and labour exploitation in the UK: What does or could work?'

38. The Council of Europe Convention on Action against Trafficking in Human Beings 2005 (ECAT) Articles 1, 5, 6, as well as Articles 7-9.

39. Such, E., Aminu, H., Barnes, A., Hayes, K., Ariyo, M., Brierley, R. (2022) 'Prevention of adult sexual and labour exploitation in the UK: What does or could work?'



Recommendation 1: In year 1, the Government should commit to developing a new, long-term, cross-Government Modern Slavery Strategy that has a greater focus on prevention, which would be a vehicle to drive the delivery of renewed ambitions on modern slavery. In advance of a new Strategy, the Government should publish its immediate Year 1 priorities on modern slavery.

To increase the effectiveness of the strategic approach to modern slavery, we recommend focusing on five foundations that should be put in place over the next year.

Foundation 1: Meaningful engagement of people with lived experience of modern slavery

Modern Slavery PEC research, funded by the FCDO, has found that meaningful survivor inclusion can improve the effectiveness of policies and programmes to address modern slavery.⁴⁰ More broadly, there is increasing recognition within the UK civil service of the value of including lived experience insights in the policymaking process, to better understand the lived reality of policy decisions and to build trust in the policy process.⁴¹ The UK Government has taken some steps to include survivors in its policymaking on modern slavery, for example the FCDO-funded research,⁴² and the Home Office worked with Human Trafficking Foundation to gather views of survivors to inform policy development around the new Modern Slavery Victim Support Contract.⁴³

There needs to be a more strategic government approach to survivor engagement, that sets short-, medium-, and long-term objectives. This should take account of emerging best practice⁴⁴ – being non-tokenistic, trauma-informed and preventing harm – and the 12 core principles developed by the Modern Slavery PEC Lived Experience Advisory Panel (LEAP) to support meaningful and ethical engagement with those who hold lived experience of modern slavery.⁴⁵

40. Asquith, W., Kiconco, A., Balch, A. (2022) 'Promising practices in the engagement of people with lived experience to address modern slavery and human trafficking'

41. Civil Service Policy Lab Blog (2024) 'Launching the Lived Experience in Policymaking Guide: Reflections on the principles, behaviours, and mindsets that underpin lived experience work'

42. Asquith, W., Kiconco, A., and A. Balch (2022) 'Promising practices in the engagement of people with lived experience to address modern slavery and human trafficking' Available at: <https://modernslaverypec.org/assets/downloads/Engagement-lived-experience-research-summary.pdf>

43. Human Trafficking Foundation (2024) 'Victim Support 2025 (VS25) Consultation with Survivors of Modern Slavery'

44. Balch, A., and Kiconco, A. (2023) 'Towards principles for equitable engagement: six research projects.'

45. Annex to the Modern Slavery PEC Briefing: Priorities for Independent Anti-Slavery Commissioner's (IASC's) Strategic Plan (2024) https://modern-slavery.files.svdcn.com/production/assets/downloads/Annex-IASC-Briefing_Lived-experience-engagement.pdf



Any survivor engagement mechanism should be designed in partnership with a diversity of survivors and other experts. This should include close collaboration with the Office of the Independent Anti-Slavery Commissioner (IASC), given the Commissioner's calls for a national survivor council.⁴⁶ The approach should explore whether Government should engage with survivors directly or work with intermediaries that have the requisite skills and experience. The approach should also learn from experiences of existing government-focused survivor advisory councils including the US Advisory Council on Human Trafficking⁴⁷ and the ODIHR International Survivors of Trafficking Advisory Council (ISTAC).⁴⁸

Recommendation 2: In year 1, the Government should put in place an effective and sustained survivor engagement mechanism to inform the development of a new Strategy and government policymaking on modern slavery, which is appropriately resourced and takes a non-tokenistic and trauma-informed approach, learning from good practice.

- The Modern Slavery and Human Rights PEC will publish a survivor payments standards toolkit in autumn 2024, which will provide guidance to Lived Experience Experts, and organisations working with them, about remuneration for lived experience engagement.
- The Modern Slavery and Human Rights PEC will publish research in autumn 2024 that explores the ethics of co-production with Lived Experience Experts and what it means to adopt a trauma-informed approach to participatory research.
- The Modern Slavery and Human Rights PEC will continue to share learning from our own lived experience engagement, for example via blogs and through our direct engagement with Ministers and officials.

46. House of Lords Modern Slavery Act 2015 Committee (2024) 'Corrected Oral Evidence, Monday 25 March 2024.' Q100

47. US Department of State (no date) 'U.S. Advisory Council on Human Trafficking'

48. OSCE (no date) 'ODIHR International Survivors of Trafficking Advisory Council (ISTAC)'



Foundation 2: Robust data and evidence on modern slavery

There is a growing volume of research, data and evidence about modern slavery in the UK, including that generated by Modern Slavery PEC analysis and funded research. Over the last two years, the Government has published more detailed National Referral Mechanism (NRM) data⁴⁹ and the Home Office has published some evaluations of certain policy initiatives,⁵⁰ and research has explored the potential effectiveness of using Artificial Intelligence (AI) to uncover insights from large modern slavery data sets.⁵¹

Despite the growing evidence base, there remain gaps in understanding of modern slavery, gaps in data and gaps and tensions in the evidence-policy relationship.⁵² For example, many stakeholder groups, as well as the Office for Statistics Regulation⁵³ raised concerns during the passage of the Illegal Migration Act about the evidential basis for the previous government's assertions that large numbers of migrants were abusing the protections of the Modern Slavery Act.⁵⁴

Recommendation 3: The UK Government should ensure that the new Strategy, and overall response to modern slavery, are informed by robust data and evidence. The Government should commit to policy being evidence-informed, where assessments and evaluations of policies are published to provide greater transparency about how data has been used to inform policymaking.

Recommendation 4: the UK Government should collect, analyse and publish further quantitative data on modern slavery to enable better identification of patterns and trends in modern slavery, assist local agencies to better understand what is happening in their areas and enable more independent scrutiny of the effectiveness of Government policies. The Modern Slavery and Human Rights PEC has previously made detailed recommendations for data the government could collect and publish to enable a better understanding of the effectiveness of the Modern Slavery Act 2015.⁵⁵

49. Home Office, Modern Slavery Research & Analysis. (2024). *National Referral Mechanism and Duty to Notify Statistics, 2014-2024. 13th Edition*. UK Data Service. SN: 8910, DOI: <http://doi.org/10.5255/UKDA-SN-8910-13>

50. See for example, Home Office (2024) 'An Evaluation of the Pilot to Devolve Decision-Making for Child Victims of Modern Slavery' and Shrimpton, H., Baker, C., MacLeod, K., Spencer, S., Ellis, N., and Scholes, A. (2023) 'Independent Child Trafficking Guardians (ICTG) MSA evaluation'

51. Piotrowicz, R., Lake, Q., Muraszkiewicz, J., Gilhespy, E., Young, M. (2024), 'Utilising AI technology to improve modern slavery survivor support'

52. Balch, A. & Hesketh, O. (2024) Mind the Gap(s)? Evidence and UK Policymaking on Human Trafficking and Modern Slavery, *Journal of Human Trafficking*, 10:2, 330-338, DOI: [10.1080/23322705.2024.2303257](https://doi.org/10.1080/23322705.2024.2303257)

53. Office for Statistics Regulation (2022) [Letter from Ed Humpherson to Jennifer Rubin: use of National Referral Mechanism statistics](#)

54. Modern Slavery and Human Rights Policy and Evidence Centre (2023) 'Explainer: Modern slavery clauses in Illegal Migration Act'

55. Modern Slavery and Human Rights Policy and Evidence Centre (2024) [Written Evidence to House of Lords Modern Slavery Act 2015 Committee](#)



Robust data is essential for measuring and monitoring the progress made under the new strategy. A previous Public Accounts Committee inquiry found that there were not clear measures for what success would look like under the 2014 Modern Slavery Strategy, nor was there an holistic performance framework in place, underpinned by data.⁵⁶

Recommendation 5: The UK Government should design a clear performance framework for the new Strategy that defines a set of measurable outcomes the Government aims to achieve through the Strategy. It is important that any performance framework is not limited to quantitative data sources, and draws on qualitative data to help contextualise and understand trends.

→ The Modern Slavery and Human Rights PEC will increase its focus on quantitative data analysis, to generate new insights into modern slavery and inform the policy response.

56. Public Accounts Committee (2018) '[Reducing Modern Slavery](#)'



Foundation 3: Effective cross-government collaboration

As of February 2024, there were no formalised cross-government engagement structures in place to consider modern slavery policy in general, though bilateral or project specific collaboration was in place.⁵⁷ While the Home Office has overall policy responsibility for modern slavery, through the leadership of the Safeguarding Minister and Home Secretary, the interconnectedness of modern slavery with other policy agendas means it is essential that multiple departments work together to design and deliver the new strategy. The later section on 'Year 1, Priority 4' demonstrates the range of linked policy issues.

