

## Modern Slavery PEC Briefing: Priorities for Independent Anti-Slavery Commissioner's (IASC's) Strategic Plan

15 March 2024

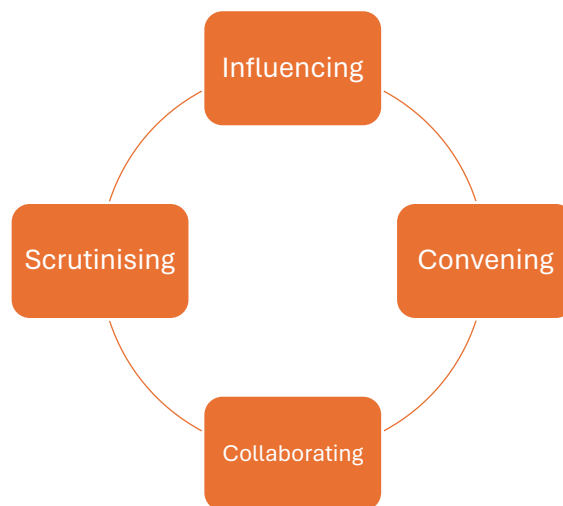
### Summary

- Based on the Modern Slavery PEC's analysis, funded research and experience of using evidence and engaging with lived experience experts to develop targeted recommendations for strategic development of policy, we present insights and recommendations to inform the new IASC's first Strategic Plan.
- Recommendations are grounded in our assessment that influencing, convening, collaborating and scrutinising are the four main levers available to the IASC to deliver her statutory functions under the Modern Slavery Act 2015. We recommend:
- **Meaningful inclusion of people with lived experience of modern slavery:** ensure that the IASC's own objectives and activities are informed by meaningful, ethical and equitable engagement with lived experience experts, and advocate for increased involvement of lived experience experts across the modern slavery sector.
- **Supporting research and better use of data:** ensure all IASC activity is informed by robust evidence and support the further building of the evidence base on modern slavery, by partnering with and influencing data owners and evidence producers.
- **Prevention:** encourage greater prioritisation of prevention in the UK's strategic response to modern slavery.
- **Survivor identification and support:** encourage greater prioritisation of early identification and protection in the UK's response to modern slavery and encourage participation of people with lived experience of modern slavery in the design, development and evaluation of policies and interventions that affect them.
- **Domestic and global supply chains:** encourage strengthening of the UK's policy response to forced labour in domestic and global supply chains and promote best practice across businesses.
- **Law enforcement and criminal justice:** advocate for measures that strengthen modern slavery survivors' engagement in the criminal justice system.
- **International:** share best practice internationally about the UK IASC role with other similar anti-slavery Commissioner roles.
- The briefing contains specific suggested activities for the IASC under these six themes.

## Approach to this briefing

1. **This briefing aims to inform the development of the Independent Anti-Slavery Commissioner’s first Strategic Plan.** It has been prepared by the Modern Slavery PEC’s lived experience engagement, policy impact, research and partnerships teams. It is based on evidence generated by Modern Slavery PEC-funded research and Modern Slavery PEC Policy Briefs and Explainers, and the Centre’s firsthand experience of working to influence modern slavery policy and engage lived experience experts.<sup>1</sup>
2. **This briefing is grounded in our assessment of the main levers available to the IASC in light of the role’s statutory functions,** as set out in the Modern Slavery Act 2015. We assess that these levers are:
  - a. **Influencing:** advocating for changes to laws, policies and practice to increase the effectiveness of the prevention, detection, investigation and prosecution of slavery and human trafficking offences and survivor identification and support.
  - b. **Convening:** bringing together different actors who have a role in addressing modern slavery to consult them and share best practice and insights.
  - c. **Collaborating:** joint work and partnerships with actors who have a role in addressing modern slavery to improve the prevention, detection, investigation and prosecution of slavery and human trafficking offences and survivor identification and support.
  - d. **Scrutinising:** drawing on insights, data and research to monitor and assess the effectiveness of laws, policies and practices to address modern slavery, including by drawing on the IASC’s power under section 43 of the Modern Slavery Act 20145 to request information from specified public bodies.

Figure 1: Modern Slavery PEC Assessment of main levers available to IASC



These levers are mutually reinforcing, for example through scrutinising, the IASC will identify issues on which to collaborate with others and seek to influence policy.

