

INDEPENDENT ANTI-SLAVERY  
COMMISSIONER  
ANNUAL REPORT 2021-2022



**Independent Anti-Slavery Commissioner**

# **Annual Report 2021-2022**

Presented to Parliament pursuant to Section 42 (10) (b) of the  
Modern Slavery Act 2015

April 2022



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# Foreword

## Dame Sara Thornton – Independent Anti-Slavery Commissioner

This is my third and final annual report as the Independent Anti-Slavery Commissioner.

This review accounts for my work, and that of my small team, in support of the objectives set in my Strategic Plan 2019-2021 which was laid before Parliament by the Home Secretary in October 2019. The plan outlined four priorities: improving victim care and support; supporting law enforcement and prosecution; focussing on prevention; and getting value from research and innovation. Unlike previous years I have been unable to include comprehensive data tables because of the need to lay this report in Parliament before the end of my appointment.

Over the last three years thousands of victims have been identified and supported by charities and through the Modern Slavery Victim Care Contract. I have been impressed by the compassion and dedication of those who provide support and while systems are not perfect, UK arrangements compare very favourably with those in other countries. The great weakness in the system is the decision making process which is subject to significant delays. In 2021 the average number of days a victim waited for a conclusive grounds decision was 568 days and some victims have been waiting since 2016 for a decision. This is completely unacceptable and while I have supported the Home Office in their work to reform the system it remains dysfunctional. I have concluded that it is time to move away from a centralised approach which is clearly failing victims. Trafficking decisions should be made locally by multi-disciplinary teams who have expertise and knowledge.

In the last twelve months I have been deeply concerned about the impact on victims of the New Plan for Immigration and the Nationality and Borders Bill. I will leave immigration policy experts to comment on legislation which seeks to punish the most desperate refugees who are willing to take dangerous routes to reach the United Kingdom. My concern has been the proposals for modern slavery. While I welcome the clauses which place support for victims on a statutory footing, I remain most concerned about moves to withdraw support from some victims on account of their criminal past and the requirement for victims to make disclosures to a deadline or to risk undermining their credibility.

I have been delighted to see the rise in police investigations, prosecutions and convictions in the last year – albeit from a modest base point. Modern slavery and human trafficking is complex and complicated to investigate or to prosecute but it is essential that we send the strongest signal to traffickers that you will be pursued and your profits confiscated. In 2021 I therefore published two reports on financial investigation, and another on victim compensation in 2022, to encourage good practice. While police forces are under great pressure from competing priorities it is essential that they develop the capacity and capability to tackle this most heinous of crimes effectively. Good quality training, expert teams and clear governance are all key to effective enforcement.

While protecting victims and prosecuting offenders is vital, I have also focussed heavily on prevention. It is essential that we develop responses which address the economic, structural and cultural conditions which allow slavery to flourish across the globe. I remain convinced that a public health approach with its focus on prevention provides an excellent framework for anti-slavery strategy and have strongly recommended this to the Home Office and to local partnerships across the country. The development of a new government strategy for

modern slavery provides an excellent opportunity for central government to work with agencies across the country to join up policy and delivery in order to make impact for survivors but also to address the underlying causes which create vulnerability and criminal opportunity.

Forced labour taints many supply chains and we must encourage business to look for it and to eradicate it. Our Modern Slavery Act legislation on supply chains encourages transparency on the basis that abuse is endemic. Businesses which find forced labour should not be vilified for doing so but required to address the abuse with their suppliers and provide compensation for workers. In the last year I have continued to focus my work on high risk business sectors in the UK and on the influential financial services sector. Over three years I have found the business community to be highly responsive to my work and keenly aware that modern slavery poses both a salient and material risk to their business.

Throughout my three years I have acted with independence, sought to rely on evidence and data and listened to very different perspectives. I have tried to avoid activist bias while scrutinising the role of government and to avoid the temptation to address issues through the lens of what is currently in the news rather than taking a longer and deeper look. I have collaborated with numerous committed professionals who have helped me to do this and I have listened to the wisdom and insights of survivors. In all that I have done I hope that I have fulfilled the ambitions of Parliament when it created the role of Independent Anti-slavery Commissioner in 2015.

## Glossary

<b>APMIS</b>	Agencies and Partners Management Information System
<b>APPG</b>	All Party Parliamentary Group
<b>BASNET</b>	UK BME Anti-Slavery Network
<b>CPA UK</b>	Commonwealth Parliamentary Association UK
<b>CPS</b>	Crown Prosecution Service
<b>CQC</b>	Care Quality Commission
<b>ESG</b>	environmental, social and governance
<b>EUSS</b>	EU Settlement Scheme
<b>FCDO</b>	Foreign, Commonwealth and Development Office
<b>GLAA</b>	Gangmasters and Labour Abuse Authority
<b>GRETA</b>	Group of Experts on Action against Trafficking in Human Beings
<b>ICAI</b>	Independent Commission for Aid Impact
<b>ICTG</b>	Independent Child Trafficking Guardian
<b>IE</b>	Immigration Enforcement
<b>IECA</b>	Immigration Enforcement Competent Authority
<b>MoRiLE</b>	Management of Risk in Law Enforcement
<b>MSHT</b>	modern slavery and human trafficking
<b>MSOIC</b>	Modern Slavery and Organised Immigration Crime Unit
<b>MSU</b>	Home Office Modern Slavery Unit
<b>NCLCC</b>	National County Lines Co-ordination Centre
<b>NCA</b>	National Crime Agency
<b>NGO</b>	non-governmental organisation
<b>NPCC</b>	National Police Chiefs' Council
<b>NRM</b>	National Referral Mechanism
<b>OCG</b>	organised crime group
<b>OSCE</b>	Organization for Security and Co-operation in Europe
<b>PEC</b>	Modern Slavery and Human Rights Policy and Evidence Centre
<b>ROCU</b>	Regional Organised Crime Unit
<b>SCA</b>	Single Competent Authority
<b>SOC</b>	serious organised crime
<b>TISC</b>	transparency in supply chains
<b>TOEx</b>	The Tackling Organised Exploitation Project
<b>TSA</b>	The Salvation Army
<b>MSVCC</b>	Modern Slavery Victim Care Contract



**Figure 1: The Commissioner’s strategic priorities 2019-2021**

# The Commissioner's Advisory Panel

## Message from the chair: The Rt Rev Dr Alastair Redfern

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*“This annual report marks the end of Dame Sara’s tenure of office as Independent Anti-Slavery Commissioner. It provides a fitting testament to a huge range of ground breaking work, and illustrates the skill of the Commissioner and her team in identifying key issues needing to be addressed, and then being able to gain the confidence of all those involved, including victims, institutional operators, businesses, NGOs and government agencies – so that effective responses are encouraged and implemented.*

*The result has been targeted and highly effective research, high-level consultation and advice, the encouragement of better practices, and the more appropriate framing of policy options and issues. The Commissioner has become the go-to person for people and agencies across the sectors, while developing initiatives based upon her expert reading of such a huge range of concerns and aspirations.*

*It has been a privilege for the Advisory Panel to play a small part in this work which has created a broad and comprehensive platform for further improvements to the necessary legal frameworks, effective harnessing of lived experience and better schemes of identification and care for victims, and the urgent need for improving the protection and support for children and vulnerable young people.*

*The panel congratulate Dame Sara on providing such outstanding leadership as this report so clearly testifies. I hope that the next commissioner will be able to build upon it appropriately.”*

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## Purpose of the panel

The purpose of the Advisory Panel is to provide me with guidance, challenge and support. The panel meets quarterly and is comprised of a diverse body of experts from the modern slavery sector and beyond.

The Advisory Panel was reconstituted following my appointment as Commissioner in May 2019.

Panel members have agreed [Terms of Reference](#) which are available on my website. The Advisory Panel met four times in 2021-2022 and the [meeting minutes](#) are available on the website.

## Panel members

### **The Rt Revd Dr Alastair Redfern**

Chair, The Clewer Initiative

### **Lara Bundock**

CEO and Founder, The Snowdrop Project

**The Rt Hon. The Baroness Butler-Sloss GBE**

Co-Chair, All-Party Parliamentary Group (APPG) on Human Trafficking and Modern Slavery

**Michael Clarke**

CEO, The Passage

**Rt Hon. Fiona Mactaggart**

Chair, Agenda and Fawcett Society; former Co-Chair, APPG on Human Trafficking and Modern Slavery

**Julia Mulligan**

Independent Chair, Police Advisory Board for England and Wales; Non-Executive Director, Gangmasters and Labour Abuse Authority

**Dr Paul Rigby**

Lecturer in Social Work, University of Stirling

**Gillian Rivers**

Partner, Penningtons Manches Cooper

**Sir Bernard Silverman FRS**

Professor of Modern Slavery Statistics, Rights Lab, University of Nottingham

**Yasmin Waljee OBE**

Partner, International Pro Bono, Hogan Lovells

**Mel Wiggins MBE**

Former Project Coordinator, Freedom Acts

**The Baroness Young of Hornsey OBE**

Co-Chair, APPG on Ethics & Sustainability in Fashion, and APPG on Sport, Modern Slavery and Human Rights

## Priority 1: Improving victim care and support

1.1.1 Since my last annual report the number of potential victims of modern slavery identified has continued to rise. While this increase reflects to some extent heightened levels of awareness among practitioners which is welcome, I am acutely aware of the considerable pressures being placed on the system, both in terms of making trafficking decisions and in providing appropriate support for victims and survivors.

1.1.2 Aside from the encouraging developments over the past year in relation to the pilot to test devolved National Referral Mechanism (NRM) making for children and the continued rollout of the Independent Child Trafficking Guardianship (ICTG) service, there has been limited progress on other aspects of the NRM Transformation Programme. Despite engagement with the anti-slavery sector almost 18 months ago regarding proposed changes to the financial support policy for victims and survivors, only minimal changes have been made. In addition, we are now in year two of the new Modern Slavery Victim Care Contract (MSVCC), yet survivors are still not able to access the pre-NRM Places of Safety provision.

1.1.3 Access to decent employment, training, and education to gain knowledge and skills, as well as stable accommodation, are all fundamental components of sustainable independence for survivors however progress in these areas has been particularly slow. I am aware that there are pockets of good practice across the UK, but there is not yet a consistent approach that is accessible to all. We must do more to prevent re-trafficking and support the longer term outcomes for survivors.

1.1.4 Over the next few months it is anticipated that the UK Government's new Modern Slavery Strategy will be published. This provides a great opportunity to focus not only on the protection of victims, but the important steps that need to be taken to prevent re-trafficking and further harm. To be effective, a cross-Whitehall approach to this work is essential.

### Encouraging better identification and referrals

1.2.1 In 2021, 12,727 referrals were made into the NRM.<sup>1</sup> This represents a 20% increase on referrals made in 2020. This is especially significant given the continued impacts of the Covid-19 pandemic this year. In addition, the number of potential victims identified but who have not consented to an NRM referral and have consequently been referred into the Duty to Notify process has also increased, from 2,175 referrals in 2020 to 3,190 in 2021. The Modern Slavery and Exploitation Helpline received 8489 calls, webforms and app submissions in 2021, a 6% increase on contacts in 2020.<sup>2</sup>

1.2.2 Training continues to be an essential part of equipping frontline practitioners to identify potential victims. In June 2021 the Home Office published a further e-learning module for First

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<sup>1</sup> Home Office (2022), 'Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2021': <https://www.gov.uk/government/statistics/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-end-of-year-summary-2021>.

<sup>2</sup> Modern Slavery and Exploitation Helpline (2021), 'Helpline statistics': <https://www.unseenuk.org/helpline-statistics/>.

Responders with a focus on child trafficking<sup>3</sup> which I understand was accessed by more than 4000 unique users in the first three months.<sup>4</sup> E-learning cannot be a substitute for in person training, however I am pleased that the Home Office have fulfilled their commitment to produce this supplementary resource and that my office had the opportunity to contribute to its content. My office has also supported the Bakhita Centre for Research on Slavery, Exploitation and Abuse at St Mary's University in the development of a training standards framework for children.<sup>5</sup> This has been a good example of cross sector collaboration and I am now keen to see these standards implemented by organisations across the statutory and non-statutory sectors. The Victims and Partnerships lead from my office has continued to participate in the National Modern Slavery Training Delivery Group and I am encouraged to see some of the outputs from this group coming to fruition, for example a training package for the financial sector.

1.2.3 The introduction of the new MSVCC in January 2021 led to operational changes which highlighted the lack of availability of First Responders outside office hours. The Home Office have since established a forum for First Responders Organisations to engage and explore solutions for key challenges, with my office invited to join these discussions. While I welcome this forum in principle, I have not yet seen significant progress. There are examples of organisations within the sector who over two years ago expressed an interest in becoming a First Responder, however a formal process for making changes to this cohort has still not been implemented. If we are to have the best chance of identifying potential victims, it is essential that those who are designated as First Responders are adequately trained and well-positioned to identify victims of modern slavery in all its forms.

1.2.4 Other government departments also have a key role to play in the identification of potential victims and while progress has been slower than I had hoped, Her Majesty's Prisons and Probation Service (HMPPS) is now conducting an internal review of its response to modern slavery. The Ministry of Defence (MoD) has recently published its latest iteration of the Human Security in Defence Joint Service Publication (JSP), JSP 985.<sup>6</sup> Modern slavery is included within this document and my office is now supporting the MoD in identifying civil society colleagues to participate in a roundtable to discuss this JSP, as well as the MoD's approach to Human Security in Defence more broadly.

1.2.5 My last annual report referred to concerns in the sector regarding secure reporting for victims and highlighted my views that despite publication of the report of findings<sup>7</sup> following the

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<sup>3</sup> Home Office (2021), 'Child Victims of Modern Slavery Training Programme':

<https://policingslavery.co.uk/transforming-our-response/training-delivery/e-learning-child-victims-of-modern-slavery/>.

<sup>4</sup> Home Office (2021), 'UK 2021 Annual Report Modern Slavery':

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1033986/2021\\_UK\\_Annual\\_Report\\_on\\_Modern\\_Slavery.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1033986/2021_UK_Annual_Report_on_Modern_Slavery.pdf).

<sup>5</sup> Skills for Care and the Bakhita Centre for Research on Slavery, Exploitation and Abuse at St Mary's University (2022), 'Training Framework for the Prevention, Identification, Support and Care of Child Victims and Survivors of Modern Slavery and Human Trafficking and Information and Resources to Support the Training': [https://skillsforcareanddevelopment.org.uk/wp-content/uploads/2022/03/2022-CHILDRENS-TRAINING-FRAMEWORK\\_A4-BOOKLET.pdf](https://skillsforcareanddevelopment.org.uk/wp-content/uploads/2022/03/2022-CHILDRENS-TRAINING-FRAMEWORK_A4-BOOKLET.pdf).

<sup>6</sup> Ministry of Defence (2021), 'JSP 985 Human Security in Defence - Volume 1: Incorporating Human Security in the way we Operate':

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1040257/20211209\\_JSP\\_985\\_Vol\\_1.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1040257/20211209_JSP_985_Vol_1.pdf).

<sup>7</sup> HM Inspectorate of Constabularies and Fire and Rescue Services, College of Policing and Independent Office for Police Conduct (2021), 'Safe to Share?: Liberty and Southall Black Sisters' super-complaint on policing and immigration status':

2018 Southall Black Sisters and Liberty Super Complaint,<sup>8</sup> this matter had not been resolved. Recommendation two of this report asked the Home Office to review the legal and policy framework underpinning data sharing for migrant victims of crime and consider a mechanism for establishing a firewall between the police and Immigration Enforcement (IE). IE colleagues subsequently convened a series of workshops with key stakeholders, including my office, to explore the issues and identify ways to encourage the safe reporting of crimes. This work culminated in the announcement of a Migrant Victims Protocol in December 2021.<sup>9</sup> I welcomed this proposal which will ensure that no immigration enforcement action will be taken against a victim of crime while their case is being investigated and prosecuted. It is good to see that there will be no time limit on this and that victims will be given advice about regularising their immigration status.

## Improving the quality of victim care and support

1.3.1 An important part of my role is engaging directly with survivors. While this has continued to be difficult due to the limitations posed by the Covid-19 pandemic, over the past year I have met survivors in a number of settings, for example during a visit to Caritas Bakhita House and at an art exhibition hosted by Hestia. In addition, in October 2021 I hosted a conference at Cumberland Lodge focussed on practitioner responses to child trafficking and three young people with lived experience from ECPAT UK's Youth Advisory Board were able to participate in the event. I have also engaged with survivors using online platforms including participation in Employability Programme sessions run by the Sophie Hayes Foundation.

1.3.2 In my last annual report I noted my plans to recruit a survivor with lived experience to produce a survivor-informed piece of research. My office sought advice from stakeholders to ensure that the recruitment process for this role was as accessible as possible, and I was delighted to be able to interview three strong candidates. The Project Officer joined our team in August 2021 and embarked on a research project examining mental health support for survivors and the extent to which this is culturally sensitive. The methodology for this work has included a call for insight aimed at survivors,<sup>10</sup> as well as the examination of extracts from the University of Nottingham Rights Lab 'Moments' study.<sup>11</sup> I hope that the opportunity to work as part of this office will be offered again in the future – the insight and wisdom of survivors is essential to our work.

1.3.3 Over the past year I have maintained engagement with Non-Governmental Organisation (NGO) colleagues in a variety of forums, including regular meetings with groups such as the Anti-

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/945314/safe-to-share-liberty-southall-black-sisters-super-complaint-policing-immigration-status.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945314/safe-to-share-liberty-southall-black-sisters-super-complaint-policing-immigration-status.pdf).

<sup>8</sup> Liberty and Southall Black Sisters (2018), 'Super complaint prepared by Liberty and Southall Black Sisters': [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/767396/Super-complaint\\_181218.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/767396/Super-complaint_181218.pdf).

<sup>9</sup> Home Office (2021), 'Review of data sharing: migrant victims and witnesses of crime': <https://www.gov.uk/government/publications/review-of-data-sharing-migrant-victims-and-witnesses-of-crime/review-of-data-sharing-migrant-victims-and-witnesses-of-crime-accessible-version>.

<sup>10</sup> IASC (2021), 'IASC calls for Survivor Insights: Mental Health Provision and Cultural Sensitivity': <https://www.antislaverycommissioner.co.uk/news-insights/closed-iasc-calls-for-survivor-insights-on-mental-health-support/>.

<sup>11</sup> Wright, N, Hadziosmanovic, E, Dang, M, Bales, K, Brookes, C, Jordan, M and Slade, M (2021), 'Mental health recovery for survivors of modern slavery: grounded theory study protocol': <https://bmjopen.bmj.com/content/10/11/e038583>.

Trafficking Monitoring Group (ATMG), the Labour Exploitation Advisory Group (LEAG) and with the Human Trafficking Foundation which have all taken place using online platforms. These meetings offer the chance to discuss key concerns with the sector and seek updates on the impact of policy changes such as the EU Settlement Scheme. I have also been pleased to see examples of collaboration across the sector to encourage consistent standards in care including a partnership between Hope for Justice, The British Red Cross and Snowdrop to develop an accreditation framework for the Independent Modern Slavery Advocate role.<sup>12</sup>

1.3.4 As the number of referrals being made into the NRM system continues to rise, I remain significantly concerned about the timeliness of decision making. In 2021 the average number of days for a conclusive grounds decision was 568 days.<sup>13</sup> As of 7 January 2022 there were also 24,499 cases awaiting decisions.<sup>14</sup> I understand that the Single Competent Authority (SCA) have expanded their team considerably over the past year<sup>15</sup> with further intakes of new staff planned. I commend their efforts to recruit and train new staff during the Covid-19 pandemic, however I fear that an enormous task remains to address the huge backlogs within the system. The continued annual increases in the number of referrals being made only exacerbates this issue further.

1.3.5 In November 2021 the Home Office updated their Modern Slavery Statutory Guidance noting creation of the Immigration Enforcement Competent Authority (IECA) to make reasonable grounds and conclusive grounds decisions for a specific cohort of potential victims.<sup>16</sup> I subsequently wrote to the Home Secretary to highlight my concerns about the way that the decision was made, without consultation with the sector, and that the new arrangements risk failing to identify potential victims.<sup>17</sup> We know that there were significant concerns in the past about the differing rates of positive decisions between the National Crime Agency and UK Visas and Immigration, and in announcing the introduction of the SCA in 2017, the Home Secretary placed an emphasis on this unit being ‘completely separate from the immigration system’.<sup>18</sup> There will be a need to monitor the impact of this change and it is vital that the government is held to account on its commitment to publishing data on decisions once sufficient data is available.<sup>19</sup>

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<sup>12</sup> Hope for Justice (2021), ‘New partnership launched to assist survivors of modern slavery to get the support they need’: <https://hopeforjustice.org/news/new-partnership-launched-to-assist-survivors-of-modern-slavery-to-get-the-support-they-need/>.

<sup>13</sup> Information provided by the Home Office on 3 March 2022.

<sup>14</sup> Home Office (2022), ‘Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2021’.

<sup>15</sup> The Home Office [2021 UK Annual Report on Modern Slavery](#) reported that 200 new staff had been recruited to the SCA during 2021.

<sup>16</sup> Home Office (2021), ‘Modern Slavery: Statutory Guidance for England and Wales (under s49 of the Modern Slavery Act 2015) and Non-Statutory Guidance for Scotland and Northern Ireland: Version 2.6: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1051135/Modern\\_Slavery\\_Statutory\\_Guidance\\_EW\\_Non-Statutory\\_Guidance\\_SNI\\_v2.6.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1051135/Modern_Slavery_Statutory_Guidance_EW_Non-Statutory_Guidance_SNI_v2.6.pdf).

<sup>17</sup> IASC (2021), ‘IASC exchange of letters with Rachel Maclean’: <http://www.antislaverycommissioner.co.uk/media/1717/iasc-and-hs-exchange-of-letters-december-2021.pdf>.

<sup>18</sup> Home Office (2017), ‘Modern Slavery Taskforce agrees new measures to support victims’: <https://www.gov.uk/government/news/modern-slavery-taskforce-agrees-new-measures-to-support-victims>.

<sup>19</sup> House of Commons Deb, 16 December 2021: <https://www.theyworkforyou.com/wrans/?id=2021-12-13.91987.h>.

1.3.6 NRM decisions should be timely, but we must also be confident that they are of a consistent high quality. In July 2021 After Exploitation published data from a Freedom of Information (FOI) request<sup>20</sup> which identified that in 2020, of the 325 reconsideration requests made, 78% resulted in a positive decision at either the reasonable grounds or conclusive grounds stage.<sup>21</sup> This is a concerning figure. I welcome the continuation of the Multi-Agency Assurance Panels (MAAPS) in reviewing negative NRM decisions and providing an additional level of transparency and independent scrutiny. The 2021 UK Annual Report on Modern Slavery confirms that an evaluation has been conducted on the role of the MAAPS, however I am disappointed that the findings have not yet been made public.

1.3.7 In relation to the Recovery Needs Assessment (RNA) process, in the year to 31 July 2021, 2,318 RNAs were completed for individuals in receipt of a positive conclusive grounds decision with the Home Office fully agreeing with the recommendations set out in 21%, partially agreeing with 72% and not agreeing with 7%.<sup>22</sup> The increase in partially agreed decisions has been attributed to inaccuracies in the RNAs submitted and requests made contrary to guidance. I am pleased that the SCA has worked with The Salvation Army (TSA) to run a series of sessions for support providers to help improve RNA quality, however I am aware there are concerns within the sector regarding the RNA process. A forthcoming ATMG survivor-led piece of research will examine this in more detail.

1.3.8 In January 2022 the MSVCC entered its second year of operation. While my office meets regularly with SCA colleagues to remain sighted on progress regarding the new contract and the feedback has been positive, I have seen no performance data outside of TSA's Annual Report to confirm this. I am extremely disappointed that the Places of Safety provision, a commitment made by the Home Office in 2017, has still not commenced as part of the new MSVCC. Given the continuing challenges regarding pre-NRM accommodation and the need for First Responders to seek informed consent prior to an NRM referral, this is a much-needed provision that must be introduced urgently.

1.3.9 The Care Quality Commission (CQC) has made good progress with regards to the inspection programme of safehouses and outreach services, with 41 services inspected as of December 2021. Survivor engagement within this process has continued, both through direct engagement with inspectors on site visits and through an online survey. Generally, the feedback that I have received so far about the support being provided has been positive. I am aware that a process has now been introduced for providing time-bound recommendations for action which I welcome, however note that there is not currently a formal requirement on TSA for them to respond to these recommendations.

1.3.10 In addition to providing a sense of justice and acknowledgement of the crimes that have been committed, compensation and reparation can bring practical benefits in giving survivors an opportunity to rebuild their lives and help to protect them from further exploitation.<sup>23</sup> While there are examples of cases where survivors have been able to make compensation claims, or

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<sup>20</sup> FIO request 64090 by M Esslemont: <https://afterexploitation.files.wordpress.com/2021/07/64090-response.pdf>.

<sup>21</sup> The Home Office has highlighted in relation to this data that in some instances, reconsiderations may be requested by a First Responder in cases where an initial decision was not negative.

