



Modern Slavery Act: Ten Years On

UK Policy Opportunities to Address Modern Slavery

It has been a decade since the passing of the 2015 Modern Slavery Act. Despite the introduction of this landmark legislation, modern slavery continues to affect thousands of children and adults in communities across the UK.

This briefing summarises recent research findings generated by the Rights Lab, and the related policy recommendations for the UK Government stemming from this research.

These findings have been grouped under relevant Government policy commitments, as detailed in the Labour Party manifesto.

To read the research reports cited in this briefing and for further information about the Rights Lab – <https://www.nottingham.ac.uk/rights-lab>

Manifesto commitment	Related policy opportunities
Tackling violence against women and girls	<ul style="list-style-type: none">✓ Ensure consistency in how data and statistics are collected and presented by the Forced Marriage Unit to allow for year-on-year comparison.✓ Generate a robust prevalence estimate for victims of forced marriage, FGM, and honour-based abuse.✓ Ensure adequate funding for by-and-for service provision for victims of forced marriage and honour-based abuse, and include consideration of the need for this provision in local authority needs assessments.✓ Include age-appropriate content on forced marriage and honour-based abuse in RSHE curricula at all ages, including ensuring culturally sensitive teaching on coercive control and consent.
Improving support for victims of crime	<p>Improving Modern Slavery Identification</p> <ul style="list-style-type: none">✓ Consider the positive evidence on local authority multi-agency working in the identification and support for victims of modern slavery, including the work of Nottingham's multi-agency Slavery and Exploitation Risk Assessment Conference (SERAC).✓ Ensure that exploitation is more clearly delineated from wider forms of abuse in the Care Act 2014 to improve recording of exploitation amongst adults with care and support needs.✓ Publish data from the Safeguarding Adults Collection showing the intersection between support reasons and types of exploitation / abuse recorded to provide a better understanding of the scope of exploitation amongst vulnerable adults.✓ Improve NRM data to also report proportions of those with Reasonable Grounds decision with diagnosed mental / physical disability.



Improving Support for Modern Slavery Survivors

- ✓ Review the impact of the 2022 Nationality and Borders Act and amend 2015 Modern Slavery Act statutory guidance where it is found to be preventing access to support for victims of modern slavery.
- ✓ Ensure Clauses 22-25 of the 2023 Illegal Migration Act are not implemented.
- ✓ Remove National Referral Mechanism (NRM) decision-making and contract management from the portfolio of the Minister for Immigration, and consider re-housing it outside of the Home Office, either within the Department of Health and Social Care or the Ministry of Housing, Communities and Local Government.
- ✓ Provide 12 months of automatic leave to remain on receipt of a positive Conclusive Grounds decision, which includes the right to engage in paid employment and access to education.
- ✓ Review the current process of obtaining consent from survivors prior to entering the NRM, and throughout the NRM process, to ensure consent is informed and ongoing.
- ✓ Develop local or regional hubs for survivor services, involving local statutory services as well as statutory and NGO support providers.
- ✓ Implement standardised training aligned to the National Training Standards for supporting adult survivors and ensuring that all first responders and support workers are adequately trained to support victims safely into recovery and (re)integration.
- ✓ Consider the evidence on the merits of adopting a public health approach to addressing modern slavery.

Improving Connections Between Modern Slavery and Adult Safeguarding

- ✓ Review legal provisions to recognise that adults can be groomed (existing provisions apply only to children), and that contextual conditions such as homelessness, substance misuse, social isolation and unemployment can contribute to vulnerability.
- ✓ Review current safeguarding protocol which allows for the automatic disengagement of support services when an individual is found to have mental capacity to make a decision.