A range of key departments should be included: the FCDO, given the international dimension of modern slavery; the Department of Business and Trade (DBT), given the role of businesses in addressing modern slavery in supply chains; the Ministry of Justice (MoJ) and Attorney General's Office (AGO), given their role in relation to prisons, legal enforcement and prosecutions, as well as responsibility for compliance with human rights and the rule of law; and social policy departments (such as Department for Education, the Ministry of Housing, Communities and Local Government, the Department for Work and Pensions and the Department of Health and Social Care) given their responsibilities for mainstream services that would have a preventive effect on modern slavery by reducing vulnerability to exploitation and providing services to survivors, such as children's services, mental health, housing and welfare. Consideration should also be given to including operational public sector agencies in collaborative efforts, such as law enforcement and prosecution agencies, as well as devolved and regional administrations and representation from local authorities (e.g. the Local Government Association) given their statutory responsibilities in relation to safeguarding.

Lessons should be learned from previous cross-government collaborative efforts on modern slavery and broader policy agendas. This includes the Inter-Departmental Ministerial Group on Modern Slavery, which included representation from the devolved administrations and published reports 2012-2016,⁵⁸ and the Prime Minister-led Modern Slavery Taskforce, in place 2017-2019.⁵⁹ The wider emerging governance structures within the new government, including the Mission boards, should be used as one of the means of facilitating such cross-government engagement on modern slavery.

Recommendation 6: In year 1, the Home Office should put in place mechanisms for more effective cross-Government collaboration on the design of the new Strategy and modern slavery policies. Over years 2-5, these mechanisms could evolve into a lasting structure that is responsible for delivery and governance of the Strategy.

57. House of Lords Modern Slavery Act 2015 Committee (2024) 'Corrected Oral Evidence, Monday 26 February 2024'. Q5 and Q19

58. Home Office (2016) 'Modern slavery: inter-departmental ministerial group publications'

59. Prime Minister's Office, 10 Downing Street (2016) 'Prime Minister urges international action to stamp out modern slavery'



Foundation 4: Effective partnership-working

It is essential that the UK Government works in partnership with a range of non-government organisations to address modern slavery. This includes civil society groups, survivors, businesses, trade unions, researchers, relevant independent institutions such as national human rights institutions and commissioners like the Independent Anti-Slavery Commissioner and Children’s Commissioner, and international organisations including various UN bodies and the Global Commission on Modern Slavery and Human Trafficking. Previous research has highlighted the need for changes to government modern slavery policies to be effectively communicated before they are introduced, to enable organisations to appropriately prepare, and to avoid confusion and uncertainty for both practitioners and people with lived experience of modern slavery.⁶⁰

A range of existing structures are in place. The Home Office engages with non-government organisations through the Modern Slavery Engagement Forums (MSEFs), which were refreshed in 2022, while the FCDO set up a Modern Slavery Envoy stakeholder engagement group in 2023 to focus on the international response.

Recommendation 7: in year 1, the Home Office and FCDO should undertake a light-touch review of the refreshed MSEFs and the Envoy stakeholder engagement groups. This review should explore whether any changes are needed to these structures to support greater partnership-working and clearer information-sharing.

→ As members of the Home Office core MSEF and the FCDO Envoy stakeholder group, the Modern Slavery and Human Rights PEC will continue to work in partnership with the government and other groups to address modern slavery, and will proactively identify opportunities for PEC research and evidence to inform the work of these groups.

60. Magugliani, N., Gauci, J.P., Trajer, J., (2024), ‘Assessing the modern slavery impacts of the Nationality and Borders Act 2022: one year on’



Foundation 5: Sustainable funding for modern slavery programmes

To date, UK Government funding streams for modern slavery policy initiatives have been attached to specific streams of activity, such as programme funding for the Independent Child Trafficking Guardians service, the police Modern Slavery and Organised Immigration Crime Unit, the Modern Slavery Fund (which is Official Development Assistance), and the Modern Slavery Victim Care Contract.⁶¹

There has been limited, one-off or no specific funding for other streams of modern slavery policy initiatives. For example, the Modern Slavery Prevention Fund was delivered in 2021/22 only and the evaluation of it has not yet been published.⁶² Initial funding was made available to support the establishment of the Global Commission on Modern Slavery and Human Trafficking but this commitment is due to end in 2025. Evidence has shown that prevention of modern slavery is a particularly under-explored area of policy and research.⁶³ Given the significant individual, social and economic costs of modern slavery to the UK (the latter estimated at £3.3bn-£4.3bn per year),⁶⁴ investment into prevention activity shows promise in terms of its harm reduction and cost-effectiveness.

Recommendation 8: In year 1, the Home Office and FCDO should prepare a Spending Review (SR) bid for a dedicated stream of sustainable funding to support the delivery of the Strategy, including dedicated funding for prevention activity overseas and in the UK, and for research to evaluate the effectiveness of the Strategy. To support this, the Home Office should publish its evaluation of the 2021/22 Modern Slavery Prevention Fund. The Government should also continue its support for the Global Commission to enable it to implement its Report.

→ The Modern Slavery and Human Rights PEC will continue to produce new research and analysis to explore the effectiveness of different prevention interventions, to make more evidence available to drive renewed policy effort on prevention.

61. Home Office (2021) '2021 UK annual report on modern slavery'

62. Home Office (2023) 'Home Office Evaluation Strategy'

63. Such, E., Aminu, H., Barnes, A., Hayes, K., Ariyo, M., Brierley, R. (2022) 'Prevention of adult sexual and labour exploitation in the UK: What does or could work?'

64. Home Office (2018) 'The Economic and Social Costs of Modern Slavery'



Strengthened legal framework

Next year, the Modern Slavery Act 2015 will mark its 10th anniversary. The Act was seen as groundbreaking at the time, and implementation of the Act has led to significant improvements in the UK's response to modern slavery.⁶⁵ The UK's international reputation as a global leader in countering modern slavery is largely due to the 2015 Act being regarded as a pioneering legislative response at the time.

However, the MSA's effectiveness is undermined by modern slavery measures in recent immigration legislation and evidence shows the measures already implemented are having significant negative impacts on modern slavery survivors.⁶⁶ Several of these measures are also incompatible with the requirements of human rights law and the UK's international legal obligations on modern slavery and, at the very least, need to be amended to be brought back in line with those requirements (see more detail in priority 2). These recent measures have seriously undermined the UK's international reputation as a global leader on countering modern slavery.

There is also room for significantly strengthening several aspects of the Modern Slavery Act 2015. Modern Slavery and Human Rights PEC evidence and analysis highlights several possible areas of improvement, for example to strengthen transparency in supply chains laws and extend them to public sector bodies.⁶⁷ Government could also consider learning from laws in other countries to address forced labour in supply chains through mandatory human rights due diligence and forced labour import bans.⁶⁸ In addition, the legislative provisions around the Independent Anti-Slavery Commissioner role could be strengthened to provide greater institutional guarantees around the independence of the role.⁶⁹ Section 48 on Independent Child Trafficking Guardians should be commenced, and sections 49 and 50 could be amended to provide greater clarity in primary legislation on survivors' entitlements to assistance and support. Updating and strengthening of the Act can contribute to re-establishing the UK's reputation for global leadership on addressing modern slavery.

Recommendation 9: In year 1, the Home Office should prioritise preparations to bid for a Bill to be brought forward in the second session of Parliament, to provide a legislative underpinning for a more ambitious and more effective legal framework to respond to modern slavery.

→ The Modern Slavery and Human Rights PEC will publish a Policy Brief setting out recommendations on a new Bill on modern slavery, which will consider how the UK's legal framework for modern slavery could be strengthened and grounded in its human rights obligations.

