

## Briefing: the UK Government review of the 2014 Modern Slavery Strategy

5 November 2021

### Summary of key recommendations

The Modern Slavery and Human Rights Policy and Evidence Centre (Modern Slavery PEC) welcomes the UK Government's commitment to review the 2014 Modern Slavery Strategy<sup>1</sup> (hereafter "the 2014 Strategy") and develop a revised strategic approach to modern slavery. This Briefing aims to inform the UK Government's review. It draws on the Modern Slavery PEC's assessment of existing research and evidence on modern slavery and considers four broad themes.<sup>2</sup> Priority recommendations under each theme are summarised here:

- **Strategic Framework:** The UK Government should revise the 2014 Strategy "4Ps" (Pursue; Prevent; Protect; Prepare) strategic framework and replace with a clearer set of strategic objectives in the new Modern Slavery Strategy, that align with international anti-trafficking frameworks (based on 3Ps of Prosecution, Protection and Prevention; with additional 4<sup>th</sup> P of Partnership). This will more clearly reflect the breadth of UK Government activity to address modern slavery and support international collaboration.
- **Strategic Priorities:** Looking across all policy areas, evidence suggests the need for the new Modern Slavery Strategy to place a greater emphasis on preventing harm in the first place, underpinned by a clearer definition of prevention. Also, the need to explore further levers to address forced labour in supply chains, such as through international trade and the role of investors. The new Strategy should take account of the increased vulnerability to modern slavery that has resulted from the effects of the Covid-19 pandemic.
- **Modern Slavery Data:** To enhance transparency, improve understanding of patterns and trends, and increase understanding of the effectiveness of Government policies on modern slavery, the new Modern Slavery Strategy should set out how UK Government will improve the accessibility of existing modern slavery data it collects and publishes (such as National Referral Mechanism data), and prioritise new data collections (for example, on the use of the statutory defence).
- **Survivor involvement in research and policymaking:** The UK Government should make a clear commitment to embed the inclusion of survivors in research and policy development and set short-, medium- and long-term objectives for how it intends to do so. It should take account of emerging good practice in involving survivors in research, policymaking, and the selection and design of UK interventions in upstream countries. The UK Government should draw on existing good practice when conducting its own survivor engagement, whilst recognising that it might not be best placed to engage with survivors directly and should explore using intermediaries with the requisite skills and experience.

<sup>1</sup> HM Government (2014) *Modern Slavery Strategy*. Available at: <https://www.gov.uk/government/publications/modern-slavery-strategy>

<sup>2</sup> This Briefing largely draws on research and policy briefs published to date by the Modern Slavery PEC. This Briefing is not based on a full evidence review.

## Introduction to the Modern Slavery Policy and Evidence Centre

1. **This Briefing has been prepared by the [Modern Slavery and Human Rights Policy and Evidence Centre \(Modern Slavery PEC\)](#).<sup>3</sup> The Modern Slavery PEC was created by the investment of public funding to enhance understanding of modern slavery and transform the effectiveness of law and policies designed to prevent it. The Centre is a consortium of six research organisations led by the [Bingham Centre for the Rule of Law](#) and is funded by the Arts and Humanities Research Council on behalf of [UK Research and Innovation](#) (UKRI).**
2. **The Modern Slavery PEC funds research to provide independent, innovative and authoritative insight and analysis on modern slavery.** The Modern Slavery PEC is an impartial organisation and our focus is on ensuring the best available evidence and analysis is available for policymakers and law-makers. We are led by evidence and our position is that strategies and policies are more effective when they are firmly underpinned by evidence that is grounded in robust research and data. Our approach is rooted in human rights.

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<sup>3</sup> This response has been prepared by the Modern Slavery PEC's core team following discussion and consultation with PEC partners. It does not necessarily represent the views of all partners making up the PEC consortium.

## Theme 1: Framework for a new Modern Slavery Strategy

3. **The review is an opportunity to revise the framework guiding the UK Government's aim(s) and strategic objectives in relation to modern slavery.**
4. **The overall 'aim' of the 2014 Strategy was to “reduce significantly the prevalence of modern slavery”.** However, accurately measuring the prevalence of modern slavery is widely acknowledged as challenging due to the methodological difficulties of quantifying a complex issue. The 2014 Strategy included an estimate of the prevalence of modern slavery in the UK (10,000-13,000 potential victims), but it has not been possible to repeat this methodology to obtain an up-to-date comparable estimate. In July 2018, the Walk Free Foundation estimated there were 136,000 victims of modern slavery in the UK. However, a 2019 Office for National Statistics publication concluded that this figure “cannot be regarded as at all accurate or reliable” due to a series of concerns about the methodology used.<sup>4</sup> This means it has not been possible to assess how successful the 2014 Strategy has been at meeting its aim. A wide range of methodological innovations are being explored by researchers to measure prevalence of modern slavery.<sup>5</sup>
5. **In 2015, the UK endorsed the UN Sustainable Development Goals which are more ambitious in relation to modern slavery than the 2014 Strategy.** Target 8.7<sup>6</sup> commits states to “take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour...” by 2030 and there are specific targets on slavery and trafficking under SDGs 5 and 16 as well.<sup>7</sup> The global indicator framework for the SDGs<sup>8</sup> does not include any indicators on prevalence of modern slavery, meaning there is no formal requirement for the UK and other states to report progress against the eradication of forced labour, modern slavery and human trafficking, though there are indicators about known human trafficking and child labour.<sup>9</sup>
6. **There are wider benefits of setting ambitious strategic aims such as ending or eradicating modern slavery,** even if it is challenging to measure progress against them. Such aims can help to set a vision which generates and sustains political will to address modern slavery, and assists in mobilising a wide range of stakeholders, such as Governments, businesses and NGOs to take action. It is useful for strategies to also have a mission statement, which sits below a vision, and sets out a more medium-term aim for Government action on modern slavery which is more amenable to measurement. For example, the Australian Government National Action Plan to Combat Modern Slavery<sup>10</sup> sets a vision and a mission as follows:

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<sup>4</sup> Office for National Statistics (2020) *Modern Slavery in the UK: March 2020*. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/modernslaveryintheuk/march2020#quality-and-methodology>

<sup>5</sup> Global Fund to End Modern Slavery (2021) *Prevalence Estimation Methods Brief*. Available at: <https://www.gfems.org/reports/prevalence-estimation-methods-brief/>

<sup>6</sup> United Nations (no date) *The 17 Goals, Sustainable Development*. Available at: <https://sdgs.un.org/goals>

<sup>7</sup> Target 5.2 is “Eliminate all forms of violence against all women and girls in the public and private spheres, including trafficking and sexual and other types of exploitation” and target 16.2 is “End abuse, exploitation, trafficking and all forms of violence against and torture of children”.