Introducing a Fair Work Agency	<ul style="list-style-type: none">✓ Ensure the Fair Work Agency is adequately funded and resourced, with a clear remit and increased powers, to ensure meaningful reform of the labour market.✓ Implement outstanding commitments to strengthen Transparency in Supply Chains measures set out in the 2015 Modern Slavery Act, including:<ul style="list-style-type: none">• Extending Section 54 of the Modern Slavery Act 2015 to the public sector• Removing Section 54(4)(b) of the Modern Slavery Act 2015, which allows organisations to report that they have taken 'no steps' to tackle modern slavery in their supply chains• Mandating the areas that TISC statements should cover• Introducing civil penalties for organisations which fail to meet their statutory obligations under Section 54• Introducing a single reporting deadline for TISC statements✓ Consider introducing mandatory human rights and environmental due diligence legislation.
Developing Trade Policy	<ul style="list-style-type: none">✓ Develop a systematic approach to the integration of modern slavery concerns in trade and investment agreements, embedded in a broader UK trade strategy addressing human rights, labour rights, and sustainable development.✓ Seek to ensure that modern slavery concerns are substantially integrated in trade and investment agreements in negotiations, with robust monitoring and engagement mechanisms.✓ Review existing trade and investment agreements with a modern slavery lens to support future amendments and new instruments.
Reform the Immigration System and End Abuse of the Visa System	<p>To work with UKVI to reduce the risk of exploitation of migrant care workers by:</p> <ul style="list-style-type: none">✓ Removing the obligation for care workers to update their visas when they move job roles within the sector.✓ Reducing or removing related visa fees for both the worker and the sponsoring employer.✓ Banning or regulating the use of exit fees on these visas to make sure that they aren't used to tie workers.✓ Abuse Authority (GLAA), to separate immigration control from labour inspection.✓ Establishing a Memorandum of Understanding with labour market enforcement bodies, especially the Gangmasters and Labour Abuse Authority. <p>To prevent exploitation of domestic workers:</p> <ul style="list-style-type: none">✓ Introduce a registration scheme for employers of domestic workers.✓ Ratify ILO Convention 189: Domestic workers convention.✓ Require UK Visas and Immigration (UKVI) to provide rights-based training and information to domestic workers arriving in the UK.



	<ul style="list-style-type: none">✓ Enforce a firewall between the investigation of labour exploitation and immigration control. <p>To increase provision of grievance mechanisms and effective access to remedy for human rights abuses faced by seasonal migrant workers in the UK</p> <ul style="list-style-type: none">✓ Clarify guidance on non-state grievance mechanisms, making a clear connection to access to remedy and business responsibility to respect workers' rights.✓ Hold business actors accountable for the effective provision of grievance mechanisms and related remedy.✓ Improve transparency of collected data to assist organisational learning and ensure actors' accountability.
Addressing the Climate Crisis	<p>To address the intersecting issues of modern slavery and climate change:</p> <ul style="list-style-type: none">✓ Encourage greater strategic oversight between the leading departments focused on modern slavery (Home Office and Foreign, Commonwealth & Development Office).✓ Facilitate enhanced cross-departmental collaboration to overcome current siloed approaches throughout the UK government and devolved administrations, including through cross-departmental sub-groups and establishing internal networks.✓ Provide international leadership around climate change and modern slavery through the UK's role within the UN multi-lateral systems, the new Global Commission on Modern Slavery and other multi-lateral systems.
Preventing Child Trafficking and Exploitation	<ul style="list-style-type: none">✓ Ensure Home Office rollout of the Independent Child Trafficking Guardianship Service to all remaining local authorities in England and Wales.✓ Develop and implement early intervention programmes with adequate support provision, based upon holistic and inclusive models which account for the diverse needs of vulnerable children and young people.✓ Make training on criminal exploitation and county lines a national requirement for the Department of Education and anyone working with children and young people.✓ The Ministry of Justice should extend legal aid provision to school exclusion appeals as a preventive measure in reducing vulnerability for recruitment into exploitation.



1. Tackling Violence Against Women and Girls

Human trafficking for the purposes of sexual exploitation is a form of violence against Women and Girls, as too is forced marriage.¹ There is currently no estimate of the prevalence of forced marriage in the UK. However, data is collected on forced marriage by the Forced Marriage Unit (a joint Home Office and Foreign, Commonwealth and Development Office unit) and by charities such as Karma Nirvana, who run the national helpline for victims of forced marriage and Honour-Based Abuse, by the police, by the Crown Prosecution Service and by local authorities (e.g. by children's social services).

