

# HUMAN TRAFFICKING & MODERN SLAVERY



## REPORT 2018



London  
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Standard**



**INDEPENDENT**



London **Evening Standard**  **INDEPENDENT**

In September 2017, **The Evening Standard** and **The Independent**, in partnership with the Independent Anti-Slavery Commissioner, launched a three-month special investigation into the issue of modern slavery. The special investigation, which was personally backed by the newspapers' proprietor Evgeny Lebedev, was called Slaves On Our Streets.

As part of the Investigation, Cardinal Vincent Nichols, Britain's most senior Catholic, convened a round table of experts from business, media, law, finance, philanthropy, law enforcement and victim support. The recommendations of this group are presented in this document.

**This report will now be presented at the Santa Marta conference in Rome in February and to other relevant anti-modern slavery stakeholders.**

## KEY FINDINGS

- ◆ Government must put victim support on a statutory footing as part of the statutory guidance
- ◆ Longer term support for victims and survivors is the key to breaking the cycle of slavery and should be available to survivors irrespective of immigration status
- ◆ The likelihood of modern slavery in supply chains is high. Non-compliance with s54 of the Modern Slavery Act must be identifiable through a recognised process and result in sanctions
- ◆ Companies should be encouraged to pursue profit with integrity, and compliance with modern slavery should be on the same footing as other sustainability goals
- ◆ Any corporate regulation must be in support of market-driven solutions
- ◆ Companies should band together by sector or industry to have greater clout
- ◆ Consumers should vote with their purses, and support brands associated with ethical supply chains
- ◆ Increased pressure on immigration must not be at the expense of the most vulnerable in society
- ◆ Modern Slavery must become a coordinated national policing priority. All constabularies must focus on the issues at hand locally in order for national solutions to be delivered
- ◆ Statutory agencies must professionalise their responses, ensuring it fits within 'business as usual' and not just occasional interventions
- ◆ Media has a duty to report accurately and sensitively, with the security and wishes of survivors paramount and a view to the long-term tackling of the issue

**H**uman trafficking and modern slavery is an evil crying out to heaven, an open wound on the body of society. It strips people of their fundamental dignity, reducing each person to the status of a commodity. That there are more than 40 million people callously held in slavery in the world today is a mark of shame for us all. It demands our response. The challenge for all of us is to rescue, protect, assist and serve all of those held in slavery.

It is essential that we see the human face of every victim of trafficking. Each one is a daughter or a son, a mother or a father. Each slave is a person with a story. It is our duty to remind ourselves constantly of this truth and not succumb to indifference.

**It is in our power to rid the world of slavery and human trafficking. We have the ability to do so, but do we have the will?**

Today, organised crime is winning. There are more slaves today than at the height of the Atlantic slave trade in the 18th century. And the number is growing as international criminal gangs increase their influence and reach. Remarkable work is being done by religious sisters and other groups in caring for survivors of trafficking; by some businesses who offer a pathway to work and reintegration for these survivors; and by some financial institutions in tracking ill-gotten profits. However, today we are losing the fight against trafficking as our collective response is uncoordinated and fragmented.

In bringing together this expert panel with experience and knowledge from business, law enforcement, media and trafficking survivors themselves, we have fashioned recommendations in the hope of shaping a coordinated response to defeat the criminals, rescue victims of trafficking and care for the survivors.

Businesses must recognise the problem and clean up their supply chains, for no businesses are immune from slavery in their supply chains. Banks and the City must recognise the problem of money laundering and ensure organised crime is traced and halted. Local government must identify and crack down on those local businesses, such as nail bars and car washes, which are often places of modern slavery.

Despite the Modern Slavery Act (2015), police and law enforcement agencies are failing. Breaking up the gangs and rescuing victims of trafficking is not the priority for police services that it should be. The Act demands it. Politicians, both local and national, need to ensure this most evil of crimes is made a priority.