<sup>22</sup> Home Office (2021), 'UK 2021 Annual Report Modern Slavery': [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1033986/2021\\_UK\\_Annual\\_Report\\_on\\_Modern\\_Slavery.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1033986/2021_UK_Annual_Report_on_Modern_Slavery.pdf).

<sup>23</sup> ATLEU (2020), 'Survivors of trafficking and the Criminal Injuries Compensation Scheme': <https://drive.google.com/file/d/1I7OUqUgyMnSYy6FsndAdPILfJkgq5pFp/view?usp=sharing>.

seek damages or reparations from their traffickers, I am concerned that this is happening far too infrequently. In February 2022 I convened a roundtable with stakeholders including the Ministry of Justice, the Legal Aid Agency, the Crown Prosecution Service, law enforcement, legal practitioners, and NGOs to examine the current barriers to survivors being able to seek compensation and reparation. We heard from experts such as ATLEU regarding their experiences of the Criminal Injuries Compensation Scheme, from Hogan Lovells on the recent landmark decision regarding compensation in relation to the Gray's Essex tragedy of October 2019,<sup>24</sup> from the University of Liverpool and from the President of GRETA. In April 2022 I published a policy paper to outline the key issues.<sup>25</sup>

1.3.11 My last annual report commented on the introduction of the new Adults at Risk (AAR) in Immigration Detention Policy which brought potential and confirmed victims of modern slavery fully within scope of the AAR policy. Having previously written to the Minister to highlight my concerns, over the past year my office has maintained contact with the safeguarding lead in detention policy and sought an agreement for data on the use of the new policy to be shared with me on a confidential basis. I have not been given permission to publish this data in the annual report however the response that I received from the Home Office states that the team will consider whether the Home Office should publish this type of data in the future.

## Taking a longer term view

1.4.1 I continue to be concerned about the barriers that many survivors face in accessing employment, education, and accommodation. The lack of progress is disappointing. If we ensure that survivors are socially included, economically empowered and have access to the employment market, the risk of re-trafficking reduces.<sup>26</sup> The significant delays in NRM and asylum decision making contribute to making this even more challenging.

1.4.2 My last annual report referred to work to understand whether those in the NRM are disproportionately represented among those waiting longer than 12 months for a decision on their asylum claim. In October 2021 I published a briefing<sup>27</sup> setting out the findings from this work which was supported by Sir Bernard Silverman, Professor of Modern Slavery Statistics at the University of Nottingham Rights Lab. Analysis revealed that considering cases resolved in 2018 and 2019, asylum decisions with an associated NRM referral are seven times more likely to have taken longer than 12 months than asylum decisions without an associated NRM referral. I have since written to the Minister for Safeguarding, acknowledging that while cases with an NRM referral make up a small proportion of overall decisions, concentrating efforts on streamlining the process for this vulnerable group would have real benefits. The response from the Minister set out the steps taken by the Home Office to increase the number of decision

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<sup>24</sup> Hogan Lovells (2022), 'Hogan Lovells secures landmark win in Essex lorry human trafficking case': <https://www.hoganlovells.com/en/news/hogan-lovells-secures-landmark-win-in-essex-lorry-human-trafficking-case>.

<sup>25</sup> IASC (2022), 'Access to compensation and reparation for survivors of trafficking': [iasc-policy-paper-access-to-compensation-and-reparation-for-survivors-of-trafficking\\_april-2022-final.pdf](https://www.antislaverycommissioner.co.uk/media/1687/iasc-policy-paper-access-to-compensation-and-reparation-for-survivors-of-trafficking-april-2022-final.pdf) ([antislaverycommissioner.co.uk](https://www.antislaverycommissioner.co.uk)).

<sup>26</sup> IASC and the University of Nottingham Rights Lab (2021), 'Re-trafficking: The current state of play': <https://www.antislaverycommissioner.co.uk/media/1705/iasc-and-rights-lab-re-trafficking-report-november-2021.pdf>.

<sup>27</sup> IASC (2021), 'Asylum decision times for potential victims of modern slavery': <https://www.antislaverycommissioner.co.uk/media/1687/iasc-paper-nrm-and-asylum-decision-times-for-potential-victims-of-modern-slavery-october-2021.pdf>.

makers within the NRM, as well as measures within the asylum system to reduce the timescales for decisions.

1.4.3 In May 2021 I published a report in collaboration with the University of Nottingham Rights Lab that examined the benefits of work and the harms of unemployment.<sup>28</sup> An online launch event was held and I have since raised the practical recommendations made by the report with Home Office officials and ministers.<sup>29</sup> I have been encouraged to find a level of agreement that employability and work preparation skills should be part of the support that is offered to victims and survivors.

1.4.4 In January 2022 I held a roundtable with a range of stakeholders including the Home Office and TSA where examples of existing good practice were shared, and we discussed options to implement the report's recommendations. It was agreed that a secondee to my office would scope and bring together existing resources and training materials relating to employability and work preparation to help inform recommendation two of the report. I have since written to the Minister for Safeguarding to encourage the Home Office to consider opportunities for research to be undertaken on the skills, qualifications, work interests and work histories of survivors in the NRM; to think about longer term issues and prioritise prevention within the update to the Modern Slavery Strategy; and for the MSVCC to include greater specificity regarding the provision of support for survivors that relates to work preparation and employability.<sup>30</sup>

1.4.5 This work aligns closely with the Review of Asylum Seeker Right to Work, which the former Home Secretary Sajid Javid committed to in 2018. In December 2021 the Minister for Justice and Tackling Illegal Migration announced that the review had concluded, and that the fiscal benefits arising from a relaxation of the right to work are likely to be significantly lower than those claimed by the Lift the Ban campaign. He therefore confirmed that the current policy will be retained with no further changes.<sup>31</sup> Despite written correspondence from both the previous<sup>32</sup> and current<sup>33</sup> Minister for Safeguarding confirming that the findings from this review would be published, sadly this has not been the case. This detail is vital to inform public debate, therefore I have raised my concerns regarding the lack of publication with the Minister for Justice and Tackling Illegal Migration and encouraged him to reconsider. If we are to develop good policy, it is essential that this report is publicly available for scrutiny and review.

1.4.6 I am pleased that St Mary's University were able to run their Horizons Summer School in 2021. This six-week course is tailored to the needs of survivors, including courses such as English as a Second Language, employability and volunteering skills, and human nutrition. In October 2021 I participated in an online event to celebrate the successes of this course and share

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<sup>28</sup> Independent Anti-Slavery Commissioner and the University of Nottingham Rights Lab (2021), 'The benefits and the barriers to accessing employment: Considerations for survivors of modern slavery': [https://www.antislaverycommissioner.co.uk/media/1599/rights\\_lab\\_access-to-work-pathways\\_final.pdf](https://www.antislaverycommissioner.co.uk/media/1599/rights_lab_access-to-work-pathways_final.pdf).

<sup>29</sup> Independent Anti-Slavery Commissioner (2021), 'IASC exchange with Rachel Maclean': <http://www.antislaverycommissioner.co.uk/media/1728/iasc-exchange-with-rachel.pdf>.

<sup>30</sup> IASC (2022), 'Letter to Rachel Maclean MP': <http://www.antislaverycommissioner.co.uk/media/1752/iasc-letter-to-rachel-maclean-mp-february-2022.pdf>.

<sup>31</sup> Hansard HC Deb. vol. 705 cols. 11WS, 8 December 2021, [https://hansard.parliament.uk/Commons/2021-128/debates/21120876000007/AsylumSeekersRightToWorkPolicy?\\_cf\\_chl\\_managed\\_tk\\_=Z5qk3rfii2xjVW2auauAeYXgIIIFThP.C6hMFyjtnnjE-1641983444-0-gaNycGzNCxE](https://hansard.parliament.uk/Commons/2021-128/debates/21120876000007/AsylumSeekersRightToWorkPolicy?_cf_chl_managed_tk_=Z5qk3rfii2xjVW2auauAeYXgIIIFThP.C6hMFyjtnnjE-1641983444-0-gaNycGzNCxE).

<sup>32</sup> Home Office (2020), 'Letter to the IASC from Victoria Atkins MP April 2020': <http://www.antislaverycommissioner.co.uk/media/1403/letter-to-the-iasc-from-victoria-atkins-mp-april-2020.pdf>.

<sup>33</sup> Home Office (2021), 'Letter to Dame Sara': <http://www.antislaverycommissioner.co.uk/media/1728/iasc-exchange-with-rachel.pdf>.

learning. The evaluation findings demonstrate that the programme supported the students in their recovery journey, contributed to building resilience and expanded options for their futures.<sup>34</sup> I am aware that the Free Thinking programme at Fircroft College in the West Midlands also continues to offer opportunities that can be accessed by survivors of modern slavery, with two courses planned for 2022 so far.<sup>35</sup> Despite these positive examples, not all survivors are able to access the educational opportunities they desire. I would encourage other educational institutions to think about how they may be able to make their programmes more accessible.

1.4.7 Since writing my last annual report, the Department of Levelling Up, Housing and Communities has published its updated Homelessness Code of Guidance for local authorities.<sup>36</sup> The feedback provided by my office has been incorporated and it now includes further detail on the NRM, the role of the MSVCC and the responsibilities of local authorities, particularly in respect of accommodation prior to a reasonable grounds decision or while enquiries are carried out. While this is a welcome step, I am aware that challenges remain in practice. To complement this guidance, the Local Government Authority (LGA) have written a guide for local authorities with a specific focus on housing which will be published in March 2022.

1.4.8 There are examples of good practice in relation to housing and accommodation for survivors such as the initiative where Snowdrop has become a ‘trusted assessor’ for housing for Sheffield City Council. In Westminster The Passage has embedded a model for multi-agency case conferences to help safeguard potential victims of modern slavery who are homeless, and a joint working protocol has now been established with the London Borough of Camden. I also support TSA’s ambition to identify Single Points of Contact (SPOCs) within local authorities to provide avenues for assistance and escalation where required.

1.4.9 The guidance on granting discretionary leave for victims of modern slavery states that discretionary leave may be considered where the SCA has made a positive conclusive grounds decision and the individual satisfies the required criteria.<sup>37</sup> Despite this, the number of survivors being granted discretionary leave remains low. FOI data sought by ECPAT UK shows that in the first three quarters of 2021, just 8% of discretionary leave decisions made resulted in a grant.<sup>38</sup> Without such leave, survivors may be left with limited or no access to welfare benefits and entitlements, leaving them vulnerable to destitution and further exploitation.<sup>39</sup> Clause 64 of the Nationality and Borders Bill sets out in primary legislation the circumstances in which a confirmed victim should be granted limited leave to remain in the UK. I hope this leads to an increase in the number of survivors who are given discretionary leave - but I am not optimistic.

1.4.10 For survivors who return home, the support they receive can be crucial to helping them reintegrate safely and protect them against the risk of being re-trafficked. In June 2021 I wrote to the Home Secretary highlighting my concerns regarding the Voluntary Returns Scheme (VRS),

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<sup>34</sup> Bregu, S and Doucakis, M (2021), ‘Evaluation of the Horizons Summer School’:

<https://www.stmarys.ac.uk/research/centres/bakhita/docs/hss-evaluation-report-21-260-oct21-proof-3-final.pdf>.

<sup>35</sup> Fircroft College, ‘Free Thinking: a new course for communities’: <https://www.fircroft.ac.uk/free-thinking>.

<sup>36</sup> Department for Levelling-up, Housing and Communities (2021), ‘Homelessness code of guidance for local authorities’: <https://www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities>.

<sup>37</sup> Home Office (2020), ‘Discretionary leave considerations for victims of modern slavery’:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1040852/Discretionary\\_leave\\_for\\_victims\\_of\\_modern\\_slavery.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1040852/Discretionary_leave_for_victims_of_modern_slavery.pdf)

<sup>38</sup> FOI 67328 requested by ECPAT UK – data for 2021 was from 01/01/2021-30/09/2021.

<sup>39</sup> Independent Anti-Slavery Commissioner (2021), ‘IASC Commentary: Support survivors to regain independence’: <http://www.antislaverycommissioner.co.uk/news-insights/iasc-commentary-supporting-survivors-to-regain-independence/>.

which was only used by twelve non-European Economic Area nationals between 01/04/2017 and 31/03/2020,<sup>40</sup> and called for more tailored return and re-integration support for survivors.<sup>41</sup> I have recently received a response, which cited work with TSA to ensure a joined-up approach to confirmed victims of modern slavery using the VRS and set out the financial support packages available.<sup>42</sup> The response confirms that the UK is no longer a part of the European Return and Re-integration Network (ERRIN) programme following our exit from the European Union and refers to ‘exploring other opportunities of enabling in-country support for individuals returning’. While I welcome the attention on this area, I am particularly concerned about the support that will be available to those returning in the interim and the risk that support is likely to remain inconsistent. The Home Office must do more to improve this.

## Improving the support to child victims

1.5.1 In 2021, 5,468 children were identified as potential victims of modern slavery and referred into the NRM, accounting for 43% of all referrals.<sup>43</sup> 2,689 children in total or 49% were referred into the NRM in 2021 on the basis of criminal exploitation. The total number of referrals flagged for children as county lines cases (for both children and adults) was 2,053, an increase of 23% from 2020. At the end of last year my office published a Child Trafficking in the UK 2021 snapshot report in collaboration with ECPAT UK which highlighted some of the key data in relation to child trafficking, along with notable policy developments. The report made ten recommendations aimed at a range of stakeholders including prosecuting bodies, justice departments, law enforcement, policy makers and practitioners.<sup>44</sup>

1.5.2 Although an increasing number of children are being identified as potential victims and referred into the NRM, I remain concerned about the safeguarding response to these children. There are examples of good practice that exist, and I welcome the national efforts to improve the strategic response to extra-familial through the Tackling Child Exploitation Programme.<sup>45</sup> However, I recognise that multiple challenges remain.

1.5.3 Over the past year there have been significant developments in relation to the pilot devolving NRM decision making to local safeguarding partners. Following a period of stakeholder engagement and a competitive grants process, in June 2021 the Home Office announced the ten

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<sup>40</sup> FOI Number 60267.

<sup>41</sup> Independent Anti-Slavery Commissioner (2021), ‘IASC letter to Rt Hon Priti Patel MP, Home Secretary’: [http://www.antislaverycommissioner.co.uk/media/1630/letter\\_to\\_home\\_sec\\_on\\_returns\\_and\\_reintegration\\_on\\_09\\_06\\_2021.pdf](http://www.antislaverycommissioner.co.uk/media/1630/letter_to_home_sec_on_returns_and_reintegration_on_09_06_2021.pdf).

<sup>42</sup> Home Office (2022), ‘Letter from Matthew Rycroft Permanent Secretary’: <http://www.antislaverycommissioner.co.uk/media/1751/letter-from-matthew-rycroft-permanent-secretary-at-the-home-office-february-2022.pdf>

<sup>43</sup> Home Office (2022), ‘Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2021’.

<sup>44</sup> Independent Anti-Slavery Commissioner and ECPAT UK (2021), ‘Child trafficking the UK 2021: A snapshot’: [https://www.antislaverycommissioner.co.uk/media/1724/ecp05-a4-report-snapshot-21\\_aw7.pdf](https://www.antislaverycommissioner.co.uk/media/1724/ecp05-a4-report-snapshot-21_aw7.pdf).

<sup>45</sup> Tackling Child Exploitation website: <https://tce.researchinpractice.org.uk/>.

areas<sup>46</sup> across England, Wales and Scotland who would be involved in the twelve month pilot.<sup>47</sup> The pilot is still in the early stages, but feedback from practitioners has been positive so far with promising observations including: a more streamlined process for gathering evidence ahead of making decisions; increased awareness of the NRM process among practitioners; and a reduction in the average time taken for conclusive grounds decisions to be made.

1.5.4 The pilots are currently being evaluated and my office sits on the Independent Expert Advisory Board for the evaluation alongside a range of academics, policy makers and practitioners with expertise in child trafficking. Although the evaluation is focussing primarily on the process for devolving NRM decision making, there have been welcome efforts to consider how the impact on children can best be measured. My office also participates in the Cross-Government Advisory Board which has been a useful mechanism for ensuring that colleagues from across Whitehall are sighted on this important work and can make contributions. I commend the Home Office for their work on this pilot and their efforts to ensure meaningful stakeholder engagement from the outset. We must wait for the findings from the evaluation, but should these be positive, it is vital that the pilot areas are able to continue their work and that the approach is rolled out across the country.

1.5.5 In May 2021 the Independent Child Trafficking Guardianship (ICTG) service was expanded to an additional one third of local authority areas, bringing the total coverage to two thirds of local authority areas across England and Wales. As part of this phase of the rollout, three of the recommendations made by the Independent Review of the Modern Slavery Act 2015 are being tested including: removing the 18-month limit on support; providing support beyond a child's eighteenth birthday where required; and allowing children with a figure of parental responsibility in the UK to access direct worker support. I am aware that the Home Office is currently evaluating the impact of these additional measures and encourage them to publish the findings.

1.5.6 I hope that once this phase has concluded, national roll-out of the service is commenced as a priority. I appreciate the desire to take an evidence based approach and test the various models for support, however this has taken far too long and it is unacceptable that seven years on from the Modern Slavery Act one third of children in England are not yet able to access this provision. This position is echoed by GRETA in their third evaluation of the UK where they noted their concerns that the ICTG service is still not fully operational across the whole of England and Wales despite the rising numbers of identified child victims.<sup>48</sup>

## Supporting Partnership Activity

1.6.1 Multi-agency partnerships have a vital role in helping to facilitate a co-ordinated response to modern slavery at a local level. The work of these partnerships has been sustained over the last year, with many partnerships still carrying out their activity online. We have

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<sup>46</sup> The ten pilot areas are: Cardiff Council; Glasgow City Council; Hull City Council; London Borough of Barking and Dagenham; London Borough of Islington (Joint with London Borough of Camden); Newport City Council (Joint with Torfaen, Blaenau, Gwent, Monmouth and Caerphilly); North Lincolnshire Council (Joint with North East Lincolnshire Council).

<sup>47</sup> Home Office (2021), 'Piloting devolving decision-making for child victims of modern slavery': <https://www.gov.uk/government/publications/piloting-devolving-decision-making-for-child-victims-of-modern-slavery>.

<sup>48</sup> Group of Experts on Action against Trafficking in Human Beings (2021), 'Evaluation Report United Kingdom: Third evaluation round: Access to justice and effective remedies for victims of trafficking in human beings': <https://rm.coe.int/greta-third-evaluation-report-on-the-united-kingdom/1680a43b36>.

supported meetings of the National Anti-Slavery Network (NASN),<sup>49</sup> the West Midlands Anti-Slavery Network, Hampshire and the Isle of Wight Anti-Slavery Partnership, the West Yorkshire Anti-Slavery Partnership and the National Network Co-ordinators Forum.<sup>50</sup>

1.6.2 In May 2021, 23 new Police and Crime Commissioners (PCCs) were elected, therefore I took the opportunity to write to them to outline the areas where PCCs can add value to the modern slavery response and to encourage them to include modern slavery within their Police and Crime Plan.<sup>51</sup> In January 2022 I also responded to the Mayor of London's consultation on his Police and Crime Plan 2021-2025. My response welcomed the various commitments within the draft plan that specifically refer to modern slavery, for example multi-agency work to safeguard young people who are being criminally exploited, however I encouraged a greater reference to the other forms of modern slavery that we know are impacting adults and children in London such as domestic servitude.<sup>52</sup>

1.6.3 My last annual report referred to the publication of a refined framework for a public health approach to modern slavery<sup>53</sup> in collaboration with the University of Sheffield and Public Health England. There has been considerable interest in this work and over the past year, Dr Liz Such has carried out work in the South West of England as a proof of concept exercise and has also presented the framework to various stakeholders including the West Midlands Anti-Slavery Network and the Scottish Government. In August 2021 I wrote to the Home Secretary to highlight the framework and encourage the government to use the update to the Modern Slavery Strategy as an opportunity to put prevention at the forefront of the UK's approach to tackling modern slavery. I was pleased to find that the response from the Home Secretary agreed that prevention must be a key element of our approach to tackling modern slavery.

1.6.4 In November 2021 I convened a meeting with colleagues who are leading on public health approaches within policing and have since made connections with the Global Law Enforcement and Public Health Association (GLEPHA). In early 2022 I arranged a follow-up meeting, bringing the Victims' Commissioner and Domestic Abuse Commissioner into the conversation about encouraging a greater focus on prevention nationally. In March 2022 the Police Foundation published its Strategic Review of policing which concluded that a public safety system should be designed to include primary, secondary, and tertiary prevention. I have publicly welcomed this work alongside the other Commissioners, highlighting the opportunities afforded by this approach in the context of modern slavery.<sup>54</sup>

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<sup>49</sup> West Yorkshire Combined Authority website: <https://www.westyorks-ca.gov.uk/policing-and-crime/national-anti-slavery-network/>.

<sup>50</sup> The National Network Co-ordinators Forum brings together the co-ordinators of the various anti-slavery networks and partnerships operating throughout the UK: <https://www.humantraffickingfoundation.org/nncf>.

<sup>51</sup> IASC (2021), 'IASC letter to newly elected Police and Crime Commissioners': <http://www.antislaverycommissioner.co.uk/media/1637/iasc-letter-to-newly-elected-police-and-crime-commissioners-without-violence-reduction-units-june-2021.pdf>.

<sup>52</sup> Independent Anti-Slavery Commissioner (2021), 'IASC letter to the Mayor of London': <http://www.antislaverycommissioner.co.uk/media/1740/iasc-letter-to-the-mayor-of-london-january-2022.pdf>.

<sup>53</sup> Such, E et al (2021), 'A public health approach to modern slavery: An evidence based approach to developing a strategy for action on modern slavery in the UK': <https://view.genial.ly/60a4e9647da7bf0dbe16703e>.

<sup>54</sup> Independent Anti-Slavery Commissioner and Rt Hon Priti Patel MP (2021), 'IASC exchange of letters with the Rt Hon Priti Patel MP': <http://www.antislaverycommissioner.co.uk/media/1671/iasc-exchange-of-letters-with-the-rt-hon-priti-patel-mp-home-secretary-september-2021.pdf>.

1.6.5 In July 2021 the UK BME Anti-Slavery Network (BASNET) published its action plan on equality, diversity and inclusion within the anti-slavery sector and held an associated launch event. I spoke at the launch event to welcome the collaboration across the sector in developing the plan and reflected on a number of important areas including: the lack of data on ethnicity; the need for research which is inclusive of survivors' voices; and the importance of cultural sensitivity within support for victims and survivors. My office is a member of the BASNET Working Group and has joined insightful events organised by BASNET such as a webinar on exploring the vulnerabilities of the BME LGBTQ community to human trafficking.

## Priority 2: Supporting Law Enforcement and Prosecutions

2.1.1 Law enforcement activity and prosecutions remain critical to eradicating slavery. Every publicised, successful prosecution is a likely deterrent to perpetrators and provides hope to victims. It is therefore important that the increase in police activity, prosecutions and convictions reported this year, albeit built on previously low figures due to the pandemic, is maintained. I have focused on encouraging financial investigation in the last year and remain convinced that it is key to success. MSHT is essentially an economic crime and we should follow the money in order to pursue offenders but also to have any prospect of compensating victims for what has been so egregiously stolen from them.

### Coordinating the whole system

2.2.1 Responding to MSHT requires a single, whole system approach to ensure that national, regional and local resources work together. The National Crime Agency (NCA) assess that offenders involved in modern slavery in the UK are most likely to operate in organised groups or networks.<sup>55</sup> Separately, they assess that most of these organised crime groups are loosely networked and of low sophistication. More sophisticated groups are highly likely to engage in slavery and trafficking alongside other crime, including immigration and financial crime.<sup>56</sup> Research by my office into the characteristics of defendants and offences charged under the Modern Slavery Act finds that, of the cases examined, most appear to be low sophistication and do not typically fit the stereotypes of organised crime. Moreover, many convicted under the Modern Slavery Act do not fit the stereotypes of organised criminals. Approximately a quarter of convictions are for women (Sentencing Council, 2020),<sup>57</sup> a trend not unique to the UK, and new research by the University of Manchester<sup>58</sup> finds that ‘Mr Bigs’, substantially profiting from organised crime, are only a small minority of those convicted. Rather, many are substitutable actors and quite a few are destitute, themselves victims of exploitation.

2.2.2 The Modern Slavery and Human Trafficking Unit, which is a part of the NCA, plays a key role in modern slavery threat leadership coordinating activity, reviewing and improving systems and providing tactical advice to forces. Over the past year I have met regularly with NCA colleagues including those from the National Assessment Centre and we have contributed to workstreams such as raising awareness of MSHT across the road haulage sector. I am pleased that the NCA has maintained effective working relationships with EU partners and Europol and continues to lead the UK contribution to the European Multidisciplinary Platform Against Criminal Threats (EMPACT) Trafficking in Human Beings Initiative. In January 2022 the ringleader of the criminal syndicate involved in trafficking some of the 39 Vietnamese people who lost their lives in October 2019 was convicted following an investigation by the Belgian authorities supported by the NCA.