Forced Marriage Unit (FMU) statistics from 2023 show that the FMU gave advice and support in 280 cases of forced marriage, which is fewer cases than in 2022. The FMU emphasises that this decrease is unlikely to indicate a decline in the prevalence of forced marriage in the UK; their statistics only reflect reported cases to the unit. Charities like Karma Nirvana and statutory agencies like the police have witnessed increases in forced marriage reporting since the pandemic. Accurate and consistent data collection is vital to better understand the extent, location and victim/perpetrator profiles for forced marriage across the UK.

In November 2024, the Rights Lab launched the '[Forced Marriage in Domestic Legislation Database](#)', accompanied by an empirical analysis of the domestic legislation in place in 193 UN Members States governing forced marriage and related issues.²

2. Improving Support for Victims of Crime

Modern slavery survivors are victims of serious crime. Under the 2015 Modern Slavery Act, the offences of Slavery, Servitude, Forced or Compulsory Labour (see [Section 1](#)) and Human Trafficking (see [Section 2](#)), are punishable by a [maximum sentence of life imprisonment](#).

Survivors of modern slavery and human trafficking in the UK are formally identified and provided access to government-funded support through the National Referral Mechanism (NRM). Survivors of modern slavery and human trafficking in the UK are formally identified and provided access to government-funded support through the National Referral Mechanism (NRM).³ Multiple, long-standing issues have been identified with the NRM⁴, including:

Delays in NRM decision-making - The average (median) time taken from referral into the NRM to conclusive grounds decisions was 526 days in 2023.⁵ Research involving in-depth interviews with survivors shows that delays in decision-making cause a significant decline in survivor well-being and lead to increased dependency.

Fragmented and unequal support across the UK - Experiences of support differ dramatically across various parts of the UK, resulting in unequal outcomes for survivors' wellbeing and recovery. The variation in survivors' experiences can be explained by the location of identification,

¹ A forced marriage is where one or both people do not or cannot consent to the marriage and pressure or abuse is used to force them into the marriage. It is also when anything is done to make someone marry before they turn 18, even if there is no pressure or abuse. See <https://www.gov.uk/guidance/forced-marriage> for further guidance.

² Rights Lab (2024). Forced Marriage in domestic legislation: An empirical analysis of national provisions globally. <https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2024/november/forced-marriage-in-domestic-legislation-2511-v2.pdf>

³ The National Referral Mechanism (NRM) is the UK framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support.

⁴ Rights Lab, St. Mary's University. (2024). *Pathways to Liberation, A Policy Report*. <https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2023/november/pathways-to-liberation-.pdf>. [Funded through Economic and Social Research Council grant number ES/T016337/1].

⁵ Home Office (2024). *Modern Slavery: NRM and DtN statistics, end of year summary 2023*.



support available in that location, timeliness of service delivery, length of engagement, and immigration status. In later stages of the recovery process, limited access to educational opportunities, lack of rights to work and to suitable accommodation compounded earlier negative experiences of the fragmented system on survivors' recovery journeys.

Conflation of immigration and human trafficking – Analysis⁶ of the data provided by the Home Office (comprising data from 55,462 individual NRM referrals) indicates that there is a problematic conflation between immigration and human trafficking policies in decision- making. This data reveals that British nationals received 17% higher positive Conclusive Grounds decisions compared to any other nationality, indicating bias in current decision- making.

The Nationality and Borders Act ('NABA', see Part 5) and 2023 Illegal Migration Act (see, in particular, sections 22-29) further confirmed the Conservative government's view that modern slavery is an immigration issue. **Recent research⁷ on the impacts of the operationalised NABA provisions has shown that the legislation has resulted in the exclusion of modern slavery survivors from the statutory support provided within the NRM.** The Illegal Migration Act, if implemented, would have serious implications for victims of modern slavery; in contravention of Article 4 of the European Convention on Human Rights, any potential victim of modern slavery who has entered the UK irregularly will be automatically excluded from protection.⁸ Any foreign national who has been convicted of a criminal offence, including criminal offences committed as a result of their exploitation, will also be disqualified from accessing support.⁹