Your awareness of this outrageous abuse of our fellow human beings is essential. We can make modern slavery simply unacceptable. For with awareness comes a determination to act. That is why the Evening Standard and The Independent's campaign to raise awareness is so important. As citizens, we must hold our elected officials and law enforcement agencies to account. We must use our consumer choices to reward businesses which offer goods and services free from the abuse of slavery and refuse those who do not. Businesses which put profit above human dignity should be punished, both by law enforcement and by consumer pressure. It is in our gift collectively to combat human trafficking and rid the world of slavery.

I thank the Evening Standard and The Independent for their excellent campaign, and the experts who have joined the round table and whose deliberations have resulted in these recommendations, which we hope offer a way forward. I thank all who will join the struggle to rid London, the UK and the world of the scourge of human trafficking.

**Cardinal Vincent Nichols**



**FOREWORD**  
by Cardinal Vincent Nichols





# M

odern slavery is a crime of economic opportunity. It represents organised crime at its most efficient, and we currently fight it in an uncoordinated and fragmented manner. It is the dark side of globalisation. The same networks and technologies that help to connect the world have been adapted by criminals, who use it to perpetuate an ancient form of abuse.

The continued existence of modern slavery in the United Kingdom is one of its most pernicious scandals. The Home Office estimates that there are at least 13,000 victims of modern slavery in the United Kingdom today, while the National Crime Agency has suggested the total is now in the tens of thousands, an estimate supported by the UK's Independent Anti-Slavery Commissioner.

These victims are only part of a larger global problem. In September, a report by the International Labor Organization (ILO) found there were 40m victims of modern slavery worldwide – that 210 years on from the Abolition of the Slave Trade Act, there are more slaves worldwide than ever. Globally, the ILO found that in 2012 modern slavery generates \$150bn in profits. It is second only to drug trafficking in illegal trades. Despite recent efforts, particularly by the UK and US governments, these profits still dwarf the money being spent fighting it. Figures from 2014 showed that in 2012/13, a similar period to that surveyed by the ILO, just \$124m was spent by OECD countries on fighting human trafficking. While that figure has risen somewhat in recent years, thanks mainly to efforts by the UK and US, it still comes nowhere near the profits involved, which have also risen.

Modern slavery comes in many forms. The major ones are forced labour, debt bondage, trafficking in persons, sexual exploitation and the exploitation and sale of children, as well as horrendous but smaller-in-scale crimes such as organ trafficking. Modern slavery also corrupts supply chains, erodes economies, fuels criminal networks and threatens security. A lack of global coordination has made it easier for traffickers to pivot to new vulnerable populations whenever we address slavery in a specific location, resulting in the possibility of displacing the problem rather than addressing it.

The UK is considered a world leader in this field, with ground-breaking legislation, The Modern Slavery Act 2015, shaping the country's robust response to the crime. The Act carries life-sentences for convicted traffickers and slave masters, prevention and risk orders to restrict the movements of potential perpetrators, and provisions to ensure money is directly restored to survivors of the crime. The Act also established the role of the Independent Anti-Slavery Commissioner, who drives the UK's response to the crime and independently scrutinises government, statutory and non-statutory agencies.

While the government deserves credit, being good is no reason not to be better. The situation remains far from perfect. In particular, survivor support is still not on a full statutory footing. The anti-slavery coalition of NGOs and other support groups is nearly unanimous in its view that it should be.

Solving this crime requires improved communications, coordination and collaboration. While ample resources and expertise are available, they are not at present held by any one sector. We need a holistic approach that works with both the public and private sectors and integrates efforts across law enforcement, business engagement and survivor care. This will maximise the impact of existing efforts, while reducing the risk of overlap, or of different efforts stumbling over one another.

Earlier this year, when the Evening Standard & Independent decided to focus on modern slavery in the UK for their special investigation, they wanted their reporting underpinned by broad knowledge. To this end they convened a round table of experts from across the sector. This group met frequently throughout the campaign to share their findings, and their expertise formed the backbone of much of the newspapers' reporting.