65. Modern Slavery and Human Rights Policy and Evidence Centre (2024) 'Written Evidence to House of Lords Modern Slavery Act 2015 Committee'

66. Magugliani, N., Gauci, J.P., Trajer, J., (2024), 'Assessing the modern slavery impacts of the Nationality and Borders Act 2022: one year on'

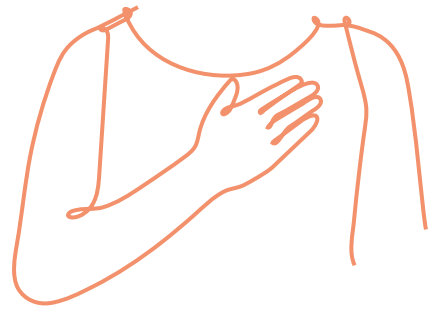
67. See for example New et. al., (2021) 'Effectiveness of Section 54 of the Modern Slavery Act Evidence and comparative analysis'

68. See Pietropaoli, I., Johnstone, O., and A. Balch (2021) Modern Slavery and Human Rights Policy and Evidence Centre Policy Brief 'Effectiveness of forced labour import bans' and Gonzalez De Aguinaga, S. (2024) Modern Slavery and Human Rights Policy and Evidence Centre Policy Brief Update 'Effectiveness of mandatory human rights and environmental due diligence legislation in addressing modern slavery in business value chains'

69. Detailed suggestions on Part 4 are included in the Modern Slavery and Human Rights Policy and Evidence Centre (2024) 'Written Evidence to House of Lords Modern Slavery Act 2015 Committee'

Priority area 2:

Improving the effectiveness of the system for protecting, identifying and supporting survivors and bringing the system back in line with human rights law and international legal obligations



Bringing the system back in line with human rights law and international legal obligations

Several modern slavery measures in recent immigration legislation are incompatible with the requirements of human rights law and the UK's international legal obligations on modern slavery. Significantly, this includes measures which are already in operation, most notably section 63 of the Nationality and Borders Act 2022 which creates a "public order disqualification" – a wide disqualification from eligibility for crucial protections for potential and confirmed victims of modern slavery. It also includes several of the modern slavery measures in the Illegal Migration Act 2023, which have not been commenced, but would further reduce protections for survivors who entered the UK through irregular means, and would likely reduce victims' willingness to engage in criminal prosecutions.⁷⁰

Recommendation 10: at the very minimum, in year 1, the Government should amend recent immigration laws and associated statutory guidance to bring them back in line with human rights law and international legal obligations on modern slavery. This will ensure all victims of modern slavery are identified and protected, regardless of how they entered the UK.

→ The Modern Slavery and Human Rights PEC will publish a Policy Brief in autumn 2024 setting out recommendations for specific changes that should be made to immigration legislation and associated statutory guidance to bring the modern slavery system back in line with human rights law and international modern slavery obligations.

70. Jovanovic, M., (2023) 'Legal Analysis of the Human Rights Compatibility of the Modern Slavery Sections in the Illegal Migration Act (Sections 22-29)'; Jovanovic, M., (2024) 'The Rwanda Treaty and Bill and the UK's legal obligations towards victims of modern slavery and human trafficking'; Jovanovic, M., (2024) 'Legal Analysis of Section 63 of the Nationality and Borders Act 2022 and modern slavery statutory guidance'



Effective and early identification of survivors

First Responder training and early identification

Evidence shows that there are ways that early identification of survivors and First Responder training can be improved:

- A lack of training and awareness of modern slavery and variations in use and understanding of definitions leads to different interpretations and creates gaps in early identification of children at risk.⁷¹ Research has found that racial prejudice, biases, and the adultification of children are significant barriers to prevention and early identification, highlighting the need for culturally competent services.⁷²
- First Responder training could be improved through taking trauma-informed approaches and including the perspectives of people with lived experience of modern slavery, with a focus on ensuring that a decision to be referred to the NRM is consensual and informed.⁷³
- Research has shown that potentially a large number of survivors of modern slavery remain in prisons without being identified, which puts them at risk of further exploitation, both within prisons and upon release. His Majesty's Prison and Probation Service (HMPPS) is currently not a First Responder Organisation for the NRM.⁷⁴
- Research reveals that effective early identification initiatives include: understanding indicators of exploitation; multiagency responses; children's rights-compliant intelligence gathering; quality training for professionals; building trust with children; avoiding stereotyping victim profiles; resolving victim blaming language; preventing victim criminalisation; investing in families and communities; and ensuring the critical role of professionals in education.⁷⁵

Recommendation 11: the Home Office should increase policy focus on early identification of potential victims and people at risk of modern slavery and improve the effectiveness of training for First Responders and other frontline professionals that may come into contact with potential victims, including in healthcare and education. This should include consideration of expanding the list of First Responders to include statutory agencies such as HMPPS, making training mandatory for First Responders, and how to improve pathways for early identification by frontline professionals.

71. Celiksoy, C., Schwarz, K., Sawyer, L., Vargas Gorena, P., Ciucci, S., Yin, S., Durán, L. (2024) 'Prevention and identification of children and young adults experiencing, or at risk of, modern slavery in the UK'

72. Shirgholami, Z., King, P., Omole, D., Brierley, R., Smith, A. (2024) 'Cultural competency in UK responses to modern slavery'; Celiksoy, C., Schwarz, K., Sawyer, L., Vargas Gorena, P., Ciucci, S., Yin, S., Durán, L. (2024) 'Prevention and identification of children and young adults experiencing, or at risk of, modern slavery in the UK'

73. Magugliani, N., Gauci, J.P., Trajer, J., (2024), 'Identification of adults with lived experience of modern slavery in the UK'

74. Jovanović, M., Burland, P., Topp, V., Fluhr, F., 'Tackling the blind spot of the UK anti-slavery regime The role and responsibility of prisons in securing the rights of modern slavery survivors'.

75. Celiksoy, C., Schwarz, K., Sawyer, L., Vargas Gorena, P., Ciucci, S., Yin, S., Durán, L. (2024) 'Prevention and identification of children and young adults experiencing, or at risk of, modern slavery in the UK'



Duty to Notify referrals

There are increasing numbers of adults identified by First Responders as potential victims of modern slavery who decide not to enter the NRM and are instead referred under the 'Duty to Notify' process:

- In 2023, the Home Office received 4,929 reports of adult potential victims via the 'Duty to Notify' process. This is a 546% increase in the number of Duty to Notify reports since 2016 (762 reports), the first full year of the Duty to Notify being in place.⁷⁶
- Previous Modern Slavery PEC-funded research analysed a snapshot of Duty to Notify Referral Data for 2020/21, provided by the Home Office, to provide insight into the reasons why adults with lived experience of modern slavery decide to give (or not to give) consent to enter the NRM. Key reasons included not recognising themselves as a victim of modern slavery, wanting to move on from their experience, fear of traffickers.⁷⁷

Recommendation 12: the Home Office should build a better understanding of the reasons adults decide not to enter the NRM through improved data collection and either analysing its 'Duty to Notify' data or making this data available for researchers to analyse. The Home Office should draw on this analysis to inform its policy response to adults who do not consent to enter the NRM and develop appropriate resources to address barriers to engagement.

Lengthy formal identification processes

The Home Office-run NRM identification process continues to experience large delays. The average (median) time from referral to the NRM to a conclusive grounds (final) decision being made was 526 days for decisions made in 2023.⁷⁸

Evidence shows that delays in NRM and asylum decisions negatively impact on survivors' wellbeing, contribute to the anguish and harm and of limbo and can put people at risk of re-trafficking.⁷⁹

Recommendation 13: the Home Office should continue to prioritise the work already underway to improve NRM decision-making timescales, including the recruitment and training of new caseworkers.

76. Home Office (2023) 'Modern slavery: National Referral Mechanism and Duty to Notify statistics UK: end of year summary 2023'

77. Magugliani, N., Gauci, J.P., Trajer, J., (2024), 'Identification of adults with lived experience of modern slavery in the UK'

78. Home Office (2023) 'Modern slavery: National Referral Mechanism and Duty to Notify statistics UK: end of year summary 2023'

79. Modern Slavery and Human Rights Policy and Evidence Centre (2023), 'Policy Brief: Survivor support Based on the Modern Slavery PEC funded research portfolio'



Diverging formal identification models

Presently, the NRM victim identification process is run at the national level by the Home Office, though the department is piloting devolving the victim identification process for children to local panels. ECAT notes that States must have in place a mechanism to identify survivors, but it is not prescriptive about what form this takes.⁸⁰

An initial evaluation of the pilot highlighted that it is progressing well with effective and accurate decisions, and that pilot sites made conclusive grounds decisions more quickly than the Home Office Single Competent Authority with improved awareness of modern slavery a further benefit.⁸¹ ECAT does place an emphasis on special protection of children from human trafficking in general, and GRETA has stressed that assistance to children should be provided within the framework of an NRM.

→ The Modern Slavery and Human Rights PEC Policy Brief on the creation of a child criminal exploitation offence explores these issues in its discussion of the UK's legal obligations to identify and support victims of modern slavery.⁸²

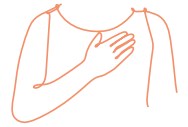
Recommendation 14: the Home Office should build on the existing evaluation of the devolved decision-making pilot to meaningfully include the perspectives of young people in the pilot sites in research. Any decisions about national roll-out of the pilot should carefully consider the impact on children and how to ensure coherence and consistency in application of the identification framework and how to ensure that those running the identification mechanism have appropriate training, expertise, capacity and resources.

Recommendation 15: the Home Office should consider relevant learnings on timely decision-making as well as learnings applicable to adult decision-making, in particular on the efficiency of decision-making.