Importance of effective multi-agency working to identify and support survivors:

Multi-agency partnership working is essential in developing an effective response to modern slavery; no one agency can tackle modern slavery on its own. Nottingham has a well-established multi-agency approach to addressing exploitation. Both the police and council have dedicated teams specialising in cases of exploitation and the Slavery and Exploitation Risk Assessment Conference or SERAC, chaired by the City Council, provides a regular meeting to review referrals concerning potential cases.¹⁰ There is also a county-wide modern slavery partnership involving a wide range of statutory, educational, voluntary and faith partners which meets every two months, and promotes both information-sharing and awareness-raising initiatives. **Frontline professionals working in Nottingham noted that multi-agency working and the partnerships that they had formed had allowed them to better identify and respond to victims of exploitation.**¹¹

Our research¹² exploring the links between cognitive impairment and exploitation demonstrates that multiple intersecting vulnerabilities, such as mental health conditions, substance misuse and forms of cognitive impairment can combine to create conditions of vulnerability to exploitation and re-trafficking.

⁶ Ibid

⁷ The Anti-Trafficking Monitoring Group, Human Trafficking Foundation, British Institute of International and Comparative Law, *Assessing the modern slavery impacts of the Nationality and Borders Act 2022: One year on*.

⁸ Rights Lab. (2023). *Assessing the Potential Impact of the Illegal Migration Bill on Victims of Modern Slavery – A briefing for Peers*. <https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2023/may/house-of-lords-2nd-reading-briefing-assessing-the-potential-impact-of-the-illegal-migration-bill-on-victims-of-modern-slavery.pdf>.

⁹ Modern Slavery & Human Rights Policy and Evidence Centre. (2023). *Explainer: Modern slavery clauses in Illegal Migration Act*. <https://www.modernslaverypec.org/resources/migration-act-explainer>

¹⁰ For further information on the Nottingham SERAC model, see Local Government Association. (2023). *Council Guide to tackling Modern Slavery*, p131. [Council guide to tackling modern slavery \(local.gov.uk\)](https://www.local.gov.uk/council-guide-to-tackling-modern-slavery)

¹¹ Rights Lab. (2022). *Intersections between exploitation and cognitive impairment: An exploratory study in Nottingham, UK*. <https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2022/march/intersections-between-exploitation-and-cognitive-impairment.pdf>

¹² <https://exploitationandci.org.uk/>



Our research on safeguarding adult reviews showed that less 'extreme' forms of exploitation such as financial exploitation are often accompanied by other exploitation and abuses including forms of Modern Slavery. Social and contextual issues such as being unemployed, having insecure immigration status, being a care leaver or justice involved also increase risks of exploitation.

Many apparent cases of exploitation do not currently meet local thresholds for intervention: this leads to cases being missed, especially among communities that are already stigmatised.¹³ It is important that all exploitation is reviewed and there is close work with impacted communities to understand risks and improve resilience.¹⁴

Through monthly multi-agency conferences, professionals were able to identify victims, discuss their vulnerabilities, gather intelligence about perpetrators and learn from evidence-based approaches what had worked in other cases of exploitation and what had failed. Being able to liaise with professionals with a common goal often meant that participants felt supported and were able to openly reflect on how best to deal with complex situations that they had little experience of. **All cases of potential exploitation should therefore receive local multi-agency review regardless of whether they meet existing thresholds for being identified as Modern Slavery.**

Improving connections between modern slavery and adult safeguarding

Legal provisions on adult exploitation should be reviewed to recognise that adults can be groomed (existing provisions apply only to children), and that contextual conditions such as homelessness, substance misuse, social isolation and unemployment can contribute to vulnerability.