In this report we summarise the findings of these meetings and identify key areas of focus. With it we aim to make clear the state of play, and give hope to victims and survivors.

We hope it is of use to anyone working to fight this evil, whether in the UK or internationally.

## INTRODUCTION



## THE PANEL

### Chair

#### **Cardinal Vincent Nichols, Archbishop of Westminster and President of the Catholic Bishops' Conference of England & Wales**

Cardinal Nichols has been a committed anti-slavery advocate since 2012, when he heard the testimony of Sophie Hayes, a British woman trafficked into prostitution. Since then he has worked with law enforcement agencies, through the Santa Marta Group, to provide practical, workable solutions to the international modern slavery crisis.

#### **John Studzinski, CBE, Blackstone**

Studzinski held senior positions at Morgan Stanley and HSBC before joining Blackstone, where he is Vice-Chairman, Investor Relations and Business Development. He is also well known for decades of work on human rights and arts philanthropy and as a leading campaigner for human dignity. He founded the ARISE Foundation, which is engaged in anti-slavery work, and is Co-chair of the Home Office's Business Against Slavery initiative, Vice-chair Emeritus of Human Rights Watch, and Chair of CREATE. He founded the Genesis Foundation 15 years ago to nurture young and emerging talent in the arts, and with Cardinal Hume co-founded The Passage day centre in Westminster.

#### **Kevin Hyland, Independent Anti-Slavery Commissioner (IASC)**

Kevin Hyland, Independent Anti-Slavery Commissioner (IASC) Mr Hyland is the first IASC since the role was created by the Modern Slavery Act 2015, with a responsibility to spearhead the UK's response to the crime. Since creation of the act there has been a significant increase in awareness of modern slavery, with over 80% more survivors referred for support, an unprecedented 160% increase in crimes recorded, a 285% increase in identification of slavery in the health sector and increased prosecutions. The Commissioner has been instrumental in shaping domestic and international modern slavery policy.

#### **Yasmin Waljee, Hogan Lovells**

A human rights lawyer and international pro bono director at her law firm, overseeing the anti-trafficking work, Waljee is also on the board of Mosaic, an initiative to help young Muslims in deprived areas.

#### **Julie Etchingham, ITV News**

Familiar to TV viewers as the presenter of Tonight and a newsreader on News At Ten, Etchingham has been reporting on modern slavery for 10 years. She will moderate the Santa Marta conference at the Vatican in February.

#### **Sir Matt Baggott, former Northern Ireland chief constable**

Sir Matt joined the Metropolitan Police in 1977 and worked his way up to serving as chief constable of Northern Ireland from 2009 until 2014. He is president of the Christian Police Association and trustee of the International Needs charity.

#### **Paul Polman, Unilever**

Born in Holland, Mr Polman has been the chief executive of Unilever since 2009. He has been a ferocious advocate of sustainability in supply chains, whether ecological or human, and under his watch Unilever has become a global leader in this field. He argues that customers have the power to inspire global change.

#### **Lu Hope, Survivor**

'Lu Hope' is a survivor of sexual trafficking, with first-hand experience of the trauma it entails, and the difficulties encountered by survivors throughout the recovery process. She was introduced to the group by the IASC.

#### **Monique Villa, Thomson Reuters Foundation**

As chief executive of the Thomson Reuters Foundation, Villa has oversight of its activities supporting journalism, women's empowerment, the rule of law and human rights around the world. She has been a vocal campaigner against slavery. She created the Stop Slavery Award and the Trust Conference, the biggest forum for fighting slavery.

#### **Paul Gerrard, The Co-op**

After 20 years in the Civil Service, Gerrard has been Policy and Campaigns Director at the world's oldest co-operative business, the Co-op, since 2016 and leads its campaigning work including support for survivors of slavery, which was recognised by the Stop Slavery Award last year.