3. **The briefing is structured around six themes:** two cross-cutting priority areas (lived experience engagement, and research and data), and five thematic policy areas

---

<sup>1</sup> This briefing does not necessarily represent the views of all partners making up the Modern Slavery PEC consortium.

(prevention; domestic and global supply chains; survivor identification and support; law enforcement and criminal justice and international).

4. **We recommend the IASC regularly re-visits the Strategic Plan to ensure it remains relevant**, and engages lived experience experts in any review process. Modern slavery is a dynamic policy area and significant legislative or policy developments, or new insights about the scale and nature of modern slavery, may necessitate revisions to the Plan.

## Meaningful inclusion of people with lived experience of modern slavery

Insights from Modern Slavery PEC Analysis, Funded Research and Organisational Experience

5. **Lived experience engagement in work to address and prevent modern slavery is critical**, not just because it is an ethical imperative but also because it makes research more robust and policies more effective. A 2022 research project<sup>2</sup> undertaken by the Modern Slavery PEC, with funding from the FCDO, found that *“high-quality and meaningful engagement of people with lived experience of modern slavery improves policies and programmes designed to tackle this global challenge and its root causes, as well [as] benefitting affected individuals, communities and ally-colleagues.”*
6. **It is important to carry out lived experience engagement appropriately**, both to minimise the risk of causing any harm to lived experience experts and to ensure that the engagement is effective. The report referenced in the previous point found that engagement should follow three key principles of being non-tokenistic, being trauma-informed and preventing harm.
7. **There are many different ways in which to carry out lived experience engagement.** Organisations across the anti-slavery sector have taken approaches such as: recruiting permanent lived experience expert roles (either full-time or part-time), engaging lived experience consultants on ad hoc projects, establishing a Lived Experience Advisory Panel (LEAP), or working with another organisation that already has an established LEAP. There are several examples of LEAPs in the sector, but each is constituted differently and has a different mode of operation and remit. Organisations with established LEAPs include Causeway, the Trafficking Awareness Raising Alliance (TARA) Scotland, the Human Trafficking Foundation and the Modern Slavery PEC.
8. **For more detailed guidance on best practice, please refer to the attached document** which lists 12 core principles to support healthy engagement with those who hold lived experience of modern slavery.

### Recommended IASC Objective(s) on Lived Experience Engagement

9. **The IASC should ensure that her own objectives and activities are informed by meaningful, ethical and equitable engagement with lived experience experts, and advocate for increased involvement of lived experience experts across the modern slavery sector.**

### Recommended IASC Activities on Lived Experience Engagement

10. The IASC should:

---

<sup>2</sup> Asquith, W., Kiconco, A., Balch, A. (2022) [‘Promising practices in the engagement of people with lived experience to address modern slavery and human trafficking’](#)

- a. Establish a lived experience engagement mechanism which is informed by developing good practice across the anti-slavery sector and which is non-tokenistic, trauma-informed and minimises the risk of any harm to participants.
- b. Identify and communicate clear objectives for any lived experience engagement that the IASC intends to undertake. These objectives should be informed by prior consultation with survivor-led organisations or individual lived experience experts.
- c. Consult and convene survivor-engaged and survivor-led organisations across the anti-slavery sector to identify good practices in lived experience engagement that can inform the IASC's work.
- d. Advocate for other organisations working to address modern slavery (such as government departments) to set up their own mechanisms for meaningful engagement of lived experience experts.

## Supporting research and better use of data

### Insights from Modern Slavery PEC Analysis and Funded Research

11. **There is a growing volume of research, data and evidence about modern slavery in the UK**, including that generated by Modern Slavery PEC-funded projects. Over the last two years, the Government has published more detailed National Referral Mechanism (NRM) data.
12. **Despite the growing evidence base, there remain gaps in understanding of modern slavery**, and also gaps and tensions in the evidence-policy relationship where the engagement work of the Modern Slavery PEC has been making a difference.<sup>3</sup> Forthcoming syntheses of Modern Slavery PEC-funded research will highlight the outstanding evidence gaps, for example what works to prevent and address different exploitation types.