80. Heys, A., and Jovanovic, M. (forthcoming) Modern Slavery and Human Rights Policy and Evidence Centre Policy Brief: Creation of a Child Criminal Exploitation (CCE) Offence in England and Wales

81. Home Office (2024) 'An Evaluation of the Pilot to Devolve Decision-Making for Child Victims of Modern Slavery'

82. Heys, A., and Jovanovic, M. (forthcoming) Modern Slavery and Human Rights Policy and Evidence Centre Policy Brief: Creation of a Child Criminal Exploitation (CCE) Offences in England and Wales



Survivor support

Improving the effectiveness of support for survivors

A Modern Slavery and Human Rights PEC Policy Brief synthesised seven of our funded projects on survivor support and highlighted several insights for improving policy:⁸³

- The term 'recovery' is often used in the context of support interventions and research shows the need to adopt survivor-informed outcomes for 'recovery' that recognise the challenges and limitations of the term as well as its iterative, cyclical, non-linear, non-timebound nature.
- There is a need for holistic, long-term, flexible, trauma-informed and culturally competent services with improved links between specialist services with wider systems such as housing and health.
- There is a lack of clarity among survivors and service providers about victims' entitlements and several practical and structural barriers to accessing those entitlements that can differ by location including language, lack of funding, lack of capacity, long waiting lists, restrictive eligibility criteria, inconsistent provision, lack of childcare and lack of travel costs.
- Newer interventions hold significant promise: digital access enabling the use of services aimed to support adults' recovery is particularly important for survivor wellbeing,⁸⁴ the potential therapeutic benefits of journaling within a suitable app,⁸⁵ and dedicated programmes in Scotland and Northern Ireland providing advice prior to entering the NRM.⁸⁶

Recommendation 16: The Home Office should consider the evidence available about ways to make the operation of the UK's current protection and support system for adult survivors, and the policy underpinning it, more effective in practice including through the re-tendering of the Modern Slavery Victim Care Contract for England and Wales by providing holistic, long-term, trauma-informed and culturally competent interventions and developing trusted relationships between practitioners and survivors.

83. Modern Slavery and Human Rights Policy and Evidence Centre (2023), 'Policy Brief: Survivor support Based on the Modern Slavery PEC funded research portfolio'

84. Polizzi, G., D'Arcy, J., Harris, R., Yates, S., Cullen, C., Andrew, B., Barrera, P. (2023) 'Evaluating the provision of distributed technology to adults with lived experience of modern slavery' <https://www.modernslaverypec.org/resources/technology-survivors>

85. Piotrowicz, R., Lake, Q., Muraszkiewicz, J., Gilhespy, E., Young, M. (2024), 'Utilising AI technology to improve modern slavery survivor support'

86. Gauci, J.-P., Magugliani, N., Trajer, J., (2023) 'Impacts of a lack of legal advice on adults with lived experience of modern slavery' Polizzi, G., D'Arcy, J., Harris, R., Yates, S., Cullen, C., Andrew, B., Barrera, P. (2023) 'Evaluating the provision of distributed technology to adults with lived experience of modern slavery'



Improving the effectiveness of support for children and young people

Research provides evidence of the unique importance of a relationship with a trusted adult for children and young people at risk of or affected by exploitation and for the prevention of exploitation, re-exploitation and support for recovery.⁸⁷

Research has demonstrated how the Independent Child Trafficking Guardians (ICTGs) service supports the attainment of positive outcomes for children and young people affected by modern slavery.⁸⁸ Section 48 of the Modern Slavery Act provides that the State must make reasonable arrangements to provide an independent advocate to potential child victims of trafficking and make regulations as such, but as of 2024 the ICTG service is available to only two thirds of local authorities in England and Wales and the regulations had not been introduced.⁸⁹ A Home Office evaluation found that ICTGs staff and stakeholders felt that the introduction of Post-18 ICTG Workers and Regional Practitioner roles in the ICTGs service had positive outcomes on the flexibility of the ICTG service and on the quality of support for children and young people.⁹⁰

Recommendation 17: The Home Office should commence Section 48 of the MSA (on ICTGs) to provide this service across all of England and Wales and draft and adopt the regulations that sit beneath this.

Some Modern Slavery and Human Rights PEC-funded research projects have explored the challenges that specific groups of adult and child survivors may face when accessing support to which they are entitled. It should be noted that this is not an exhaustive list of specific groups, rather it reflects where PEC funded research has explored issues in depth:

- **British nationals:** Research with British national survivors identified that systems, including mental health and criminal justice, are not set up to support the complexity of British national survivors' needs and recovery pathways have not been established for British nationals.⁹¹
- **Survivors in prisons:** research has found that there is a lack of specialised support for adult survivors of modern slavery identified in prisons and unmet needs for appropriate accommodation and specialist mental health support in prisons.⁹²

87. Skeels, A., Bashir, F., (forthcoming), 'Prevention of child modern slavery: A synthesis of Modern Slavery PEC funded research on child trafficking and child exploitation (2020-24)'

88. Skeels, A., Huxley, K., Stott, H. (2024), 'Outcomes for children and young people affected by modern slavery: An analysis of Independent Child Trafficking Guardianship service support in England and Wales'

89. Home Office (2024), 'Interim Guidance for Independent Child Trafficking Guardians'

90. Shrimpton, H., Baker, C., MacLeod, K., Spencer, S., Ellis, N., and Scholes, A. (2023) 'Independent Child Trafficking Guardians (ICTG) MSA evaluation' published 21 May 2024

91. Murphy, C., Heys, A., Barlow, C., Gleich, L., and Wilkinson, S., (2022) 'Identifying Pathways to Support British Victims of Modern Slavery towards Safety and Recovery: A Scoping Study'

92. Jovanović, M., Burland, P., Topp, V., Fluhr, F., 'Tackling the blind spot of the UK anti-slavery regime The role and responsibility of prisons in securing the rights of modern slavery survivors'. Since 2022, HMPPS has been working on addressing the identified challenges through its Modern Slavery Guidance for prisons in England and Wales.



- **Children with special educational needs and disabilities (SEND):** for example waiting for SEND diagnosis and support and when responding to reports from parents of missing episodes for young people with SEND.⁹³
- **Children transitioning to adulthood:** The transition to adulthood or to adult services (and any related support service exit) can make young survivors of modern slavery more vulnerable and at risk of re-exploitation as well as present barriers to their further development and positive outcomes, particularly for non-UK born children awaiting immigration decisions, looked after young people and those with SEND.⁹⁴

Recommendation 18: the Home Office should ensure that there is flexibility in the support provided by the new VS25 contract and that it can be responsible to the specific needs of different groups. VS25 should consider potential interventions that show promise e.g. providing digital access.

→ The Modern Slavery and Human Rights PEC is exploring commissioning research to review evidence on the effectiveness of safe houses for survivors of modern slavery, and how they relate to outcomes for survivors

Non-punishment of survivors

The statutory defence in section 45 of the Modern Slavery Act gives effect to the 'non-punishment principle' required by Article 26 of ECAT.⁹⁵ This defence provides for the possibility of not imposing penalties on victims for crimes they were compelled to commit, and operates slightly differently for adults and children. Schedule 4 outlines a list of offences for which the defence cannot be used, and it also must be proven that there is a link between the defendant's experience of exploitation and the offence they committed.⁹⁶

There has been very limited research on how the statutory defence is working in practice, and no quantitative data is collected on the use of the defence.

A Modern Slavery and Human Rights PEC evidence review highlighted the need for adequate training for the police, lawyers and the judiciary if the statutory defence is to be used as it was intended i.e. to protect victims of modern slavery and reduce harms associated with criminalisation of people forced into

93. Franklin, A., Bradley, L., Greenaway, Jo., Goff, S., Atkins, S., Rylatt, L. (2024) '[Internal trafficking and exploitation of children with special educational needs and disability](#)'

94. Skeels, A., Bashir, F., (forthcoming), 'Prevention of child modern slavery: A synthesis of Modern Slavery PEC funded research on child trafficking and child exploitation (2020-24)'

95. ECAT (2005) '[Council of Europe Convention on Action against Trafficking in Human Beings](#)' Warsaw, 16 May 2005. Cm 7465 (entered into force in respect of the United Kingdom 1 April 2009)

96. [Modern Slavery Act 2015](#)



criminal activity.⁹⁷ A report from the Independent Anti-Slavery Commissioner highlighted the need for non-prosecution of children to be supported by effective safeguarding.⁹⁸ Research and reports have made other suggestions around the statutory defence, including by making it capable of being applied to all offences that victims may be compelled to commit,⁹⁹ amending or removing the 'reasonable person test'¹⁰⁰ and providing greater clarity on the meaning of 'direct consequence' in the legislation.¹⁰¹

Improved evidence on the operation in practice of the statutory defence will also support the UK's implementation of its Action Plan in response to the judgment from the European Court of Human Rights in V.C.L. and A.N. v. the United Kingdom¹⁰² which remains under the supervision of the Committee of Ministers.¹⁰³ This case, which concerned child criminal exploitation, highlighted the complexity of the issues surrounding the state's obligations to identify victims of modern slavery; to investigate and prosecute potential modern slavery; and to implement the principle of non-punishment.