#### **Dr Jean Baderschneider, Global Fund to End Modern Slavery**

With more than 35 years of experience, Dr Baderschneider retired from ExxonMobil in 2013 where she was Vice President, Global Procurement. In this role she had global responsibility for procurement, strategic sourcing, supply chain management, warehousing and accounts payables operations. She is now the CEO and founding board member of the Global Fund to End Modern Slavery (GFEMS).





## SURVIVORS

The panel was unanimous in agreeing that survivor care must be at the core of all responses to modern slavery. Victims and survivors of this terrible crime are highly vulnerable and have extremely complex needs, with no two cases being the same. Victims may have been trafficked across borders without knowing where they are. They will likely be unfamiliar with the local context, have suffered unimaginable physical and psychological abuse and be under the control of their exploiter. However, there are also many British victims and a third of all modern slavery victims are children.

Lu, a survivor of modern slavery who addressed the round table, was clear about the need for support workers to be trained professionals. Situations such as the one she endured can be profoundly traumatic. Successful recovery calls for specialists and extensive expertise at every stage of the process.

The Independent Anti-Slavery Commissioner has consistently called for reform of the UK's system of support for victims and survivors of slavery, namely, the National Referral Mechanism (NRM) to improve care and increase criminal justice effectiveness. The demands on the NRM and the services required have shifted since it was set up in 2009. Together with many stakeholders, the Commissioner has therefore set out a number of recommendations to the UK government on how an effective system should look.

Based on many of these recommendations, in October the Home Office announced improvements and changes that will ensure victims are supported immediately after being rescued, improved decision making on the status of the individual, greater data collection and more long-term support.

These changes are welcome, and implementation will commence early 2018. Britain is a world leader in modern slavery legislation, but delivery and accountability are essential to ensure that those who suffer are protected and that criminals are pursued. Survivor care is essential to successfully identifying and bringing to justice the perpetrators. If survivors do not trust law enforcement and partners to protect them, they will be reluctant or less likely to help with the prosecution of their abusers and traffickers.

While the situation is improving, survivor support could be viewed to be at the discretion of the government, or dependent on the generous work of key charities. Unlike in Scotland and Northern Ireland, support for adult survivors in England and Wales is not on a statutory footing. Until this is changed, there will remain a glaring weakness at the heart of the fight against modern slavery in this country and the welcomed inclusion of implementing statutory guidance within the reform of the NRM provides the opportunity to remedy this.

The Modern Slavery (Victim Support) Bill, currently before Parliament, proposes welcome improvements to survivor support provision. This will provide a 12-month period of support, rather than the existing 45 or 90 days. It will also enable victims who are ready to start employment.

But still more could be done. The Government must not be

creating a clear pathway out of prison and into regular, formal employment. For many survivors there is a gap between the rescue phase and being able to take back control of their lives, an issue identified by the University of Liverpool's independent evaluation of the Bright Future programme. A Timpson style model could plug this gap.

A similar model for survivors of modern slavery would be welcome, as it could help to minimise the uncertainty facing survivors once they are out of the statutory care period.

One source of confusion is the lack of a holistic approach between survivor support groups, survivors and law-enforcement. Systems should be integrated vertically to guarantee the needs of survivors, from the moment of rescue onwards, to ensure they have everything needed to sustain their freedom.

There are several reasons, including but not limited to their immigration status, why survivors of modern slavery status may resist seeking the help available. Survivors also risk being forced into black market jobs, or even re-trafficked. One recent case saw teenage survivors rescued from a nail bar and put into care in the local authorities. The teenage girls left their carers and returned to their traffickers, to be sent to another British town. Care Homes and Social Care authorities in particular may need further training to be alert to such risk. Support and communication with police is essential, as is the appropriate legal aid for those in need. Preventative measures should be focused on the most vulnerable members of society.