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<sup>55</sup> National Crime Agency (NCA), ‘National Strategic Assessment of Serious and Organised Crime (2020)’: <https://www.nationalcrimeagency.gov.uk/who-we-are/publications/437-national-strategic-assessment-of-serious-and-organised-crime-2020/file>.

<sup>56</sup> National Crime Agency ‘Organised Crime and MSHT’, March 2019 (Official Sensitive) [Unpublished]

<sup>57</sup> Sentencing Council (2020), ‘Modern Slavery Offences Consultation’: <https://www.sentencingcouncil.org.uk/wp-content/uploads/Modern-slavery-consultation-web.pdf>.

<sup>58</sup> Gadd, David and Rose Broad, University of Manchester (2022), ‘The truth about modern slavery offenders’: <https://www.opendemocracy.net/en/beyond-trafficking-and-slavery/the-truth-about-modern-slavery-offenders/>.

2.2.3 The NCA led Project Aidant raises the profile of MSHT across the law enforcement community by coordinating regular, cross agency themed operations. There were four Operation Aidant initiatives during 2021/22 focussing on labour exploitation and domestic servitude, sexual exploitation, child trafficking and illicit finances. The operations saw domestic and international partners work together on large scale joint action days in the UK and across Europe. In the UK, the operations resulted in 123 arrests, the identification of 516 potential victims of trafficking of which 217 entered the NRM initiating 126 new investigations.<sup>59</sup>

2.2.4 Operational activity continues to increase and in January 2022, 4322 modern slavery police investigations were recorded across the UK, a rise of 78% from January 2021 building on a 46% increase from the previous year. During the same period, there were 2,485 investigations relating to criminal exploitation, a rise of 91% from a year ago.<sup>60</sup> Some caution should be applied to the MSOIC live operation data as 1469 of the 4322 reported investigations had not been updated by forces since November 2020.<sup>61</sup>

2.2.5 Police recorded crime of modern slavery offences increased 6% from 8,622 in 2020/21 to 9,158 in 2021/22.<sup>62</sup> The number of MSHT investigations recorded on the Serious and Organised Crime (SOC) Master List<sup>63</sup> continued to increase throughout 2021/22. In February 2022 there were 355 MSHT threats recorded (primary, secondary, and tertiary) on the SOC Master List, a 345% increase on March 2021. The number of investigations citing MSHT as the primary threat in February 2022 was 173. Eighteen (10%) were owned by national assets (e.g. NCA, GLAA, IE), 7 (4%) were owned by ROCUs and 148 (86%) were owned by forces.<sup>64</sup>

2.2.6 I am concerned that the Regional Organised Crime Units (ROCUs) contribution to this effort is weak. In early 2021 I wrote to the regional leaders urging them engage more with MSHT. I am disappointed that there has been no significant increase in the number of investigations owned by ROCUs which has remained between seven and nine over the period February 2021 to February 2022. Three of the nine ROCUs had no MSHT investigations at all during the period despite their region's forces collectively owning more than 400 live investigations.

2.2.7 Following the exchange of letter with ROCU chairs, I approached the four ROCUs that owned MSHT investigations at that time to understand the nature and complexities of the enquiries but also to get a broader knowledge of the tasking processes and structures. I am grateful for the assistance given to my office by the investigating officers who cooperated generously with the review showing commitment, resilience and expertise explaining the detail of what were complex, two to three year investigations.

2.2.8 It was apparent that while MSHT investigations scored more highly on MoRiLE<sup>65</sup> than drugs investigations they were much less likely to be pursued and it is likely that this is partly caused by a lack of training and expertise. My office interviewed five investigation teams from the four ROCUs and only one team had officers with any MSHT training. The review also found that there was an incomplete picture of law enforcement's response to MSHT caused by four factors. There is no reliable reporting on assistance provided by national and regional teams to

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<sup>59</sup> Data provided by the NCA Threat Leadership Team.

<sup>60</sup> Data provided by the NPCC Modern Slavery and Organised Immigration Crime (MSOIC) Unit.

<sup>61</sup> Information provided by the NPCC Modern Slavery and Organised Immigration Crime Unit (MSOIC).

<sup>62</sup> October to September 2019-2020 against October to September 2020-2021.

<sup>63</sup> The Serious Organised Crime Master List is a means of analysing and scoring different serious crime threats in a comparable way providing a single picture of risk.

<sup>64</sup> Data provided by the SOC System Tasking Project, National Tasking and Coordination (NTAC).

<sup>65</sup> Management of Risk in Law Enforcement (MoRiLE).

force investigations; MSHT as a secondary or tertiary threat is under reported on APMIS<sup>66</sup> probably because it is not a mandatory field; forces are not mapping OCGs engaged in MSHT (one force has near to 200 investigations but only one is mapped using MoRiLE and APMIS); and the MSOIC database is not kept updated. On a more positive note, the Police Uplift Programme will result in an additional 1150 ROCU officers over three years and a new ROCU induction training course will include dedicated modules on modern slavery.

2.2.9 TOex is a nationally-coordinated initiative providing teams of intelligence and analytical staff who identify organised exploitation, develop the intelligence picture and task activity. TOex teams are working on 32 live MSHT intelligence operations across three regional sites with ambitions to extend to all ROCUs subject to Home Office funding. Whilst I consider TOex an important step forward in providing needed, dedicated intelligence and analytical capacity, I am concerned whether ROCUs have the appetite, training and knowledge to take on the increasing number of threats TOex will develop.

2.2.10 Financial investigation is a key capability for law enforcement as it seeks to bring offenders to justice and provide justice and compensation for victims. In March 2021 I published a report that made a series of recommendations designed to increase the number of financial investigations supporting modern slavery operations.<sup>67</sup> While the response to this report was encouraging, I considered there was more to be done. In November 2021 I published a second report<sup>68</sup> identifying some of the practical barriers to greater use of financial investigation and to how these could be overcome. The report made a series of practical recommendations that were largely tactical and low cost but, if implemented, would likely make a great difference. The report recommended that greater use should be made by forces of the Joint Money Laundering Intelligence Taskforce (JMLIT); that the availability of financial investigators should be more closely managed; that Suspicious Activity Reports (SARS) could be better utilised as financial intelligence as part of MSHT investigations; and that that modern slavery, and financial investigation, should be better covered in the broad sweep of police investigative training. I have been encouraged by the response from the National Crime Agency and the police service to my recommendations. I am aware that already there is greater uptake in forces using JMLIT and that training courses have been updated to include further modern slavery and financial investigation content.

2.2.11 In November 2021 the NCA hosted a conference on 'The Importance of Financial Intelligence in MSHT Investigations' to improve understanding among law enforcement officers and financial institutions of the intelligence benefits of the JMLIT and SARS. Over 180 law enforcement officers and 27 different banks and partner agencies attended. Importantly, 20% of financial institution attendees said that it increased their knowledge regarding illicit finances and the MSHT threat.

2.2.12 A further example of whole system working is Operation Innerste, a multi-agency initiative aimed at improving the safeguarding response to unaccompanied migrant children across England and Wales. The initiative brings together police, local authorities, immigration enforcement and Barnardo's ICTGs. By January 2022, 34 forces and partner agencies, including

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<sup>66</sup> Agencies and Partners Management Information System (APMIS).

<sup>67</sup> IASC (2021), 'Financial Investigation of Modern Slavery':

<http://www.antislaverycommissioner.co.uk/media/1586/financial-investigation-of-modern-slavery-march-2021.pdf>.

<sup>68</sup> IASC (2021), 'Financial Investigation of Modern Slavery Part II':

[www.antislaverycommissioner.co.uk/media/1703/financial-review-part-2-november-2021\\_iasc.pdf](http://www.antislaverycommissioner.co.uk/media/1703/financial-review-part-2-november-2021_iasc.pdf).

children’s services, had adopted Operation Innerste that aims is to prevent children from going missing and being exploited (or re-exploited) by traffickers and OCGs. It includes a series of common components such as children’s services leading on building trust and rapport with a child explaining the support and protection available and the taking of photographs and fingerprints to be able to identify children who go missing or who become subject of disputed identity. Since April 2021, Operation Innerste has engaged over 540 children.

## Increasing prosecutions

2.3.1 In my last annual report I expressed concern that prosecutions for modern slavery offences for the previous two years were low. The closure of courts in 2020 and the consequent back log of cases caused significant delays and will have contributed to this. I am therefore cautiously pleased about the most recent data published by the Crown Prosecution Service (CPS) included below at Table 1. The number of cases referred to the CPS by police increased by 19.2% from 297 to 354. It further showed that completed prosecutions for offences flagged as modern slavery increased from 261 in 2020 to 451 in 2021, a gain of 72.8%. Over the same period, reported convictions also increased from 191 to 331, an increase of 73.3%.<sup>69</sup> The conviction rate increased marginally from 73.2% to 73.4%.

### Pre-charge receipts and modern slavery flagged prosecutions and convictions, England and Wales, rolling year (Oct-Sept) 2018/19 to 2020/21<sup>70</sup>

Oct 2018 - Sept 2019	Q3 2018/2019	Q4 2018/2019	Q1 2019/2020	Q2 2019/2020	Rolling year
Pre-charge receipts	46	58	88	53	<b>245</b>
Prosecutions	68	105	67	91	<b>331</b>
Convictions	59	70	45	69	<b>243</b>

Oct 2019 - Sept 2020	Q3 2019/2020	Q4 2019/2020	Q1 2020/2021	Q2 2020/2021	Rolling year
Pre-charge receipts	76	72	64	85	<b>297</b>
Prosecutions	86	57	51	67	<b>261</b>
Convictions	67	43	41	40	<b>191</b>

<sup>69</sup> These data refer to the periods quarter 3 of the financial year through to quarter 2 of the next financial year, i.e. The periods October through to September as presented in Table 1.

<sup>70</sup> Data Source: The CPS Case Management Information System (CMS). **Pre-charge decisions** are recorded on a suspect basis. In some cases, a number of suspects may be investigated together. All suspects may be charged; all may receive a no prosecution decision; or some may be charged and others may have no further action taken against them. **Prosecution outcomes** are recorded on a defendant basis. In some cases, a number of defendants may be prosecuted together. All defendants may be convicted; all may be acquitted; or some may be convicted and others acquitted. (1) CPS modern slavery statistics are dependent upon lawyers and administrative staff identifying modern slavery cases and flagging the case on CMS. (2) A modern slavery flag is applied at the onset of any case referred by the police to the CPS for a charge of modern slavery; and remains in place even if the charge is not proceeded with, is amended or dropped. If a case is referred by the police for a charge other than modern slavery but at a later date a charge of modern slavery or trafficking is preferred the flag is applied at that point. (3) Charges of modern slavery may be considered at the time of the pre-charge decision but following the charging decision a defendant may be charged with another offence. Similarly, there may be cases where a person was proceeded against for modern slavery but convicted of a lesser offence.

Oct 2020 - Sept 2021	Q3 2020/2021	Q4 2020/2021	Q1 2021/2022	Q2 2021/2022	Rolling year
Pre-charge receipts	110	96	82	66	<b>354</b>
Prosecutions	92	112	99	148	<b>451</b>
Convictions	73	84	70	104	<b>331</b>

**Table 1**

2.3.2 In Northern Ireland, six defendants were prosecuted for Modern Slavery Act offences during 2021. There have been three successful convictions from two trials. In Scotland, between April and September 2021, 18 people were referred by police to the Crown Office and Procurator Fiscal Service (COPFS) and ten were prosecuted. While there were no MSHT convictions during the period, a number of cases are ongoing.<sup>71</sup>

2.3.3 The significant backlog of crown court cases caused by the pandemic appears to have stabilised but remains at over 58,000 cases<sup>72</sup> that will continue to have ramifications for retaining witnesses and victims while awaiting a trial date. I met a survivor in Belfast who explained to me that she had been waiting several years to give evidence against her abuser and just could not cope with the continuing trauma and had reluctantly withdrawn her support for the prosecution.

2.3.4 Key to increasing prosecutions is the work of NGOs in supporting vulnerable victims in the criminal justice system. In November 2021 I met with the NGO Justice and Care to discuss the positive results of an independent interim evaluation of their Victim Navigators initiative.<sup>73</sup> Victim Navigators embed into police teams and engage victims from the moment of identification by police, providing trauma informed and specialist support during the crucial post-rescue period and then providing ongoing coordination between the victim and the officers investigating their case. By June 2021, eight Victim Navigators were embedded in six UK forces and Border Force Scotland. Notably, 89% of victims supported by Victim Navigators engage with police investigations compared with an UK average of 33% providing police with key evidence to pursue investigations and increase prosecutions.

2.3.5 I have also been monitoring the Medaille Trust's 'Victim's Voices' project<sup>74</sup> that supports survivors to engage with the criminal justice system. The project began last year and has successfully trained 24 staff members across a series of safe houses to support survivors and

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<sup>71</sup> Data provided by the Scottish Government as of 21 February 2022. 2021/2022 is for quarter 1-2 only. Data is provided based on the date on which the initial police report was submitted to the Crown Office and Procurator Fiscal Service (COPFS). 'Prosecuted' means that the Procurator Fiscal has placed the accused person(s) on petition. This is an initial step which is followed by a period of investigation. It does not necessarily mean that an indictment was served on the accused person(s). Decisions about whether to place a number of people on petition are being considered (particularly in relation to people reported to COPFS in 2021/22). Proceedings in respect of a number of accused persons are ongoing. Accordingly, the data on prosecutions and convictions will change as decisions are made and proceedings conclude. Numbers of persons reported, prosecuted and convicted are regarding offences under the Human Trafficking and Exploitation (Scotland) Act 2015.

<sup>72</sup> HM Courts & Tribunals Service (2021), 'Management information during coronavirus - December 2020 to December 2021':

<https://www.gov.uk/government/statistical-data-sets/hmcts-management-information-december-2021>.

<sup>73</sup> Justice and Care (2021), 'Victim Navigators Evaluation':

<https://justiceandcare.org/wp-content/uploads/2021/09/Victim-Navigator-Interim-Evaluation-July-2021.pdf>.

<sup>74</sup> Medaille Trust (2021), 'Victim's Voices Project':

<https://www.medaille-trust.org.uk/news/article/victims-voice-new-project-launches-to-support-women-survivors-of-modern-slavery-to-access-justice>.

digitally record 'best evidence' interviews that can be used in criminal proceedings. Ten interviews have been recorded so far of which seven have supported police to pursue prosecutions in relation to domestic servitude, forced and compulsory labour and sexual exploitation. The Trust intends to continue embedding the skills across safe houses to encourage survivor recovery and bring perpetrators to justice.

2.3.6 The Sentencing Council released new Modern Slavery Sentencing Guidelines<sup>75</sup> in August 2021. I welcome the recognition that a victim may not recognise themselves as such, and that any apparent consent to their treatment should be treated with caution by the sentencing judge. The guidelines also state that sentences should be careful not to assume that the absence of evidence of harm indicates a lack of harm or seriousness. In response to my feedback,<sup>76</sup> the draft guidelines were amended so that when victims have been coerced or deceived into sexual activity this is assessed as a harm factor. It is good to see that the guidelines acknowledge that some offenders may themselves be victims of modern slavery and this should be taken into account where the statutory defence does not apply. Although it is disappointing that psychological behaviours of victims are not better reflected under the culpability factors, I recognise that the Sentencing Council gave proper consideration to this and they are reflected in the harm factors.

2.3.7 Slavery and Trafficking Risk Orders (STROs), Slavery and Trafficking Prevention Orders (STPOs), and the equivalent orders in Scotland and Northern Ireland remain important tools to control a perpetrator's behaviour and safeguard vulnerable victims. The prevention order is predominantly issued post-conviction and the risk order is applied when criminal justice proceedings do not ensue or prior to conviction. The latter is particularly helpful to control perpetrator behaviour in relation to victims and witnesses when there is a protracted time between arrest and charge or there is no charge. In the first three quarters of 2021, there were 19 Slavery and Trafficking Risk Orders issued by Magistrates Courts in England and Wales, matching the 19 issued in the whole of 2020. There were 17 STPOs issued in England and Wales in the first three quarters of 2021, compared with only 6 in 2020. There were no orders issued in Scotland or Northern Ireland during the same period. In February 2022 the Police National Computer (PNC) recorded that there were 168 STPOs and 78 STROs live across UK regions. This is probably a good indication of the number of live orders but it is unlikely to be exact as the PNC relies on officers updating the records.

2.3.8 Concerned that the orders were not being sufficiently pursued by law enforcement agencies, I commissioned a review of the use of risk and prevention orders and published the findings and recommendations in March 2022.<sup>77</sup> The review included a survey of the agencies with authority to apply for orders and contributions from the CPS, Home Office and Devolved Administrations. The report found that courts were appropriately considering STPOs and that the relatively small number of orders in existence was indicative of the disappointingly low number of convictions under Sections 1,2 and 4 of the Modern Slavery Act. The report made a series of recommendations including greater use of evidence led investigations when a victim is unable to provide witness evidence and greater use of STROs. There are currently over 4000 live MSHT

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<sup>75</sup> Sentencing Council (2021), 'Modern Slavery Sentencing Guidelines': <https://www.sentencingcouncil.org.uk/offences/magistrates-court/item/slavery-servitude-and-forced-or-compulsory-labour-human-trafficking/>.

<sup>76</sup> IASC (2020), 'Response to Sentencing Council Consultation on Modern Slavery Offences': <http://www.antislaverycommissioner.co.uk/media/1551/iasc-letter-responding-to-the-sentencing-councils-consultation-on-modern-slavery-offences-january-2021.pdf>.

<sup>77</sup> IASC (2022), 'The use of modern slavery risk and prevention orders': [https://www.antislaverycommissioner.co.uk/media/1764/iasc-review\\_risk-and-prevention-orders-report\\_march-2022.pdf](https://www.antislaverycommissioner.co.uk/media/1764/iasc-review_risk-and-prevention-orders-report_march-2022.pdf).

investigations and yet there are only 78 STROs recorded in the PNC.<sup>78</sup> Many of those 4000 investigations would not justify considering a risk order, but some would, and the report recommends that forces make greater use of this approach to disrupt criminality and protect victims.

2.3.9 While England and Scotland have access to both prevention and risk orders, Northern Ireland currently have not legislated for risk orders. I discussed this with the Justice Minister during my November 2021 visit and was pleased to be told that both this and the 'Duty to Inform' went out to public consultation in March 2022.

2.3.10 I have commented in previous reports about the importance of charging under Section 2 of the Modern Slavery Act in cases here children are forced to traffic drugs in what are known as county lines. I am pleased to note the continued success of the MPS County Lines Taskforce's Operation Orochi that is committed to tackling modern slavery and exploitation in the context of county lines drug supply. Since inception in November 2019, and in addition to closing down over 100 telephone lines used to sell drugs, Operation Orochi have successfully charged 30 different offenders for 47 offences of Modern Slavery utilising the Modern Slavery Act 2015. These prosecutions are almost entirely evidence led, victimless prosecutions meaning that the victim is not required to give evidence in court.

2.3.11 The Independent Review of the Modern Slavery Act in 2019 heard concerns that the wording of Section 2 of the Act with its emphasis on travel would limit its use and that it was not compliant with international legal definitions. The Reviewers concluded that it was too early to form a judgement but that I should keep the issue under review to guard against an overly restrictive view of what constitutes trafficking. Similar observations have been made more recently by leading legal experts who also doubt its compatibility with Article 4 of the ECHR.<sup>79</sup> I have raised with the NCA, policing and the CPS and none report difficulties in the interpretation of Section 2. The issue is particularly relevant in cases of the online sexual exploitation of children and a recent report by the International Justice Mission<sup>80</sup> recommended that in order to deal with international live streaming of child abuse that the Modern Slavery Act should be amended. I am concerned that we may be missing an opportunity to use the Section 2 offence in such cases.

## Protecting victims of trafficking

2.4.1 The February 2021 decision<sup>81</sup> by the European Court of Human Rights (ECtHR) in the case of VCL and AN v the United Kingdom challenged the approach of law enforcement agencies and the CPS in relation to investigating and charging suspects who may be a victim of slavery or trafficking. The ruling placed the onus on police, prosecutors, defence and the courts to identify indicators of trafficking whether or not the suspect makes any disclosure that they are a potential victim, and whether or not they make any admissions concerning the offence. I had raised the need for police to consider the statutory defence at the outset of an investigation in my 2020

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<sup>78</sup> Information provided by the NPCC Modern Slavery and Organised Immigration Crime Unit (MSOIC).

<sup>79</sup> Ben-Douglas-Jones, Michelle Brewer and Pam Bowen (2020), 'Criminal Offences of Trafficking', in 'Human Trafficking and Modern Slavery: Law and Practice', Philippa Southwell, Michelle Brewer and Ben Douglas-Jones, Bloomsbury Professional, 2nd ed.

<sup>80</sup> The International Justice Mission (2020), 'Falling short: demand-side sentencing for online sexual exploitation of children': <https://www.ijmuk.org/falling-short>.

<sup>81</sup> ECtHR (2021), 'Judgement of VCL and AN v United Kingdom': <https://hudoc.echr.coe.int/eng?i=001-207927>.

report 'The Modern Slavery Act statutory defence – a call for evidence',<sup>82</sup> and this judgement set out very clearly why this is necessary.

2.4.2 Responding to the decision, the CPS updated their legal guidance<sup>83</sup> shifting the focus from a suspect raising that they had been trafficked or exploited to directing that law enforcement fully investigate the possibility that a suspect may be a victim of slavery or trafficking before a suspect is charged, regardless as to whether the Section 45 statutory defence had been raised. The decision to prosecute should, so far as possible, be taken after a SCA decision has been made unless an immediate charging decision is sought for a remand in custody. The SCA currently prioritise cases where proceedings have commenced. This change in police and prosecution process will require the SCA to work with criminal justice partners to agree new processes for prioritisation of cases before charge.

## Equipping professionals

2.5.1 There are now four MSHT training products on the College of Policing's (CoP) learning platform: the four day specialist investigator's course; the one day awareness course for first responders; the digital learning (three hour) course and the Victim Liaison Officer (VLO) course. Since responsibility for coordinating MSHT training passed to the College of Policing from the MSOIC, there has been a steady decline in the number of officers and forces attending the four day investigator's course. Due to force training units being responsible for collating training data, there is no national record of officers who have attended the one day or four day courses. I understand from the records still kept by the MSOIC course developers, that fewer than 10 forces have hosted the four day investigator courses this year. On a more positive note I understand that two 'train the trainer' courses attracted 69 delegates from 34 forces and agencies in February 2022 which included the NCA, ROCUs and the NCLCC. Over 79,000 officers have completed the digital learning course and the VLO course has very recently been added to the learning platform.

2.5.2 The MSOIC Unit built on their Section 45 training webinars delivered throughout 2021 by co-developing further sessions with the National County Lines Coordination Centre (NCLCC) on the statutory defence and NRM engaging over 1500 officers. MSOIC also developed a webinar training package for major investigation teams across UK regions raising their awareness to the NRM, statutory defence and changes in recent case law.

2.5.3 The MSHT courses on the CoP learning platform are underpinned by Authorised Professional Practice (APP). Although I have corresponded with the College in 2019, 2020 and 2021 each time noting that the APP needs updating (it is shown as last updated on 12 January 2016), the information online remains out of date. Important new guidance issued by the CPS, the NCLCC and MSOIC need to be incorporated urgently in the APP. I have recently written to the College of Policing to ask that the APP is updated and received a reply in February 2022 providing assurance that a consultation version of a refreshed MSHT APP will be released in March.

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<sup>82</sup> IASC (2020), 'The Modern Slavery Act 2015 statutory defence: A call for evidence': <http://www.antislaverycommissioner.co.uk/media/1480/the-modern-slavery-act-2015-statutory-defence-a-call-for-evidence.pdf>.

<sup>83</sup> CPS (2021), 'Guidelines Modern Slavery, Trafficking and Smuggling': <https://www.cps.gov.uk/legal-guidance/modern-slavery-human-trafficking-and-smuggling>.

2.5.4 During 2021 the CPS continued to deliver training to prosecutors on the application of the Section 45 defence and its interaction with non-punishment principles. This continues to be a priority for the CPS ensuring all prosecutors are alert to the issues of criminal exploitation and the steps they must take. It also forms part of the induction training for new prosecutors as well as youth prosecutor training. Following further caselaw developments during 2021, including the ECHR case of VCL and AN v the UK, the CPS legal guidance was updated and the training pack revised to reflect those changes. The CPS continues to concentrate its modern slavery training on lawyers working on regional complex case units and the national organised crime division that prosecutes NCA cases.

2.5.5 The Judicial College has recently refreshed and updated modern slavery training for legal advisers and magistrates and expects to be in a position to roll out the new material in early spring. The online training will include information on what is meant by the term modern slavery and the offences which are comprised within this definition, the defence under Section 45 and the national referral mechanism, links between modern slavery and coercive control and information about the effects of trauma on victims. The training will take account of recently reported judgements.