### Recommended IASC **Objective(s)** on Research and Data

13. **The IASC should ensure all of her work is informed by robust evidence, and support the further building of the evidence base on modern slavery, by partnering with and influencing data owners and evidence producers.**

### Recommended IASC **Activities** on Research and Data

14. The IASC should:
  - a. Convene roundtables of researchers, lived experience experts, practitioners and policymakers on thematic topics, to generate insights on new and emerging modern slavery issues, and what looks promising in terms of the research agenda. Such roundtables could focus on 'evergreen' strategic issues, such as 'what works' to prevent modern slavery, use of innovative methodologies and forms of engagement with lived experience in research, and topical emerging issues such as exploitation linked to the care sector. The IASC office should consolidate and publish roundtable findings and recommendations in public-facing reports.

---

<sup>3</sup> Balch, A. & Hesketh, O. (2024) Mind the Gap(s)? Evidence and UK Policymaking on Human Trafficking and Modern Slavery, *Journal of Human Trafficking*, 10:2, 330-338, DOI: [10.1080/23322705.2024.2303257](https://doi.org/10.1080/23322705.2024.2303257)

- b. Subject to research resource within the IASC office, undertake novel analysis of existing data sets (such as the NRM data on the UK Data Service platform) and use the Commissioner’s powers under Part 4 of the Modern Slavery Act 2015 to request and then analyse data from statutory organisations, and make insights available through published reports.
- c. Make recommendations to data owners, including the Government, about improvements that could be made to data collection, analysis and publications.
- d. Form strategic partnerships with evidence-producers, such as researchers and the Modern Slavery PEC, to support and co-produce new research on topics of mutual interest.

## Prevention

### Insights from Modern Slavery PEC Analysis and Funded Research

- 15. **Prevention is an underdeveloped aspect of the response to modern slavery in the UK** with limited evidence about ‘what works’ to prevent modern slavery.<sup>4</sup>
- 16. **Prevention is a helpful overarching framework for modern slavery policy objectives.** One Modern Slavery PEC-funded research project proposed a definition of prevention, informed by people with lived experience of modern slavery and drawing on public health principles: *“Prevention is an on-going process of avoiding and minimising exploitation and harm. This can be achieved by intervening before exploitation and harm occurs, by intervening early, and by treating harms. It also includes action to prevent re-exploitation/re-trafficking. Prevention includes enabling people to exercise choice, control over their lives and to thrive.”*<sup>5</sup>
- 17. **Modern slavery has multiple underlying root causes and drivers.**<sup>6</sup> This means wider laws and policies (such as around immigration, safeguarding children and labour market enforcement) may have important consequences for conditions faced by modern slavery survivors or those at risk. For example, recent immigration legislation (the Illegal Migration Act 2023) is likely to have harmful impacts on survivors’ recovery and willingness to support prosecutions.<sup>7</sup>
- 18. **Wider laws and policies could have potential preventative effects for modern slavery.** For example Government interventions introduced during the pandemic, such as furlough schemes and accommodation for homeless individuals, likely reduced vulnerability to exploitation.<sup>8</sup>

### Recommended IASC Objective(s) on Prevention

- 19. **We recommend the IASC should encourage greater prioritisation of prevention in the UK’s response to modern slavery.**

### Recommended IASC Activities on Prevention

---

<sup>4</sup> Modern Slavery PEC (2021) [‘UK Government Modern Slavery Strategy review briefing’](#); Such, E., Aminu, H., Barnes, A., Hayes, K., Ariyo, M., Brierley, R. (2022) [‘Prevention of adult sexual and labour exploitation in the UK: What does or could work?’](#)

<sup>5</sup> Such, E., Aminu, H., Barnes, A., Hayes, K., Ariyo, M., Brierley, R. (2022) [‘Prevention of adult sexual and labour exploitation in the UK: What does or could work?’](#)

<sup>6</sup> Hesketh, O. and Balch, A. (2021) Modern Slavery PEC Policy Brief: [‘Modern Slavery and International Development’](#)

<sup>7</sup> Modern Slavery PEC (2023) [‘Explainer: Modern slavery clauses in Illegal Migration Act’](#)

<sup>8</sup> Hesketh, O. and Johnstone, O. (2021) Modern Slavery PEC Policy Brief: [‘Impact of the Covid-19 pandemic on modern slavery’](#)