Recommendation 19: the Home Office should prioritise gathering greater data and evidence on the operation of the section 45 statutory defence. In light of these data and evidence, the Home Office should review aspects of the s45 statutory defence, including schedule 4 offences, the 'reasonable person test' and the meaning of 'direct consequence', and consider whether any changes are necessary. In light of the evidence of the number of survivors of modern slavery in prisons and cases before the Criminal Cases Review Commission involving refugees and victims of human trafficking,¹⁰⁴ the criminal justice system should continue to improve the implementation of the non-punishment obligation, including by providing adequate training for the police, CPS, judiciary, and defence counsels.

→ The Modern Slavery and Human Rights PEC will publish a Policy Brief exploring the implications of the landmark European Court of Human Rights V.C.L and A.N v the United Kingdom judgment, and the issues that need resolving before the judgment can be fully implemented.

97. Kidd, A. (2022) '[Section 45 of the Modern Slavery Act: evidence review](#)'

98. Independent Anti-Slavery Commissioner (2020) '[The Modern Slavery Act 2015 Statutory Defence: a call for evidence](#)'

99. Group of Experts on Action against Trafficking (GRETA) (2021), '[Evaluation Report: United Kingdom, Third Evaluation Round](#)' para 177.

100. Group of Experts on Action against Trafficking (GRETA) (2021), '[Evaluation Report: United Kingdom, Third Evaluation Round](#)'

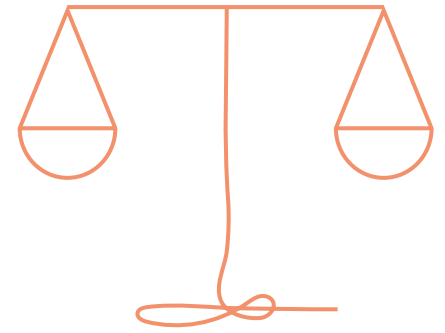
101. Heys, A. (2023) The UK's Statutory Defence for Victims of Modern Slavery and its Narrow Understanding of Victimhood. *The Journal of Criminal Law* 87(4):237-251; Haughey, C. (2016) '[The Modern Slavery Act Review](#)'

102. *V.C.L. and A.N. v the United Kingdom*

103. Ministry of Justice, '[Responding to human rights judgements – Report to the Joint Committee on Human Rights on the Government's response to human rights judgments 2022-2023](#)'

104. Criminal Cases Review Commission (no date) '[Asylum, immigration and victims of human trafficking](#)'

Priority area 3: Increase prosecution of offending and improve remediation for survivors



Prosecutions

The volume of charges, prosecutions and convictions for modern slavery offending remains notably low. In the year ending March 2023, 1.18% (120) of modern slavery crimes recorded by the police in England and Wales (10,148) resulted in a charge/summons.¹⁰⁵ In the year ending September 2023, the CPS recorded 395 prosecutions for modern slavery-flagged crimes in England and Wales, of which 301 (76%) resulted in a conviction.¹⁰⁶ Evidence shows that a lack of support for victims during modern slavery investigations is a “serious factor” impacting on engagement with the police, and which helps to explain the low number of prosecutions.¹⁰⁷ Furthermore, the police describe modern slavery investigations as “typically complex”.¹⁰⁸

Co-operation and engagement from victims is often critical for securing prosecutions and convictions but there are a range of challenges with securing prosecutions under the MSA. Evidence suggests that these challenges relate to *implementation* of the existing framework, as opposed to gaps or deficiencies in the law itself. As set out in the PEC’s Policy Brief on CCE,¹⁰⁹ these challenges include: fear of perpetrators and potential repercussions for co-operating in investigations, uncertainty over how professionals will respond, fear of being detained or repatriated (for those with insecure immigration status), stigma and shame, not identifying as a victim, complexity of investigations, witness protection and professional awareness of modern slavery. In 2021/22, the Home Office provided funding to initiatives that aimed to support adult victims of modern slavery to engage in the criminal justice system,¹¹⁰ however we are not aware of publication of any review or evaluation of this funding.

There is scope to increase use of financial investigations to secure prosecutions for modern slavery offending. This means that cases do not rely on witness testimony. However, there are challenges including availability of financial investigators.¹¹¹

105. Home Office (2024) ‘Outcomes open data, year ending March 2023’

106. Crown Prosecution Service (2023) ‘Prosecution Outcomes by Crime Types Management Information, 23/24-Q2’ Data Table 5.1

107. HM Inspectorate of Constabulary and Fire & Rescue Services, the College of Policing and the Independent Office for Police Conduct (updated 2021) ‘The hidden victims: Report on Hestia’s super-complaint on the police response to victims of modern slavery’

108. Modern Slavery and Organised Immigration Crime Programme (2022) ‘Annual Report 2021-22’

109. Heys, A., and Jovanovic, M. (forthcoming) Modern Slavery and Human Rights Policy and Evidence Centre Policy Brief: Creation of a Child Criminal Exploitation (CCE) Offence in England and Wales

110. Home Office (2021) ‘Supporting victims of modern slavery in the Criminal Justice System’

111. Independent Anti-Slavery Commissioner (2021), ‘Financial Investigation of Modern Slavery (Part 2)’



Recommendation 20: the Home Office should work with law enforcement and CPS to better understand the obstacles to using the existing criminal offences at sections 1-2 of the MSA to prosecute modern slavery offending, and increase resource and focus on increasing prosecutions, including greater use of financial investigations and provision of trauma-informed training on modern slavery to relevant staff in the criminal justice system.

Recommendation 21: the Home Office should publish a review or an evaluation of the funding it provided in 2021/22 to initiatives aimed at improving victim engagement in the criminal justice system, and draw on these learnings and promising practices to inform future responses.

→ The Modern Slavery and Human Rights PEC will publish research exploring how financial investigations could be used to increase prosecutions under the Modern Slavery Act 2015.

Other tools and powers in the Modern Slavery Act 2015

The Modern Slavery Act 2015 created a number of potentially beneficial ancillary orders which are underused. Slavery and Trafficking Prevention Orders and Slavery and Trafficking Risk Orders enable restrictions on individuals convicted of, or believed to be at risk of perpetrating a modern slavery or human trafficking offence. However, these are widely reported as being underused, owing to issues including a lack of awareness, guidance and training.¹¹²

Recommendation 22: the Home Office should work with the police and CPS to drive a renewed effort to enhance use of Slavery and Trafficking Risk and Prevention Orders.

112. Independent Anti-Slavery Commissioner (2022) 'The Use of Modern Slavery Risk and Prevention Orders'



Remediation and compensation

Research and data show that very few survivors of modern slavery have received compensation in practice, even though it has been identified as an important positive outcome for survivors.¹¹³ Access to legal advice is often necessary to navigate compensation claims but there are barriers to accessing this.¹¹⁴ Data shows that a very small number of survivors apply for compensation through the Criminal Injuries Compensation Authority (CICA) and research has identified barriers to access including awareness of the scheme and the burden of evidence required.¹¹⁵ The Modern Slavery Act 2015 includes provisions for Slavery and Trafficking Reparation Orders, to enable courts to order offenders convicted for modern slavery offences to pay reparation to victims. There needs to be a Confiscation Order in place in order for a Reparation Order to be made.¹¹⁶ There is no published data on Slavery and Trafficking Reparation Orders, and a 2021 GRETA UK evaluation report found that “GRETA’s interlocutors were not aware of any victims ... having received a Reparation Orders”.¹¹⁷ The Independent Review of the Modern Slavery Act 2015 noted that barriers to use of Reparation Orders include the relatively narrow set of circumstances in which they can be used, the inability to use them for “victimless” prosecutions and low awareness of the Orders among those in the criminal justice system. The Review highlighted the importance of compensation being at the forefront of the Court’s mind during sentencing.¹¹⁸

Recommendation 23: the Home Office should work with Ministry of Justice to improve the access to legal advice to support compensation claims and address the wider barriers that survivors face when seeking compensation. The Home Office should work with criminal justice system partners to increase their awareness of Slavery and Trafficking Reparation Orders.

113. Paphitis, S., Jannesari, S., Witkin, R., Damara, B., Joseph, L., Triantafillou, O., Dang, M., Howarth, E., Katona, C., Wright, N., Sit, Q., & Oram, S. (2023) [The Modern Slavery Core Outcome Set](#)

114. Gauci, J.-P., Magugliani, N., and J. Trajer (2023) [‘Impacts of a lack of legal advice on adults with lived experience of modern slavery’](#)

115. After Exploitation (2024) [“The final piece of the puzzle”: information sheet on modern slavery and compensation \(CICA\)’](#)

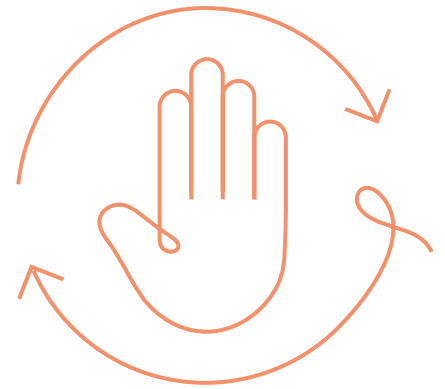
116. Modern Slavery Act 2015 [Explanatory Notes](#).