## Priority 3: Focusing on prevention

3.1.1 There are estimated to be 16 million people worldwide in forced labour in the private sector<sup>84</sup> and I have been determined to focus effort on encouraging activity that tackles the business and economic systems in which forced labour can flourish. As well as harming victims, modern slavery and forced labour represent both a material and reputational risk to businesses. This section of the report illustrates the wide range of activities that my office has carried out in the last year and I have been struck by the responsiveness of business and the engagement of many civil society organisations.

### Responsible business

3.2.1 The 16 million people in modern slavery in the private sector globally are in industries ranging from agriculture, fishing, mining, manufacturing, construction to textiles. The risks are buried deep within supply chains but can be traced within a vast range of products and services. During my time in office, I have frequently called for corporate leaders to set the tone at the top of their organisations, creating the environment for more ethical treatment of workers at every tier of their supply chains. While it is encouraging to see many businesses publicly aligning with the UN Guiding Principles,<sup>85</sup> I would like to see more evidence of how these are being translated into long term strategies and informing outcomes.

3.2.2 Over the past year there has rightly been much media focus on state sponsored forced labour of Xinjiang Uyghur Autonomous Region in China, as well as exploitation of workers in Malaysia's rubber glove factories. However, my message to boards is that labour exploitation also remains a risk in the UK. I have been working with a number of sectors in this country.

3.2.3 I have continued to engage with the agricultural and retail organisations in the aftermath of Operation Fort, the prosecution of a Polish organised crime group which exploited an estimated 400 workers in the supply chains of supermarkets and DIY stores. My first review of the case in 2020<sup>86</sup> assessed the progress that the major brands were making in tackling modern slavery risk. It included a maturity framework, by which companies could assess their activities. Subsequently, I wrote to 15 CEOs in the sector to ask them where they saw themselves on the framework, and about the next steps they planned to take.

3.2.4 All businesses replied and I published a follow up paper in May 2021, 'Operation Fort Revisited'.<sup>87</sup> The level of response from CEOs varied but, overall, I was encouraged by the way in which businesses were improving their approach to supply chain management, the training of staff, sector collaboration and worker engagement. The tone was set at the top in many organisations, and there was clear commitment to protecting the most vulnerable workers from modern slavery and human trafficking.

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<sup>84</sup> See International Labour Organization website: <https://www.ilo.org/global/topics/forced-labour/lang-en/index.htm>.

<sup>85</sup> UN (2011), 'Guiding Principles on Business and Human Rights': [https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr\\_en.pdf](https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf).

<sup>86</sup> IASC (2020), 'Operation Fort, what businesses should learn from the UK's largest anti-slavery prosecution': <http://www.antislaverycommissioner.co.uk/media/1421/iasc-operation-fort-review-june-2020.pdf>.

<sup>87</sup> IASC (2021), 'Operation Fort revisited follow up paper': <https://www.antislaverycommissioner.co.uk/media/1605/operation-fort-revisited-may-2021.pdf>.

3.2.5 The Modern Slavery Intelligence Network (MSIN) could be the most powerful legacy of Operation Fort, and I have been encouraging its development over the past year. The MSIN has been set up by a group of retailers and tier one suppliers to pilot the sharing of data. Its aim is to track and analyse potential indicators of vulnerability in the workforce and to improve detection of labour exploitation or other welfare issues. Data from the project will be used to inform prevention activities.

3.2.6 The pilot required unprecedented levels of cooperation between competitors and suppliers, and has taken some energy and commitment to get off the ground, particularly from a legal perspective. Nevertheless, this trailblazing initiative could provide a template for other business groups. The project team are already receiving enquiries from other sectors and I await the findings of the pilot with interest.

3.2.7 Small businesses have a crucial role to play in the fight against modern slavery, and this year I have been supporting an initiative by Tribe Freedom Foundation, Stronger Together and Stop The Traffik. Foodies Fighting Slavery: An Agenda for Action for Food and Drink SMEs aims to mobilise and empower thousands of small producers. The initiative has carried out a survey of knowledge and attitudes of businesses in the sector and will be using its findings to develop training, resources and an awareness raising campaign to be launched in 2022.

3.2.8 Over the past year I have supported a number of events to encourage more business leadership in tackling labour exploitation. In October 2021, I spoke at the Consumer Goods Forum's Sustainable Retail Summit, which brings together CEOs from around the world to inspire change. I took part in a panel discussing the burden of proof that brands now face in proving that their supply chains are free of forced labour. Engaging with regional and specialist groups is also an important part of my work. I was invited to address businesses at a Scotland Against Modern Slavery webinar in September 2021. My office also contributed to a panel at CONVERGE21, an international conference of compliance, ethics and legal professionals on trends and developments in global legislation that were driving great corporate accountability.

3.2.9 In October 2021 I spoke at the launch of Sedex's new report<sup>88</sup> on the role of social audits in detecting forced labour. This report analysed the data of 100,000 social audits, conducted in 158 countries over five years against the ILO's indicators of forced labour. Findings included that forced labour indicators were found in 64% of social audits on the Sedex platform, and that 36% of audits showed multiple indicators. As I wrote in the foreword to the report, these findings highlight the hidden nature of labour exploitation, and suggest the need for companies to go beyond audit, using a wider variety of tools to engage with workers and better understand conditions within their supply chains.

## Investigation into the construction sector

3.3.1 This year my office has been researching the construction sector, in the wake of another major police modern slavery investigation, Operation Cardinas, in which hundreds of Romanian workers were exploited by a Romanian OCG. The gang operated across building sites in the Southeast over a period of several years and managed to infiltrate a range of projects, including prestigious central London developments and regional housebuilding schemes.

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<sup>88</sup> Sedex (2021), 'Recognising forced labour risks in global supply chains': <http://www.antislaverycommissioner.co.uk/media/1683/sedex-recognising-forced-labour-risks-in-global-supply-chains-october-2021.pdf>.

3.3.2 The OCG used a variety of methods to evade detection, including industrial scale generation of fake identity documents, and exploitation of weaknesses in site security. I was particularly struck by the response of one subcontractor involved with the case, who took steps to safeguard victims while the investigation was ongoing and has used the experience of Cardinas to strengthen its flagging and vetting systems.

3.3.3 However, Cardinas exposes the distinct challenges that this industry faces, due to the rapid churn of workers on building sites, complex and fragmented supply chains and heavy reliance on temporary migrant labour. My office has interviewed a range of organisations including clients, framework operators, principal contractors, suppliers and auditors to understand the sector's approach to labour exploitation risk.

3.3.4 While engagement with tier one subcontractors is progressing, considerably less is known about labour agencies and subcontractors in the lower tiers of supply chains, many of which are SMEs. In some instances a concerning lack of process has been found in the recruitment and payment of temporary labour. Many workers do not have clear terms and conditions, and there is lack of clarity over the deductions from their wage slips. I welcome the initiatives of several principal contractors to do more to investigate conditions for workers on the ground, including interviews and site visits. However, deep and prolonged activity will be necessary to understand the nature of the challenge. I am pleased to see a number of cross-industry collaborations and partnerships developing. These will be essential for making progress on shared supply chains in this pre-competitive space.

## Working with the private sector

3.4.1 Section 54 of the Modern Slavery Act 2015 requires businesses with a turnover of £36 million or more to write an annual statement setting out the steps they have taken to address modern slavery risk in their operations and supply chains. As I have recorded throughout my time in office,<sup>89</sup> business response to this ground-breaking piece of legislation has been uneven but the government has never used its powers of injunction against non-compliant organisations.

3.4.2 In its response to the Transparency in Supply Chains consultation<sup>90</sup> in September 2020, government committed to strengthening Section 54.<sup>91</sup> Measures included extending modern slavery reporting to the public sector, introduce mandatory topics and an annual reporting deadline. Fines for non-compliance were also considered in line with the development of a single enforcement body. Since then, government has delivered its promise to build a centralised registry of statements, but there has been no legislative progress to implement the other measures. The lack of momentum is disappointing and sends a message to business that government does not care.

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<sup>89</sup> IASC (2021), 'Independent Anti-Slavery Commissioner Annual Report 2020 – 2021': <https://www.antislaverycommissioner.co.uk/media/1642/independent-anti-slavery-commissioner-annual-report-2020-2021.pdf>.

<sup>90</sup> Home Office (2019), 'Transparency in Supply Chains Consultation': [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/919940/Transparency\\_in\\_supply\\_chains\\_consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/919940/Transparency_in_supply_chains_consultation.pdf).

<sup>91</sup> Home Office (2020), 'Transparency in supply chains consultation, Government Response': [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/919937/Government\\_response\\_to\\_transparency\\_in\\_supply\\_chains\\_consultation\\_21\\_09\\_20.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/919937/Government_response_to_transparency_in_supply_chains_consultation_21_09_20.pdf).

3.4.3 In recent months I have been monitoring the development of the government modern slavery statement registry, which launched on 11 March 2021. Linking statements to the registry will only become compulsory when new legislation is passed. However, with the encouragement of a major letters campaign by the Home Office, thousands of companies have voluntarily registered and provided links. The level of participation is encouraging, and the registry should become an essential resource for reading and monitoring modern slavery statements at scale. However, the manner in which entities engage with it will be critical to its usefulness as a resource for investors, NGOs, consumers and procurement professionals.

3.4.4 In September 2021 I asked the IASC team to investigate how companies were linking to the registry. They analysed 150 company registrations and found that only 45% correctly linked to the company's modern slavery statement. This is an important requirement for facilitating automated data analysis. In other cases, extra clicks were needed before the statement could be reached. For example, 12% of links took enquirers to policy or compliance-related sections of the website; 31% went directly to the company homepage. More concerningly 7% of links were broken, and 5% of organisations claimed not to have websites. But 3% were claiming this inaccurately.

3.4.5 Following this initial study, my team carried out separate analysis of 33 companies that claimed not to have a website. In such cases, businesses do not have to publish online, but are legally required to submit a statement in writing to anyone who requests it within 30 days of receiving the request. Twenty four of the companies in this group did, in fact have websites, and half of them had no visible statement.

3.4.6 As this was an exploratory paper,<sup>92</sup> I recommend that a large randomised study is conducted to assess the extent of non-compliance and that government develops more education, guidance and measures to hold businesses to account. I would also encourage investors, lenders and procurement professionals to take an active role in encouraging best practice. This should help to build a rich set of data, over the longer term.

3.4.7 In November 2021 the Financial Reporting Council (FRC) analysed corporate reporting on modern slavery for the first time in its Annual Review of Corporate Governance.<sup>93</sup> The FRC commissioned Lancaster University to compare the annual reports and modern slavery statements of 100 companies. The findings suggest that modern slavery is not a mainstream concern for many boards<sup>94</sup> and references to modern slavery tended to be superficial in annual reports. Only 19% of companies referred to KPIs or other non-financial performance indicators relating to modern slavery; a mere 13% explicitly discussed board-level decisions on that matter, and just 2% referred to the long-term impact of related issues on their business.

3.4.8 My office is collaborating with FRC and Lancaster University on a second project to analyse the same data sample. It will focus how businesses assess forced labour risk and measure their mitigation efforts against it, which were the least transparent areas of reporting.

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<sup>92</sup> IASC (2021), 'Linking to the Modern Slavery Statement Registry, an exploratory study of corporate behaviour': <https://www.antislaverycommissioner.co.uk/media/1738/linking-to-the-modern-slavery-statement-registry-an-exploratory-study-of-corporate-behaviour-january-2022.pdf>.

<sup>93</sup> Financial Reporting Council (2021), 'Review of Corporate Governance Reporting': [https://www.frc.org.uk/getattachment/b0a0959e-d7fe-4bcd-b842-353f705462c3/FRC-Review-of-Corporate-Governance-Reporting\\_November-2021.pdf](https://www.frc.org.uk/getattachment/b0a0959e-d7fe-4bcd-b842-353f705462c3/FRC-Review-of-Corporate-Governance-Reporting_November-2021.pdf).

<sup>94</sup> IASC (2021), 'Dame Sara welcomes ground breaking analysis of modern slavery activity in annual reports': <http://www.antislaverycommissioner.co.uk/news-insights/dame-sara-welcomes-ground-breaking-analysis-of-modern-slavery-activity-in-annual-reports/>.

3.4.9 It is important that all levers are available to government to drive transparency, improve the quality of corporate reporting and ensure that modern slavery becomes a boardroom priority. In July 2021 I wrote in support of the BEIS consultation, Restoring Trust in Audit and Corporate Governance.<sup>95</sup> I agree that decisive and substantial moves are needed to shake up the audit regime. A holistic approach is essential, and directors, auditors, shareholders and the audit regulator must all play their part in the reform. In my letter<sup>96</sup> to the consultation, I recommended that government introduces labour exploitation as a new category of risk for corporate resilience statements. I also welcome moves to make it easier for shareholders and investors to ask questions about audits at company AGMs.

## Harnessing the power of the financial community

3.5.1 I remain convinced that the financial community should be at the heart of the global effort against slavery, and agree with the Finance Against Slavery and Trafficking (FAST) initiative<sup>97</sup> that ‘finance is a lever by which the entire global economy can be moved’.<sup>98</sup> This year my engagement with the financial sector has built on the work of my original joint report with Themis and the TRIBE Freedom Foundation,<sup>99</sup> launched in January 2021, which found that, despite some pockets of good practice, there was a lack of activity to combat modern slavery risk within financial institutions.

3.5.2 Following the launch of the report, I supported Themis on the development of a free training module for the financial sector, which promotes awareness of the issues and recommends good practice. I also wrote to 51 CEOs of financial services organisations, asking them what concrete steps they were taking, in the light of the report’s findings, to address modern slavery risk internally and with their supply chains, clients and investments. A total of 44 responded, ranging from international banks to investment platforms, building societies and digital payment companies. The responses were often detailed and described innovative initiatives, leadership commitment and collaborative working. However, while there were examples of good practice, it was clear that the sector had not integrated modern slavery risks across its processes in the way it has approached environmental risk.

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<sup>95</sup> BEIS (2021), ‘Restoring trust in audit and corporate governance: proposals on reforms’: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/970676/restoring-trust-in-audit-and-corporate-governance-command-paper.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/970676/restoring-trust-in-audit-and-corporate-governance-command-paper.pdf).

<sup>96</sup> IASC (2021), ‘Response to the BEIS consultation: Restoring trust in audit and corporate governance: proposals on reforms’: <http://www.antislaverycommissioner.co.uk/media/1639/iasc-response-to-beis-audit-consultation-july-2021.pdf>.

<sup>97</sup> Finance Against Slavery and Trafficking – home page: <https://www.fastinitiative.org/>

<sup>98</sup> Liechtenstein Initiative Financial Sector Commission on Modern Slavery and Human Trafficking (2019), ‘A Blueprint for Mobilizing Finance Against Slavery and Trafficking’: <https://www.fastinitiative.org/wp-content/uploads/BlueprintExecutive-DIGITAL-1.pdf>.

<sup>99</sup> Themis, TRIBE, IASC (2021), ‘Preventing Modern Slavery and Human Trafficking – An Agenda for Action Across the Financial Services Sector’: <https://www.antislaverycommissioner.co.uk/news-insights/new-joint-report-on-modern-slavery-and-financial-services/>.

3.5.3 Therefore, along with my analysis of the letters,<sup>100</sup> published in September 2021, I made five recommendations to the sector.<sup>101</sup> Firstly, that modern slavery and human trafficking risk should be embedded throughout the investment lifecycle of a business; second that financial sector entities need to find ways of sharing data more widely on current and emerging threats; third that the sector broadens and deepens collaborations to improve disclosure and mitigation of forced labour risk, particularly in high risk sectors; fourth that the sector collaborates to improve conditions in electronics supply chains, through both investing and lending activities.

3.5.4 My fifth and final recommendation is that financial institutions are mandated to report on their investment and lending portfolios, under Section 54 of the Modern Slavery Act. Lack of activity in this area was apparent in the replies from CEOs that I received, and was reflected in recent study by Walk Free, WikiRate and the Business and Human Rights Resource Centre. The project's researchers analysed the modern slavery statements of 79 asset managers.<sup>102</sup> Only 27% disclosed that they carried out due diligence on modern slavery and human rights in their portfolios and just 15% reported direct engagement on such issues with investee companies.

3.5.5 In December 2021 I wrote to Minister for Safeguarding Rachel Maclean MP<sup>103</sup> and Economic Secretary to the Treasury John Glen MP, to recommend that government sets out specific requirements to financial services entities as part of its legislative package to strengthen Section 54. While I will continue to encourage voluntary disclosure, I suspect that this risk-averse and compliance driven sector will need to be compelled to report before real progress can be made. I spoke on these and other issues at an All Party Parliamentary Group (APPG) on ESG in February 2022, and as guest speaker at an Investor Forum meeting in December 2021.

3.5.6 I have continued to support investor collaborations to improve corporate accountability on modern slavery. The Votes Against Slavery (VAS) coalition, led by Rathbones, has expanded to 97 partners representing £7.8 trillion of assets under management. In 2021, VAS targeted 61 FTSE 350 companies that were not compliant with Section 54.<sup>104</sup> The level of non-compliance was much higher than anticipated and a sharp rise on the previous year (where just 22 companies were targeted).<sup>105</sup> Rathbones cited the Covid-19 pandemic as a contributing factor, as employees that would normally be responsible for reporting had been furloughed in several of the targeted companies. The VAS findings underline the fluid nature of compliance, and the need for the financial community to maintain ongoing vigilance. I am encouraged that all companies targeted in 2021 have since become compliant.

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<sup>100</sup> IASC (2021), 'The role of the financial sector in eradicating modern slavery: CEOs respond to the Independent Anti-Slavery Commissioner': <https://www.antislaverycommissioner.co.uk/media/1672/iasc-report-sep-2021-the-role-of-the-financial-services-sector-in-eradicating-modern-slavery.pdf>.

<sup>101</sup> IASC (2021,) 'Dame Sara's recommendations to the financial sector': <https://www.antislaverycommissioner.co.uk/media/1674/five-iasc-recommendations-to-the-financial-sector-sep-2021.pdf>.

<sup>102</sup> Walk Free, WikiRate, BHRC (2021), 'Beyond compliance in the finance sector': <https://www.walkfree.org/reports/beyond-compliance-in-the-finance-sector/>.

<sup>103</sup> IASC (2021), 'IASC exchange of letters with Rachel Maclean MP': <https://www.antislaverycommissioner.co.uk/media/1755/iasc-exchange-of-letters-with-rachel-maclean-mp.pdf>.

<sup>104</sup> Rathbones Group Plc (2022), 'Votes Against Slavery: investor action on supply chain transparency': [https://www.rathbones.com/sites/rathbones.com/files/imce/votes\\_against\\_slavery\\_report\\_march\\_2022.pdf](https://www.rathbones.com/sites/rathbones.com/files/imce/votes_against_slavery_report_march_2022.pdf).

<sup>105</sup> Rathbones (2021), 'Votes Against Slavery report, Investor action on supply chain transparency': <https://www.rathbones.com/knowledge-and-insight/rathbones-votes-against-slavery-report-launched-outlining-successful>.

3.5.7 I have also continued to be a partner to charity fund manager CCLA's Find it Fix it Prevent it Initiative,<sup>106</sup> which is now supported by 56 investors representing over £7 trillion in assets under management. The initiative involves members directly engaging with companies, asking what they have done to find modern slavery in their supply chains, and how they have addressed the issues and remediated victims. This year it has been working with the hospitality and construction materials sectors.

3.5.8 In October 2021 I addressed an online roundtable for investors jointly hosted by CCLA and the Home Office, where discussion included the problems of assessing corporate performance on the "S" – or social aspects – of environmental, social and governance (ESG) reporting, and the lack of quality data in this area. The International Regulatory Strategy Group (IRSG) and KPMG's joint report, 'Accelerating the "S" in ESG'<sup>107</sup> made a strong argument that minimum standards should be developed for social issues and recommended that modern slavery should be chosen as the lead social priority, to help to drive momentum.

3.5.9 The financial community has a pressing need for standardised, measurable and accessible data which reflects both forced labour risk and the ethical management of supply chains. Current commercial models tend to be fragmented, limited in scope and largely focused on predictive estimates of risk. I discussed these issues in June 2021 at the launch of the Modern Slavery and Human Rights Policy and Evidence Centre (Modern Slavery PEC) report on 'Data for investor action on modern slavery',<sup>108</sup> by the Alan Turing Institute and the Bingham Centre for the Rule of Law. The report recommends more coordination and collaboration on the development of data products, with an emphasis on value and practical usability for investors. In my view, creating the richest data picture would require a hybrid model that blends information sourced from law enforcement and other government agencies with commercially available data. However, a significant culture shift in the way that public and private sectors share information would be needed.

3.5.10 Insurers play an important role in influencing how businesses are run, from the individual responsibility of directors, to daily operations and strategic board decisions. They have untapped potential for raising standards in corporate behaviour. However, insurance products have traditionally focused on compliance and risk, an approach that is more likely to uphold the status quo, rather than encourage continual improvement. This year, I have been supporting the promotion of the Marine Cargo Clause (MCC)<sup>109</sup> which targets the transportation of goods made by forced labour. Adopted by a number of underwriters and brokers, including Fidelis, Marsh, Aon and Gallagher, the clause has seen significant uptake this year. Feedback suggests it is triggering deeper conversations between insurers and clients and prompting businesses to produce more evidence on their processes for tackling forced labour risk.

3.5.11 Having proved that the concept works for transport and logistics, I believe that it could now be strategically applied to other insurance products. As I said in an interview with Insurance

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<sup>106</sup> CCLA (2021), 'Find it, Fix it, Prevent it. Annual Report':

<https://www.modernslaverycccla.co.uk/news/find-it-fix-it-prevent-it-annual-report>.

<sup>107</sup> International Regulatory Strategy Group, KPMG (2021), 'Accelerating the S in ESG – a roadmap for global progress on social standards':

<https://home.kpmg/uk/en/home/insights/2021/06/accelerating-the-s-in-esg-a-roadmap-for-global-progress-on-social-standards.html>.

<sup>108</sup> Alan Turing Institute, Bingham Centre for the Rule of Law, MS PEC, (2021), 'Data for Investor Action on Modern Slavery: A Landscape Analysis': <https://modernslaverypec.org/resources/investors-data>.

<sup>109</sup> The clause states: "It is hereby understood and agreed that the Insured shall exercise best efforts to be compliant with all applicable legal and regulatory obligations that the Insured should be aware of in their country of domicile, relating to the cargo insured, in respect of forced and/or child labour".

Insider in November 2021,<sup>110</sup> the sector should be designing products that encourage entities to minimise risk of forced labour, rather than hedge against it. In March 2022, I jointly hosted a roundtable with Fidelis and Anti-Slavery International. It was attended by senior leaders from brokers, underwriters and industry influencers. The leaders agreed to form a regular working group to improve the sector's response to forced labour issues, and are developing a joint agreement committing them to future actions. The group's first initiative will be to create greater accountability through employer liability products.

## Encouraging the role of the public sector

3.6.1 Government spends £284 billion a year on buying goods and services from external suppliers. This amounts to around a third of all public expenditure.<sup>111</sup> The public sector should be playing a powerful role in driving ethical behaviour in supply chains. The Home Office committed to extending Section 54 reporting requirements to public sector bodies in its response to the transparency in supply chains (TISC) consultation in 2020.<sup>112</sup> Unfortunately, as this legislation has yet to materialise, it is acting as a brake on progress and a disincentive to local authorities and public sector organisations to review their procurement strategies.

3.6.2 However, central government continues to show leadership on TISC. Following the publication of its modern slavery statement in March 2020,<sup>113</sup> the government issued a progress report on its goals in November 2021.<sup>114</sup> Major departments also published their own modern slavery statements for the first time,<sup>115</sup> setting their own key performance indicators. The statements were peer reviewed by internal and external stakeholders, and my office helped to review two statements.

3.6.3 The government has met its target of appointing anti-slavery advocates (ASAs) at director level in each department, and some non-ministerial departments, such as Crown Commercial Services. The advocates have been appointed to provide senior oversight on the steps that each department is making to tackle modern slavery in supply chains. In order to educate and encourage best practice, the MSU developed an induction pack for ASAs which my office reviewed. MSU has also created and chaired a network for the anti-slavery advocates, which meets regularly to identify best practice and encourage cross-departmental collaboration. I spoke

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<sup>110</sup> Insurance Insider (2021), 'Commissioner says insurance could be a significant anti-slavery influencer': <https://www.insuranceinsider.com/article/299h00u0z88yahqk6x2bk/commissioner-says-insurance-could-be-significant-anti-slavery-influencer>.

<sup>111</sup> Institute for Government, 'Summary – Government procurement: the scale and nature of contracting in the UK': <https://www.instituteforgovernment.org.uk/summary-government-procurement-scale-nature-contracting-uk>.

<sup>112</sup> Home Office (2020), Transparency in Supply Chains Consultation: Government response: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/919937/Government\\_response\\_to\\_transparency\\_in\\_supply\\_chains\\_consultation\\_21\\_09\\_20.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/919937/Government_response_to_transparency_in_supply_chains_consultation_21_09_20.pdf).