20. The IASC should:

- a. Advocate for a strategic shift to prevention in organisational strategies and policies, such as the Scottish Government's Human Trafficking and Exploitation Strategy (currently being refreshed) and the UK Government's potential delivery of a new modern slavery strategy.
- b. Convene actors working on modern slavery with actors working in other, linked sectors, such as homelessness, poverty and safeguarding children, to discuss the areas of interlinkage, share best practice and identify areas for improved policy.
- c. Promote greater cross-Whitehall and cross-UK working on prevention of modern slavery by convening different government departments and different administrations to share best practice and insights, and to identify policies that could be improved to safeguard against modern slavery.
- d. Collaborate and partner with evidence producers to encourage more research to build the evidence base on the effectiveness of preventative activities, and a better understanding of how wider laws and policies interact with modern slavery.

## Survivor Identification and support

### Insights from Modern Slavery PEC Analysis and Funded Research

21. **UK survivor support policy is particularly dynamic.** Changes to the functioning of the National Referral Mechanism (NRM) continue to be delivered through the Home Office's transformation programme alongside the introduction and implementation of primary legislation. The Nationality and Borders Act 2022 and the Illegal Migration Act 2023 include provisions on victim identification and support, which evidence indicates is likely to have significant impacts on survivors when they are brought into force.<sup>9</sup>
22. **Evidence which predates this legislation challenges established concepts and terminology** and highlights key factors and barriers to what can be considered success in providing support to people with lived experience of modern slavery. In summary:
  - a. Evidence shows a need for policies, research and interventions to adopt survivor-informed outcomes for 'recovery' that recognise the challenges and limitations of the term as well as its iterative, cyclical, non-linear, non-timebound nature. Also, that 'recovery' is connected to the wider context of people's lives, for example asylum claim outcomes.
  - b. The delivery of support services could be improved, including by providing holistic, long-term, trauma-informed and culturally competent interventions and developing trusted relationships between practitioners and survivors.
  - c. There are practical and structural barriers to more effective support for survivors of modern slavery, such as language, geography, lack of funding, lack of capacity, long waiting lists, restrictive eligibility criteria, inconsistent provision, lack of childcare and lack of travel costs.

---

<sup>9</sup> Modern Slavery PEC (2023) '[Explainer: Modern slavery clauses in Illegal Migration Act](#)'; Modern Slavery PEC (2021) '[Submission to the UK Joint Committee on Human Rights on the Nationality and Borders Bill](#)'

- d. Wider systems such as immigration and housing often have a negative impact on support and wellbeing for survivors.<sup>10</sup>
  - e. Forthcoming research from PEC Children’s Fellow Dr Anna Skeels takes a child-centred approach to explore the benefits and limitations of the Independent Child Trafficking Guardianship service in England and Wales on children and young people’s outcomes (long-term safeguarding and protection, well-being, and recovery). The ICTG service was found to have supported positive outcomes for all young people participating in the research. All outcomes were important and mattered to them.<sup>11</sup>
23. **Modern Slavery PEC commissioned research reveals the insights that analysis of Duty to Notify Referral Data can provide** on the reasons why adults with lived experience of modern slavery decide to give (or not to give) consent to enter the NRM, as well what further data should be published to allow for more effective monitoring of trends and patterns. The research also identifies how to improve the effectiveness of First Responder training to recognise the indicators of modern slavery and to ensure the possibility of an informed decision on whether to be referred.<sup>12</sup>
24. **We have funded a recent/forthcoming portfolio of research projects which will generate evidence and insights including on how to improve the early identification of people at risk of modern slavery,** addressing a key evidence gap.<sup>13</sup>

#### Recommended IASC **Objective(s)** on Survivor Identification and Support

25. **The IASC should encourage greater prioritisation of early identification and protection in the UK’s response to modern slavery. We recommend the IASC encourage the development of mechanisms for the meaningful participation of adults and children with lived experience of modern slavery in the design, development and evaluation of policies and interventions that affect them.**

#### Recommended IASC **Activities** on Survivor Identification and Support

26. The IASC should:
- a. In recognition of the limitations of the terms ‘recovery’ and ‘psychological assistance’<sup>14</sup>, take account of and promote survivor-informed outcomes for recovery for both adults and children, which reflect the cyclical, non-linear and non-timebound nature of recovery.
  - b. Advocate for adequate resourcing to provide consistent and appropriate long-term support to survivors of modern slavery, as well as to address the barriers to accessing support. Advocate for the roll out of the ICTG service to all local authorities in England.