<sup>8</sup> United Nations (no date) *SDG Indicators*. Available at: <https://unstats.un.org/sdgs/indicators/indicators-list/>

<sup>9</sup> Indicator 16.2.2 is “number of victims of human trafficking per 100,000 population, by sex, age and form of exploitation” and indicator 8.7.1 is “proportion and number of children aged 5-17 years engaged in child labour, by sex and age”.

<sup>10</sup> Australian Government (2020) *National Action Plan to Combat Modern Slavery 2020-25*. Available at: <https://www.homeaffairs.gov.au/reports-and-publications/submissions-and-discussion-papers/combat-modern-slavery-2020-25>

- a. Vision: “we are committed to a future where no one is subjected to modern slavery and the human rights of all people are valued equally.”
- b. Mission: “we work to actively prevent and combat all forms of modern slavery wherever it occurs, including by supporting, protecting and empowering survivors.”

7. **Recommendation:** The UK Government should consider integrating UN Target 8.7 as the overall vision of the new Modern Slavery Strategy and set a more measurable mission in support of this, and develop a performance framework to monitor progress (see paragraphs 62-64).

8. **The 2014 Strategy used a “4Ps” framework (Pursue; Prevent; Protect; Prepare), adapted from previous Government strategies on counter-terrorism and serious and organised crime, to organise strategic objectives.** The PEC is not aware of any research into this framework, but we note that it is not always clear how the terminology of some of these objectives relates to modern slavery, for example, activity to identify and support potential victims was categorised under ‘Prepare’, rather than the more intuitive ‘Protect’, and activity to address modern slavery in supply chains was categorised under ‘Protect’ rather than ‘Prevent’. In addition, this framework does not clearly capture the full range of Government activity underway since 2014 to address modern slavery, such as partnership-working and international collaboration.
9. **Internationally, a “3Ps” framework (Prosecution; Protection and Prevention) is commonly used as a paradigm for addressing human trafficking,** stemming from the Palermo Protocol, with a fourth “P” (Partnership) sometimes added to reflect the importance of collaborative working across different groups and agencies.<sup>11</sup> Other countries appear to have adapted this broad framework in their national strategies, with some adjustments to terminology which remain in the spirit of the international 3 or 4 “Ps”. For example, the Australian National Action Plan<sup>10</sup> is in line with the international 4Ps plus a fifth strategic objective on ‘Research’ and the Scottish Government Trafficking and Exploitation Strategy objectives appear to align with the international 3Ps.<sup>12</sup>
10. **UK Government strategies on other complex crime types use more intuitive, all-encompassing and clearer strategic objectives than the 2014 Strategy “4Ps”,** for example the current Violence Against Women and Girls Strategy and Tackling Child Sexual Abuse Strategy.<sup>13</sup> Clear objectives assist in helping partners understand how their roles and responsibilities fit into the strategic mission and vision, and make it easier to measure progress.

11. **Recommendation:** The UK Government should revise the 2014 Strategy “4Ps” and replace with a clearer strategic framework, grounded in the wider international “3Ps” approach, with “Partnership” added as a new 4<sup>th</sup> P. This will have the benefit of more clearly reflecting the breadth of UK Government activity to address modern slavery and support international collaboration.

<sup>11</sup> US Department of State (no date) *3Ps: Prosecution, Protection, and Prevention*. Available at: <https://www.state.gov/3ps-prosecution-protection-and-prevention/>

<sup>12</sup> Scottish Government (2017) *Trafficking and Exploitation Strategy for Scotland*. Available at: <https://www.gov.scot/policies/human-trafficking/trafficking-and-exploitation-strategy/>

<sup>13</sup> HM Government (2021) *Tackling Violence Against Women and Girls Strategy*. Available at: <https://www.gov.uk/government/publications/tackling-violence-against-women-and-girls-strategy> HM Government (2021) *Tackling Child Sexual Abuse Strategy*. Available at: <https://www.gov.uk/government/publications/tackling-child-sexual-abuse-strategy>

## Theme 2: Priorities for a new Modern Slavery Strategy

### Role of evidence in the new Modern Slavery Strategy

12. **The modern slavery research and evidence landscape in the UK has shifted significantly since the 2014 Strategy.** The UK Government and partner agencies have invested in building the evidence base on modern slavery. For example, investment of £10m through UK Research and Innovation to establish the Modern Slavery PEC to build understanding of modern slavery and enhance the effectiveness of laws and policies, and the establishment of the Joint Slavery and Trafficking Analysis Centre (JSTAC) in the National Crime Agency from 2016/17 to enhance law enforcement intelligence assessment on modern slavery. There is a growing volume of academic research into modern slavery underway, with an increase in UK research groups and centres dedicated to modern slavery, greater focus on modern slavery by UK research councils, and an intensification of worldwide efforts to address modern slavery as part of the UN SDGs.
  13. **Although there is a growing body of research, there remain significant gaps in knowledge and understanding about modern slavery, hampering the ability of policymakers to use the best evidence when designing policies.** Not all modern slavery research has a clear pathway to impact, and may not be informing the strategic response designed by policymakers and lawmakers. Barriers to impact include limited visibility and accessibility of research, limited ability for researchers to access policymakers, or research timescales not aligning with the policymaking lifecycle.<sup>14</sup>
  14. **The 2018 UK Modern Slavery Annual Report included a set of Government modern slavery research priorities.** This was a helpful snapshot overview to guide further research in this area and these 2018 priorities (alongside wider consultation with stakeholders) informed the Modern Slavery PEC's research agenda.<sup>15</sup> Given that modern slavery is a dynamic policy area, it would be valuable to understand Government's research priorities on a more regular basis, to ensure that research remains relevant to evolving policy considerations.
15. **Recommendation:** The UK Government should consider publishing a refreshed set of modern slavery research priorities as part of the new Modern Slavery Strategy, and consider mechanisms for regularly reviewing and revising these priorities and making the evolving priorities publicly available (for example, through publishing annual updates via the UK Modern Slavery Annual Reports).
16. **There are growing calls for policies and interventions to be more systematically linked to evidence of effectiveness ('what works') to address modern slavery.** This was an issue identified by the Independent Commission for Aid Impact (ICAI) review into

<sup>14</sup> Semione, J. and Independent Anti-Slavery Commissioner's Office (2020) *Preparing for Impact*. Available at: <https://www.antislaverycommissioner.co.uk/media/1433/iasec-review-preparing-for-impact-july-2020.pdf>