117. Group of Experts on Action against Trafficking (GRETA) (2021), [‘Evaluation Report: United Kingdom, Third Evaluation Round’](#)

118. Home Office (2019) [‘Independent Review of the Modern Slavery Act: final report’](#)

Priority area 4:

Take a whole-system approach by integrating consideration of modern slavery prevention into the delivery of the Government's Missions and wider Year 1 policy priorities



The nature of modern slavery means that effectively addressing modern slavery requires a systemic, long-term and holistic approach. There are a number of linked policy areas where the government has indicated it will take action during its first year and it is important that the Home Office and wider departments ensure that modern slavery considerations are effectively integrated into these proposals. We focus on some of these linked policy areas here, but stress that this is not by any means an exhaustive list of the relevant areas of interlinking policy.

Border Security and Asylum

Policy priority: The Government has committed to introducing a Border Security, Asylum and Immigration Bill which will include powers for a new Border Security Command to “crack down on criminal gangs”, and measures to support “clearing the asylum backlog”.¹¹⁹ This sits alongside operational work to increase returns of people who have exhausted all available routes to claiming asylum and protection in the UK and an “illegal working programme” to target employers who illegally employ those with no right to work in the UK.¹²⁰

The link to modern slavery: Some people claiming asylum as well as people subject to immigration enforcement may also be identified as potential victims of modern slavery and referred to the NRM.¹²¹ This means policy decisions about asylum and returns need to take into account the UK’s obligations towards victims of modern slavery under human rights law and international treaty obligations. For example, ECAT obliges states to complete the victim identification process before their return to the country of origin could be considered. Article 16 stipulates that a state ought to evaluate how such return may impact on ‘the rights, safety and dignity of that person’.¹²²

119. King’s Speech (2024) [Background Briefing Notes](#).

120. Home Office (2024) [‘Home Secretary announces new measures to boost Britain’s border security’](#)

121. Between 2017 and 2019, the average proportion of asylum claimants referred to the NRM was 11%. More detail at [this Home Office statistics bulletin](#).

122. For more detail on ECAT Article 16 obligations, see Jovanovic, M., (2023) [‘Legal Analysis of the Human Rights Compatibility of the Modern Slavery Sections in the Illegal Migration Act \(Sections 22-29\)’](#)



Some announcements about the Border Security Command suggest that the Government sees the Command as focusing on both ‘human smuggling’ and ‘human trafficking’.¹²³ It is important to recognise that ‘migrant smuggling’ and ‘human trafficking’ are two distinct offences in accordance with the international treaties governing these practices.¹²⁴ Accordingly the Home Office’s statutory guidance on modern slavery states that “the purpose of human smuggling is to move a person across a border illegally, and it is regarded as a violation of state sovereignty. The purpose of modern slavery is to exploit the victim for gain or other benefit and is regarded as a violation of that person’s freedom and integrity”, though sometimes the distinction is complex because situations that start as smuggling might become exploitative.¹²⁵ It is essential that smuggling and trafficking are not conflated in the policy and operational response.

Recommendation 24: the Home Office should ensure that where it seeks to return confirmed victims of modern slavery to their country of origin, this is conducted in line with human rights law and international obligations under ECAT.¹²⁶ These considerations are particularly relevant for countries with low asylum grant rates but relatively high numbers of potential victims referred to the NRM, such as Albania and Vietnam.¹²⁷

Recommendation 25: the Home Office should ensure relevant staff in the new Border Security Command are trained in understanding indicators of modern slavery and the difference between human trafficking and human smuggling, drawing on good practice.¹²⁸ This will help ensure that the UK meets its legal obligations to identify victims of modern slavery under human rights law and international treaties such as ECAT.

Recommendation 26: the Home Office’s initiative to tackle illegal working should ensure protection of vulnerable workers and incorporate relevant training for staff involved to identify indicators of exploitation to ensure that such workers are referred into the NRM if there are grounds to believe that they have been trafficked and/or exploited.

→ If the Border Security, Asylum and Immigration Bill includes measures on modern slavery, the Modern Slavery and Human Rights PEC will publish a Policy Explainer exploring the implications of the Bill for victims of modern slavery and the Bill’s compatibility with the requirements of human rights and international law.

123. Prime Minister’s Office, 10 Downing Street (2024) ‘Our first steps for change’

124. Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention against Transnational Organized Crime; Protocol against the Smuggling of Migrants by Land, Sea and Air, Supplementing the United Nations Convention against Transnational Organized Crime.

125. Home Office (2024) ‘Statutory Guidance – Modern Slavery: how to identify and support victims’. Paragraphs 2.61 – 2.68 of the May 2024 version of the guidance discusses in detail the difference between human trafficking and human smuggling.

126. European Court of Human Rights (2024), ‘Guide on the case-law of the European Convention on Human Rights: Immigration’

127. Home Office (2023) ‘Modern slavery: National Referral Mechanism and Duty to Notify statistics UK: end of year summary 2023’ Data table 5 and Home Office (2023) ‘Asylum and resettlement datasets’ Outcome analysis of asylum applications dataset.

128. Annex to the Modern Slavery PEC Briefing: Priorities for Independent Anti-Slavery Commissioner’s (IASC’s) Strategic Plan (2024) https://modern-slavery.files.svdcdn.com/production/assets/downloads/Annex-IASC-Briefing_Lived-experience-engagement.pdf



Visas and Immigration

Policy priority: Under the Mission to “Kickstart Economic Growth”, the Government committed to reform the points-based immigration system.¹²⁹

The link to modern slavery: Evidence shows that certain work visas can increase vulnerability to exploitation and there are particular concerns about exploitation of migrant workers on adult social care visas and seasonal worker visas for agricultural work. Visas that tie migrants to their employer can increase worker vulnerability to exploitation because of the power that the sponsorship system gives unscrupulous employers to take advantage of workers, who face big barriers to report abuses.¹³⁰ Accordingly, the European Court of Human Rights has emphasized that: “state’s immigration rules must address relevant concerns relating to encouragement, facilitation or tolerance of trafficking.”¹³¹

Recommendation 27: The Government’s reform of the points-based immigration system should correct the flaws in the current arrangements that have enabled exploitation to take place in the UK. The Home Office should ensure that visa regimes are designed to prevent and address modern slavery risks. Those coming to the UK on work visas should have the freedom and opportunity to report exploitation by their employer, and be encouraged to do so without fear of repercussions. Where exploitation has happened, workers should be provided with protection and support.

Recommendation 28: the Home Office should consider inviting the Migration Advisory Committee to review the Health & Care visa and make recommendations for how the visa could be modified to reduce vulnerability to workers experiencing exploitation.

¹²⁹. Labour Party (2024) [Manifesto](#).

¹³⁰. Thiemann, I., et al. (2024) ‘UK agriculture and care visas: worker exploitation and obstacles to redress’; Modern Slavery and Human Rights Policy and Evidence Centre (2024) ‘Written Evidence to House of Lords Modern Slavery Act 2015 Committee’; Modern Slavery and Human Rights Policy and Evidence Centre ‘Written Evidence to Joint Committee on Human Rights (JCHR) inquiry on Human Rights at Work’

¹³¹. Rantsev v Cyprus and Russia (2010) para. 284.



Child Criminal Exploitation (CCE)

Policy priority: Under the Mission to “Take Back Our Streets” the Government has committed to measures to address CCE in the context of wider efforts to address youth violence and knife crime. The Labour manifesto included a commitment to “introduce a new offence of criminal exploitation of children, to go after the gangs who are luring young people into violence and crime.”¹³²

The link to modern slavery: CCE is recognised as a form of modern slavery in the relevant international legal framework and the Modern Slavery Act 2015 can and has been used to prosecute CCE offending. These issues are explored in more detail in the forthcoming Modern Slavery and Human Rights PEC Policy Brief on the modern slavery implications of a standalone CCE criminal offence.

Recommendation 29: the government should ensure that the strategic and policy response to CCE is grounded in the UK’s international legal obligations on modern slavery and that CCE is an integral part of the national legal and policy framework on modern slavery, with a focus on providing effective identification and support for all children who have been trafficked and exploited.

→ The Modern Slavery and Human Rights PEC will explore commissioning research to examine definitions of child exploitation in place across the UK, how they are applied practically and interpreted by frontline professionals, and how these definitions impact on children’s cases.