<sup>113</sup> Home Office (2020), 'Modern Slavery Statement': [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/875800/UK\\_Government\\_Modern\\_Slavery\\_Statement.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/875800/UK_Government_Modern_Slavery_Statement.pdf).

<sup>114</sup> HM Government (2021), 'UK government modern slavery statement progress report': [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1026089/Modern\\_Slavery\\_HMG\\_Statement\\_progress\\_report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1026089/Modern_Slavery_HMG_Statement_progress_report.pdf).

<sup>115</sup> Home Office (2021), 'Departments publish modern slavery statements for the first time': <https://www.gov.uk/government/news/departments-publish-modern-slavery-statements-for-the-first-time>.

at an ASA meeting in November 2021 and was impressed by the dedication shown by the participants.

3.6.4 Closer engagement with businesses in public sector supply chains is critical for improving corporate behaviour. This year, government departments have been increasingly using the modern slavery assessment tool (MSAT) to spark discussions with suppliers. As of 1 October 2021, more than 3,000 businesses had completed an assessment, compared to 1,104 as of March 2020. Many of the participating businesses were not contractually obliged to complete the MSAT but would have been asked to do so by public bodies.<sup>116</sup> In December 2021 I addressed a meeting of strategic government suppliers, which was jointly organised with the British Services Association and the Cabinet Office. I was pleased to hear of new initiatives being discussed to combat modern slavery risk in supply chains.

3.6.5 Nevertheless, the risk of goods made with forced labour entering the public sector is significant. In October 2021, US agency Customs and Border Protection (CBP) issued an import ban, or withhold release order (WRO),<sup>117</sup> against Malaysian glove producer Supermax. Responding to this event, Lord Alton of Liverpool asked the UK government what assessment it had made of alleged labour abuses by the company; how many of the company's products it had purchased, and the cost of those purchases.

3.6.6 I was disturbed by Lord Kamall's response in Parliament that government had placed an order with Supermax in July 2021 for 135 million gloves at a cost of £7.9 million. Despite his reference to safeguards to terminate a contract in the event of substantiated allegations against a provider, no actual termination of the Supermax contract nor practical safeguarding measures were mentioned.

3.6.7 In November 2021 I wrote to the 16 permanent secretaries, enclosing a list of recent WROs, and asking for reassurance that their department was taking adequate measures to stop goods subject to international import bans from entering their supply chains. I asked the permanent secretaries to check with procurement teams whether they had let contracts with suppliers, producers or importers of goods that were in whole, or in part, produced by these companies. In the case that such contracts had been let, I asked what steps they are taking to work through concerns with suppliers. The WRO list included palm oil, PPE, tomatoes, tech products, textiles and apparel.

3.6.8 All replied apart from the Ministry of Defence. Most agreed that WROs were a useful data source, even if issued under a different legal framework. The Home Office and Cabinet Office are now considering how WROs might be included in further guidance to departments. However, wording was varied on whether there were no contracts with organisations listed in the letter. The use of the phrase "direct contracts" suggests that the analysis was limited to tier one suppliers in many cases. The Department of Health and Social Care declined to comment on its individual contracts due to commercial sensitivity, but did say that when concerns were raised, the related stock was not distributed while it carried out investigations. This was the only department to express such reluctance and given the admission that gloves had been ordered from Supermax I remain concerned that it is possible that the UK government is purchasing from companies that are subject to US WROs.

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<sup>116</sup> HM Government (2021), 'UK government modern slavery statement progress report': [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1026089/Modern\\_Slavery\\_HMG\\_Statement\\_progress\\_report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1026089/Modern_Slavery_HMG_Statement_progress_report.pdf).

<sup>117</sup> The US government issues WROs under Section 307 of its 1930 Tariff Act, which prohibits the importation of any product that was mined, produced or manufactured wholly or in part by forced labour.

3.6.9 I have continued to encourage the devolved governments to write their own modern slavery statements, but progress has been slow. In accordance with the Welsh Government's Code of Practice on Ethical Employment in Supply Chains, the Welsh Government will voluntarily publish a statement later in this calendar year. I would encourage Scotland and Northern Ireland to develop their statements when resources allow, as this would send a powerful message to suppliers across the UK.

## Labour market conditions

3.7.1 The labour market has been buffeted by a multitude of crosswinds this year. The ongoing Covid-19 pandemic, the UK's exit from the European Union, and critical labour shortages in low-skilled roles have created a perfect storm for employers, particularly in sectors with a heavy reliance on migrant labour.<sup>118</sup>

3.7.2 Many EU nationals that went home during the pandemic did not return,<sup>119</sup> and others have relocated to find work inside the EU. A large proportion of foreign workers with settled status have stayed on, progressing to better paid roles. This has created an unprecedented number of low-skilled job vacancies. Despite initiatives such as Pick for Britain, UK nationals show little enthusiasm for filling the gaps.

3.7.3 The UK is a desirable destination for migrant workers, but as recruitment routes open up globally, the risks of exploitation increase. There is a risk of workers being tricked by rogue agents and middlemen into paying exorbitant training and recruitment fees or other dubious charges; being recruited into non-existent jobs, or being misled on the nature of work and wages that they can earn. Workers that arrive in debt, with poor English speaking skills and little understanding of their rights are already vulnerable, and at risk of exploitation from unscrupulous employers or criminal gangs.

3.7.4 The seasonal workers visa scheme for the agricultural sector illustrates some of the challenges. In 2019 the pilot scheme had places for 2,500 temporary migrant workers and was run by two government-appointed operators. This year there are four operators, recruiting 30,000 workers, with the option of adding a further 10,000 places if required. An evaluation of the 2019 pilot season, published in December 2021,<sup>120</sup> found no instances of modern slavery, but did identify issues that fall under the ILO's definition of forced labour. Almost half of compliance visits conducted by government agencies found that workers had not receive their employment contract in their native language; 15% of respondents to a Defra survey said that their accommodation was neither safe, comfortable, hygienic nor warm, and 10% that it had no bathroom, running water or kitchen. In addition, 22% alleged ill treatment by farm managers, including racism, discrimination or mistreatment on grounds of their nationality.

3.7.5 As the review acknowledges, these conditions are unacceptable, and I am pleased that some action has already been taken, such as extra training for managers and updated guidance to tighten the compliance requirements. However, the exponential increase in places in recent

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<sup>118</sup> The Times, 'Supply problems and labour shortages start to bite' (25 August 2021):

<https://www.thetimes.co.uk/article/supply-problems-and-labour-shortages-could-start-to-bite-gv5gq0tc5>.

<sup>119</sup> The Times, 'Covid or Brexit, what's to blame for Britain's labour shortages?' (9 October 2021):

<https://www.thetimes.co.uk/article/covid-or-brex-it-whats-to-blame-for-britains-shortages-g8d7p3fp8>.

<sup>120</sup> Defra, Home Office (2021), 'Seasonal workers pilot review 2019':

<https://www.gov.uk/government/publications/seasonal-workers-pilot-review/seasonal-workers-pilot-review-2019>.

years raises questions about whether adequate checks and balances are in place to protect workers. I wrote to Kevin Foster MP, Minister for Future Borders and Immigration and George Eustice, Secretary of State for Food, Environment and Rural Affairs, to call for renewed efforts to educate workers before and during the recruitment process; for a rolling out of worker voice tools, that could understand the worker experience, at scale and while in the UK; and finally, for remediation to be considered for workers that had paid recruitment fees.<sup>121</sup>

3.7.6 In December 2021, I raised concerns about the welfare of agricultural workers on Radio 4's Today programme. In February 2022, I brought together businesses, NGOs, government agencies and local councils for a roundtable in partnership with the UK BME Anti-Slavery Network (BASNET) to explore the practical and cultural challenges of long-haul recruitment in the agriculture and care sectors.

3.7.7 The fashion and textile industry is another high risk industry in the UK, but a different set of social and cultural factors impact on its largely British workforce, including coercive practices resulting in underpayment of minimum wage, forced overtime and health and safety violations. This year I have continued to support efforts by brands, the GLAA, Leicester City Council, unions and NGOs to collectively improve conditions for workers and encourage more ethical procurement standards in the supply chains. The Apparel and General Merchandise Public Private Partnership (AGM PPP) has been negotiating for months to develop a set of commitments – the Joint Responsibility Initiative – that brands can sign up to. I hope that an agreement on this initiative can be reached soon.

3.7.8 The hand car wash sector has been consistently identified by the Director of Labour Market Enforcement as at severe risk of labour exploitation.<sup>122</sup> In extreme cases this evolves into modern slavery. Last year two men were successfully prosecuted for running a modern slavery ring at a car wash in Cumbria. Workers received £20 for working 11 hours a day, six days a week, and forced to live and work in cramped and dangerous conditions.<sup>123</sup> As I commented in media interviews,<sup>124 125</sup> we as consumers should be asking ourselves, if we are getting a service at a cheap price, what price others are paying through exploitation.

3.7.9 This year my office continued to support the Responsible Car Wash Scheme (RCWS),<sup>126</sup> which ran a new pilot in several locations to build an evidence base for licensing. In November 2021 I wrote to support the RCWS in its bid to the Home Office's Modern Slavery Prevention

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<sup>121</sup> IASC (2022), 'IASC raises concerns over labour exploitation risk for migrant agricultural workers': <http://www.antislaverycommissioner.co.uk/news-insights/iasc-raises-concerns-over-labour-exploitation-risk-for-migrant-agricultural-workers/>.

<sup>122</sup> Director of Labour Market Enforcement (2021), 'United Kingdom Labour Market Enforcement Strategy 2020/21': [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1040316/E02666987\\_UK\\_LMES\\_2020-21\\_Bookmarked.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1040316/E02666987_UK_LMES_2020-21_Bookmarked.pdf).

<sup>123</sup> IASC (2021), 'Dame Sara Thornton interviewed on BBC Radio Cumbria': <http://www.antislaverycommissioner.co.uk/news-insights/dame-sara-interviewed-on-bbc-radio-cumbria-following-modern-slavery-sentencing/>.

<sup>124</sup> IASC (2021), 'Dame Sara Thornton says that the recent sentencing of two men for running a car wash modern slavery ring can be a wake-up call for consumers': <http://www.antislaverycommissioner.co.uk/news-insights/dame-sara-interviewed-on-bbc-radio-cumbria-following-modern-slavery-sentencing/>.

<sup>125</sup> i Paper, 'Carwash bosses jailed for modern slavery after exploiting workers' (30 July 2021): <https://inews.co.uk/news/car-wash-bosses-jailed-modern-slavery-exploiting-rulers-1129402>.

<sup>126</sup> IASC (2021), 'Independent Anti-Slavery Commissioner supports launch of the Responsible Car Wash Scheme': <http://www.antislaverycommissioner.co.uk/news-insights/independent-anti-slavery-commissioner-supports-launch-of-the-responsible-car-wash-scheme/>.

Fund. Funding has since been secured for a collaborative project with five ROCUs. That month, I also spoke at a House of Commons reception for stakeholders in the sector, hosted by the Car Wash Association.

3.7.10 Hand car washes, fast fashion, care homes and agriculture are just some of the UK sectors that face distinctive challenges in the UK labour market, from minor non-compliances to severe labour exploitation. The risks to workers could be magnified without sufficient safeguards, particularly in the design of visa schemes, and in the enforcement of business standards. The government has recognised gaps in its approach. In 2019, the Department for Business, Energy and Industrial Strategy and the Home Office launched a joint consultation on the creation of a single labour market enforcement body.<sup>127</sup> It proposed to bring together the GLAA, Employment Agency Standards and Her Majesty's Revenue and Customs' minimum wage unit.

3.7.11 In June 2021 the government published its response to the consultation,<sup>128</sup> confirming its commitment to a single body that would tackle modern slavery, enforce the minimum wage and protect agency workers as well as acting as a single point of contact for both employers and employees.<sup>129</sup> This commitment is welcome, particularly if the new body can coherently address the spectrum of exploitation. However, slow progress in the practical development of the body, and lack of accompanying legislation, continues to create uncertainty for government agencies, leaves businesses less supported and workers more at risk.

3.7.12 As there is no clear timetable for implementation of a single enforcement body, it is essential that all three agencies receive adequate funding before the transition, as they confront challenging labour market conditions. The GLAA currently licenses labour providers in the agriculture, horticulture, shellfish gathering and associated processing and packaging sectors. In recent months, there have been calls for licensing to be extended to other sectors, such as hand car washes, construction and the fashion industry. Introducing licensing to new business areas is no silver bullet. It would require significant investment and resources, and careful design to reflect the individual features of each industry.

## Raising public awareness

3.8.1 The Independent Review of the Modern Slavery Act recommended that research be carried out into how consumer attitudes can be influenced.<sup>130</sup> Consumers are an important part of the anti-slavery agenda, as they can knowingly or unknowingly purchase goods and services made by forced labour, inadvertently feeding into the demand for such goods. Consumers can also be mobilised to take part in campaigns, such as the Safe Carwash app, which encourages

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<sup>127</sup> BEIS (2019), 'Good work plan: establishing a new single enforcement body for employment rights': <https://www.gov.uk/government/consultations/good-work-plan-establishing-a-new-single-enforcement-body-for-employment-rights>.

<sup>128</sup> BEIS (2021), 'Establishing a single enforcement body for employment rights: government response': [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/991751/single-enforcement-body-consultation-govt-response.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/991751/single-enforcement-body-consultation-govt-response.pdf).

<sup>129</sup> HM Government (2021), 'Government to protect workers' rights and clamp down on workplace abuse with powerful new body': [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/991751/single-enforcement-body-consultation-govt-response.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/991751/single-enforcement-body-consultation-govt-response.pdf).

<sup>130</sup> Field et al. (2019), 'Independent Review of the Modern Slavery Act 2015: Final Report': [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).

consumers to report suspicions of modern slavery in hand car washes, or the End Uyghur Forced Labour campaign<sup>131</sup> which encourages consumers to buy responsibly from companies that have committed to end links to forced labour from the Uyghur region.

3.8.2 Over the past year, my office has been supporting a research project by Royal Holloway University of London, the University of Melbourne, and the University of Glasgow to examine what motivates consumer behaviour. I spoke at the online launch of the resulting paper by the Modern Slavery and Human Rights and Policy and Evidence Centre<sup>132</sup> which identified the complex and conflicting priorities that consumers have when purchasing goods and services. The paper recommended that campaigns should be targeted to specific audiences with clear pathways to action. It also recognised the power of social influencers and recommended that the design, development and evaluation of awareness raising campaigns could be improved through common marketing techniques.

3.8.3 I believe that public speaking is an essential part of my role to raise awareness and have presented at more than 90 events in the last year. The events are recorded at pages 68 to 72. Most were carried out online due to the pandemic, and many were addressing specific business groups or disciplines. In October 2021, I participated in the International Bar Association's showcase debate 'New Light Through Old Windows', which examined the global legislative landscape on forced labour. In November 2021 I participated in a Simmons & Simmons' fireside chat which explored the responsibilities of financial services organisations in combatting modern slavery.<sup>133</sup> I have taken part in two Chatham House events. The first was in July 2021 on coordinating the fight against financial crime; The second was the Chatham House Responsible Business Conference in March 2022, where I spoke on the importance of social factors within ESG. Several events that I have attended have looked at the challenges of changing immigration patterns. In September 2021 I spoke at a University of Hull round table on 'The Impact of Brexit, has this increased or decreased the risk of modern slavery and labour exploitation in the UK?'

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<sup>131</sup> The Coalition to End Forced Labour in the Uyghur Region website: <https://enduyghurforcedlabour.org/>.

<sup>132</sup> University of Melbourne, Royal Holloway University of London, University of Glasgow, MS PEC (2021), 'Addressing consumer awareness and (in)action towards modern slavery': <https://modernslaverypec.org/assets/downloads/Consumers-full-report.pdf>.

<sup>133</sup> See Simmons and Simmons LLP event webpage: <https://www.simmons-simmons.com/en/training/ckx05fw4x15wg0b14ezphjdis/esg-modern-slavery-in-financial-services>.

## Priority 4: Getting value from research and innovation

4.1.1 Evidence and data is essential to inform effective policymaking and practice in response to modern slavery. Over the past year I have developed work to build the evidence base, convening experts across academia, practice and peer research to begin to address research priorities and to share and translate the available data and evidence. Where evidence gaps on modern slavery persist, decision makers must be proactive and creative to develop new approaches to discover what works.

4.1.2 Independent scrutiny of the issues remains imperative and I have continued to advocate for improved access to more detailed data. To inform my statutory remit to undertake or support the carrying out of research which supports my functions as Commissioner, my office published a Data Sharing Agreement with the Home Office in 2020 which reflects a recommendation in the Independent Review of the Modern Slavery Act, accepted by the government, that I should have sufficient access to government data to carry out scrutiny of the response to modern slavery.<sup>134</sup> Despite this, requests for data to inform my remit have been met with delays and obfuscation. Such obstruction undermines my independence and broader research efforts across the sector.

4.1.3 There is a growing body of modern slavery research and my office has benefited from taking a partnership approach, working strategically with academic bodies and institutions and supporting many discrete research projects. The Modern Slavery PEC is now an established facilitator of modern slavery research, with a mission to enhance understanding of modern slavery and transform the effectiveness of law and policies designed to address it.

### Defining the scale of the problem

4.2.1 Over the past year I have added to calls led by the Home Office in 2018<sup>135</sup> and the Modern Slavery PEC in 2020<sup>136</sup> to understand how we can use the latest evidence and data on modern slavery to develop an updated prevalence estimate in the UK.<sup>137</sup> Despite the challenges of assessing the scale and nature of exploitation, it is important that the available quantitative and qualitative data is gathered and methodologies are tested to ensure policymaking and practice is evidence based. Innovative approaches to gather data from 'hidden' populations such as respondent driven sampling look promising and should be explored.

4.2.2 One of my modern slavery research priorities sets out the need to better understand the scale and nature of child trafficking. Last year my office and ECPAT UK jointly produced the child trafficking in the UK 2021 snapshot report which outlined the latest data, policy developments and promising practice.<sup>138</sup>

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<sup>134</sup> IASC and Home Office (2020), 'Data Sharing Protocol between HO and the Independent Anti-Slavery Commissioner': <http://www.antislaverycommissioner.co.uk/media/1420/data-sharing-agreement-for-iasc-and-home-office.pdf>.

<sup>135</sup> Home Office (2018), '2018 UK Annual Report on Modern Slavery': <https://www.gov.uk/government/publications/2018-uk-annual-report-on-modern-slavery>.

<sup>136</sup> Modern Slavery and Human Rights Policy and Evidence Centre (2021), 'Consultation on the Modern Slavery PEC's research priorities': <https://modernslaverypec.org/assets/downloads/Research-consultation-report-final.pdf>.

<sup>137</sup> IASC (2021), 'IASC Research Priorities': <http://www.antislaverycommissioner.co.uk/media/1732/iasc-research-priorities-2021.pdf>.

<sup>138</sup> IASC and ECPAT UK (2021), 'Child trafficking in the UK 2021: a snapshot': [http://www.antislaverycommissioner.co.uk/media/1724/ecp05-a4-report-snapshot-21\\_aw7.pdf](http://www.antislaverycommissioner.co.uk/media/1724/ecp05-a4-report-snapshot-21_aw7.pdf).

4.2.3 I was first briefed on work by the National Data Analytics Solution (NDAS) to use advanced data analytics to identify cases of modern slavery in police files in 2019 which has the potential to provide a new prevalence estimate. Whilst the approach requires validation, I am aware that work is continuing and welcome such efforts. I have also discussed the potential merits of revisiting the 2014 Home Office prevalence estimate of 10,000 to 13,000 potential victims in the UK, which was produced by Sir Bernard Silverman using multiple systems estimations.<sup>139</sup> Sir Bernard now leads the University of Nottingham Rights Lab work in estimating modern slavery prevalence and I will continue to engage with the Rights Lab as they explore opportunities to revisit and refine this methodology.

4.2.4 A revised global estimate on modern slavery prevalence is due to be released by the Walk Free Foundation's Global Slavery Index (GSI) this year. Previously the Walk Free Foundation estimated that there were 40.3 million victims of modern slavery on any given day in 2016.<sup>140</sup> The Walk Free Foundation subsequently used a combined methodological approach, including the use of surveys and individual and country-level risk factors for the 2018 GSI which provided an estimate of 136,000 victims in the UK.<sup>141</sup> I look forward to seeing the latest estimate which will provide much-needed data on the global impact of the pandemic on modern slavery.

4.2.5 Another methodological approach to understanding the scale and nature of modern slavery has been to use proxy data from a range of sources linked to modern slavery. The Office for National Statistics (ONS) published a useful article taking this approach which explored the issues of prevalence and brought together different data sources to understand the nature of the crime and potential demand on support services.<sup>142</sup> My office has engaged with the ONS which is now using this approach to collate and publish the latest data related to child trafficking to support work on the Sustainable Development Goals. I welcome such efforts and look forward to promulgating the forthcoming ONS publication on this.

4.2.6 The NCA is currently considering how to provide the most accurate assessment of the scale of the modern slavery and human trafficking threat. The NCA previously estimated there were between 6,000 to 8,000 offenders involved in exploitation of people in the UK, who carry out a variety of roles linked to modern slavery and human trafficking.<sup>143</sup> I understand the new approach will combine the previous estimate of known offenders with an estimation of the hidden scale of offending using the mark and recapture technique, which has been used by the NCA to provide an updated scale of offending related to child sexual abuse. My office will continue to support these attempts to provide a more sophisticated picture of the scale of the threat.

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<sup>139</sup> Home Office (2014), 'Modern Slavery: an application of multiple systems estimation': <https://www.gov.uk/government/publications/modern-slavery-an-application-of-multiple-systems-estimation>.

<sup>140</sup> Global Slavery Index (GSI) 2018, 'Global Findings': <https://www.globalslaveryindex.org/2018/findings/global-findings/>.

<sup>141</sup> GSI (2018), 'More than 136,000 people are living in modern slavery in the United Kingdom': <https://www.globalslaveryindex.org/news/more-than-136000-people-are-living-in-modern-slavery-in-the-united-kingdom/>.

<sup>142</sup> Office for National Statistics (2020), 'Modern slavery in the UK: March 2020': <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/modernslaveryintheuk/march2020>.

<sup>143</sup> National Crime Agency (2021), 'National Strategic Assessment of Serious and Organised Crime 2021': <https://www.nationalcrimeagency.gov.uk/who-we-are/publications/533-national-strategic-assessment-of-serious-and-organised-crime-2021/file>.

## Developing strategic partnerships

4.3.1 I have found a partnership approach to producing and supporting research on modern slavery to be effective and mutually beneficial to my office and the network of researchers I have established during my tenure as Commissioner. Longer term research relationships with universities and consortia have been strengthened through joint protocols agreed over the past year whilst I have also supported a number of rapid research initiatives which can provide policy-relevant findings at speed.

4.3.2 In 2021 I published a portal on my website to record and respond to research requests from academics, peer researchers, civil society and others.<sup>144</sup> This outlines my ambition to support policy-relevant research which can answer the most pressing research challenges as set out in my research priorities. Since the portal was published, I have received 23 requests ranging from interviews for academic projects, invitations to contribute to academic advisory boards and offers to co-produce research. Where research efforts align with my strategic priorities and my research priorities, I have been able to offer in-kind support to a breadth of projects which typically involves feedback on research aims and methodology, support to convene roundtables and meetings, making requests for data and supporting dissemination and translation of research outputs.

4.3.3 The research relationships developed through the portal complement a growing body of new and existing research partnerships on topics as diverse as modern slavery perpetrators, barriers to prosecution and mapping human trafficking spatially through data. One initiative I was particularly pleased to see had been successful was the creation of the ESRC Vulnerability and Policing Futures Research Centre. The Centre is led by the Universities of York and Leeds and seeks to understand how vulnerabilities including modern slavery are compounded and mitigated by policing and how the police and other services can prevent and reduce vulnerabilities. This is one of a number of ambitious projects I have provided letters of support for, and which have the chance to produce much-needed evidence which is strategic and able to drive policy change.

4.3.4 Last year my office and the Rights Lab at the University of Nottingham agreed a protocol to design a collaborative approach to research design and delivery in recognition of the breadth and agility of Rights Lab research.<sup>145</sup> The intention of the protocol was to develop a more structured approach to collaborate on emergent research, and I have since commissioned two rapid research projects which my office co-produced with the Rights Lab. The first project examined the benefits of working, the harms caused by not working, and the current approach to how survivors are assisted to access employment, reintegrate, and work towards stability and independence. The resultant report was launched in May 2021 and found that whilst employment is only a part of the equation in supporting survivors to reintegrate into society and achieve sustainable independence, it is a vital part offering meaning and purpose, routine and stability, and enabling financial independence. Regardless of a survivor's status in the UK, the time in the NRM should be used more productively to develop skills, prepare for employment, financial independence and economic resilience and agency.<sup>146</sup>

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<sup>144</sup> See 'Online Form: Research Requests to the Independent Anti-Slavery Commissioner': <https://www.antislaverycommissioner.co.uk/contact-us/>.

