



Mainstreaming modern slavery and climate change governance in the UK: National and Devolved recommendations

Findings based on the study led by Dr Bethany Jackson by University of Nottingham (Rights Lab and School of Geography), Transparentem, and International Justice Mission (IJM) UK, February 2024^{i,ii}

This study focused on the potential for intersection of climate change and modern slavery policy within the UK context (both national and devolved). Findings indicated that there are current policy silos between policy experts focused on climate change adaptation and mitigation, and those focused on modern slavery. However, there is a willingness and interest from key policy makers in both areas to encourage collaborative thinking and action in the future. Our study provides a series of recommendations targeted at varying levels of national and devolved governments and highlights departments and expertise that can be used to address climate change and modern slavery in a combined response in the future.



The following briefing explores the most relevant recommendations to the national [UK government](#) (and thus [England](#)), and the devolved administrations (DA) of [Scotland](#), [Wales](#), and [Northern Ireland](#).

Navigation to each section can be accessed from the country names above.

Key findings

Through the study we noted that policymakers working on modern slavery and climate change often work in isolation (policy silos) and that can lead to a disconnect of both combined action and scale of issues and solutions.

Efforts are being made to consider combined actions (e.g., decent work is considered in some climate change legislation across the UK), but more combined action could be undertaken. For example, it was noted that there was a willingness for integration through combined Directorate mandates, development of joint-legislation, more networking between policy experts in both fields of expertise and learning between devolved and national policymakers.

The methods (see [research overview](#)) we deployed in this study have already begun to fill some of the identified gaps in combined action simply by opening the conversation and enabling connections between policymakers to take place.

Considering these issues in conjunction was new to many of these we engaged with and highlights opportunities for future efforts in this area.

UK National Government (Including England)

The UK Government was the primary region where many of the recommendations established throughout this project are focused. This is because of the role that the UK has in much of the modern slavery policy within the UK. For those linked to climate change there is more differentiation due to the devolved nature of the issue – particularly in Northern Ireland and Scotland.

Here these recommendations are presented through several primary and secondary recommendations targeted at Parliament, the UK Government, specific departments, and the operations within the civil service.

We have provided a range of the key recommendations targeted toward governance actors specifically here in summary format but they can be found in full within the main report.ⁱ



Recommendations for Governance Actors (UK National Government)

- **Recommendation: Greater Strategic Oversight**
 - The Home Office and FCDO need greater strategic coordination and oversight between departments as they address modern slavery.
 - There should be a single Directorate in the FCDO that covers issues of migration, modern slavery and humanitarian issues (including impacts from climate change) so reporting can be targeted and intersection issues addressed simultaneously.
 - Linkages between modern slavery and climate change should be included as a strategic priority in Home Office domestic policies.
- **Recommendation: Problem framing and recognition**
 - An overarching human rights lens should be integrated into all department mandates; with movement from human-climate risks transitioning beyond a security issue into humanitarian and social responses.
 - Greater strategic alignment between UK and DAs to establish a unified and cohesive approach to address modern slavery and climate change.
 - The Cabinet Office should include modern slavery (and intersectional risks) within the *National Risk Register*.
- **Recommendation: Enhanced cross-departmental collaboration**
 - Establish and embed a cross-department sub-group within existing networks focused on international development, modern slavery, and climate risks.
 - Establish internal and cross-departmental sessions/workshops for networking and knowledge exchange.
 - Meetings between UK and DA policymaker counterparts. Additional attention is needed for Northern Ireland given the unique relationship between the countries.
 - Establish a system for effective handover and transfer of knowledge, expertise, and networks.
- **Recommendation: Legislative change**
 - Parliament should consider the development of and equivalent to the *EU Corporate Sustainability Due Diligence Directive* (CSDDD)ⁱⁱⁱ or a UK version (e.g., the proposed *UK Business, Human Rights and Environment Act* framework^{iv}).
 - Language around the 'just transition' should be included in new/updated climate change legislation learning from Scotland and Northern Ireland.
 - Proposed improvements to strengthen Section 54 of the *Modern Slavery Act*

Scotland

Scotland is one of two areas in the UK that has begun to connect social issues (such as decent work) within their climate legislation and this progressive precedent means that there are some openings already in place to more actively combined modern slavery and climate change responses. There are also clear avenues that the other devolved administrations and the UK government can learn from to strengthen overall climate change responses.

A full breakdown of all recommendations can be found in the main report.ⁱ

Recommendations for Scottish Governance Actors



■ Recommendation: Problem framing and recognition

- An overarching human rights lens should be integrated into all department mandates; with movement from human-climate risks transitioning beyond a security issue into humanitarian and social responses.
- Greater strategic alignment between UK and DAs to establish a unified and cohesive approach to address modern slavery and climate change.