<sup>15</sup> Modern Slavery Policy and Evidence Centre (2020) *Consultation on the Modern Slavery PEC Research Priorities*. Available at: <https://modernslaverypec.org/resources/report-consultation-on-the-modern-slavery-pec-research-priorities>

aid spending on modern slavery<sup>16</sup> and there is increasing focus within the UK Government on policy evaluation through the new Evaluation Taskforce.<sup>17</sup>

17. **There are specific challenges in developing a ‘what works’ approach to modern slavery.** These include ethical issues in designing randomised controlled trials (RCTs) in this area, and the importance of incorporating experiential and more practice-based forms of knowledge and expertise. As the field is relatively new, terms and definitions also remain contentious and/or contested. However, in the last 3-5 years there has been useful initial work to systematically analyse modern slavery policies and interventions, pointing to a decidedly uneven picture in terms of effectiveness, with evidence hampered by lack of methodological rigor.<sup>18</sup>

18. **Recommendation:** In the new Modern Slavery Strategy, the primary focus to establish ‘what works’ should be on gaining consensus about what needs to be measured, and how, informed by survivors. New interventions set out in the new Modern Slavery Strategy should be informed by learning from previous evidence reviews, recognise a plurality of evidence (including, e.g. practitioner experience and expertise) and seek to co-develop outcome measures through involvement of survivors and survivor perspectives.<sup>19</sup>

## Policy Priorities for a new Modern Slavery Strategy

19. **This section of the Briefing considers evidence relevant to five individual modern slavery policy areas (supply chains, international, prevention, survivor identification and support and disruption and prosecution of offending),** as well as the impact of Covid-19 on modern slavery. We make evidence-informed recommendations about what the new Modern Slavery Strategy should prioritise within each policy area.

20. **Recommendation:** looking across all policy areas, evidence suggests the need for the new Modern Slavery Strategy to place a greater emphasis on preventing harm before it occurs, underpinned by a clearer definition of prevention. Also, the need to explore further levers to address forced labour in supply chains, such as through international trade and the role of investors. The Strategy should also take account of the increased vulnerability to modern slavery that has resulted from the effects of the Covid-19 pandemic.

## Supply Chains

21. **In the 2014 Modern Slavery Strategy, the introduction of a transparency in supply chains legal obligation was discussed under Protect,** saying that: *“Companies sourcing their products overseas must be confident that those they do business with are*

<sup>16</sup> Independent Commission for Aid Impact (2020) *The UK’s approach to tackling modern slavery through the aid programme.* Available at: <https://icai.independent.gov.uk/report/the-uks-approach-to-tackling-modern-slavery-through-the-aid-programme/>

<sup>17</sup> Civil Service Blog (2021) *Don’t Stagnate – Evaluate to innovate.* Available at: <https://civilservice.blog.gov.uk/2021/08/09/dont-stagnate-evaluate-to-innovate/>

<sup>18</sup> Bryant, K., & Joudo, B. F. (2019). What works? Lessons learned in case management. Perth: Walk Free Foundation, Bryant, K., and Landman, T. (2020) ‘Combatting Human Trafficking since Palermo: What Do We Know about What Works?’, *Journal of Human Trafficking*, Published online: 01 Mar 2020, Cockayne, J. (2021) Synopsis, *Developing Freedom: The Sustainable Development Case for Ending Modern Slavery, Forced Labour and Human Trafficking.* Available at: <https://www.developingfreedom.org/report/>, See also, *Delta 8.7 Policy Guides* <https://delta87.org/2021/04/delta87-policy-guides-and-data-patterns/>

<sup>19</sup> For example, a [project](#) currently being funded by the Modern Slavery PEC, led by Kings College London, is producing a Modern Slavery Core Outcome Set informed by those with lived experience.

*not using forced or trafficked labour, so that consumers in the UK can be equally confident that the goods and services they buy are free from slave labour.”*

22. **A significant amount of research has been undertaken since 2014 on modern slavery in supply chains** and this continues to be an area of interest to many researchers. The Modern Slavery PEC has funded ten [projects](#) related to supply chains as well as publishing a [Policy Brief](#) on the effectiveness of forced labour import bans.
23. **Modern slavery in supply chains is a highly complex issue and there is therefore a need to explore the potential use of a range of policy levers to address it**, including transparency and reporting legislation, investor and consumer tools and guidance, due diligence obligations and import restrictions. The Modern Slavery PEC is publishing a series of Policy Briefs on the effectiveness of different policy levers.
24. **Research funded by the Modern Slavery PEC has shown that there are limited levels of compliance with the minimum requirements of section 54 of the Modern Slavery Act** and that, even where businesses are compliant, there is limited evidence linking the length or sophistication of modern slavery statements with increased corporate action on modern slavery or greater insight into a company's modern slavery supply chain risks.<sup>20</sup> Another research project found that 80% of supply chain and procurement practitioners believe stronger legislation is needed in relation to the Modern Slavery Act's corporate reporting requirements.<sup>21</sup> Internationally, there is increasing momentum in support of mandatory human rights due diligence legislation, including the prospect of a legislative initiative at EU level.

25. **Recommendation:** The UK Government has set out its intention to strengthen section 54 of the Modern Slavery Act 2015, including in particular its monitoring and enforcement. The UK Government should identify and commit to a suitable legislative vehicle through which to do this and set out a clear timetable for its introduction. With a view to aligning with emerging international standards and to ensuring a level playing field for UK businesses, the new Modern Slavery Strategy could explore how proposed changes to section 54 relate to international mandatory human rights due diligence legislation.

26. **Investors have a significant role to play in preventing and mitigating the risk of modern slavery in global supply chains, but that role needs further exploration.** In particular, there is a need for focused efforts to improve the quality, coverage and accessibility of modern slavery data in order to support efforts to integrate modern slavery risk into investment decision-making.<sup>22</sup>

27. **Recommendation:** The new Modern Slavery Strategy should include a strategic focus on further exploring and supporting the potential role of investors in acting to address modern slavery.

<sup>20</sup> Hsin, L. et al. (2021) *Effectiveness of Section 54 of the Modern Slavery Act: Evidence and Comparative Analysis*. Modern Slavery Policy and Evidence Centre. Available at: <https://modernslaverypec.org/assets/downloads/TISC-effectiveness-report.pdf>.