Apparent 'consent' to participate in an exploitative situation needs to be carefully reviewed by support services. A finding that an individual has mental capacity to take a decision should not automatically result in the disengagement of support services, and alternative safeguarding approaches should be considered.¹⁵

Adopting a public health approach to addressing modern slavery

Recognising the limitations of the criminal justice approach has had to date, there is growing support for developing a public health approach to modern slavery, including by the former Independent Anti-Slavery Commissioner, Dame Sara Thornton. Research in 2021¹⁶ involving research workshops with 48 anti-slavery professionals, noted enthusiasm for developing an approach that was 'holistic, human rights focussed, linked to other cross-cutting social injustices (e.g. homelessness) and was framed in a way that encouraged different people across sectors to be involved'. The research resulted in a refined public health framework to address modern slavery that can be [viewed here](#). This framework requires application and testing and further development through operational feedback.

¹³ Rights Lab, DeMontford University (2022). Fashioning a beautiful future? Supporting workers and addressing labour exploitation in Leicester's textile and garment industry. [fashioning-a-beautiful-future.pdf](#)

¹⁴ Khazbak, R., Gardner, A., Burcu, O., & Gray, C. (2024). Can a 'structural competency' approach improve the safeguarding of diverse marginalised communities from exploitation? Critical Social Policy, 0(0). <https://doi.org/10.1177/02610183241284502>

¹⁵ <https://exploitationandci.org.uk/>

¹⁶ Such, E. et al. A public health approach to modern slavery in the United Kingdom: a codeveloped framework.



3. Introducing a Fair Work Agency & Ensuring Workers' Rights

Rights Lab research¹⁷, undertaken in 2023 in collaboration with the Office of the Independent Anti-Slavery Commissioner, revisited the notion of establishing a Single Enforcement Body (now to be called the 'Fair Work Agency' (FWA)) and examined the relevant remit, powers and governance structure required for an inspectorate that can most effectively meet current and future labour exploitation challenges.

According to those interviewed for the research (including third sector organisations representing workers directly, fair trade organisations, businesses, enforcement agencies and government representatives), a FWA requires:

Adequate funding and resource: Respondents expressed concern that a FWA could face severe funding limitations within the context of continued austerity and constraints for institutional resourcing.

A clear remit: The FWA's remit would need to be wider than the current remit of the GLAA, with the flexibility to examine the sectors and workers most exposed to the risk of exploitation and modern slavery. It must be clear what categories and areas of enforcement the FWA covers, and whether this will include the gig and informal economies as well as the formal economy.

An increase in powers: The FWA should be able to make use of a range of powers from compliance through engagement, fixed and variable monetary penalties, restoration and compliance notices, to deferred prosecutions, enforcement undertakings and cost recovery with the escalation to prosecution for non-compliance. Increased investigative powers would enable the FWA to respond proactively to labour market abuses.

Defined powers: Existing labour market enforcement bodies have recourse to an array of powers, ranging from normative, compliance-led influence through to light and hard enforcement powers. Any increase in legislative powers for a FWA must be matched by sufficient funding and resource.

Guidelines for businesses: Assisted by clearly defined powers of the FWA, guidelines should be issued to businesses to ensure they understand and can meet expectations on labour market compliance.

A strengths-based partnership approach: The FWA should embody a truly functional partnership whereby partners' (enforcement agencies, civil society, businesses domestically and internationally) contributions are recognised and compensated.

Transformative institutional change: The FWA needs to recruit a more varied body of staff with wider experiences and backgrounds, whilst supporting current staff through training and opportunities for promotion to encourage retention of expertise.

In addition to introducing a FWA, there are a number of outstanding governmental commitments relating to strengthening Transparency in Supply Chains measures set out in the 2015 Modern Slavery Act, including:

- ✓ Extending Section 54 of the Modern Slavery Act 2015 to the public sector

¹⁷ Rights Lab. (2023). *Restating the case for a Single Enforcement Body* <https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2023/february/briefing-restating-the-case-for-a-single-enforcement-body.pdf>



- ✓ Removing Section 54(4)(b) of the Modern Slavery Act 2015, which allows organisations to report that they have taken ‘no steps’ to tackle modern slavery in their supply chains
- ✓ Mandating the areas that TISC statements should cover
- ✓ Introducing civil penalties for organisations which fail to meet their statutory obligations under Section 54
- ✓ Introducing a single reporting deadline for TISC statements¹⁸

The UK Government’s approach to tackling modern slavery in supply chains to date has focused on legislative measures to increase transparency in the most profitable companies through disclosure and reporting laws. However, other countries and businesses have adopted different approaches, instead favouring, for instance, mandatory human rights and environmental due diligence (mHREDD) legislation – see, for example, the 2023 [EU Corporate Sustainability Due Diligence Directive](#).