<sup>10</sup> Modern Slavery PEC (2023), [‘Policy Brief: Survivor support Based on the Modern Slavery PEC funded research portfolio’](#)

<sup>11</sup> Skeels, A., Huxley, K. and Stott, H. (forthcoming) [‘Outcomes for children and young people affected by modern slavery: An analysis of ICTG service support in England and Wales’](#)

<sup>12</sup> Magugliani, N., Gauci, J.P., Trajer, J., (2024), [‘Identification of adults with lived experience of modern slavery in the UK’](#)

<sup>13</sup> Celiksoy, E., Schwarz, K., Sawyer, L., Vargas Gorena, P., Ciucci, S., Yin, S., Durán, L., (2024) [‘Prevention and identification of children and young adults experiencing, or at risk of, modern slavery in the UK’](#);

Forthcoming Modern Slavery PEC funded research on: [Homelessness and modern slavery in the UK](#); [Identification of disabled children and young people at risk of modern slavery](#); [Trafficking risks for unaccompanied children in Home Office operated hotels](#)

<sup>14</sup> Though acknowledging that these terms are used in legal instruments such as ECAT.



- c. Facilitate opportunities to share promising practice in developing trauma-informed and culturally competent interventions, organisations and First Responder Training in the modern slavery sector as well as drawing on expertise from other sectors.
- d. Promote consistency and coordination of services between specialised modern slavery services and wider systems affecting survivors' lives such as housing, mental health services, the immigration and asylum systems.
- e. Support the generation of data, information and insights on how the modern slavery provisions in the Nationality and Borders Act and Illegal Migration Act are impacting on survivors and on wider systems to support survivors and prevent modern slavery. This includes forthcoming PEC funded research examining the impacts of the Nationality and Borders Act 2022 on the identification and wellbeing of people with lived experience of modern slavery in the UK.<sup>15</sup>

## Domestic and Global Supply Chains

### Insights from Modern Slavery PEC Analysis and Funded Research

#### 27. There is growing evidence exploring the effectiveness of different regulatory interventions being introduced around the world to address modern slavery in domestic and global supply chains.

- a. The effectiveness of section 54 of the Modern Slavery Act 2015 could be improved. There are gaps in business compliance, businesses may change their behaviour with the aim of minimal compliance rather than effecting substantial change, and there is little evidence of its impact on downstream outcomes.<sup>16</sup>
- b. Other regulatory interventions not yet introduced in the UK indicate promise, though a need for more evidence on long-term effectiveness, for example, mandatory human rights due diligence,<sup>17</sup> public procurement measures,<sup>18</sup> and forced labour import bans,<sup>19</sup> including to prevent and mitigate state-sponsored forced labour.<sup>20</sup>
- b. The role of capital market actors remains underexplored in policy and legislation. Harnessing their leverage by e.g., setting clear regulatory expectations for these actors may improve the UK's response to modern slavery in the UK and abroad.<sup>21</sup>
- c. Labour market conditions in the UK could also be improved by addressing under-resourcing and fragmentation in labour market enforcement<sup>22</sup> and by revisiting

<sup>15</sup> Forthcoming Modern Slavery PEC [research on modern slavery impact of NABA 2022](#).

<sup>16</sup> Hsin, L. K. E., New, S., Pietropaoli, I., and L. Smit (2021) '[Effectiveness of Section 54 of the Modern Slavery Act](#)'; Cranston, C., Dorett, A., Martin, E., and L. T. Murphy (2024) '[Uyghur forced labour: Respecting Rights in Renewable Energy](#)'; Gonzalez De Aguinaga, S. (2023) '[Accelerating Change: The Potential of Capital Market Actors in Addressing Modern Slavery](#)'

<sup>17</sup> Johnstone, O., and O. Hesketh (2022) '[Effectiveness of mandatory human rights and environmental due diligence](#)'

<sup>18</sup> Gonzalez de Aguinaga, S., Johnstone, O., and O. Hesketh (2022) '[Effectiveness of public procurement measures in addressing modern slavery](#)'

<sup>19</sup> Pietropaoli, I., Johnstone, O., and A. Balch (2021) '[Effectiveness of forced labour import bans](#)'