132. Labour Party (2024) [Manifesto](#).



Violence Against Women and Girls (VAWG)

Policy priority: Under the Mission to “Take Back Our Streets”, the Government has committed to “halve violence against women and girls in a decade”.¹³³

The link to modern slavery: The number of women and girls referred to the National Referral Mechanism, the UK’s identification and support system for modern slavery, in 2023 (4,088) was the highest annual number since the NRM began.¹³⁴ Women and girls were most commonly referred to the NRM for sexual exploitation (36%; 1,470). Adult Services Websites (ASWs) are enablers of adult sexual exploitation, modern slavery and human trafficking.¹³⁵

Recommendation 30: the Government and Ofcom should ensure that implementation of the Online Safety Act 2023 in respect of Adult Services Websites is accompanied by adequate resourcing, and monitor any unintended consequences of the legislation, for example displacement of adverts involving exploitation to encrypted spaces.

Recommendation 31: The Government should identify the policy lessons learned from countering domestic violence and abuse, such as a multi-agency approach and proactive local services, which should also inform the policy response to modern slavery.

International Development

Policy priority: The Government has committed to deliver a new approach to international development and to focus on priority areas of “supporting economic transformation, tackling unsustainable debt, empowering women and girls, supporting conflict prevention, and unlocking climate finance.” It has also committed to work with the Independent Commission for Aid Impact (ICAI) to apply high standards to aid spending.

The link to modern slavery: previous Modern Slavery and Human Rights PEC analysis has evidenced the links between modern slavery and key international development priorities, including climate change, health, education, poverty reduction and societal resilience.¹³⁶ The FCDO-funded ‘Developing Freedom’ research suggests that anti-slavery efforts could contribute to achieving 113 of

133. Labour Party (2024) [Manifesto](#).

134. Home Office (2023) [‘Modern slavery: National Referral Mechanism and Duty to Notify statistics UK: end of year summary 2023’](#)

135. Sanders, T. & Keighley, R. (2023) [‘The role of adult service websites in addressing modern slavery’](#)

136. Hesketh, O. and Balch, A. (2021) Modern Slavery and Human Rights Policy and Evidence Centre Policy Brief: [‘Modern Slavery and International Development’](#)



the 169 SDG targets,¹³⁷ but the ICAI concluded in 2020 that efforts to address modern slavery through the UK's aid programme 'has had limited long-term impact, did not build on existing international efforts and experience, and failed to adequately involve survivors'.¹³⁸ PEC research commissioned by FCDO has outlined practical ways in which a more survivor-centred approach could improve effectiveness of international development policies and programmes.¹³⁹ This has highlighted the importance of a context-sensitive, collaborative and flexible approach.¹⁴⁰ There are opportunities to incorporate measures that will reduce modern slavery both abroad and in the UK through an approach to international development that is more evidence-based and survivor-informed.

Recommendation 32: the FCDO and Home Office should work with Global South partners to develop tailored, inclusive programming on modern slavery that is context-sensitive and survivor-engaged. This means prioritising equitable collaboration with local intermediaries, NGOs, communities and experts alongside strengthening partnerships with relevant counterparts at international level (e.g. IOM, UNODC). The FCDO and Home Office should continue to build on the ICAI modern slavery review recommendations around improved use of evidence and meaningful involvement of those directly affected. The FCDO and Home Office should mainstream measures to prevent modern slavery and apply learning from 'what works' into other relevant international development priorities, e.g. recently announced £84million of funding for reducing irregular migration through projects in the Global South,¹⁴¹ new bilateral or multilateral agreements on trade,¹⁴² asylum and refugee issues, and climate change.¹⁴³

137. Cockayne, J. (2021) 'Synopsis, Developing Freedom: The Sustainable Development Case for Ending Modern Slavery, Forced Labour and Human Trafficking'

138. ICAI (2020) 'The UK's approach to tackling modern slavery through the aid programme'

139. Asquith, W., Kiconco, A., Balch, A. (2022) 'Promising practices in the engagement of people with lived experience to address modern slavery and human trafficking'

140. Balch, A., and Kiconco, A. (2023) 'Towards principles for equitable engagement: six research projects.'

141. FCDO (2024) 'UK steps up work to reduce illegal migration'

142. Masiko et al. (2024) 'Harnessing UK trade and investment to address Indo-Pacific modern slavery'

143. Jackson et al. (2024) 'Integrating policies addressing modern slavery and climate change'



Employment Rights and Labour Market Enforcement

Policy priority: Under the Mission to “Kickstart Economic Growth”, the Government has committed to introducing an extensive package of reforms to workers’ rights through its “New Deal for Working People”¹⁴⁴ and Employment Rights Bill.¹⁴⁵

The link to modern slavery: forced labour and non-compliance occur on a continuum that ranges from deviations from “decent work” standards set by the International Labour Organization (ILO) to forced labour and labour exploitation that meet the definition of the crime of modern slavery.¹⁴⁶ The proposal to establish a new single enforcement body for workers’ rights, which will be known as the Fair Work Agency, is the most directly relevant element of this package for modern slavery policy. Research has identified how a Single Enforcement Body could address current insufficiencies and issues impeding effective enforcement.¹⁴⁷ Evidence shows that particular groups of workers – such as seasonal migrant workers – may be hesitant to come forward to report exploitation due to their irregular status and a fear of deportation, language barriers, social and cultural reasons, and/or lack of access to legal aid.¹⁴⁸ Some experts have recommended a “firewall” between immigration enforcement and policing to encourage greater reporting.¹⁴⁹

Recommendation 33: DBT and the Home Office should ensure that policy design of the Fair Work Agency is based on evidence of best practice and considers how the Agency will identify exploitation that constitutes modern slavery, and engages with vulnerable workers and trade unions to support workers to report exploitation, without fear of repercussions.

Recommendation 34: DBT and the Home Office should ensure that the GLAA’s responsibilities and specialism in relation to modern slavery is maintained within the new Fair Work Agency.

→ The Modern Slavery and Human Rights PEC will explore commissioning an evidence review to explore the existing evidence base around migrant workers reporting labour rights violations, especially modern slavery, and perceived threat of immigration enforcement action, to inform the design of the Fair Work Agency.

144. Labour Party (2024) ‘Labour’s Plan to Make Work Pay: Delivering A New Deal for Working People’

145. King’s Speech (2024) ‘Background Briefing Notes’

146. Skrivankova, K. (2010) ‘Between decent work and forced labour: examining the continuum of exploitation’

147. University of Nottingham Rights Lab (2023) ‘Restating the case for a Single Enforcement Body’

148. Hastie, B. (2017) ‘The Inaccessibility of Justice for Migrant Workers: A Capabilities-Based Perspective’; Gauci, J.-P., Magugliani, N., and J. Trajer (2023) ‘Impacts of a lack of legal advice on adults with lived experience of modern slavery’

149. International Labour Organization (2022) ‘Labour Inspection and Monitoring of Recruitment of Migrant Workers’, p. 10; International Labour Organization (2021) ‘Protecting the Rights of Migrant Workers in Irregular Situations and Preventing Irregular Labour Migration: A Compendium’, p. 35, 52; European Commission against Racism and Intolerance (2016) ‘ECRI General Policy Recommendation N°16 on Safeguarding Irregularly Present Migrants from Discrimination’; For specific concerns regarding the situation in the UK, see e.g. GRETA (2021) ‘Evaluation Report: United Kingdom’, p. 20, 61; Crépeau, F., and B. Hastie (2015) ‘The Case for ‘Firewall’ Protections for Irregular Migrants: Safeguarding Fundamental Rights’



Homelessness

Policy priority: Under the Mission to “Break Down the Barriers to Opportunity” the Government committed to “develop a new cross-government strategy...to put Britain back on track to ending homelessness.”¹⁵⁰

The link to modern slavery: People who are homeless are at increased risk of exploitation,¹⁵¹ and when exploitation has occurred, there are barriers for modern slavery survivors in accessing appropriate housing which can increase vulnerability to further exploitation.¹⁵² Research has identified the importance of secure accommodation for adult survivors’ recovery as well as some issues around the effects of unsuitable accommodation for those referred into the NRM.¹⁵³

Recommendation 35: MHCLG and Home Office should ensure that the new homelessness strategy takes account of the links with modern slavery and identifies ways to reduce vulnerability to exploitation. The strategy should consider how to improve access to suitable and secure housing for survivors of modern slavery.

→ The Modern Slavery and Human Rights PEC will explore commissioning research on the link between modern slavery and homelessness to inform a more joined up approach to policy.