4. Addressing Modern Slavery through Trade Policy

The relationship between trade and investment and modern slavery risks and outcomes is becoming increasingly clear. Recent Rights Lab research¹⁹ assessed UK efforts to include modern slavery relevant concerns in trade and investment instruments with the Indo-Pacific. The findings are of relevance to the UK’s recent accession to the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPPTP), negotiations for a UK-India trade pact, growing UK-ASEAN trade cooperation, and enhanced two-way capital flows between the UK and the Indo-Pacific.

The research found that UK efforts to address modern slavery practices in UK trade and investment have evolved, but do not reflect a coherent strategy and continue to fall behind international best practice. The impact of trade relations on forced labour depends on the types of products being traded and the characteristics of trade partners. Trade openness can help to reduce forced labour and strengthen protection against it when involving partners with high levels of labour protection. Trade in primary goods and products intensive in unskilled labour can increase forced labour, where labour protections are not pursued and enforced.

5. Reform the Immigration System and End Abuse of the Visa System

Exploitation of migrant care workers – With over 1.6 million jobs, more people work in adult social care than in the NHS. The danger of labour exploitation in the adult social care sector is high, with live-in and agency care workers thought to be at particular risk. Live-in care, where care workers stay in their client’s homes and provide around the clock personal assistance, is a growing sector of the social care market. This is due to the comparatively high costs of care homes and nursing homes, more people paying for their own care, and due to safety and quality

¹⁸ Rights Lab. (2022). *Modern Slavery Bill: Strengthening Transparency in Supply Chains*. <https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2022/september/modern-slavery-bill-strengthening-transparency-in-supply-chains-tisc.pdf>

¹⁹ Rights Lab. (2024). *Harnessing UK trade and Investment to address Indo-Pacific modern slavery risks*. <https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2024/may/trimsfull-report-final.pdf>; Also see Summary Report here <https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2024/may/trims-summary-final.pdf>; and four country case studies here <https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2024/may/trims-case-studies.pdf>



considerations. Many live-in carers are migrants, including a high proportion of circular migrants who travel between the UK and their country.²⁰

Ensuring labour and employment rights for domestic workers - Domestic workers in the UK are a high-risk of labour exploitation, including questionable practices that leave them at vulnerable to severe forms of abuse such as forced labour. A survey of domestic workers in 2023, the majority of whom were from the Philippines, reported high levels of verbal abuse, and payment rates below that of nationally agreed minimum wage levels. A very high number also indicated that they did not know where to go to find help. Intimidating behaviour and threats on the part of employers were also reported, with nearly a quarter of respondents indicating that they had received a lasting injury as a result of physical violence.²¹

Providing workers on the Seasonal Workers Scheme (SWS) access to grievance mechanisms and access to remedy – For migrant workers on the SWS, who are vulnerable to exploitative practices, access to State-based grievances remains minimal. Their legal status paired with the short-term of their stay make the access to State-based mechanisms challenging. Within the SWS, scheme operators are responsible for workers' safety, fair payment, and fair treatment on farms, and to ensure that procedures are in place to enable workers to report any concerns to them. However, it is the employers (ie, farms) who are required to provide on-site grievance mechanisms, both by law and by audits often conducted by scheme operators and/or retailers. Stakeholders from the SWS have varied understandings of grievance mechanisms and their connection with access to remedy.²² Many SWS actors still consider grievance mechanisms as a mere legal requirement, with the risk of these mechanisms being reduced to a tick box exercise. However, these mechanisms can actually unlock a multitude of operational and financial advantages, reducing the risk of media exposure and/or disengagement from buyers, so becoming a proper risk management tool. Businesses with robust ethics and/or compliance procedures display organisational changes generated thanks to learnings from grievance mechanisms.