<sup>20</sup> Cranston, C., Dorett, A., Martin, E., and L. T. Murphy (2024) '[Uyghur forced labour: Respecting Rights in Renewable Energy](#)'

<sup>21</sup> Gonzalez De Aguinaga, S. (2023) '[Accelerating Change: the Potential of Capital Market Actors in Addressing Modern Slavery](#)'

<sup>22</sup> Niezna, M., and V. Tecca (2023) '[Submission to UK Parliament Joint Committee on Human Rights \(JCHR\) on Human Rights at Work](#)'; Thiemann, I., et al. (forthcoming) '[UK agriculture and care visas and vulnerability to exploitation](#)'



public policies that increase vulnerability to exploitation among workers, such as through the redesign of certain visa regimes.<sup>23</sup>

- d. People in situations of labour exploitation encounter a number of barriers to reporting, including a fear of immigration enforcement.<sup>24</sup>
- e. Meaningful engagement of people with lived experience of modern slavery, and with communities at risk of modern slavery such as workers in high-risk sectors, may improve mechanisms designed to prevent and remediate labour exploitation.<sup>25</sup>

#### Recommended IASC **Objective(s)** on Supply Chains

- 28. We recommend the IASC encourages a strengthening of the UK's policy response to forced labour in domestic and global supply chains, and promotes best practice across businesses.**

#### Recommended IASC **Activities** on Supply Chains

- 29. The IASC should:
  - a. Advocate for a multipronged and complementary legislative and policy approach:
    - i. effective regulation of private, public, and finance actor activities,
    - ii. strengthened labour market enforcement through e.g., adequate resourcing,
    - iii. decreasing vulnerabilities to labour exploitation among high-risk groups and in high-risk sectors including by scrutinising wider laws and policies (such as visa regimes), and
    - iv. the reduction and removal of barriers to securely reporting instances of labour exploitation, including through collaboration with the Domestic Abuse Commissioner who is advocating for measures that would remove barriers to reporting crime and abuse.<sup>26</sup>
  - b. Convene actors with the leverage, motivation, and capability to influence the labour market (e.g., business networks, public purchasing consortia, and finance actors) alongside groups at risk of – and who have lived experience of – labour exploitation, and those who represent them such as trade unions, to identify areas for policy improvement. Remediation and secure reporting mechanisms are two areas that warrant further exploration.
  - c. Advocate for and support the facilitation of collaboration between businesses and finance actors with the aim of increasing leverage through collective initiatives. This includes through engagement with pre-existing coalitions.
  - d. Scrutinise the effectiveness of current policy and legislative approaches by supporting research that critically examines established business models and the corporate social responsibility framework, and that explores the effectiveness of worker-driven and enforcement-focused interventions.

---

<sup>23</sup> Ibid.

<sup>24</sup> Such as where their employer also sponsors their leave to remain in the UK, or where they are exploited in the informal labour market. See, e.g., Thiemann, I., et al. (2024) '[UK agriculture and care visas and vulnerability to exploitation](#)'

<sup>25</sup> Ibid.; Niezna, M., and V. Tecca (2023) '[Submission to UK Parliament Joint Committee on Human Rights \(JCHR\) on Human Rights at Work](#)'; Thiemann, I., et al. (forthcoming) '[UK agriculture and care visas and vulnerability to exploitation](#)'

<sup>26</sup> See, e.g., Domestic Abuse Commissioner (2023) '[Safety Before Status](#)'