<sup>145</sup> See 'Designing a collaborative approach to research and innovation': <https://www.antislaverycommissioner.co.uk/media/1581/iasc-and-rights-lab-collaborating-on-research-and-innovation.pdf>.

<sup>146</sup> IASC and University of Nottingham Rights Lab (2021), 'Re-trafficking: The current state of play': [https://www.antislaverycommissioner.co.uk/media/1705/iasc-and-rights-lab-re-trafficking-report\\_november-2021.pdf](https://www.antislaverycommissioner.co.uk/media/1705/iasc-and-rights-lab-re-trafficking-report_november-2021.pdf).

4.3.5 The second project I commissioned under the IASC and Rights Lab protocol was a rapid research project to identify knowledge and data gaps in relation to re-trafficking and its causes, and to hear from those across the sector on their understanding of the reality of re-trafficking on the ground. To inform the research we ran a call for evidence inviting service providers, civil society and survivor organisations, and policymakers to submit views about the definition of re-trafficking, its causes and drivers, and prevention and mitigation. A rich set of case studies obtained through this call for evidence demonstrated that re-trafficking is happening in a UK context, and is affecting a diverse range of survivors regardless of gender, age, nationality and exploitation type. A report was published in November 2021 and found that there is a need to develop a consensus on a definition of re-trafficking and to embed this in policy and guidance on modern slavery. It also revealed a lack of data on the prevalence of re-trafficking which is needed to inform appropriate responses. Finally, the report emphasised the importance of developing dedicated reintegration pathways for survivors remaining in the UK or returning to another country.

4.3.6 To support the joint report by my office and the Rights Lab on re-trafficking, I requested data from the Home Office on the information collected and held in relation to re-trafficking as part of the NRM and the Home Office MSVCC before, during and after NRM support. Data was sought on the numbers of referrals to support and how many individuals have returned to support, been referred more than once, gone missing or absconded from support services. I also requested data on whether the risk of re-trafficking is being recorded across the Home Office MSVCC and what is being done to address the issue of re-trafficking. The data request was submitted in June 2021 and I received a formal response in March 2022 stating that the data cannot be provided as it is not readily available. This is data which the Home Office should be collecting and evaluating. I was disappointed, not only that they declined to provide me with the information but that they were not, themselves, monitoring the issue.

4.3.7 Further to these two rapid research projects my office has continued to benefit from quarterly research briefings led by experts at the Rights Lab on issues such as modern slavery data and measurement, the links between modern slavery, ecosystems and the environment, and the impact of slavery on economies and how businesses can tackle slavery in supply chains. Regular meetings between my office and the Rights Lab have provided a channel for two-way learning to identify and work to answer research questions of shared interest.

4.3.8 Another longer term research relationship I have developed has been with the University of Liverpool. I was appointed Honorary Professor in Modern Slavery at the Centre for the Study of International Slavery (CSIS) which is a joint initiative between the University and the International Slavery Museum (ISM) in Liverpool. I have visited the Centre on a number of occasions to meet with academics and understand the linkages across historical slavery, contemporary slavery and heritage. As well as the Centre, I have worked with anti-slavery experts across the university from the Faculty of Humanities and social Sciences, Liverpool Law School and the Management School among others. I supported a public event hosted by CSIS for International Women's Day in March 2022 which brought together these cross-discipline perspectives for an exploitation of the gendered issue of modern slavery.

4.3.9 In August 2021 I supported a workshop at the CSIS on the future of the Centre and the expansion of the ISM which has explored curating an exhibition on contemporary slavery. Exhibitions can provide creative platforms through which to communicate the diversity of experiences of modern slavery survivors and their hopes and dreams for the future. I was pleased to support the launch of one such exhibition in October 2021 at Westbury Manor Museum hosted by the Office of the Police and Crime Commissioner for Hampshire and the Isle of Wight

which told compelling stories of survivors identified and supported in the region with visual and audio content depicting their experiences and future aspirations.

4.3.10 The Bakhita Centre for Research on Slavery, Exploitation and Abuse at St Mary's University has a focus on applied research, working closely with civil society organisations, practitioners and academics to gather empirical evidence and make the modern slavery response more targeted. I commissioned research by the Bakhita Centre last year to examine the role that practice-based research can play in policy development and survivor support,<sup>147</sup> and championed this research during a keynote presentation for the Centre's 'Healing the Wounds of Modern Slavery' conference in October 2021. The Bakhita Centre also ran the Horizon Summer School in 2021, a pilot programme for modern slavery survivors based on the premise that access to education can be a key factor in the longer term support of survivors. I welcome this initiative which represents the best of collaborative working across higher education, service providers and practitioners to empower survivors through a range of practical courses.

4.3.11 My office has been working with Cumberland Lodge to develop shared thinking on best practice and practitioner responses to child trafficking, culminating in a conference held in October 2021 at the Cumberland Lodge site. We ran a call for evidence ahead of the conference inviting practitioners, academics and policymakers to share promising practice in the field of responding to child exploitation and trafficking. I worked closely with Cumberland Lodge and a steering committee of experts across modern slavery and child safeguarding to shape the conference, which brought together stakeholders across modern slavery and related sectors to inform improvements in policy and practice. The Rt Hon Theresa May presented the keynote address and sessions were held on the structural harms of racism and the impact of this on practitioner responses, the ethics of risk assessments and profiling children, and multiple examples of good practice in responding to harm. The most powerful intervention was provided by three survivors who shared their experiences of first contact with practitioners, the care system and the immigration system. A forthcoming report will outline the key findings and recommendations arising from the conference and I look forward to promulgating these important insights.

4.3.12 I have continued to explore opportunities to commission or influence research on modern slavery by engaging with students and staff through conferences and events. In June 2021 I participated in an event held by Chatham House on modern slavery as part of their Common Futures Conversations series which engages young people from across Africa and Europe on politics and the key global challenges. In July 2021 I presented at the Evidence Based Policing Conference hosted by the University of Cambridge's Institute of Criminology on the opportunities for police practitioners to exploit data and implement practices such as a public health approach to prevent the harm caused by modern slavery. In September 2021 my office participated in the Partnership for Conflict, Crime & Security Research (PaCCS) Conference on Serious Organised Crime, which brought together policymakers, practitioners and early career researchers to maximise the impact of research on responses to crime. In October 2021 I was invited by the Vice-Chancellor of Canterbury Christ Church University to deliver a public lecture on the scale and nature of modern slavery. My research lead also spoke about modern slavery research with students in February 2022 at an event hosted by UCL's Department of Security and Crime Science.

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<sup>147</sup> Ruth Van Dyke with Anta Brachou, St Mary's University Twickenham (2021), 'What Looks Promising for Tackling Modern Slavery: A review of practice-based research': <https://www.stmarys.ac.uk/research/centres/bakhita/docs/modern-slavery-report-what-looks-promising-a4-brochure-21-031-feb21-proof-2.pdf>.

4.3.13 I have been sponsoring two members of my team to undertake the University of Cambridge MSt in Applied Criminology and Police Management hosted by the Cambridge Institute of Criminology. The programme is centred around the concept of evidence based policing and the application of tested practices to target police resources more efficiently and reduce the harm caused by crime. The research undertaken by my team adopts the evidence based policing paradigm to the complexities of modern slavery which have been explored in depth through two thesis projects. One area of research examines the characteristics of defendants and offences charged under the Modern Slavery Act, and the extent to which these align with our understanding of modern slavery as organised crime. Whilst, strictly speaking, many cases meet the definition of organised crime they do not typically fit the archetypal stereotypes. Another area of research considers the application of the statutory defence and whether the modern slavery policy and legislative framework is providing adequate protection to children who are victims of criminal exploitation. A partnership approach across agencies, sharing data and practitioner expertise is essential to prevent child criminal exploitation and reduce harm to children and the public. I will publish the findings from these two projects in briefing form which will be tailored for policy and practice audiences and shared widely.

## Defining research priorities

4.4.1 Last year I published a series of research priorities to address the most pressing research needs and evidence gaps.<sup>148</sup> I held a joint roundtable with the Rights Lab in November 2021 which brought together a small group of researchers from different institutions and disciplines to examine the priorities and to explore options to address research gaps. Attendees discussed the need for cross-discipline approaches to overcome the most challenging questions, the importance of coalescing definitions and methodologies to support shared research efforts, and the role for a strategic knowledge broker which can facilitate knowledge exchange, translate findings and collate a database of evidence.

4.4.2 To advance work to address the research priorities, I will publish a research priorities briefing paper. This will be a collaborative effort between my office and academics to understand the research already being undertaken to answer questions outlined in the priorities and to explore opportunities to conduct further research. This will be a policy-focused product which is accessible and which can provide immediate impact and value. The briefing paper will cover topics such as responding to modern slavery in business supply chains and the nature of modern slavery offending and I look forward to developing this work.

4.4.3 It is essential that the insights of individuals with experience of modern slavery and those who may be vulnerable to exploitation inform research. There are as many views as there are individuals affected and they all represent crucial qualitative evidence which academics, policymakers and practitioners must listen to and incorporate in their work. My office has greatly benefited from the work of our Project Officer who is producing a survivor-informed research project examining mental health support for survivors, and the extent to which this is culturally sensitive.

4.4.4 I welcome the efforts of the Modern Slavery PEC to include survivors in all aspects of their work. Good practice in survivor inclusion in research includes participatory action research pioneered by Focus on Labour Exploitation (FLEX) using a community research methodology to

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<sup>148</sup> IASC (2021), 'IASC Research Priorities'.

produce action research on the experiences of workers in high-risk sectors.<sup>149</sup> Another meaningful initiative was led by Anti-Slavery International, which built the capacity of survivor peer researchers through the Agents for Change project. This led to the production of a briefing on the lessons and challenges faced by a small research team formed to conduct research on long-term outcomes of survivors in the UK. The briefing was co-written by survivors and includes important reflections such as the need to recompense survivors when they contribute to advocacy or research.<sup>150</sup>

4.4.5 I have continued to support the Modern Slavery PEC which has an important remit underpinned by £10 million investment to commission and convene cross-cutting research able to provide a strategic research response to the modern slavery challenge. In June 2021 I spoke at the launch event for a Modern Slavery PEC supported project on data for investor action on modern slavery<sup>151</sup> and in December 2021 I provided opening remarks at the launch event for another Modern Slavery PEC supported project on the role of consumers in addressing modern slavery.<sup>152</sup> I remain a member of its advisory group and my office holds monthly meetings with the Modern Slavery PEC's core team to share ideas and discuss opportunities for research collaboration. Over the past year I have proposed research projects to examine the barriers and opportunities for greater equality, diversity and inclusion in modern slavery research, on the challenges and solutions in sharing modern slavery data, and to investigate the links between non-compliance with labour regulations and more severe forms of labour exploitation. My office has also provided feedback on Modern Slavery PEC led responsive research and wider calls for research projects through a Research Coordination Group. In recognition of this in-depth engagement my office agreed a Memorandum of Understanding with the Modern Slavery PEC last year which sets out a joint commitment to collaborating on research and policy work.<sup>153</sup>

4.4.6 In November 2021 I held a joint conference with the Modern Slavery PEC on working collaboratively to maximise the impact of modern slavery research.<sup>154</sup> The conference examined how the modern slavery research landscape is changing, how modern slavery research is being used by policymakers, practitioners and survivors and the opportunities and challenges towards facilitating equitable, timely and policy-relevant research as recommended in a review I published with PaCCS in 2020.<sup>155</sup> Speakers included the author of the review, staff and researchers from the Modern Slavery PEC, and research users and producers from business, government, civil society and survivorship. A survey conducted during the event examined

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<sup>149</sup> FLEX (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>150</sup> Anti-Slavery International (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>.

<sup>151</sup> Florian Ostmann, Alex Harris, Nyasha Weinberg, Irene Pietrapaoli and Lise Smit (2021), 'Data for investor action on modern slavery': <https://modernslaverypec.org/assets/downloads/Investors-data-summary.pdf>.

<sup>152</sup> Michal Carrington, Andreas Chatzidakis and Deirdre Shaw (2021), 'Addressing consumer awareness and (in)action towards modern slavery': <https://modernslaverypec.org/assets/downloads/Consumers-full-report.pdf>.

<sup>153</sup> IASC and Modern Slavery PEC (2021): Memorandum of Understanding (MoU) between the Independent Anti-Slavery Commissioner (IASC) and Modern Slavery and Human Rights Policy and Evidence Centre: <http://www.antislaverycommissioner.co.uk/media/1746/iasc-and-mspec-mou.pdf>.

<sup>154</sup> Modern Slavery PEC (2021), 'How to make modern slavery research more impactful': <https://modernslaverypec.org/latest/make-modern-slavery-research-impactful>.

<sup>155</sup> IASC and Partnership for Conflict, Crime and Security Research (2020): 'Preparing for Impact - How we can overcome barriers and cultivate a culture of collaboration, understanding, and respect to achieve impact on survivor support': <http://www.antislaverycommissioner.co.uk/media/1433/iasc-review-preparing-for-impact-july-2020.pdf>.

barriers to modern slavery impact with respondents assessing that the biggest challenge is access to research outside academic circles.

## Maximising government investment

4.5.1 I have continued to uphold the importance of ensuring value for money where there is significant UK government spend to reduce modern slavery. In 2020, the Independent Commission for Aid Impact (ICAI) published a review of the UK's approach to tackling modern slavery through £200 million UK aid programming.<sup>156</sup> I was pleased to meet with the ICAI Commissioner Sir Hugh Bayley as the ICAI Secretariat conducted this review. In June 2021, I gave evidence to the International Development Committee's Sub-Committee on the work of the Independent Commission for Aid Impact (ICAI) where I reiterated the need for a coordinated approach with a focus on what works and which listens to the views of survivors.

4.5.2 A strategic and multinational response is crucial to reduce modern slavery in the UK. However, I voiced my concern to the Sub-Committee that the reduction in the aid budget will result in wasted money in sunk costs incurred by programmes as they were established and will undermine the UK's leadership on modern slavery in the world. Of particular concern has been the 80% funding cut to the Global Fund to End Modern Slavery (GFEMS), which works across Asia and Africa. One of the many partnerships established by GFEMS has been with the International Justice Mission in India to protect children against child sex trafficking. This programme has been severely impacted, which is of great concern considering the additional vulnerabilities to communities in India because of the pandemic. As we consider how to build back better, we must also think about how to protect the most vulnerable people across the world.

4.5.3 Following the Sub-Committee session, I provided additional written evidence about how the government can gather better evidence on the drivers of modern slavery.<sup>157</sup> There is a need to build the evidence base on which aspects of modern slavery to prioritise to inform interventions, and the government must develop a comprehensive response to understand the drivers, causes and vulnerability to modern slavery before programmes are established. Survivors must be involved in the research and evidence gathering process to develop effective programming reflecting the lived realities of modern slavery, and I welcome the commissioning of research by the government to examine this.<sup>158</sup>

4.5.4 Over the last year research involving victims and survivors has been undermined by a data embargo imposed in March 2021, when a review of MSVC data was undertaken to ensure contractual mechanisms were in place to protect survivor data. Service providers operating under the Home Office MSVCC have not been able to conduct or support research until the review has been completed. This embargo is preventing independent scrutiny and research on modern slavery. One project on improving outcomes for survivors of modern slavery in the UK has been cancelled. Another on survivors' journeys outside the NRM has faced major delays as service providers are not able to share information on the project with survivors to decide independently if they want to participate. Sharing data on modern slavery is essential to ensure

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<sup>156</sup> Independent Commission for Aid Impact (ICAI) (2020), 'The UK's approach to tackling modern slavery through the aid programme': <https://icai.independent.gov.uk/report/the-uks-approach-to-tackling-modern-slavery-through-the-aid-programme/>.

<sup>157</sup> International Development Sub-Committee on the Work of the Independent Commission for Aid Impact (2021), 'Written evidence, Office of the Independent Anti-Slavery Commissioner': <https://committees.parliament.uk/writtenevidence/39526/default/>.

<sup>158</sup> Modern Slavery PEC (2021), 'Survivor engagement in international policy and programming': <https://modernslaverypec.org/research-projects/survivor-engagement-international-programming>.

that responses to this complex issue are informed by the evidence, including quantitative information and qualitative insights.

4.5.5 A joint research project between my office and the Rights Lab examining the evidence base on re-trafficking has also been impacted, with confusion and delays from the Home Office in responding to a data request I submitted in June 2021. This is despite a Data Sharing Protocol agreed between my office and the Home Office in 2020 which sets out how I may request and obtain data to inform my statutory functions as Commissioner, including undertaking or supporting the carrying out of research.<sup>159</sup> This protocol aligns with the government's response to the Independent Review of the Modern Slavery Act, whereby the government accepted the review's recommendation that as Commissioner, I should have sufficient access to government data to carry out scrutiny of the response to modern slavery.<sup>160</sup>

4.5.6 I have raised the data embargo with the Home Office on multiple occasions and in November 2021 I wrote to the Home Office Chief Scientific Adviser to raise my concerns about the embargo specifically and to seek assurance that this will not lead to lasting changes in the way data is shared by the Home Office for essential research purposes.<sup>161</sup> I received a response from the Director General of the Public Safety Group in the Home Office which stated that there is no generalised embargo on modern slavery data and that the Home Office is hopeful that the Home Office MSVCC contract will soon be modified to facilitate and manage research involving data relating to survivors of modern slavery. The embargo on modern slavery survivor data remains unresolved. I reluctantly conclude that the Home Office must be less concerned with improving the quality of their services through independent scrutiny and research than protecting its reputation.

4.5.7 An important recommendation arising from the joint conference between my office and Cumberland Lodge in October 2021 on practitioner responses to child trafficking was the need to ensure practitioner evidence is shared through policy-focused and accessible briefings to improve practice on child trafficking. We suggested that a community of practice be developed which is able to collate, share and evaluate practitioner evidence, similar to the Contextual Safeguarding Network model. I hope my office can continue to use its convening role to support such efforts and work in partnership with connectors across the sector to establish a community of practice on modern slavery.

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<sup>159</sup> Home Office and IASC (2020), 'Data Sharing Protocol between HO and the Independent Anti-Slavery Commissioner'.

<sup>160</sup> Home Office (2019), 'Government response to the independent review of the Modern Slavery Act: <https://www.gov.uk/government/publications/government-response-to-the-independent-review-of-the-modern-slavery-act>.

<sup>161</sup> IASC (2021), 'IASC letter to Professor Jennifer Rubin and response from Jaee Samant': <http://www.antislaverycommissioner.co.uk/media/1727/exchange-of-letters-sara-and-jennifer-ho-data-sharing.pdf>.

## International

5.1.1 While my role to encourage good practice is UK-focused, this necessarily has international dimensions. Each year thousands of foreign nationals are identified as potential victims in the UK, many of whom are from a small number of countries. Building resilience in countries of origin is the cornerstone of effective prevention and the UK's aid programme has an important role to play in tackling modern slavery. Criminal investigations often span international borders and safe returns are vital for the prevention of re-trafficking. Many goods and services in the UK are linked to complex international supply chains and the global financial sector is a powerful lever for change.

5.1.2 The UK has long demonstrated strong international leadership in the global fight against slavery. At the 2017 UN General Assembly, then Prime Minister Theresa May launched a 'Call to action to end forced labour, modern slavery and human trafficking' as a commitment to achieving Sustainable Development Goal 8.7. But this is somewhat threatened by the cuts to Overseas Development Assistance (ODA). As the International Development Committee stated in their recent report from the Sub-Committee on the work of ICAI, it is more crucial than ever that programmes are effectively targeted.<sup>162</sup> It is also vital that the UK continues to use its influence at the multilateral level to achieve maximum impact.

5.1.3 I meet quarterly with the Home Office and Foreign, Commonwealth and Development Office (FCDO). Over the past year I have also had regular and constructive engagement with the Migration and Modern Slavery Envoy, whose role it is to engage with the UK's international partners in support of government's modern slavery objectives. I am pleased that the role has now been filled on a permanent basis. International efforts to tackle modern slavery must involve a concerted cross-government approach. The Department for International Trade and the Ministry of Defence, for example, both have important roles to play and it is vital that this is reflected in the forthcoming government strategy.

### The impact of immigration policy on modern slavery

5.2.1 As Independent Anti-Slavery Commissioner, I have been concerned about the potential for immigration policy to create vulnerability or impact victims of modern slavery. Since beginning my role I have been clear with ministers and government officials that the new immigration system must be stress-tested against this, and that protecting the vulnerable must be at the forefront of the debate. With the end of free movement for EU nationals at the end of 2020, the UK immigration system has profoundly changed. At the same time, the COVID-19 pandemic has significantly impacted the labour market. In December 2021 the Migration Advisory Committee reported that vacancies were fifty percent higher than pre-pandemic in some sectors.<sup>163</sup> This included several sectors that pose a high risk for labour abuses and exploitation, such as construction and agriculture.

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<sup>162</sup> International Development Committee (2021), 'The UK's approach to tackling modern slavery through the aid programme: report from the Sub-Committee on the Work of ICAI': [ICAI's review on The UK's approach to tackling modern slavery through the aid programme \(parliament.uk\)](https://www.parliament.uk/publications/2021/1/icais-review-on-the-uk-s-approach-to-tackling-modern-slavery-through-the-aid-programme).

<sup>163</sup> Migration Advisory Committee (2021), 'Migration Advisory Committee: annual report, 2021': <https://www.gov.uk/government/publications/migration-advisory-committee-annual-report-2021/migration-advisory-committee-mac-annual-report-2021-accessible-version>.

5.2.2 In my last annual report I outlined the work my office had done to understand and raise key concerns related to the EU Settlement Scheme (EUSS) and the points-based system. As the main deadline for applying to the EUSS passed in June 2021 and the points-based system embeds in, I have continued to monitor the realised and potential impacts. I have revisited my original issues with officials and would emphasise two continuing concerns. Firstly, while much work has been done to raise awareness of the EUSS among hard to reach groups through the Grant Funded Network, I am aware of concerns that messaging is still not reaching some vulnerable groups. Secondly, I have remained concerned that, with a continued demand for low skilled labour and an absence of formal routes, the visitor route could increasingly be used to facilitate entry of those intending to work informally and who may be at risk of exploitation. I have again encouraged the Home Office to consider how this route is monitored.

5.2.3 It is now six years since James Ewins QC published his 'Independent Review of the Overseas Domestic Worker Visa'. In both of my previous annual reports I criticised the government's lack of progress in implementing his recommendations. The unsuccessful tender exercise for information sessions took place in 2018, yet there has been no formal explanation. I have not had a formal response to several letters requesting an update. I have suggested that government considers what is on the record and engages with the sector. This is particularly important as the government begins to consider plans for reforming the route.

5.2.4 In December 2021 the Low Pay Commission (LPC) published its 2021 report, which included evidence on the application of the live-in domestic worker exemption to minimum-wage entitlements.<sup>164</sup> The report found that the exemption is being abused not only in the case of au pairs, but also for live in workers, particularly those on Overseas Domestic Worker (ODW) visas. The LPC recommended that the current exemption for live-in workers be removed and failing this, that it is amended to give more legal clarity. Ending any doubt that live-in domestic workers should be paid the minimum wage could protect thousands from more serious exploitation and I have publicly supported the LPC's recommendation.<sup>165</sup>

5.2.5 In my last annual report I noted that my office had engaged with several independent schools' bodies about potential links between Tier 4 visas and trafficking. My office has continued to engage constructively with the independent schools' sector and presented at two events arranged by the Safeguarding and Child Protection Association (SACPA) and the Boarding Schools' Association. The first of these focused on safeguarding international students and the second on broader themes and issues relating to child protection.

## International trade, climate change and modern slavery

5.3.1 In June 2021 the UK hosted the G7 Summit as part of its G7 Presidency. Ahead of the Summit, I worked with the GFEMS to convene key leaders from the anti-slavery and human trafficking sector. Together, we wrote an open letter to G7 leaders urging them to take

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<sup>164</sup> Low Pay Commission (2021), 'Low Pay Commission Report 2021': [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1039488/LPC\\_Report\\_2021\\_web\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1039488/LPC_Report_2021_web_version.pdf).

<sup>165</sup> IASC (2021), 'Dame Sara Thornton responds to the Low Pay Commission's 2021 report': <http://www.antislaverycommissioner.co.uk/news-insights/dame-sara-responds-to-the-low-pay-commission-s-2021-report/>.

coordinated action on forced labour.<sup>166</sup> We recommended they adopt a series of concrete steps to give momentum in achieving the United Nations Sustainable Development Goal of ending forced labour, modern slavery and human trafficking by 2030, and ending child labour in all its forms by 2025. I was pleased that commitments from G7 leaders to work collaboratively to protect individuals from forced labour and to ensure that global supply chains are free from forced labour were included in the G7 Summit Communique.<sup>167</sup>

5.3.2 The Communique commitments included a tasking to G7 Trade Ministers to identify areas for strengthened cooperation and collective efforts towards eradicating the use of all forms of forced labour in global supply chains. In October 2021 G7 countries issued a Joint Statement at the Trade Track on Forced Labour. I have met with officials from the Department for International Trade and welcomed the commitment to work collaboratively to eradicate forced labour from global supply chains and protect victims of forced labour. This included enhancing support for businesses, including through guidance on human rights due diligence and responsible recruitment practices, data sharing and technical exchanges.<sup>168</sup> Building on this commitment, the UK must continue to engage on business compliance with international labour standards.