■ Recommendation: Enhanced cross-departmental collaboration

- Establish and embed a cross-department sub-group within existing networks focused on international development, modern slavery, and climate risks.
- Establish internal and cross-departmental sessions/workshops for networking and knowledge exchange.
- Meetings between UK and Scottish policymaker counterparts.
- Establish a system for effective handover and transfer of knowledge, expertise, and networks.

■ Recommendation: Legislative change

- The Scottish government and Public Bodies should produce modern slavery statements to ensure they are leading by example.
- **Recommendation 4: Addressing evidence gaps**
- The Scotland national adaptation plan/programme should explicitly address the links of modern slavery and climate change.

■ Recommendation: Adaptation Finance

- The Scottish Government should provide guidance and knowledge exchange to the UK Government regarding the establishment of a climate justice fund that supports communities affected by the climate crisis.

■ Recommendation: Investment

- Public investment (all levels of Scottish government) should implement strategies to limited modern slavery risks through their procurement and investment – for both modern slavery and climate change mitigation.

■ Recommendation: Lived experience inclusion

- Lived experience and survivor voices should be meaningfully included at all stages of policy making (related to modern slavery), including where modern slavery and climate change policy may intersect.
- Greater financial investment in Scottish community-led climate change and modern slavery organisations to lead in the development of support for local communities and populations affected by both issues.

Wales

Wales is a unique case as a devolved administration as more of the legislative aspects are aligned with the UK Government because of the devolved powers in place. As such there is a wider perceived gap in being able to link modern slavery and climate change in the policy space from the outside. However, there is a large collaborative history across Welsh government departments that can be used to generate change linked to modern slavery and climate change.

A full breakdown of all recommendations can be found in the main report.ⁱ



Recommendations for Welsh Governance Actors

- **Recommendation: Problem framing and recognition**
 - An overarching human rights lens should be integrated into all department mandates; with movement from human-climate risks transitioning beyond a security issue into humanitarian and social responses.
 - Greater strategic alignment between UK and DAs to establish a unified and cohesive approach to address modern slavery and climate change.
- **Recommendation: Enhanced cross-departmental collaboration**
 - Establish and embed a cross-department sub-group within existing networks focused on international development, modern slavery, and climate risks.
 - Establish internal and cross-departmental sessions/workshops for networking and knowledge exchange.
 - Meetings between UK and Welsh policymaker counterparts.
 - Establish a system for effective handover and transfer of knowledge, expertise, and networks.
- **Recommendation: Legislative change**
 - Language around the 'just transition' should be included in new/updated climate change legislation learning from Scotland and Northern Ireland and lobbied for by Welsh representatives.
 - The Welsh government and Public Bodies should produce modern slavery statements to ensure they are leading by example. Additional considerations and support may be required in Northern Ireland due to the relevant status of Stormont.
- **Recommendation: Addressing evidence gaps**
 - The Welsh national adaptation plan/programme should explicitly address the links of modern slavery and climate change.
- **Recommendation: Investment**
 - Public investment (all levels of Welsh government) should implement strategies to limited modern slavery risks through their procurement and investment – for both modern slavery and climate change mitigation.
- **Recommendation: Lived experience inclusion**
 - Lived experience and survivor voices should be meaningfully included at all stages of policy making (related to modern slavery), including where modern slavery and climate change policy may intersect.
 - Greater financial investment in Welsh community-led climate change and modern slavery organisations to lead in the development of support for local communities and populations affected by both issues.

Northern Ireland

Despite clear political challenges in Northern Ireland, there are opportunities to explore more integrated approaches to modern slavery and climate change. Northern Ireland is one of two areas in the UK that has begun to connect social issues (such as decent work) within their climate legislation. Although it may be more difficult as a result unique approaches may be needed to work more with departments rather than in with Stormont, there are some openings already in place to more actively combined modern slavery and climate change responses.

A full breakdown of all recommendations can be found in the main report.¹

Recommendations for Northern Irish Governance Actors

- **Recommendation: Problem framing and recognition**
 - An overarching human rights lens should be integrated into all department mandates; with movement from human-climate risks transitioning beyond a security issue into humanitarian and social responses.
 - Greater strategic alignment between UK and DAs to establish a unified and cohesive approach to address modern slavery and climate change.
- **Recommendation: Enhanced cross-departmental collaboration**
 - Establish and embed a cross-department sub-group within existing networks focused on international development, modern slavery, and climate risks.
 - Establish internal and cross-departmental sessions/workshops for networking and knowledge exchange.
 - Meetings between UK and Northern Irish policymaker counterparts. Additional attention is needed given the unique relationship between the countries.
 - Establish a system for effective handover and transferal of knowledge, expertise, and networks.
- **Recommendation: Legislative change**
 - Language around the 'just transition' should be included in new/updated climate change legislation learning from Scotland and Northern Ireland and lobbied for by Welsh representatives.
- The Northern Irish government and Public Bodies should produce modern slavery statements to ensure they are leading by example. Additional considerations and support may be required in Northern Ireland due to the relevant status of Stormont.
- **Recommendation: Addressing evidence gaps**
 - The Northern Irish national adaptation plan/programme should explicitly address the links of modern slavery and climate change.
- **Recommendation: Investment**
 - Public investment (all levels of Northern Irish government) should implement strategies to limited modern slavery risks through their procurement and investment – for both modern slavery and climate change mitigation.
- **Recommendation: Lived experience inclusion**
 - Lived experience and survivor voices should be meaningfully included at all stages of policy making (related to modern slavery), including where modern slavery and climate change policy may intersect.
 - Greater financial investment in Northern Irish community-led climate change and modern slavery organisations to lead in the development of support for local communities and populations affected by both issues.