6. Addressing the Climate Crisis

Modern slavery and climate change intersect through complex, and direct and indirect pathways that span borders.²³ Climate change can increase vulnerabilities to modern slavery through the occurrence of changing environmental conditions and slow-onset events (such as drought), or rapid-onset events, both of which can cause climate-induced displacement or longer-term migration and heighten vulnerabilities that can be exploited (both in home and receiving countries).

Moreover, change action may also be a driving factor. For instance, planned relocations of communities as part of adaptive, risk management approaches can also create or exacerbate

²⁰ Rights Lab. (2022). *Policy Briefing - Live-in, Migrant Care Worker Vulnerability to Modern Slavery*. <https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2022/july/briefing-live-in-migrant-care-worker-vulnerability-to-modern-slavery.pdf>

²¹ Rights Lab. (2023). *How do we ensure domestic workers in the UK enjoy the same labour and employment rights as other workers?* <https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2023/october/briefing-how-do-we-ensure-domestic-workers-in-the-uk-enjoy-the-same-labour-and-employment-rights-as-other-workers.pdf>

²² Rights Lab, Nottingham University Business School (2024), *Seasonal migrant workers in the UK agricultural sector: grievance mechanisms and access to remedy*. <https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2024/november/seasonal-migrant-workers-in-the-uk-agri-sector-report-oct-2024.pdf>

²³ Rights Lab. (February 2024). *Integrating policies addressing modern slavery and climate change*. <https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2024/february/integrating-policies-full-report.pdf>



vulnerabilities to modern slavery, particularly if rights and/or livelihood opportunities are limited in receiving locations. Likewise, the 'race to net zero' could prompt new businesses to engage in modern slavery and human rights abuses, while the loss of certain industries could create new vulnerabilities in the absence of just transitions.

The intersections and cascading risks that exist between climate change and modern slavery make it paramount that the two agendas be addressed together; yet to date, these issues have largely been treated as policy silos.

7. Preventing Child Trafficking and Exploitation

Child criminal exploitation is often situated as a form of modern slavery and is recognised as the fastest growing forms of recorded exploitation, according to referrals into the NRM. One model of child criminal exploitation is County Lines, in which young vulnerable people are manipulated and coerced into the distribution and sale of drugs and other criminal acts.²⁴

In 2023, there were 7,432 referrals made into the NRM for children, the highest number since the NRM began.²⁵ Recent research by the Rights Lab found a key vulnerability factor of the exploitation of children is simply the vulnerability of childhood, as many children and young people are targeted simply because of their age, experience, and maturity level.²⁶ Other key vulnerability factors fuelling child exploitation were found to be a lack of protective family and guardians, being subject to abuse and neglect, children in care, and children with a history of adverse childhood experiences.

Policy opportunities to prevent the exploitation and trafficking of children:

- ✓ Ensure Home Office rollout of the Independent Child Trafficking Guardianship Service to all remaining local authorities in England and Wales
- ✓ Develop and implement early intervention programmes with adequate support provision, based upon holistic and inclusive models which account for the diverse needs of vulnerable children and young people
- ✓ Make training on criminal exploitation and county lines a national requirement for the Department of Education and anyone working with children and young people
- ✓ The Ministry of Justice should extend legal aid provision to school exclusion appeals as a preventive measure in reducing vulnerability for recruitment into exploitation.

²⁴ Rights Lab. (2022). *Child Criminal Exploitation and County Lines drug distribution: Understanding the impact of Covid-19*. <https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2022/april/child-criminal-exploitation-and-county-lines-drug-distribution.pdf>

²⁵ Home Office. (2024). *Modern Slavery: NRM and DtN statistics, end of year summary 2023*.

²⁶ Rights Lab, ECPAT UK, (2024). *Prevention and identification of children and young adults experiencing, or at risk of, modern slavery in the UK*. <https://www.nottingham.ac.uk/Research/Beacons-of-Excellence/Rights-Lab/resources/reports-and-briefings/2024/January/Prevention-and-identification-of-children-and-young-adults-experiencing-or-at-risk-of-modern-slavery-in-the-UK-Report.pdf>