5.3.3 I have also continued to closely monitor developments in relation to human rights abuses in the Xinjiang Uyghur Autonomous Region. The government has implemented measures to help ensure British organisations are not complicit, nor profiting from, human rights violations in Xinjiang. The Overseas Business Risk Guidance makes businesses aware that conducting due diligence in Xinjiang is challenging and that traditional methods may not be effective in identifying human rights violations. Indeed, there are also other locations where businesses are not able to exercise the level of due diligence required. In their review of the UK's approach to tackling modern slavery through the aid programme, ICAI recommended deepening engagement with the private sector.<sup>169</sup> Similarly, the International Development Sub-Committee on the Work of ICAI recommended that government strengthens its partnerships with the private sector. I support these recommendations and am pleased that government recently accepted the latter.<sup>170</sup> In particular, government should be doing more to support and advocate for businesses operating in challenging environments overseas.

5.3.4 Vulnerability is exacerbated by climate change and modern slavery is linked to unsustainable production. But, supply chains for some critical minerals needed in the transition to clean energy also pose a high risk for modern slavery. The pandemic has shown how increased demand in some sectors and shifts in supply chain dynamics dramatically exacerbates risks. We must therefore ensure a just transition, with social outcomes at the forefront of the fight against

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<sup>166</sup> IASC (2021), 'Global Fund to End Modern Slavery and key leaders from the anti-trafficking sector: open Letter to G7 Heads of State and Government': [www.antislaverycommissioner.co.uk/media/1628/joint-open-letter-need-for-coordinated-action-by-g7-leaders-on-forced-labour.pdf](http://www.antislaverycommissioner.co.uk/media/1628/joint-open-letter-need-for-coordinated-action-by-g7-leaders-on-forced-labour.pdf).

<sup>167</sup> IASC (2021), 'Dame Sara Thornton welcomes the commitment from G7 leaders to work collaboratively on the issue of forced labour': <http://www.antislaverycommissioner.co.uk/news-insights/dame-sara-welcomes-the-commitment-from-g7-leaders-to-work-collaboratively-on-the-issue-of-forced-labour/>.

<sup>168</sup> IASC (2021), 'Dame Sara Thornton welcomes G7 Trade Ministers commitment on eradicating forced labour': <http://www.antislaverycommissioner.co.uk/news-insights/dame-sara-welcomes-g7-trade-ministers-commitment-on-eradicating-forced-labour/>.

<sup>169</sup> ICAI (2020), 'The UK's Approach to Tackling Modern Slavery Through the Aid Programme': <https://icai.independent.gov.uk/html-version/tackling-modern-slavery-through-the-aid-programme/>.

<sup>170</sup> International Development Committee (2022), 'The UK's approach to tackling modern slavery through the aid programme: report from the sub-committee on the work of ICAI: Government response to the Committee's third report': <https://publications.parliament.uk/pa/cm5802/cmselect/cmintdev/1021/report.html#heading-1>.

climate change. In October 2021 the UK, in partnership with Italy, hosted the 26<sup>th</sup> UN Climate Change Conference of the Parties (COP26). To mark the start of the summit I published a blog outlining the complex relationship between climate change, the transition to a green economy and modern slavery.<sup>171</sup>

## Engagement with international fora

5.4.1 Over the past year I have engaged with a range of international and multilateral organisations. Much of my overseas engagement has been to support my continued emphasis on the role of the financial sector in tackling modern slavery. The financial sector lends to and invests in businesses that, whether knowingly or unknowingly, may be benefiting from exploitation. Profits of modern slavery will also often end up being handled by financial services. I have worked on these issues in close collaboration with the Organization for Security and Cooperation in Europe (OSCE), the Liechtenstein Government and Finance Against Slavery and Trafficking (FAST), a multi-stakeholder initiative based at the United Nations University Centre for Policy Research that works to mobilise the financial sector against modern slavery and human trafficking.

5.4.2 The unparalleled influence that investors have over global business can and should be used to prevent exploitation and abuse of workers. In April 2021 I co-organised a roundtable with FAST on managing modern slavery risks in capital markets for senior representatives from City of London asset owners, asset managers, funds and stock exchange stakeholders. Drawing on the FAST Blueprint and recent research, the event explored developments in capital market expectations and regulation. CCLA, Walk Free, EOS at Federated Hermes and Refinitiv – an LSEG Business provided formal contributions. A short report was published after the event outlining discussions on the financial sector’s role as an important lever, the need to incentivise corporate entities to take action, and the need for data, metrics and tools to support mitigation of social risks such as modern slavery.<sup>172</sup>

5.4.3 In October 2021 I was pleased to participate in the FAST Implementation Review Conference in Vaduz, Liechtenstein. The conference highlighted tangible developments in the modern slavery landscape promoted by the FAST Blueprint and ongoing initiatives. It was also an opportunity to look forward at innovations and opportunities for engagement with financial sector stakeholders.<sup>173</sup> I had five observations about the future. We need to encourage financial services to incentivise disclosure; there needs to be a determined effort on international standards and measurement to guide those who invest and lend; insurers have a key role to play in encouraging the positive rather than just insuring against the negative; environmental and social issues need not be in competition; and we need to leverage G7 commitments on forced labour. Financial services can wait to be directed or they can show leadership and I heard real determination from many organisations to put this high on their agenda. There is a great opportunity for FAST to encourage this energy and momentum and I have encouraged government to formally support the initiative.

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<sup>171</sup> IASC (2021), ‘COP26: Climate change and modern slavery’: <http://www.antislaverycommissioner.co.uk/news-insights/cop-26-climate-change-and-modern-slavery/>.

<sup>172</sup> IASC (2021), ‘Managing Modern Slavery Risks in Capital Markets’: <http://www.antislaverycommissioner.co.uk/media/1662/managing-modern-slavery-risks-in-capital-markets.pdf>

<sup>173</sup> Finance Against Slavery and Trafficking (2021), ‘The FAST Implementation Review Conference’: <https://mailchi.mp/fastinitiative/special-edition-newsletter-implementation-review-conference>.

5.4.4 In November 2021 I jointly organised a roundtable with OSCE and FAST that brought together financial institutions, financial intelligence units, and anti-trafficking coordinators from twelve countries to discuss the importance of detecting and disrupting illicit financial flows generated from trafficking in human beings within legitimate financial networks. Following the conclusion of the roundtable we published a joint statement setting out a number of commitments aiming to make significant progress in tackling modern slavery and human trafficking. Commitments included assisting countries to better include modern slavery and human trafficking in their National Risk Assessments; encouraging financial institutions and financial intelligence units to learn from survivors' experiences; and supporting the establishment of public-private partnerships between financial institutions. Ten participants from the roundtable also joined the statement.<sup>174</sup>

5.4.5 I have also worked closely with OSCE to highlight the important role of independent national rapporteurs and equivalent mechanisms. In July 2021 we jointly convened a meeting with experts from across the OSCE region to share their experience. The discussions formed the basis of a policy brief and recommendations to OSCE participating states.<sup>175</sup> The independent nature of my role is central to the efficacy of the office and this event provided an opportunity to foster international engagement and promulgate good practice. Much as the UN Special Rapporteurs work cross-discipline, there is an opportunity for cross-rapporteur working on common challenges. Child trafficking was one such challenge identified during the meeting and the group has since met to discuss online sexual exploitation and criminal exploitation of children. These issues will form the basis of a panel discussion I am chairing on child protection at the OSCE Alliance Conference in April 2022.

5.4.6 The Commonwealth Human Rights Initiative (CHRI) argued in its 2018 report on a roadmap to SDG 8.7 that the Commonwealth has a historical, political and moral responsibility to act. Furthermore, the long standing cultural, political, historic and economic ties mean the Commonwealth is uniquely positioned to drive swift, co-ordinated and impactful action.<sup>176</sup> Over the past year I have continued engagement with the Commonwealth Parliamentary Association (CPA) UK, as well as other organisations working across the Commonwealth such as the Commonwealth Enterprise and Investment Council. I was pleased to provide a keynote speech at a recent event co-convened by CPA UK and Mission 89 on human trafficking through sport, which was attended by parliamentarians, parliamentary officials, border officials and high commission representatives from over 20 countries.

5.4.7 I meet regularly with the UN Special Rapporteur on Contemporary Forms of Slavery. It has been helpful to discuss the relevance of his reports to the UK context. The report on the nexus between displacement and contemporary forms of slavery, for example, is particularly relevant to the ongoing debate around the Nationality and Borders Bill.<sup>177</sup> I have continued engagement with the International Bar Association. My office has inputted into work being undertaken by their Modern Slavery Taskforce and I was pleased to speak at a modern slavery

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<sup>174</sup> OSCE, IASC and FAST (2021), 'Joint statement on human trafficking and the financial sector': <http://www.antislaverycommissioner.co.uk/news-insights/joint-statement-on-human-trafficking-and-the-financial-sector/>.

<sup>175</sup> OSCE and IASC (2021), 'The role of independent National Rapporteurs or equivalent mechanisms in enhancing States' anti-trafficking responses': [http://www.antislaverycommissioner.co.uk/media/1692/cthb\\_issuebrief\\_nars\\_en\\_final.pdf](http://www.antislaverycommissioner.co.uk/media/1692/cthb_issuebrief_nars_en_final.pdf).

<sup>176</sup> Commonwealth Human Rights Initiative (2018), 'The Commonwealth roadmap to SDG 8.7': <https://www.humanrightsinitiative.org/download/The%20Commonwealth%20Road%20Map%20SDG%208.7%206%20Dec%202018.pdf>.

<sup>177</sup> UN Special Rapporteur on Contemporary Forms of Slavery (2021), 'The Nexus Between Displacement and Contemporary Forms of Slavery': <https://undocs.org/A/HRC/48/52>.

showcase which focused on supply chains and the legal system. My office has also continued to engage with civil society organisations that work both in the UK and internationally. This has included the International Anti-Human Trafficking Network co-chaired by TSA, International Justice Mission, Hope for Justice and the Red Cross.

## Vietnam

5.5.1 In my last annual report I included a case study on Vietnam and the Grays tragedy in which 39 Vietnamese people lost their lives. I emphasised the importance of promulgating good practice and learning from the investigation, Operation Melrose, across law enforcement. More broadly it is vital that there is an effective 4Ps<sup>178</sup> response and that prevention lessons are learnt in order to reduce the risk of such a tragedy happening. Operation Melrose was an excellent investigation and I am encouraged by the work that Essex Police have undertaken with local ports communities. I have, however, written to the Chief Constable suggesting that they codify and promulgate the learning more formally. I have also written to the British Ports Authority and Associated British Ports Holdings setting out the need for them to take this seriously.<sup>179</sup>

5.5.2 In December 2020 I published a high level summary of a review I commissioned the NCA National Assessment Centre to undertake on the nature and scale of modern slavery linked to Vietnamese people. My office has since worked with the NCA to publish an updated and more detailed assessment.<sup>180</sup> This finds that Vietnamese irregular migrants are at risk of exploitation both en route to and on arrival in the UK. It highlights the exorbitant fees charged for each part of the journey, involvement of debt bondage, artificial inflation of fees and exploitative working conditions in both legal sectors and illegal activity, such as cannabis cultivation. Despite this, the UK is perceived as an attractive destination by Vietnamese migrants and the Grays tragedy is assessed as highly unlikely to have had a notable impact on the intent of prospective migrants.

5.5.3 This has been apparent over the past year, with Vietnamese nationals continuing to undertake dangerous journeys seeking to reach the UK. In January 2021 I was briefed by the NCA on increasing numbers of Vietnamese nationals detected using small boats during 2020, a trend which continued during 2021. I was concerned that the system was failing to respond to the changing methods of criminal gangs, intelligence was not being shared effectively, the response lacked agility and that consequently opportunities to identify victims and offenders were missed. Despite a clear shift in methodology and known risks, I was also concerned that sufficient measures were not in place to safeguard and prevent Vietnamese nationals from going missing. Individuals were going missing after being referred into the NRM and released from immigration detention. I was also made aware of a case in June 2021 in which over 160 Vietnamese nationals arrived via small boats on the same day and were placed in hotels. All of the individuals went missing within 24 hours.

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<sup>178</sup> 'Pursue, Prevent, Protect, Prepare'

<sup>179</sup> IASC (2022), 'IASC letters to Associated British Ports, British Ports Association and Essex Police': [www.antislaverycommissioner.co.uk/media/1744/iasc-letters-about-port-authority-detection-of-victims-and-traffickers.pdf](http://www.antislaverycommissioner.co.uk/media/1744/iasc-letters-about-port-authority-detection-of-victims-and-traffickers.pdf).

<sup>180</sup> NCA (2022), 'Report the impact of Vietnamese Organised Immigration Crime and Modern Slavery and Human Trafficking on the UK': <http://www.antislaverycommissioner.co.uk/media/1749/the-impact-of-vietnamese-msht-and-oic-on-the-uk.pdf>.

5.5.4 In August 2021 I wrote to the Permanent Secretary to express my concerns.<sup>181</sup> I subsequently convened a meeting with TSA, the NCA, the MSOIC Unit and a representative from the NPCC. As a consequence of this meeting I wrote to ministers with three recommendations for small, practical steps that would make a tangible difference.<sup>182</sup>

- Ensure culturally sensitive support for victims
- Improve the communication process between Immigration Enforcement and the MSVCC
- Improve the process for obtaining biometrics from those arriving via small boats

The response outlined some of the measures in place and whilst I am assured that the number of Vietnamese nationals arriving by small boats has declined, I have been clear that we still need to take action. I am aware of several examples of good practice relating to culturally sensitive support, which should be utilised. I recently met with the organisation that has delivered cultural competence training to TSA, Pacific Links, an international NGO working throughout Vietnam and in destination countries to prevent trafficking and help trafficking survivors build new lives. I have recommended that the Home Office also considers this training for relevant staff from the Borders and Enforcement directorates.<sup>183</sup> The West Midlands Anti-Slavery Network Albanian and Vietnamese Cultural Awareness for Frontline Professionals Project aims to increase engagement with and outcomes for survivors and perpetrators of crimes from these countries. My office recently attended the launch of two practical booklets the Network has produced in collaboration with key partners.<sup>184</sup>

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<sup>181</sup> IASC (2021), 'Exchange of letters with Matthew Rycroft, Permanent Secretary at the Home Office': <http://www.antislaverycommissioner.co.uk/media/1701/iasc-exchange-of-letters-with-matthew-rycroft-permanent-secretary-at-the-home-office-august-2021.pdf>.

<sup>182</sup> IASC (2021), 'Exchange of letters with Ministers Rachel Maclean MP and Tom Pursglove MP': <http://www.antislaverycommissioner.co.uk/media/1702/iasc-exchange-of-letters-with-ministers-rachael-maclean-mp-and-pursglove-mp-november-2021.pdf>.

<sup>183</sup> IASC (2022), 'Letter to Ministers Rachel Maclean MP and Tom Pursglove MP': [www.antislaverycommissioner.co.uk/media/1748/iasc-letter-to-ministers-tom-pursglove-mp-and-rachael-maclean-mp-february-2022.pdf](http://www.antislaverycommissioner.co.uk/media/1748/iasc-letter-to-ministers-tom-pursglove-mp-and-rachael-maclean-mp-february-2022.pdf)

<sup>184</sup> West Midlands Anti-Slavery Network, Barnardo's, West Midlands PCC & the MSOIC Unit (2022), 'Vietnamese and Albanian Cultural Information Booklets': <https://westmidlandsantislavery.org/vietnamese-and-albanian-cultural-information-booklets/>.

## Nationality and Borders Bill

6.1.1 In March 2021 the Home Office launched a public consultation on the proposals set out in the New Plan for Immigration policy paper. I outlined my concerns that the proposals risk making it harder to identify potential victims of modern slavery and that they risk creating new vulnerabilities. I also raised my concerns regarding the absence of specific attention paid to children within the Bill. I therefore encouraged putting the protection of the vulnerable, in particular victims of modern slavery, as a central thread to the Nationality and Borders Bill.<sup>185</sup> The government response to the New Plan for Immigration consultation acknowledged the need to identify and mitigate unintended consequences, and ensure safeguards are in place to protect the vulnerable.<sup>186</sup> Following the introduction of the Nationality and Borders Bill, however, I have remained concerned. In September 2021 I set out my concerns to the Home Secretary<sup>187</sup> and provided evidence at Public Bill Committee.<sup>188</sup> Since then I have closely followed the passage of the Bill through Parliament.

6.1.2 Some of the provisions in the Bill have been driven by government's concerns regarding increasing numbers of arrivals by small boats. In my last annual report I noted concerns about the identification of potential victims among those arriving via this method. While I am assured that referrals are being made, I have still not been able to confirm actual numbers. I submitted a formal request to the SCA in March 2021 and was informed in November 2021 that the Home Office could not provide this data.<sup>189</sup> I subsequently submitted a Freedom of Information request which was refused on the basis that disclosing the information would prejudice the prevention or detection of crime and the apprehension or prosecution of offenders.<sup>190</sup> I have requested an internal review of this decision, which remains outstanding.

6.1.3 One of my central concerns has been the failure to account for the impact of trauma experienced by modern slavery victims. The Bill's provisions requiring people to bring forward all grounds for protection and human rights claims within a set period do not take into account what we know about disclosure of trafficking. Narratives are likely to emerge piecemeal, becoming more coherent as trusting relationships are established and victims feel able to speak about their experiences more openly.<sup>191</sup>

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<sup>185</sup> IASC (2021), 'Response to the New Plan for Immigration':

<http://www.antislaverycommissioner.co.uk/news-insights/dame-sara-responds-to-new-plan-for-immigration-consultation/>.

<sup>186</sup> HM Government (2021), 'Consultation on the New Plan for Immigration: Government Response':

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005042/CCS207\\_CCS0621755000-001\\_Consultation\\_Response\\_New\\_Plan\\_Immigration\\_Web\\_Accessible.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005042/CCS207_CCS0621755000-001_Consultation_Response_New_Plan_Immigration_Web_Accessible.pdf).

<sup>187</sup> IASC (2021), 'Letter to the Rt Hon Priti Patel MP':

<http://www.antislaverycommissioner.co.uk/media/1668/iasc-letter-to-the-rt-hon-priti-patel-mp-home-secretary-march-2021.pdf>.

<sup>188</sup> UK Parliament (2021), 'Nationality and Borders Bill (Fourth sitting)':

[https://hansard.parliament.uk/Commons/2021-09-23/debates/122e6daf-470b-49c5-a05e-4daba0170c73/NationalityAndBordersBill\(FourthSitting\)](https://hansard.parliament.uk/Commons/2021-09-23/debates/122e6daf-470b-49c5-a05e-4daba0170c73/NationalityAndBordersBill(FourthSitting)).

<sup>189</sup> IASC (2022) 'Exchange of letters with the Home Office':

<http://www.antislaverycommissioner.co.uk/media/1750/iasc-exchange-of-letters-with-the-home-office-requesting-information-about-nrm-referrals-linked-to-small-boats-and-clandestine-entry-by-lorry-january-2022.pdf>.

<sup>190</sup> Ibid.

<sup>191</sup> Oram, S. & Domoney, J. (2018), 'Responding to the mental health needs of trafficked women':

<https://www.bacp.co.uk/bacp-journals/healthcare-counselling-and-psychotherapy-journal/april-2018/responding-to-the-mental-health-needs-of-trafficked-women/>.

6.1.4 Whilst I support the focus on disrupting criminal networks, I have also been clear that measures must not increase the vulnerability of those already in precarious situations. Differential treatment of refugees based on the nature of their arrival may only serve to exacerbate vulnerability and there is a lack of evidence that such penalties actually impact as intended.<sup>192</sup> Furthermore, there is a lack of clear evidence on the alleged abuses of the system. The government is concerned about claims being made late in order to frustrate removal from the country and pointed to an increase in the number and proportion of people in immigration detention being referred into the NRM.<sup>193</sup> Whilst I would not want the system to be abused, a range of factors could influence these numbers and it is difficult to draw a causal link between increased NRM referrals and abuse of the system.

6.1.5 Part 5 of the Bill focusses specifically on modern slavery and there have been calls for this section to be removed from the Bill in its entirety.<sup>194</sup> However the clauses within this part of the Bill seek to place in statute support provisions for victims. I have therefore concentrated on the three clauses within Part 5 that I believe have the potential to have the most significant unintended consequences on victims of modern slavery; Clauses 57, 58 and 62. In December 2021, I wrote a joint statement with the Victims' Commissioner Dame Vera Baird which set out our primary concerns regarding these clauses.<sup>195</sup>

6.1.6 Clauses 57 and 58 refer to the introduction of Slavery and Trafficking Information Notices, which will require individuals to disclose any relevant information about their trafficking history before a specified date, with the late provision of this information potentially damaging to credibility. These clauses fundamentally fail to grasp what being a victim of modern slavery means and the hugely significant impact of trauma on disclosure. This is particularly alarming given the recognition of this within the Home Office Statutory Guidance on modern slavery.<sup>196</sup> Should these clauses be implemented, there will be a need to think very carefully about the timescales for providing this information, as there is a very real risk that they will result in a failure to identify vulnerable victims. I have also highlighted the need for practical support to enable individuals who do not speak English as a first language, or those with more limited literacy skills to be able to respond to these notices.

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<sup>192</sup> Crawley, H. and Hagen-Zanker, J. (2018), 'Deciding Where to go: Policies, People and Perceptions Shaping Destination Preferences - Crawley - 2019 - International Migration': <https://www.refugee-economies.org/publications/deciding-where-to-go-policies-people-and-perceptions-shaping-destination-preferences>.

<sup>193</sup> 8 In 2018, five percent (718) of people exiting detention had been referred into the NRM whilst in detention, increasing to 16 percent (1,767) in 2019. Home Office (2021), 'Issues raised by people facing return in immigration detention'. 9 27 percent (1,005) of people exiting immigration detention in 2020 were referred into the NRM whilst detained. Home Office (2021), 'Update on modern slavery referrals from detention and prisons'.

<sup>194</sup> Human Trafficking Foundation et al (2021), 'An Overview of Concerns about Part 5 of the Nationality & Borders Bill and Modern Slavery': <https://static1.squarespace.com/static/599abfb4e6f2e19ff048494f/t/61dc188d9f06a71967903375/1641814158087/Nationality+%26+Borders+Bill%2C+Chapter+5+on+Modern+Slavery%2C+Briefing+for+Peers%2C+23.12.21.pdf>.

<sup>195</sup> IASC and Victims' Commissioner (2021), 'Commissioners Dame Sara Thornton and Dame Vera Baird outline concerns about the Nationality and Borders Bill': <http://www.antislaverycommissioner.co.uk/news-insights/iasc-and-victims-commissioner-raise-joint-concerns-about-the-nationality-and-borders-bill/>.

<sup>196</sup> Home Office (2022), 'Modern Slavery: Statutory Guidance for England and Wales (under S49 of the Modern Slavery Act 2015) and Non-Statutory Guidance for Scotland and Northern Ireland': [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1051135/Modern\\_Slavery\\_Statutory\\_Guidance\\_EW\\_Non-Statutory\\_Guidance\\_SNI\\_v2.6.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1051135/Modern_Slavery_Statutory_Guidance_EW_Non-Statutory_Guidance_SNI_v2.6.pdf).

6.1.7 Clause 62 intends for support for victims of modern slavery to be conditional, with the ability for it to be withheld on public order grounds. I have not called for this clause to be completely removed as I recognise the need to define public order and protect public safety. However, I do not support the proposed thresholds, which as they stand, would include any foreign criminal<sup>197</sup> who has received a twelve month sentence in the UK and those convicted in other countries for equivalent crimes. I am gravely concerned that this clause has the potential to bring severe consequences for a significant number of victims, as well as undermining our ability to bring traffickers to justice. I am sceptical that the Home Office can implement this clause in practice due to the practical challenges of obtaining criminal records checks from overseas. Lastly, I am doubtful of its compatibility with ECAT.<sup>198</sup> The parliamentary Joint Committee on Human Rights recommended that Clause 62 be amended so that it complies with ECAT and is limited to only those posing a current and ongoing serious threat to public order. The Committee also argued that even when an individual may fall into one of the limbs of the proposed definition of public order, the Home Office would additionally need to show that the individual presented such a continuing risk that the UK needs to avail itself of the exception provided by Article 13 of the ECAT Convention.<sup>199</sup>

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<sup>197</sup> As defined by Section 32(1) of the UK Borders Act 2007.

<sup>198</sup> Independent Anti-Slavery Commissioner (2022), 'The Independent Anti-Slavery Commissioner raises concerns about Clause 62 of the Nationality and Borders Bill': <http://www.antislaverycommissioner.co.uk/news-insights/dame-sara-comments-on-clause-62-of-the-nationality-and-borders-bill-in-the-times>.