Research overview

Our research project aimed to assess the current landscape of integration between modern slavery and climate change responses, and where there were avenues for potential intersectional efforts.^v To achieve this, we undertook a three-pronged methodological approach (full methods are available within the main report).ⁱ This enabled the development of tailored recommendations primarily focused on the governance community across the UK. Additional recommendations cover international bodies and businesses, researchers, and funding organisations.

Methods

First, we undertook an evidence review of the evidence review of the existing literature (academic and grey). The evidence was reviewed to assess the current base of recommendations that are provided based on the findings of the studies. There were four main categories identified that are aligned to the recommendations we list above related to: 1) governance; 2) knowledge-to-action; 3) capacity building and finance; and 4) support, lived-experience, and inclusion.

Second, we undertook a domestic and international legislative review. This included assessing the current intersections between modern slavery (and associated working conditions) within climate change legislative approaches.^{vi} Comparisons were made in relation to international progress to determine successful approaches in other jurisdictions that may be usefully applied to the UK in both national and devolved contexts.

Finally, we undertook a series of interviews with a range of governance actors across the UK – with a focus on those working in the antislavery and climate change spaces. As part of this we connected with several governance actors based within the UK national structures (including Parliament, the Civil Service, and Public Bodies), as well as engaging in conversation with actors from all three devolved nations (Scotland, Wales, and Northern Ireland). We asked a series of questions which covered topics on the current intersectional action being taken related to climate change and modern slavery, the barriers to achieving collaborative action, and the efforts necessary to better support and address both issues concurrently.

All recommendations developed over the course of the research were subsequently reviewed by a series of governance actors and their feedback was incorporated.

Findings

- Policymakers working on modern slavery and climate change often work in isolation (policy silos) and that can lead to a disconnect of both combined action and scale of issues and solutions.
- Efforts are being made to consider combined actions (e.g., decent work is considered in some devolved climate change legislation), but more combined action could be undertaken. For example, it was noted that there was a willingness for integration through combined Directorate mandates, development of joint-legislation, more networking between policy experts in both fields of expertise and learning between devolved and national policymakers.
- The methods we deployed in this study have begun to fill some of the identified gaps in combined action by opening the conversation and establishing new connections between policymakers.

Future Considerations

- Research is needed to explore the utility of combined policy action around modern slavery and climate change in the UK context. This should include analysing learnings from domestic (e.g., Northern Ireland and Scotland) and international (e.g., EU) achievements.
- Funding needs to be available to assess the impacts of modern slavery in the context of climate change within the UK itself, rather than considering the conjunction of both issues with an international lens only.
- Follow-up with policymakers on the development successes and challenges within this space are necessary for monitoring of impact and efficacy.

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ⁱ Jackson, B., Weir, E., Mead, J., DiPrea, A., Tucker, M., Sebastian, M., Hutchinson, K., Olatunbosun, J., Bengtson, P., Brotherton, V., Boyd, D.S., and Alexander, M. (2024). Realigning modern slavery and climate change policies for equitable governance and action. Modern Slavery & Human Rights Policy & Evidence Centre, London.

ⁱⁱ <https://modernslaverypec.org/assets/downloads/Integrating-Policies-Full-Report.pdf>

ⁱⁱⁱ For a summary of the report noted above see: <https://modernslaverypec.org/assets/downloads/Integrating-Policies-Research-Summary.pdf>

^{iv} https://commission.europa.eu/business-economy-euro/doing-business-eu/corporate-sustainability-due-diligence_en

^v CJC. (2021). A 'Business, Human Rights and Environment Act'. Retrieved 19 January 2024, from

<https://corporatejusticecoalition.org/wp-content/uploads/2021/10/CJC-BHREA-Principles-2023-1.pdf>

^v <https://modernslaverypec.org/research-projects/integrating-policies-addressing-modern-slavery-climate-change>

^{vi} <https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2024/february/transparentsummary-review-of-global-legislation-on-labour-human-rights-and-environmental-compliance-applicable-for-the-uk-context.pdf>