<sup>21</sup> Pinnington, B. et al. (2021) *Implications of Covid-19 for Modern Slavery Challenges in Supply Chain Management*. Modern Slavery Policy and Evidence Centre. Available at: <https://modernslaverypec.org/assets/downloads/MSPEC-Supply-Chain-Management-Research-Summary.pdf>.

<sup>22</sup> Ostmann, F. et al. (2021) *Data for Investor Action on Modern Slavery*. Modern Slavery Rights Policy and Evidence Centre. Available at: <https://modernslaverypec.org/assets/downloads/Investors-data-summary.pdf>.

**28. Recommendation:** The UK Government should commit to supporting the development of investor-focused tools and solutions that would provide the necessary data to inform and facilitate investor action on modern slavery. The Home Office, in collaboration with BEIS, should also explore the production of guidance on how investors can best assess modern slavery risks.

## International

**29. The 2020 ICAI report<sup>23</sup> made a number of recommendations on the UK's approach to tackling modern slavery internationally through the aid programme.** These include the importance of investment in research, ensuring that future policy and programming is evidence-based, and improving the incorporation of survivor perspectives. The government's commitment to respond to the ICAI recommendations provides an important opportunity to build on aspirations for global leadership in this area in a way that is evidence-based and survivor-informed. The ICAI recommendations align closely with the aims and objectives of the Modern Slavery PEC, which is well placed to contribute evidence that will address them, and help with the ongoing development of the UK's international strategy.

**30. There is a growing evidence base on the links between modern slavery and other key international development strategy priorities.** This is notably on climate change, but also on outcomes in health, education and wider objectives on poverty reduction and societal resilience.<sup>24</sup> The FCDO-funded 'Developing Freedom' research suggests that anti-slavery efforts could contribute to achieving 113 of the 169 SDG targets.<sup>25</sup> Modern slavery impedes both human rights and economic development. Activity to address modern slavery should therefore be a crucial part of the UK's work in achieving sustainable development. There is, however, a need for more evidence to inform development of new rules on due diligence and the introduction and implementation of forced labour import bans.<sup>26</sup>

**31. Recommendation:** International action on modern slavery should be based on high quality research and evidence that examines the effectiveness of different options and measures open to the UK or are being used by other countries and international actors.

**32. International trade, trade agreements, and membership of inter-governmental political forums such as the G7 offer significant opportunities for the UK to push forward international efforts to address modern slavery.** The October 2021 G7 Trade Ministers' Statement on Forced Labour recognised that trade policy can be an important tool to address forced labour in global supply chains.<sup>27</sup> There is an appetite for further international collaboration in this area, including from prominent businesses, and the UK is well placed to play a full role in new rules on international trade that could mitigate risks of modern slavery. However, it is very important that international efforts in

<sup>23</sup> Independent Commission for Aid Impact (2020) *The UK's approach to tackling modern slavery through the aid programme*. Available at: <https://icai.independent.gov.uk/report/the-uks-approach-to-tackling-modern-slavery-through-the-aid-programme/>

<sup>24</sup> Modern Slavery Policy and Evidence Centre (2021) *Policy Brief: Modern slavery and international development: Future opportunities for policy and evidence in the UK*. Available at: <https://modernslaverypec.org/resources/modern-slavery-international-development>

<sup>25</sup> Cockayne, J. (2021) Synopsis, *Developing Freedom: The Sustainable Development Case for Ending Modern Slavery, Forced Labour and Human Trafficking*. Available at: <https://www.developingfreedom.org/report/>

<sup>26</sup> Modern Slavery Policy and Evidence Centre (2021) *Policy Brief: Effectiveness of forced labour import bans*. Available at: <https://modernslaverypec.org/resources/forced-labour-import-bans>

<sup>27</sup> HM Government (2021) *G7 Trade Ministers' Statement on Forced Labour*. Available at: <https://www.gov.uk/government/news/g7-trade-ministers-statement-on-forced-labour-annex-a>

this area are linked to sustainable development objectives, based on equitable partnership, and include the voice of those who experience modern slavery.

**33. Recommendation:** The new Modern Slavery Strategy should include a strategic focus on international trade as a lever to address modern slavery in supply chains, and detail on how the UK will implement commitments made through the G7 Trade Track.

**34. Recommendation:** Engagement on modern slavery via entities such as the G7 should be complemented by enhanced mechanisms to deliver the Government's commitment to an equitable approach, for example by involving survivors in policy and programming, and greater emphasis on collaborative and community-centred partnership work that brings to the fore insights and perspectives from low and middle-income countries.

## Prevention

- 35. In the 2014 Strategy, "Prevent" was focused narrowly on preventing potential offenders from engaging in modern slavery crimes, but since then the Government appears to have expanded the focus of "Prevent" in ways which are welcome.** The 2020 UK Annual Report on Modern Slavery<sup>28</sup> noted that *"Prevent activity aims to stop people from committing modern slavery crimes or becoming victims of modern slavery in the first place. It also focuses on preventing re-offending and re-victimisation"*. In October 2021, the Home Office launched a Modern Slavery Prevention Fund (MSPF) to award grant funding to practitioners to run prevention interventions aimed at stopping modern slavery in the UK, which will run to end March 2022.
- 36. Recent research has found that prevention is viewed as an underdeveloped aspect of the response to modern slavery and there is appetite across the sector for a unifying definition of prevention.**<sup>29</sup> This research, which considered a public health approach to modern slavery, proposed a "BEST prevention framework" to conceptualise prevention, comprising action **B**efore (harm has happened i.e. primary prevention), **E**arly/**S**econdary action (that stops the problem early i.e. secondary prevention) and **T**reat action (reducing harm once it has happened i.e. tertiary prevention).
- 37. Under this public health framing of prevention, a significant amount of Government activity on modern slavery is preventative,** even if it is not labelled as such. For example, policy activity on transparency in supply chains can be seen as a form of primary prevention because it aims to mitigate risks of slavery from happening within supply chains. The provision of support to potential victims through the National Referral Mechanism can be conceived as tertiary prevention, because it is focused on minimising harm which has already taken place. Tertiary prevention appears to align with the "Protection" element of the international 3Ps approach, suggesting there might be value in framing tertiary prevention as protective, and emphasising primary and secondary prevention in the UK Government's future prevention activity.
- 38. Wider Government activity is likely to have potential preventative effects on modern slavery,** for example the PEC's Policy Brief on Covid-19 and modern slavery<sup>30</sup> found that Government interventions introduced during the pandemic, such as furlough

<sup>28</sup> HM Government (2020) *UK Annual Report on Modern Slavery, October 2020*. Available at: <https://www.gov.uk/government/publications/2020-uk-annual-report-on-modern-slavery>

<sup>29</sup> Such, E. et al. (2021) *Refining a public health approach to modern slavery*. Available at: <https://www.antislaverycommissioner.co.uk/media/1606/final-report-24-may-21.pdf>

<sup>30</sup> Modern Slavery Policy and Evidence Centre (forthcoming) *Policy Brief: The impact of the Covid-19 pandemic on modern slavery*.

schemes and accommodation for homeless individuals, likely reduced vulnerability to exploitation. However, the causal links between modern slavery and wider laws and policies are not well understood and there is a need for further research on how to design wider policies to safeguard against increased modern slavery risk, for example the design of immigration and asylum policies. The Modern Slavery PEC currently has an open research call for projects to build evidence on this topic in order to inform the integration of safeguards and measures to mitigate against risks of modern slavery into the design of wider laws and policies.