<sup>199</sup> Joint Committee on Human Rights (2021), 'Legislative Scrutiny: Nationality and Borders Bill (Part 5) – Modern Slavery': [https://publications.parliament.uk/pa/jt5802/jtselect/jtrights/964/96402.htm?\\_cf\\_chl=tk=D1MDtzdvxi8pNyd50k6hgy6oMUVsnQien1aAL3xHTLA-1645192617-0-gaNycGzNDNE](https://publications.parliament.uk/pa/jt5802/jtselect/jtrights/964/96402.htm?_cf_chl=tk=D1MDtzdvxi8pNyd50k6hgy6oMUVsnQien1aAL3xHTLA-1645192617-0-gaNycGzNDNE).

## Taking a UK-wide approach

### Scotland

7.1.1 Due to the continuing travel restrictions associated with the pandemic, I was limited to a single visit to Scotland this year. In December 2021 I met with Ash Regan MSP, Minister for Community Safety, Scottish Government officials, Police Scotland (including members of their National Human Trafficking Unit), Rhoda Grant MSP the convener of the Scottish Government cross party group on human trafficking and Shan Saba of the 'Scotland against Modern Slavery' (SAMS) initiative. In a positive and wide-ranging conversation with the Minister, I raised my concern that two of the three posts dedicated to MSHT in the Scottish Government's Human Trafficking Team had remained unfilled for several months. I was assured that this would be remedied in early 2022.

7.1.2 Throughout the year my office has supported the multi-agency forums focusing on the Scottish Government's four strategic action areas: victims, perpetrators, addressing the conditions that foster trafficking and exploitation and child trafficking. The Scottish Government's continued commitment to tackling human trafficking is set out in their fourth annual progress report on Scotland's Trafficking and Exploitation Strategy published in January 2022.<sup>200</sup> In addition to setting out the aims, activities and outcomes for the four strategic areas, the latest report recognises the extraordinary efforts made by Migrant Help, the Trafficking Awareness Raising Alliance (TARA) and the Anchor project to access and support survivors throughout the challenges of the pandemic.

7.1.3 I welcome the Scottish Government announcement that their new ICTG service will launch in the summer of 2022. This will be a statutory service providing ongoing practical help and support to refugee children and young people, replacing the non-statutory service currently provided by the Scottish Guardianship Service. The Scottish Government will continue to fund the Scottish Guardianship Service in the interim.

7.1.4 In September 2021 I spoke at a virtual roundtable hosted by SAMS. This positive initiative engages the business sector predominately through a recruitment and employment lens and has a membership including seafood processors, engineering and construction, recruitment and waste management. In February 2022 I spoke at an event co-ordinated by Glasgow Violence Against Women Partnership, CoSLA, Just Right Scotland and the Improvement Service focussed on the Nationality and Borders Bill and the possible impact on women and girls. I was struck by the case examples used to demonstrate the potential disproportionate impact on women and girls. In addition, I joined the launch event for the evaluation of the Scottish Guardianship Service where I provided my reflections on the evaluation, as well as the Nationality and Borders Bill and wider issues regarding child trafficking. While the Guardianship service provides support to all unaccompanied asylum seeking children in Scotland, the evaluation helpfully considers the role of Guardians in supporting children through the NRM process and comments on the concerns regarding the complexities of the NRM, the delays in decision making and its remoteness to young people.

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<sup>200</sup> Scottish Government (2022), 'Trafficking and Exploitation Strategy - Fourth Annual Progress Report and Strategy Review': <https://www.gov.scot/publications/trafficking-exploitation-strategy-fourth-annual-progress-report/pages/2/>.

## Northern Ireland

7.2.1 I was pleased to learn that in July 2021 the Department of Justice established a dedicated MSHT branch within the Protection and Organised Crime Division to lead and coordinate the delivery of the Department's strategy for MSHT based on three key elements – Pursue, Protect and Prevent. Until July, MSHT had been part of the Organised Crime Branch but it was decided that the scale, volume and complexity of the work required a dedicated resource.

7.2.2 I met with the Northern Ireland Justice Minister Naomi Long MLA in November 2021 at Stormont, Belfast to listen to the Minister's views and discuss a range of issues. In addition to meeting with officials from the Department of Justice, over a two day visit I also had the opportunity to meet with PSNI Chief Constable Simon Byrne, members of the PSNI Modern Slavery and Human Trafficking team and NGOs No More traffic and Hope for Justice. I was keen to engage with project workers and hear survivors' voices and learnt much from visiting Greater Belfast based NGOs Flourish and Invisible Traffic. I also met with the Assembly's Modern Slavery All Party Group Chair Joanna Bunting and MLA colleagues and spoke to the forum at a specially convened session.

7.2.3 The Department of Justice have led on two significant consultation exercises this reporting period. The first was about Transparency in Supply Chains (TiSC) and complemented the Home Office proposals to amend the Modern Slavery Act 2015 to strengthen the legislation in respect of TiSC. The consultation was followed by engagement with sector bodies and the resulting recommendations were approved by the Northern Ireland Executive. The second consultation concerned the introduction of Slavery and STROs which are not present in the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 (the Act). The consultation was issued in early March and additionally covered the activation of a Duty to Notify provision which is contained in the Act, and a proposed widening of warrant powers for the PSNI to allow them to search those suspected of involvement in trafficking or exploitation.

7.2.4 As highlighted earlier in this report, we must do more to prevent re-trafficking and improve the longer term outcomes for survivors. I therefore welcome the amendment to the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 regarding post-NRM support for survivors which will shortly receive Royal Assent. While I understand that post-NRM support has previously been provided on a discretionary basis, this clarification regarding the provision of support following a positive conclusive grounds decision for up to twelve months or more for those who require it is a positive step forward.

7.2.5 Detectives from the PSNI Modern Slavery and Trafficking Unit (MSTU) delivered training to a wide range of public and private sector groups throughout 2021 including the Northern Ireland Street Pastors; the Northern Ireland Prison Service; Financial Institutions; African Women Organization workshop; medical students at Queens University; George Best Belfast City Airport's Airport Safety Week; Belfast and Lisburn Women's Aid event in Belfast; and medical staff at Downshire Hospital. The training and engagement strengthened links with partner agencies, NGOs, and private sector businesses raising awareness of modern slavery and increasing the possibility of instances being reported.

## Communications

8.1.1 As Commissioner I continue to take an evidence based approach to communications and my statutory independence is reflected in my core messaging, founded on objectivity, impartiality, fairness, and accuracy. Throughout the last year I have shared information and updates on the IASC website and via social media. Increased social media output has resulted in significant growth in audience metrics and engagement, particularly within the legal and financial services community on Linked In.

8.1.2 In September 2021 I launched the IASC bulletin, which is circulated digitally to all IASC contacts including stakeholders across my strategic priority areas, press and media. It provides an overview of the work my office is involved with every few weeks and includes links to IASC media coverage as well as information about upcoming events. All editions are archived in the Resources section on the IASC website.<sup>201</sup>

## Parliamentary engagement

8.2.1 I continue to engage with Parliamentarians on a range of issues related to modern slavery and human trafficking. In June 2021 I gave evidence to the International Development Sub-Committee on the Work of the Independent Commission for Aid Impact as part of the review on the UK's approach to tackling modern slavery through the aid programme.<sup>202</sup>

8.2.2 Since the Nationality and Borders Bill was introduced by the government in July 2021 my commentary on Part 5 Modern Slavery has been referenced at every stage of its passage. I was called by the Public Bill Committee to give evidence as part of its legislative scrutiny in September 2021. Records can be found in Hansard and the House of Commons Library.

8.2.3 I have also spoken at the APPG on Human Trafficking and Modern Slavery in May 2021, the APPG on Policing and Security in September 2021 and this year I have spoken at the APPG on ESG. In November 2021 I addressed the North Eastern Ireland Assembly All Party Group on Modern Slavery at Stormont.

## Public events and media coverage

8.3.1 During the last year I have spoken at more than 90 conferences, roundtables and events hosted by NGOs, research institutions, business groups, statutory and government bodies. My office has organised a number of roundtables and public webinars including the launch event for last year's annual report in July 2021. Most events have been online, but as Covid-19 restrictions have eased I have welcomed the opportunity to attend some in person and meet with stakeholders and survivors of modern slavery.

8.3.2 In October 2021 I travelled to Liechtenstein where I addressed delegates at a conference hosted by the FAST Initiative and spoke at a public event hosted by the Ministry of Public Affairs. In April of this year I participated in the OSCE 22<sup>nd</sup> Annual Conference in Vienna. Domestic travel

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<sup>201</sup> See IASC website: <https://www.antislaverycommissioner.co.uk/resources>.

<sup>202</sup> IASC (2021), 'Dame Sara gives evidence in Parliamentary review of UK's approach to tackling modern slavery through ICAI': <https://www.antislaverycommissioner.co.uk/news-insights/dame-sara-gives-evidence-in-parliamentary-review-of-uks-approach-to-tackling-modern-slavery-through-icai/>.

has included visits to Northern Ireland and Scotland in quarter 4 2021 to meet with law enforcement and government officials, business representatives and NGOs.

8.3.3 Media interviews and IASC commentary on modern slavery, vulnerability and exploitation were featured across a broad range of local and national publications and platforms. Interviews, letters and opinion pieces were featured in The Independent, The Daily Express, The Guardian, The Times, The Times Red Box, The Times Law, The Sunday Times Magazine, The Daily Telegraph, The Mirror, i News, Responsible Investor, BBC News, Insurance Insider and the Journal of Poverty and Social Justice. Radio interviews were aired on BBC Radio 4's Today programme with Nick Robinson and a special report presented by Nga Pham, BBC Radio Cumbria, and on Times Radio with Aasmah Mir and Stig Abel. A television interview was featured on an ITV Evening News special report.

## Speaking engagements 2021-2022

Date	Event
April 2021	Human Trafficking Foundation NGO Advisory Forum Covid-19 meeting
April 2021	Soroptimist International Great Britain and Ireland Biennial Study Day
April 2021	2 Bedford Row Modern Slavery Panel Session on Section 45 of the Modern Slavery Act 2015 and the National Referral Mechanism
April 2021	Gangmasters and Labour Abuse Authority board meeting
April 2021	IASC and Finance Against Slavery and Trafficking (FAST) Initiative: Managing Modern Slavery Risks in Capital Markets
May 2021	University of Nottingham's Rights Lab: Moments Knowledge Sharing Event - Early Insights: Mental Health Recovery
May 2021	Launch of IASC and University of Nottingham's Rights Lab report: The Benefits and the Barriers to Accessing Employment: Considerations for Survivors of Modern Slavery
May 2021	Bright Blue and British Future online conference: What Next for Immigration?
May 2021	Sandwell Anti-Slavery Partnership Sexual Exploitation conference: Open Your Eyes: Sexual Exploitation Still Happens Here
May 2021	All-Party Parliamentary Group on Human Trafficking and Modern Slavery: Taking Back Control of our Borders? The Impact of Modern-Day Slavery
June 2021	Launch of the University of Sheffield, IASC and Public Health England report: Refining a Public Health Approach to Modern Slavery
June 2021	Immigration Enforcement: Vulnerability Champions Conference
June 2021	Modern Slavery and Human Rights Policy and Evidence Centre report launch: Modern Slavery Data for Investors
June 2021	Institute of Directors: Let's Talk! Why Fighting Modern Slavery is Everyone's Business
June 2021	West Yorkshire Anti-Slavery Partnership Meeting

June 2021	Chatham House Common Futures Conversations: Potential Solutions for Modern Slavery
June 2021	International Development Sub-Committee on the work of the Independent Commission for Aid Impact (ICAI): ICAI's review on the UK's approach to tackling modern slavery through the aid programme
July 2021	National Anti-Trafficking and Modern Slavery Network meeting hosted by Alison Lowe, Deputy Mayor for Policing and Crime
July 2021	Cambridge Evidence Based Policing 2021 - Reducing Serious Violence
July 2021	Local Government Association roundtable: Don't Choose to Look the Other Way: Understanding Modern Day Slavery and Councils' Role in Tackling It
July 2021	IASC Annual Report launch
July 2021	The UK BME Anti-Slavery Network (BASNET) and Human Trafficking Foundation: One Year On: Promoting Race Equality, Diversity and Inclusion
July 2021	Crest county lines: Breaking the Cycle roundtable
July 2021	IASC and the Office of the OSCE Special Representative and Co-ordinator for Combating Trafficking in Human Beings: Role of Independent National Rapporteurs or Equivalent Mechanisms in Enhancing States' Anti-Trafficking Responses
July 2021	TISC report workshop for local government leaders: Progress and Challenges in Tackling Modern Slavery in Local Government Supply Chains
September 2021	Scotland Against Modern Slavery (SAMS) roundtable
September 2021	All-Party Parliamentary Group on Policing and Security: Nationality and Borders Bill
September 2021	Anti-Modern Slavery Alliance (AMSA) roundtable
September 2021	Wilberforce Institute for Hull University: The Impact of Brexit: Has this Increased or Decreased the Risk of Labour Exploitation and Modern Slavery in the UK?
September 2021	Nationality and Borders Public Bill Committee oral evidence session
October 2021	Modern Slavery Partnership Hampshire and Isle of Wight exhibition: The Real Faces of Modern Slavery: Unmasking the Truth
October 2021	St Mary's University: Horizons Summer School shared learning event
October 2021	Hestia: Forgotten Children: The Intergenerational Impact of Modern Slavery roundtable report launch
October 2021	IASC and Cumberland Lodge Conference: Practitioner Responses to Child Trafficking: Emerging Good Practice
October 2021	Human Trafficking Foundation: National Referral Mechanism (NRM) first responder conference
October 2021	Consumer Goods Forum: The Future of Brands: Facing the Burden of Proof
October 2021	Converge 21: The EU's Forced Labour Import Ban: What You Need to Know

October 2021	Sedex Webinar: Recognising Forced Labour Risks in Global Supply Chains
October 2021	West Midlands Anti-Slavery Day Conference: Examining a Public Health Approach to Modern Slavery
October 2021	Unseen's Modern Slavery and Exploitation Helpline five year anniversary
October 2021	St Mary's University: Healing the Wounds of Modern Slavery: Social Policy, Therapy and the Arts
October 2021	National Federation of Women's Institute: Stop Modern Slavery Campaign Webinar
October 2021	Finance Against Slavery and Trafficking (FAST) Implementation Review Conference
October 2021	Liechtenstein Ministry of Public Affairs: Modern Slavery and Finance
October 2021	International Organization for Immigration: Online panel discussion on the impact of the Nationality and Borders Bill on the UK's approach to modern slavery
October 2021	Gangmasters and Labour Abuse Authority strategy day
October 2021	Home Office and CCLA Investment Management: Investor Roundtable on Modern Slavery
October 2021	Hestia: Art is Freedom exhibition
October 2021	Global Fund to End Modern Slavery and Justice and Care Roundtable: Elevating UK and Global Leadership to End Modern Slavery
October 2021	Canterbury Christ Church Public Lecture: Did You Know There Are 40 Million Slaves in The World Today?
October 2021	International Bar Association Showcase: The IBA and modern slavery: New Light Through Old Windows
November 2021	All Parliamentary Group on Modern Slavery, Northern Ireland Assembly
November 2021	Westminster Legal Policy Forum keynote seminar: Next Steps for Tackling Modern Slavery
November 2021	Cross Government Anti-Slavery Advocates meeting
November 2021	IASC and Nottingham's Rights Lab Roundtable: IASC research priorities
November 2021	OSCE and GRETA: 2021 Annual Meeting of National Anti-Trafficking Coordinators and Rapporteurs or Equivalent Mechanisms
November 2021	Medaille Trust annual conference
November 2021	The Salvation Army: Modern Slavery Roundtable with Local Authorities: Meeting Housing Needs for Survivors of Modern Slavery
November 2021	Simmons & Simmons LLP fireside chat: Global Legal and Business Outlook: Modern Slavery in Financial Services within the UK
November 2021	IASC and Modern Slavery and Human Rights Policy and Evidence Centre research and policy impact event: Working Collaboratively to Maximise the Impact of Modern Slavery Research
November 2021	IASC, OSCE and FAST Initiative Roundtable: Trafficking in Human Beings and the Financial Sector

November 2021	Petrol Retailers and Car Wash Association reception: Human trafficking and slavery
December 2021	The Investor Forum - Four O'clock Forum: The Role of the Financial Sector in Eradicating Modern Slavery
December 2021	The Business Services Association seminar: Tackling Modern Slavery
December 2021	Modern Slavery and Human Rights Policy and Evidence Centre: The Role of Consumers in Addressing Modern Slavery
January 2022	English-Speaking Union: Dame Sara Thornton in Conversation with Alastair Niven
January 2022	National Anti-Slavery Network meeting hosted by Alison Lowe, Deputy Mayor for Policing and Crime
January 2022	IASC roundtable: The Benefits and the Barriers to Accessing Employment: Considerations for Survivors of Modern Slavery
January 2022	Local Government Association (LGA) Safer and Stronger Communities Board
January 2022	Homeland Security Investigation Seminar: Best Practices and Enhancing International Partnerships to Combat Human Trafficking
January 2022	CSIS-University of Hull and Wilberforce Institute: One day networking workshop
February 2022	OSCE and IASC: Informal Meeting of Independent National Rapporteurs or Equivalent mechanisms: The Epidemic of Child Trafficking
February 2022	Glasgow Violence Against Women Partnership, CoSLA, Just Right Scotland and the Improvement Service: Impact of the Nationality and Borders Bill on women and girls subjected to male violence in Scotland
February 2022	IASC roundtable: Visa Systems and Long-haul Recruitment in the Agriculture and Care Sectors.
February 2022	Oxford University: Heads of Houses informal meeting briefing on modern slavery and human trafficking
February 2022	IASC Roundtable: Compensation and Reparation for Survivors of Modern Slavery
February 2022	Commonwealth Parliamentary Association and Mission89: Actions to Prevent Human Trafficking Through Sport - Workshop to Build Capacity and Techniques
February 2022	All Party Parliamentary Group on Environmental, Social and Governance (ESG)
February 2022	Scottish Refugee Council: Launch event: An Evaluation of the Scottish Guardianship Service
March 2022	Annual Chatham House Responsible Business Conference
March 2022	City Hearts Impact Event: Rescue to Recovery! Behind the Scenes
March 2022	University of Oxford: Florence Nightingale Lecture and Panel Session
March 2022	IASC, Anti-Slavery International and Fidelis event: The Insurance Industry and Modern Slavery
March 2022	University of Liverpool International Women's Day Event: Modern Slavery: A Gendered Issue

March 2022	Oxfordshire Anti-Slavery Network Modern Slavery forum
March 2022	IASC and Cumberland Lodge Report Launch: Practitioner Responses to Child Trafficking: Emerging Good Practice
March 2022	Themis Modern Slavery and Human Trafficking Training Module Launch
April 2022	OSCE 22nd Conference of the Alliance against Trafficking in Persons: Protection: Upholding Victims' Rights and Strengthening Assistance
April 2022	University College London online roundtable event: The war in Ukraine and associated risks of trafficking and exploitation in the UK
April 2022	In conversation with Permanent Secretary Matthew Rycroft

## Appendix: IASC Research Priorities

<b>Improving victim care and support</b>
Understanding victim and survivor experiences and longer term outcomes. How can survivor experiences best be captured? How can outcomes be measured (quantitatively and qualitatively) and what does a positive outcome look like?
Understanding what makes people vulnerable to trafficking and re-trafficking to inform prevention efforts and build resilience at a structural level and among vulnerable communities.
Identifying support needs of child victims of trafficking including during transition into adulthood. Understanding the scale and nature of child trafficking in the UK and effective models of intervention such as contextual safeguarding.
Focusing on primary prevention as per a public health approach to determine vulnerability factors at a population level. Exploring a public health approach to modern slavery.
Developing an evidence base for the benefits of access to work and the harms of not working for victim and survivor outcomes, agency and sustainable independence.
Researching the scale and nature of domestic servitude in the UK, and how challenges linked to identification and a lack of awareness impacts the response to this exploitation type.
Researching the impact of digital poverty for victims and survivors in the NRM and evaluating efforts to provide practical support such as digital access and literacy within the NRM.
<b>Supporting law enforcement and prosecutions</b>
Understanding barriers to prosecution. Why has an increase in operational activity by the police not translated into successful prosecutions using the Modern Slavery Act 2015? How can victim engagement in the criminal justice process be improved and what can be learned from rape and sexual assault and domestic abuse offences?
Researching the key challenges undermining effective financial investigation of modern slavery crimes and ability to seize assets. How do we ensure modern slavery is seen as a priority for financial investigators? How can we move towards greater levels of victim reparations?
Developing understanding of the transitions from a victim of exploitation to offender (and vice versa). Where are the indicators and intervention points? What forms of exploitation is this most prevalent in and why? Can contextual safeguarding and interventions prevent this?

<b>Focusing on prevention</b>
Exploring consumer attitudes and their impact on businesses. Does increased public awareness of modern slavery lead to behavioural change of consumers and does the purchasing power of consumers influence businesses to change procurement and manufacturing practices?
Understanding links between low or non-compliance with labour regulations, and labour exploitation. Are low levels of compliance or non-compliance evidence of non-compliance in other areas? How can we establish a baseline of evidence for this?
What does success look like in the detection of trafficking in supply chains? What best practice exists in terms of business efforts to examine and understand their supply chains and to mitigate trafficking and exploitation risks?
How effective is leadership in reorienting the business practices and expectations of suppliers and investors towards a focus on sustainability which values people and planet, as well as profit?
<b>Getting value from research and innovation</b>
Understanding the impact of research on modern slavery on policy and practice, including research and practice by academics and practitioners. Identifying good practice in the translation of research which improves policy and outcomes, as well as preventing exploitation.
Adopting a what works approach to monitoring, evaluating and informing modern slavery policy and practice, with a focus on synthesising and translating evidence into effective policy.
Building the evidence base on modern slavery, including understanding differing approaches to assess prevalence of modern slavery in the UK to support policy and practice which is underpinned by accurate data.
Exploring the use of data analytics to provide insight on trafficking-related issues such as identifying illicit financial flows and other suspicious activity resulting from human trafficking.
Scoping out opportunities to conduct systematic reviews, gap maps and evaluations of survivor interventions, criminal justice responses and prevention efforts. Synthesising cost-benefit analyses related to modern slavery support and interventions.
<b>International</b>
Assessing and evaluating the impact of immigration policy on modern slavery and vulnerability, including the points-based system and Domestic Worker Visas.
Evaluating returns and reintegration programmes, developing and sharing best practice, and understanding what works through longitudinal analyses.
Exploring the links between human trafficking and related socio-economic and humanitarian issues such as climate change and migration.

## Role of the Independent Anti-Slavery Commissioner

Part 4 of the Modern Slavery Act (2015) created the role of the Independent Anti-Slavery Commissioner. The Commissioner has a UK-wide remit to encourage good practice in the prevention, detection, investigation and prosecution of slavery and human trafficking offences and the identification of victims.

Dame Sara Thornton was appointed as the Independent Anti-Slavery Commissioner by the Secretary of State following consultation with the Scottish Ministers and the Department of Justice in Northern Ireland. She took up post at the beginning of May 2019 and her appointment is for three years.

The Commissioner is given an annual budget with which to appoint staff and carry out her duties. She is accountable through her strategic plan and annual reports, which the Secretary of State lays before parliament, setting out the extent to which objectives and priorities are achieved. The Commissioner will publish her expenses and all Freedom of Information requests she receives.

To carry out her function the Commissioner can:

- Make a report on any permitted matter to the Secretary of State, the Scottish Ministers and the Department of Justice in Northern Ireland (reports must be requested by the Secretary of State, the Scottish Ministers or the Department of Justice in Northern Ireland; or be as detailed in the strategic plan)
- Publish reports (as laid out in the Act)
- Make recommendations to any public authority about the exercise of its functions
- Undertake or support the carrying out of research
- Provide information, education or training
- Consult and co-operate with public authorities, voluntary organisations and other persons

The Commissioner published her Strategic Plan 2019-2021 in October 2019, which stated the objectives and priorities for the period 2019-2021 and identified matters on which she proposed to report.

This document, the Annual Report 2020-2021, sets out the exercise of the Commissioner's functions and activities during 2020-2021.

Public authorities have a duty to co-operate with the Commissioner, share data with her and comply with requests (to the extent specified in the Act).

The Commissioner does not exercise any function in relation to individual cases save to draw conclusions for the purpose of considering a general issue.

# The Independent Anti-Slavery Commissioner's Office

## Officers

Shelley Perera	Staff Officer
Jessica Roberts	Communications Officer
Abigail Egbe	Intern Project Officer
Ed Bateman	Chief of Staff

## Policy Leads

April McCoig	Improving victim care and support
Kieran Backhouse	Law enforcement and prosecutions (March – October 2021)
Tim Evans	Law enforcement and prosecutions (October – March 2022)
Emma Crates	Focussing on prevention
Katherine Lawson	Getting value from research and innovation
Jenna Teasdale	International

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