150. Labour Party (2024) [Manifesto](#).

151. The Passage (2017) [‘Understanding and Responding to Modern Slavery within the Homelessness Sector’](#)

152. Commonweal housing (2020) [‘Majority of victims of Trafficking do not have access to safe housing’](#); Human Trafficking Foundation (2023) [‘Housing for Survivors of Modern Slavery’](#)

153. Paphitis, S., Jannesari, S., Witkin, R., Damara, B., Joseph, L., Triantafyllou, O., Dang, M., Howarth, E., Katona, C., Wright, N., Sit, Q., & Oram, S. (2023) [The Modern Slavery Core Outcome Set](#); Murphy, C., Heys, A., Barlow, C., Gleich, L., & Wilkinson, S. (2022) [‘Identifying Pathways to Support British Victims of Modern Slavery towards Safety and Recovery: A Scoping Study’](#)



Education

Policy priority: Under the Mission to “Break Down the Barriers to Opportunity” the Government stated it was determined to “to raise school standards for every child, and ensure they are prepared for the future.”¹⁵⁴

The link to modern slavery: Research has shown that a lack of education, school exclusion, and drop out are risk factors for children and young adults becoming vulnerable to exploitation. Young people with special educational needs and disability (SEND) are at increased risk of exploitation.¹⁵⁵ Research reveals that engagement with education services that meets SEND is one of the most significant factors in keeping children with SEND safe from exploitation.¹⁵⁶ However, children and young people with SEND may have unrecognised or unmet needs, there is insufficient attention to the specific needs of young people with SEND in national safeguarding or modern slavery policy, a lack of data collection, and missed opportunities for early intervention and disrupting patterns of exploitation, such as responses to missing episodes.¹⁵⁷ Access to education was identified among the minimum core set of seven outcomes for adult survivors’ recovery through consensus-driven participatory research. The study highlighted that key features should include access to institutions, free from discrimination, and support for work preparedness and skill building.¹⁵⁸

Recommendation 36: The Government – in particular the Department for Education – should ensure that SEND is identified early, needs are met and school breakdowns are prevented through multi-agency working, which takes a safeguarding approach. Cross-government renewed safeguarding and modern slavery statutory guidance and related training, improved data collection and sharing should underpin this, to better safeguard young people with SEND and respond to vulnerability to harm.

→ The Modern Slavery and Human Rights PEC will publish new research in autumn 2024 exploring how to early identify children and young people with SEND at risk of exploitation through open conversations with practitioners.

154. Labour Party (2024) [Manifesto](#).

155. Celiksoy, C., Schwarz, K., Sawyer, L., Vargas Gorena, P., Ciucci, S., Yin, S., Durán, L. (2024) [‘Prevention and identification of children and young adults experiencing, or at risk of, modern slavery in the UK’](#)

156. Franklin, A., Bradley, L., Greenaway, Jo., Goff, S., Atkins, S., Rylatt, L. (2024) [‘Internal trafficking and exploitation of children with special educational needs and disability’](#)

157. Franklin, A., Bradley, L., Greenaway, Jo., Goff, S., Atkins, S., Rylatt, L. (2024) [‘Internal trafficking and exploitation of children with special educational needs and disability’](#)

158. 5. Paphitis, S., Jannesari, S., Witkin, R., Damara, B., Joseph, J., Triantafillou, O., Dang, M., Howarth, E., Katona, C., Wright, N., Sit, Q., and Oram, S. (2023) [‘The Modern Slavery Core Outcome Set’](#)



Housebuilding

Policy priority: Under the Mission to “Kickstart Economic Growth”, the Government has committed to building 1.5 million new homes over the course of this Parliament.¹⁵⁹

The link to modern slavery: Construction has been widely recognised as a high-risk sector for labour exploitation in the UK.¹⁶⁰ There is a need for more detailed evidence on the nature of exploitation in this sector, specifically in housebuilding, for example on the dynamics of exploitation and any differences according to geographical areas, scale of construction project and demographics of workers involved.

Recommendation 37: the Government should ensure that rapid expansion in the housebuilding sector is accompanied by clear plans to reduce risk of worker exploitation.

→ The Modern Slavery and Human Rights PEC will explore commissioning a scoping study to examine the existing evidence base on modern slavery in the construction sector in the UK, with a particular focus on housebuilding

159. Labour Party (2024) [Manifesto](#).

160. GRETA (2021) [‘Evaluation Report: United Kingdom’](#); Independent Anti-Slavery Commissioner (2022) [‘Operation Cardinas and Beyond: Addressing exploitation risk in the construction sector’](#)



Climate Change and Green Energy

Policy priority: One of the Government's Missions is to achieve clean energy by 2030. A Great British Energy Bill will be introduced, including setting a publicly owned clean power company to accelerate investment in renewable energy such as offshore wind.¹⁶¹

The link to modern slavery: People working in the renewable sector and its supply chains, namely the extraction of minerals and resources and the manufacture of energy products such as solar panels are at high-risk of modern slavery.¹⁶² Companies in the renewable energy sector in the UK are not sufficiently addressing modern slavery risks.¹⁶³ Policymakers tend to work on modern slavery and climate change policy in isolation from each other despite the increasing evidence of the interconnections between modern slavery and climate change.¹⁶⁴ In the UK there is a lack of a legal mandate to tackle modern slavery and climate change in the public sector's operations and supply chains.¹⁶⁵

Recommendation 38: the Government should encourage UK renewable sector businesses to address modern slavery risks in their operations and supply chains, and ensure that expansion of green energy, including through public procurement, does not increase the risk of modern slavery and worker exploitation.

161. King's Speech (2024) [Background Briefing Notes](#).

162. Cranston, C., Dorett, A. Martin, E., Murphy, L.T. and a team of anonymous researchers (2024) '[Respecting Rights in Renewable Energy](#)'

163. Walk Free (2023). '[Beyond Compliance in the Renewable Energy Sector](#)'

164. Jackson, B. et al., (2024) '[Integrating policies addressing modern slavery and climate change](#)'

165. Rogerson, M., Grosvold, J., Alves, K. (2024) '[Climate change and modern slavery in public procurement](#)'



Public Procurement

Policy priority: The Government has committed to bringing about “the biggest wave of insourcing of public services in a generation”¹⁶⁶ and to introducing a new National Procurement Policy Statement to set out priorities for public procurement in support of the Missions.¹⁶⁷

The link to modern slavery: The State through its public purchasing activities can have significant leverage to address modern slavery in business supply chains. While there has been limited research exploring the effectiveness of public procurement as a lever for addressing modern slavery, some case studies show how public procurement measures have positively influenced supplier behaviour and contributed to reduced modern slavery risk.¹⁶⁸

Recommendation 39: the Government should continue and enhance the work already underway in the UK to use public procurement laws, policies and practices to address modern slavery, and consider extending legislative provisions on modern slavery and supply chains to public sector organisations.

→ The Modern Slavery and Human Rights PEC will update its existing 2022 Policy Brief on the effectiveness of public procurement in addressing modern slavery, to take account of recent developments and evidence.

166. Labour Party (2024) ‘Labour’s Plan to Make Work Pay: Delivering A New Deal for Working People’

167. Cabinet Office (2024) [Written statement to the House of Commons – Procurement Act 2023 Update.](#)

168. Gonzalez De Aguinaga, S., Johnstone, O., and Hesketh, O. (2022) Modern Slavery and Human Rights Policy and Evidence Centre Policy Brief: [‘Effectiveness of public procurement measures in addressing modern slavery’](#)



Trade and Investment

Policy priority: The Government has committed to producing a new industrial strategy, aligned with procurement and trade policy and a new trade strategy.¹⁶⁹

The link to modern slavery: Trade instruments such as forced labour import bans are increasingly being developed in North America and Europe, but evidence of their effectiveness at preventing modern slavery remains limited.¹⁷⁰ Investors play a key role in addressing modern slavery in business supply chains.¹⁷¹ However, there is a lack of regulation of capital markets and investors in relation to human and labour rights, including modern slavery.

Recommendation 40: the Government should consider the implications of Forced Labour Import Bans for its new Trade Strategy, especially in relation to trade with the EU and the US who have developed forced labour import bans. The UK government should also consider the impact of trade agreements and investment policy on modern slavery to ensure that these boost economic growth while protecting workers' rights and working conditions.

🔗 The Modern Slavery and Human Rights PEC will publish an updated version of its existing 2021 Policy Brief on the effectiveness of forced labour import bans for addressing modern slavery, in autumn 2024.

This Policy Brief has focused in detail on recommendations for the first year of the Government's term. These recommendations are intended to enable years 2-5 of the Government's term to be focused on delivery of reform, underpinned by implementation of a new modern slavery strategy, strengthening of the legal framework and dedicated programme spend. The Modern Slavery and Human Rights PEC will continue to provide evidence, analysis and more detailed recommendations over this period.

169. Labour Party (2024) [Manifesto](#).

170. Pietropaoli, I., Johnstone, O., and A. Balch (2021) Modern Slavery and Human Rights Policy and Evidence Centre Policy Brief '[Effectiveness of forced labour import bans](#)'

171. Khan et al., (2023) '[Financial Markets and modern slavery](#)'

MODERN SLAVERY & HUMAN RIGHTS

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