39. **The Modern Slavery PEC has commissioned research on prevention interventions in the UK which is due to report early 2022.** This research is examining ‘what could or does work to prevent modern slavery in the UK?’ with a specific focus on interventions to address adult sexual and labour exploitation. The research will draw on a review of existing evidence, and consultation with frontline practitioners and individuals with lived experience of modern slavery.
40. **The Home Office has estimated that modern slavery costs the UK economy between £3.3-4.3bn per year and the average unit cost of modern slavery per victim of exploitation in the UK is £328,720.**<sup>31</sup> These estimates are based upon factors such as lost output and time, and costs associated with healthcare, victim support and law enforcement services. This shows that greater investment in prevention, as well as reducing harm for victims, will also reduce the wider economic impact of modern slavery overall.

41. **Recommendation:** There should be a stronger emphasis on preventing harm in the first place in the new Modern Slavery Strategy, underpinned by clearer definition of prevention, that reflects and accounts for the preventative effects of the wide range of Government activity already underway. The UK Government should consider the emerging evidence base on prevention in designing the strategy, including learnings from the evaluation of the MSPF and the PEC’s research. The UK Government should consider extending the MSPF beyond March 2022 to enable interventions to be delivered and evaluated over a longer time period.

42. **Prevention often involves a focus on the role of consumers, especially raising their awareness of modern slavery.** Emerging evidence suggests consumers have a potentially important role to play, but that role needs further exploration. The 2014 Strategy said: “...we must ensure that consumers here are not unwittingly creating demand for modern slavery elsewhere.” Research has shown, however, that awareness-raising is not enough to change consumer behaviour – it is also essential to identify clear actions that particular audiences can take.<sup>32</sup>

43. **Recommendation:** The new Modern Slavery Strategy should include a focus on further exploring and supporting the potential role of consumers in acting to address modern slavery. Future prevention work should be mindful of evidence suggesting the limitations of consumer-facing awareness-raising campaigns in terms of their limited ability to demonstrate behaviour change.

<sup>31</sup> Home Office (2018) *The Economic and Social Costs of Modern Slavery*. Available at: <https://www.gov.uk/government/publications/the-economic-and-social-costs-of-modern-slavery>

<sup>32</sup> Carrington, Michal, et al. (2021) *Addressing Consumer Awareness and (in)Action towards Modern Slavery*. Modern Slavery and Human Rights Policy and Evidence Centre. Available at: <https://doi.org/10.36399/gla.pubs.255488>.

## Survivor identification and support

44. **The 2014 Modern Slavery Strategy set objectives to reduce harm from modern slavery through improved victim identification and enhanced support under “Prepare”**, although this framing was amended to “Victim Identification and Support” in the 2020 UK Annual Report on Modern Slavery.
45. **The context for providing support to survivors has developed markedly since 2014.** The number of people being referred to the National Referral Mechanism (NRM) has increased from 2,337 in 2014 to 10,613 in 2020, with an increasing proportion of child referrals.<sup>33</sup> The NRM has undergone several reforms during this period, with an NRM Transformation Programme currently underway. There has been an increased focus on tailoring multi-disciplinary end to end support to individual recovery needs and adaptations to decision-making<sup>34</sup>. The number of people suspected by specified public authorities to be victims of modern slavery who do not give consent to enter the NRM<sup>35</sup> has seen an increase from around 750 when records began in 2016 to 2,178 in 2020.<sup>36</sup> The New Plan for Immigration signalled an intention to further strengthen the ‘front end’ of the NRM system, in terms of the identification of people with lived experience by First Responders.<sup>37</sup>
46. **Existing research on survivor support and evaluations of support interventions have typically focused on people’s outcomes whilst they are in receipt of support.** Improving survivor recovery and support and understanding longer-term outcomes are priority research areas for the Modern Slavery PEC<sup>38</sup> and for multiple stakeholder groups working to address modern slavery.<sup>39</sup> Through an Arts and Humanities Research Council (AHRC) open call process, the Modern Slavery PEC has funded five research projects which are exploring both adult and young survivor-informed longer-term outcomes and indicators of well-being and recovery.<sup>40</sup> We have launched calls for research on adult survivors’ experiences of access to legal advice; improving the identification of adult survivors; and evaluating the provision of distributed technology to adult survivors.
47. **Provisions in the Nationality and Borders Bill would present numerous changes to NRM decision-making processes for survivors with an asylum or human rights claim.** The Bill is currently undergoing public scrutiny and our response to the Joint

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<sup>33</sup> Home Office (2021) *Modern Slavery: National Referral Mechanism and Duty to Notify Statistics UK, End of Year Summary, 2020*. Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/970995/modern-slavery-national-referral-mechanism-statistics-end-year-summary-2020-hosb0821.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/970995/modern-slavery-national-referral-mechanism-statistics-end-year-summary-2020-hosb0821.pdf)

<sup>34</sup> HM Government (2020) *UK Annual Report on Modern Slavery, October 2020*. Available at:

<https://www.gov.uk/government/publications/2020-uk-annual-report-on-modern-slavery>

<sup>35</sup> As captured by ‘Duty to Notify’ statistics

<sup>36</sup> Home Office, *Modern Slavery: National Referral Mechanism and Duty to Notify Statistics UK, End of Year Summary, 2020*, 18 March 2021

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/970995/modern-slavery-national-referral-mechanism-statistics-end-year-summary-2020-hosb0821.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/970995/modern-slavery-national-referral-mechanism-statistics-end-year-summary-2020-hosb0821.pdf)

<sup>37</sup> HM Government (2021) *A New Plan for Immigration Policy Statement*, Available at:

<https://www.gov.uk/government/consultations/new-plan-for-immigration>

<sup>38</sup> Modern Slavery Policy and Evidence Centre (2021) *Strategy 2021-2024*. Available at:

<https://modernslaverypec.org/resources/strategy>

<sup>39</sup> Modern Slavery Policy and Evidence Centre (2020) *Consultation on the Modern Slavery PEC Research Priorities*. Available at: <https://modernslaverypec.org/resources/report-consultation-on-the-modern-slavery-pec-research-priorities>

Centre for the Study of International Slavery, *Fresh Start: Integrating Survivors of Modern Slavery*, 2017, p.29

[https://www.liverpool.ac.uk/media/livacuk/csis/Fresh\\_Start\\_A5.pdf](https://www.liverpool.ac.uk/media/livacuk/csis/Fresh_Start_A5.pdf) ;

Centre for Social Justice and Justice & Care, *It Still Happens Here: Fighting UK Slavery in the 2020s*, July 2020,

<https://www.centreforsocialjustice.org.uk/wp-content/uploads/2020/07/It-Still-Happens-Here.pdf>;

Independent Anti-Slavery Commissioner, *Annual Report 2020-21*, July 2021 p.86

<https://www.antislaverycommissioner.co.uk/media/1642/independent-anti-slavery-commissioner-annual-report-2020-2021.pdf>

<sup>40</sup> Modern Slavery PEC launches five new projects on survivor recovery, 8 September 2021

<https://modernslaverypec.org/latest/survivor-recovery-project-launch>

Human Rights Committee's call for evidence on the Bill<sup>41</sup> has outlined some areas where the Committee may wish to ask for further clarification from the government on compatibility with relevant human rights standards and on how several provisions will operate in practice, to ensure the Bill does not give rise to a risk of breaches in individual cases. We also make suggestions about the data and evidence that should be collected to monitor whether provisions are operating in line with stated policy objectives.

**48. Recommendation:** There should be a continuing focus in the new Modern Slavery Strategy on tailoring support to individual recovery needs. This would present opportunities for developing survivor-informed definitions of recovery and promoting survivor inclusion in the design of support and identification initiatives (see paragraph 70 for recommendations on how to engage survivors).

**49. Recommendation:** There should be increased strategic focus given to improve the identification of survivors at the point of referral to the NRM. The UK government should consider the emerging evidence base on survivors' decisions not to enter the NRM and how services can most effectively identify people with lived experience of modern slavery.<sup>42</sup>

## Disruption and prosecution of modern slavery offending

**50. The 2014 Strategy and the Modern Slavery Act 2015 had a strong focus on disruption and prosecution of offending.** There have been multiple reviews of the criminal justice provisions contained within the Modern Slavery Act 2015.<sup>43</sup> Common themes across these reviews include: concerns around the relatively low number of prosecutions under the Modern Slavery Act 2015; the need for greater training and awareness of law enforcement and prosecution practitioners; barriers to engaging victims in the criminal justice process; limited uptake of some of the tools introduced by the Act (e.g. Slavery and Trafficking Reparation Orders) and challenges with operationalising the statutory defence (section 45 of the Act). In October 2021, the Home Office launched £350k grant funding for police forces and the GLAA to bid into, to deliver measures to support adult victims of modern slavery in engaging with the Criminal Justice System.<sup>44</sup>

**51. Legal enforcement of modern slavery is a key research area for the PEC and we are currently undertaking an evidence review of the criminal justice provisions contained within the Modern Slavery Act,** through a work strand led by the Wilberforce Institute, University of Hull. To date, this review has focused on evidence about the statutory defence under section 45 of the Modern Slavery Act. Emerging findings highlight how there is very limited academic research on the statutory defence, and a lack of quantitative data on how it is used.<sup>45</sup> Case law continues to challenge and query evidential matters relating to the implementation of section 45.

<sup>41</sup> Modern Slavery Policy and Evidence Centre (forthcoming) *Response to the Joint Committee on Human Rights (JCHR) call for evidence on the Nationality and Borders Bill, September 2021*.

<sup>42</sup> The Modern Slavery PEC has launched an open call for research exploring these themes <https://modernslaverypec.org/latest/call-research-identification-survivors>

<sup>43</sup> Bristow, J. & Lomas, H. (2020) *The Modern Slavery Act 2015 Statutory Defence: A Call for Evidence*. Available at: <https://www.antislaverycommissioner.co.uk/media/1478/the-modern-slavery-act-2015-statutory-defence-call-for-evidence.pdf>  
Field, F., Miller, M., Butler-Sloss, E. (2019) *Independent Review of the Modern Slavery Act 2015: Final Report*. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/803406/Independent\\_review\\_of\\_the\\_Modern\\_Slavery\\_Act\\_-\\_final\\_report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/803406/Independent_review_of_the_Modern_Slavery_Act_-_final_report.pdf)  
Haughy, C. (2016) *The Modern Slavery Act Review*. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/542047/2016\\_07\\_31\\_Haughy\\_Review\\_of\\_Modern\\_Slavery\\_Act\\_-\\_final\\_1.0.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/542047/2016_07_31_Haughy_Review_of_Modern_Slavery_Act_-_final_1.0.pdf)

<sup>44</sup> HM Government (2021) *Supporting victims of modern slavery in the Criminal Justice System*. Available at: <https://www.contractsfinder.service.gov.uk/Notice/b2880470-fc96-49d3-95c1-54752c0f04fc>

<sup>45</sup> Kidd, A. (forthcoming) *Evidence Review of Section 45 of the Modern Slavery Act 2015*.

**52. Recommendation:** The new Modern Slavery Strategy should include a strategic focus on how Government and law enforcement agencies will promote greater use of the powers and tools contained within the Modern Slavery Act 2015. The Home Office should ensure the new £350k grant fund includes an evaluative element to generate best practice on engaging victims in the criminal justice system.

## Impact of Covid-19 pandemic on modern slavery

**53. A Modern Slavery PEC policy brief sets out the significant impact of the Covid-19 pandemic on the scale and nature of modern slavery.**<sup>46</sup> Research has shown that vulnerability to modern slavery increased across the world and within the UK as a result of the pandemic, particularly among certain groups (including migrant workers, those in informal employment and women). There is evidence of an increase in the risk of forced labour both in supply chains that experienced demand spikes (e.g. PPE production) and in those that experienced a significant reduction in demand. Within the UK, identification of potential victims in situations of exploitation was particularly affected by lockdowns. The increased vulnerability to modern slavery is likely to persist for at least the next 1-3 years.