## Law enforcement and criminal justice

### Insights from Modern Slavery PEC Analysis and Funded Research

30. **The volume of charges, prosecutions and convictions for modern slavery offending remains notably low.** In the year ending March 2023, 1.18% (120) of modern slavery crimes recorded by the police in England and Wales (10,148) resulted in a charge/summons.<sup>27</sup> In the year ending September 2023, the CPS recorded 395 prosecutions for modern slavery-flagged crimes in England and Wales, of which 301 (76%) resulted in a conviction.<sup>28</sup>
31. **Co-operation and engagement from victims is often critical for securing prosecutions and convictions.** CPS guidance recognises that victims often take significant risks when giving evidence<sup>29</sup> and the police recognise it can take many months to obtain evidence from victims.<sup>30</sup>
32. **The Illegal Migration Act 2023 is likely to reduce survivors' willingness to support criminal prosecutions.** The Act provides an exemption from automatic disqualification from NRM support for those supporting criminal prosecutions if it is deemed necessary that presence in the UK is necessary for that cooperation. However, it is not clear how this will operate in practice.
33. **There is a high likelihood of unidentified survivors of modern slavery currently being imprisoned across the UK,** and several barriers to identification of modern slavery survivors in prisons, and unmet needs for those formally identified.<sup>31</sup>
34. **Adult Services Websites (ASWs) are enablers of sexual exploitation, modern slavery and human trafficking** and there is a need to ensure that recent regulation (the Online Safety Act 2023) is accompanied by adequate resourcing for implementation and that potential unintended consequences (such as displacement to encrypted spaces) are monitored.<sup>32</sup>

### Recommended IASC Objective(s) on Law enforcement and criminal justice

35. **The IASC should advocate for measures that strengthen modern slavery victims' engagement in the criminal justice system.**

### Recommended IASC Activities on Law enforcement and criminal justice

36. The IASC should:
  - a. Monitor and scrutinise the impact of the Illegal Migration Act 2023 on survivors' willingness to engage in criminal prosecutions.
  - b. Monitor and scrutinise the impact of the Online Safety Act 2023 on sexual exploitation linked to Adult Services Websites.
  - c. Share best practice on initiatives that aim to improve victim engagement in the criminal justice process and identification and support within the prison estate.
  - d. Promote greater cross-Whitehall working on modern slavery victims' issues, for example advocate for modern slavery considerations to be part of the Victims' Code and Victims and Prisoners Bill.

---

<sup>27</sup> Home Office (2024) ['Outcomes open data, year ending March 2023'](#)

<sup>28</sup> Crown Prosecution Service (2023) ['Prosecution Outcomes by Crime Types Management Information, 23/24-Q2'](#) Data Table 5.1

<sup>29</sup> Crown Prosecution Service (updated 2022) ['Modern Slavery, Human Trafficking and Smuggling Guidance'](#)

<sup>30</sup> College of Policing (updated 2022) ['Modern slavery investigation'](#)

<sup>31</sup> Jovanović, M., Burland, P., Topp, V., Fluhr, F., (2023) ['Tackling the blind spot of the UK anti-slavery regime: The role and responsibility of prisons in securing the rights of modern slavery survivors'](#)

<sup>32</sup> Sanders, T. & Keighley, R. (2023) ['The role of adult service websites in addressing modern slavery'](#)

## International

### Insights from Modern Slavery PEC Analysis and Funded Research

37. **Vulnerability to exploitation is increasing globally** due to the Covid-19 pandemic, armed conflict and climate change. Current global efforts in relation to modern slavery are not on track, and often fragmented.<sup>33</sup>
38. **Modern slavery often shares the same root causes and drivers as other international development issues**, and there is scope for UK Government-led international development efforts to better integrate modern slavery.<sup>34</sup>
39. **The [Equity in Evidence Conference](#), which the PEC co-organised, demonstrated the critical importance of supporting international research partnerships** that involve researchers collaborating with people from directly affected communities and those with lived experience

### Recommended IASC Objective(s) on International

40. **In recognition that the Commissioner has already stated that her primary focus will be on the UK,<sup>35</sup> we recommend that the Commissioner’s international focus is on sharing best practice internationally about the UK IASC role.**

### Recommended IASC Activities on International

41. The IASC should:
  - a. Convene an informal network of international anti-slavery commissioners, to share insights and best practice. Initially this would include the New South Wales Anti-Slavery Commissioner and the forthcoming Australia-wide Anti-Slavery Commissioner, and could be expanded as and when other similar roles are created internationally.

## About the UK Modern Slavery and Human Rights Policy and Evidence Centre (Modern Slavery PEC)

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

---

<sup>33</sup> Hilland, A., Biggs, M., Kerr, S. (2022) '[Assessing the case for a Global Commission on Modern Slavery and Human Trafficking](#)'

<sup>34</sup> Hesketh, O. and Balch, A. (2021) Modern Slavery PEC Policy Brief: '[Modern Slavery and International Development](#)'

<sup>35</sup> Home Affairs Committee (2024) [Oral evidence: Anti-Slavery Commissioner](#), Tuesday 6 February 2024. Q33.