**54. Recommendation:** The UK Government should take account of the evidence-based recommendations made in the PEC Policy Brief about addressing modern slavery in the context of the Covid-19 pandemic and other crises. This includes a recommendation to ensure the new Modern Slavery Strategy takes account of the impact of the pandemic on the scale and nature of modern slavery in the UK.

## Theme 3: Modern slavery data

**55. For the purposes of this Briefing, we have limited our consideration of modern slavery data to focus on data which are collected and published by the UK Government.** We recognise that many other organisations, such as police forces and NGOs, have an important role to play in collecting, analysing and disseminating data on modern slavery.

**56. The PEC recognises that the UK Government collects data on modern slavery for a range of purposes,** and some data (such as NRM data) may be used to meet more than one of these purposes. Purposes of data collection include, but are not limited to:

- a. Gathering information that is necessary to enable the Government to fulfil its statutory obligations, for example data is collected through the NRM process to enable the Government to identify and support potential victims.
- b. Understanding the nature and scale of modern slavery in the UK, and any emerging trends, to help inform the design and implementation of policies to address modern slavery. For example, the Duty to Notify data provides information on the number and characteristics of potential adult victims who do not consent to be referred to the NRM.
- c. Monitoring and measuring the effectiveness of Government laws and policies. This may be data that is collected on an ongoing basis, for example Ministry of

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<sup>46</sup> Modern Slavery Policy and Evidence Centre (forthcoming) *Policy Brief: The impact of the Covid-19 pandemic on modern slavery*. Also see references under footnote 43.

Justice prosecutions data, or data that is collected ‘one-off’, such as to support an evaluation of a specific policy or programme.

**57. Recommendation:** The UK Government should consider using the new Modern Slavery Strategy as a vehicle for setting out the full range of data it collects on modern slavery, and for what purpose, and which of these datasets are published. This would enable the Government to enhance transparency and clarity for stakeholders using modern slavery data.

**58. There are opportunities for the UK Government to improve the transparency and accessibility of the existing modern slavery data it collects and publishes.** This would enable researchers to help Government by identifying patterns and trends in modern slavery, local agencies to better understand what is happening in their areas and would also enable more independent scrutiny of the effectiveness of Government policies. Greater data transparency would also have the added benefit of reducing the burden on Government departments to provide bespoke data cuts through other means, such as Freedom of Information Requests or Parliamentary Questions. Suggestions for improvement include:

- a. **NRM data:** PEC research<sup>47</sup> has made several recommendations linked to improving the quarterly NRM statistics published by the Home Office. For example, expanding the number of different data ‘breakdowns’ published in the data tables, such as regional breakdowns to enable greater local understanding of trends, and publishing NRM decision outcomes by different characteristics (such as nationality, gender, age and exploitation type) to understand patterns in NRM decisions. The PEC has previously recommended that the Home Office explores publishing NRM data in open data tables, similar to the approach used for police recorded crime data. This would enable users to cross-tabulate<sup>48</sup> different variables and reduce the need for the Home Office to publish aggregate data tables. Care would need to be taken around issues of statistical disclosure and ensuring that publishing open data does not compromise the anonymity of potential victims. Options could be explored around hosting open NRM data tables in a safeguarded way through the UK Data Service.<sup>49</sup>
- b. **Supply chains data:** It is welcome that the Government’s Modern Slavery Statements registry enables users to download statement data<sup>50</sup> and the Home Office could consider analysing and publishing summary data charts (or even a live dashboard with key metrics) to provide a snapshot of the key information contained in the registry. Any data charts or dashboard should include statistics on levels of compliance with Section 54 of the Modern Slavery Act, broken down by sector if possible, to support efforts to hold businesses to account for their efforts. The Government’s Modern Slavery Assessment Tool<sup>51</sup> collects data from suppliers to assist Government to work in partnership with suppliers to identify and manage modern slavery risks. The Cabinet Office could consider enabling researchers to access anonymised and/or aggregate data from the Tool to identify common patterns and trends across the Government’s supplier base, which would assist in informing departmental Modern Slavery Statements.

<sup>47</sup> Modern Slavery Policy and Evidence Centre (2021) *Policy Brief: Impact of Covid-19 on identification of potential victims of modern slavery in the UK in 2020*. Available at: <https://modernslaverypec.org/resources/impact-covid-identification-modern-slavery-uk-2020> Schwarz, K. et al. (2021) *The top 20 source countries for modern slavery victims in the UK, Comparative report* <https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2021/april/the-top-20-source-countries-for-modern-slavery-in-the-uk.pdf>

<sup>48</sup> A cross-tabulation is a two (or more) dimensional table that shows the number of cases that have specific characteristics. A cross-tabulation makes it easier to see patterns and trends across a dataset.

<sup>49</sup> UK Data Service access levels and conditions are set out here: <https://ukdataservice.ac.uk/find-data/access-conditions/>

<sup>50</sup> HM Government (no date) *Modern Slavery Statement Registry*. Available at: <https://modern-slavery-statement-registry.service.gov.uk/>

<sup>51</sup> HM Government (no date) *Modern Slavery Assessment Tool*. Available at: <https://supplierregistration.cabinetoffice.gov.uk/msat>

- c. **Maximising transparency around how existing data has informed modern slavery policies and laws:** For example, the PEC's submission to the JCHR on the Nationality and Borders Bill found that data published by the Home Office does not contain sufficient information to make an informed judgment about Ministers' assertions around the scale of misuse of the NRM system.

59. **Recommendation:** The UK Government should explore the options listed above, to improve the transparency and accessibility of existing modern slavery data.

60. **There are several modern slavery policies and laws on which the Government does not currently appear to collect any data.** This limits the ability of Government and other organisations to understand how policies are working in practice. Research has identified the following as particularly significant gaps in data collection:
- a. The lack of quantitative data collected on the use of the statutory defence (under section 45 of the Modern Slavery Act 2015) means there is no accurate understanding of the scale and nature of cases where the defence has been raised. Improving data on this is important given reports have highlighted a number of issues with how the defence is operating in practice.<sup>52</sup>
  - b. The lack of quantitative data collected on legal aid. There is no complete data collected on the numbers of survivors of modern slavery who have been able to access legal aid and for what purposes. This is required to provide a fuller picture of survivors' access to justice.

It is not currently clear what data the Government may collect in relation to the implementation of the Nationality and Borders Bill. The PEC's submission to the JCHR on the Bill set out suggestions for data points to collect to monitor the operation of the modern slavery provisions in that Bill.

61. **Recommendation:** Through the new Modern Slavery Strategy, the UK Government should set out its priorities for new data collection in relation to modern slavery policies and laws.

62. **Data is essential for measuring and monitoring the progress made under the new Modern Slavery Strategy.** A previous Public Accounts Committee inquiry found that the Government did not set out clear measures for what success would look like under the 2014 Strategy or have a holistic performance framework in place, underpinned by data.<sup>53</sup>

63. **A performance framework for a new Modern Slavery Strategy could flow from the overall strategic framework and objectives,** which could in turn define a set of outcomes the Government aims to achieve through the strategy. Data could be collected to measure these outcomes over time. There is emerging good practice from other countries, for example the Australian National Action Plan includes a commitment to develop a Monitoring and Evaluation Framework to track progress against short-, medium- and long-term outcomes, and the Scottish Government Human Trafficking Strategy contains a set of progress measures. 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.

64. **Recommendation:** The Government should develop a performance framework for the new Modern Slavery Strategy to set out what quantitative and qualitative data will be collected to measure and monitor progress.

<sup>52</sup> See references under footnote 43.

<sup>53</sup> Public Accounts Committee (2018) *Reducing Modern Slavery*. Available at: <https://publications.parliament.uk/pa/cm201719/cmselect/cmpubacc/886/88602.htm>

## Theme 4: Survivor Involvement in modern slavery research and policymaking

65. **There was no explicit mention of survivor engagement in the 2014 Strategy.** In the 2020 UK Annual Report, the UK Government outlined a commitment to embedding survivors' voices in future policy.
66. **There is broad agreement across the modern slavery sector on the importance of recognising survivors as experts by experience** and there is increasing recognition that meaningful engagement of survivors must go beyond efforts to understand the needs of survivors as beneficiaries of services or interventions or as participants in research projects.
67. **Good practice toolkits are available** on the fundamentals of survivor inclusion<sup>54</sup>, survivor involvement in research<sup>55</sup>, policymaking<sup>56</sup>, safeguarding in international development,<sup>57</sup> as well as on building survivor-informed organisations.<sup>58</sup>
68. **At the Modern Slavery PEC, we recognise that meaningful engagement with survivors with diverse experiences is essential if we want to make a significant impact.** We are committed to creating employment opportunities for survivors, integrating survivor expertise into our governance structure through the creation of a Survivor Standing Committee and to ensuring that those with lived experience of modern slavery inform the selection, design, production and uptake of research on modern slavery.<sup>59</sup> We have recently funded a portfolio of five innovative research projects<sup>60</sup> on the theme of long-term outcomes for survivors which are exploring different approaches to survivor inclusion and leadership in research and the impact this has on well-being, which will contribute to this emerging evidence base.<sup>61</sup>
69. **Emerging lessons from this evidence base, PEC's experience to date and from others working to address modern slavery include:** recognising when survivor engagement is tokenistic or extractive and taking steps to avoid this; understanding the importance of early inclusion of survivors, including in the design phase of the initiative

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<sup>54</sup> Survivor Alliance, Fundamentals of Survivor Inclusion

<https://www.survivoralliance.org/survivor-inclusion>

<sup>55</sup> Survivor Voices (2019) *Survivor Research Involvement Ladder*.

<https://survivorsvoices.org/involvement-ladder/>

The Anti Trafficking Monitoring Group (2021) *Agents for Change Survivor peer researchers bridge the evidence and inclusion gap*

<https://www.antislavery.org/wp-content/uploads/2021/06/Agents-For-Change-PDF.pdf>

Focus on Labour Exploitation (2021) *Experts by Experience: Conducting Feminist Participatory Action Research with Workers in High-Risk Sectors*

<https://www.labourexploitation.org/publications/experts-experience-conducting-feminist-participatory-action-research-workers-high-risk>

<sup>56</sup> University of Nottingham Rights Lab (2020) *Nothing about us, without us: Survivor involvement in anti-slavery policy*

[https://www.antislaverycommissioner.co.uk/media/1395/rights\\_lab\\_survivor\\_involvement\\_guide\\_final\\_2020.pdf](https://www.antislaverycommissioner.co.uk/media/1395/rights_lab_survivor_involvement_guide_final_2020.pdf)

<sup>57</sup> Balch et al. (2021) *Safeguarding in International Development Research* UKCDR – UK Collaborative on Development Research <https://www.ukcdr.org.uk/resource/guidance-on-safeguarding-in-international-development-research/>

<sup>58</sup> Administration for Children & Families Office on Trafficking in Persons and National Human Trafficking Training and Technical Assistance Center (2019) *Toolkit for Building Survivor-Informed Organizations*

[https://static1.squarespace.com/static/5ee517995ce62276749898ed/t/5f2153265fc11d7703a5d8db/1596019499993/toolkit\\_for\\_building\\_survivor\\_informed\\_organizations-2.pdf](https://static1.squarespace.com/static/5ee517995ce62276749898ed/t/5f2153265fc11d7703a5d8db/1596019499993/toolkit_for_building_survivor_informed_organizations-2.pdf)

<sup>59</sup> Modern Slavery PEC (2021) *Strategy 2021-2024* <https://modernslaverypec.org/resources/strategy>

<sup>60</sup> Modern Slavery PEC launches five new projects on survivor recovery, 8 September 2021

<https://modernslaverypec.org/latest/survivor-recovery-project-launch>

<sup>61</sup> Delta 8.7 Justice Policy Guide, 2021 [http://collections.unu.edu/eserv/UNU:8067/Delta87\\_JusticePolicyGuide.pdf](http://collections.unu.edu/eserv/UNU:8067/Delta87_JusticePolicyGuide.pdf)

and in planning survivor engagement; appropriate compensation,<sup>62</sup> committing sufficient time and resources to consider safeguarding and ethics implications, to build a relationship of trust and provide any capacity building or support; establish meaningful feedback loops on how survivor input has been used.

**70. Recommendation:** The UK Government should make a clear commitment to embed the inclusion of survivors in research and policy development and set short-, medium- and long-term objectives for how it intends to do so. It should take account of emerging good practice in involving survivors in research, policymaking, and the selection and design of UK interventions in upstream countries. The UK government should draw on existing good practice when conducting its own survivor engagement, whilst recognising that it might not be best placed to engage with survivors directly and should explore using intermediaries with the requisite skills and experience.

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<sup>62</sup> Survivor Alliance, Fundamentals for Compensation & Expenses  
<https://static1.squarespace.com/static/5ee517995ce62276749898ed/t/5f215040f8e6f3150fa2d783/1596018752491/FUNDAMENTALS-FOR-COMPENSATION-EXPENSES.pdf>