To prevent displacement and re-trafficking it is also critical to ensure coordination of services, including counselling, life skills

## BRITAIN IS A WORLD LEADER IN MODERN SLAVERY LEGISLATION, BUT DELIVERY AND ACCOUNTABILITY ARE ESSENTIAL TO ENSURE THOSE WHO SUFFER ARE PROTECTED AND CRIMINALS ARE PURSUED.

complacent: while the situation in Britain is better than some other countries, it remains far from perfect.

In order to ensure victims escape the cycle of abuse and are not re-trafficked, long-term support is essential. This includes employment and training opportunities. There are excellent schemes, such as the Co-ops Bright Future, which promise to provide employment opportunities for survivors of modern slavery. While it is scaling up, both in terms of the number of survivors it supports and the number of business across sectors, it is at a relatively early stage, but the current funding of the Project Bright Future National Matching Service by the Co-op is not, ultimately, sustainable - such support to victims cannot rely on such corporate philanthropy indefinitely. Moreover, it can still only provide support to a fraction of survivors depending on the progress in their recovery and, critically, their immigration status. Legal support is vital not only in terms of encouraging prosecutions, but in seeking compensation, to ensure offenders are held accountable for their actions.

Training is equally important. The risk of re-trafficking is higher without other opportunities being made available. One helpful model could be that developed by Timpson, the high-street key-cutter and cobbler. Timpson employs prisoners, but also provides training for prisoners before they leave, thereby

training and mentorship, as well as job training and placement. The approach must be holistic and integrated. Employment driven by the market is preferable to employment driven by philanthropy. Pathways towards employment would work best if integrated into survivor support services, so survivors do not feel compelled to seek out informal or ad-hoc employment, which can be precarious and even dangerous.

It is right that NGOs and victim support groups recognise the power of the media to help the cause, but this should never come at the expense of their primary roles. The media will always want photographs and salacious stories of victims, and put pressure on survivor organisations to provide them. There is a risk this retelling and re-living of horrors becomes part of a cycle of abuse. Those stewarding survivors must ensure the men, women and children in their care are properly treated, give informed consent, and receive the necessary accompaniments.

Victims and survivors of modern slavery are some of the most vulnerable members of society. They need total care that is protective, emotional and financial, and which endures for the long-term. This must be a non-negotiable priority shared across all government, law enforcement, and voluntary agencies.





## BUSINESS ENGAGEMENT

**M**odern supply chains are complex and difficult to police. Whatever the efforts of a single company, no firm is big enough to choke off modern slavery by itself. Sectors or industries must work together to eradicate abuse and exploitation. Only a 360-degree approach, incorporating as many of the stakeholders as possible, will lead to meaningful change.

There is a corporate provision in Section 54 of the UK's Modern Slavery Act, which says that companies with a turnover of more than £36m must report annually on the steps they are taking to prevent slavery in their supply chains or any part of their business. The Act allows for civil sanctions by the government for non-compliance, however, to date this has never been used. It could be argued it is easier and cheaper to be non-compliant, and the latest estimates from NGOs suggest non-compliance rates of 50 per cent.

Moreover, many working in the Modern Slavery field feel like more could be asked of businesses in terms of legal compliance with the Act. One suggestion for policing this duty is to make the statement a part of the Annual Accounts a company publishes each year. This would make it subject to official audits. "Naming and shaming" non-compliant businesses could add pressure on businesses to complete statements and do the right thing. A recent study by the Ashridge Centre at Hult International Business School found that 71% of companies believe there is some likelihood of modern slavery at some point in their supply chain.

Recent high-profile stories have shown how difficult eliminating slavery from supply chains can be. In the UK, John Lewis recalled a number of kitchen worktops over fears that their granite supply in India might be contaminated by exploitation. Electronics are another area of focus. Cobalt is an essential component of the modern lithium-ion batteries that are used to power everything from electric cars to smartphones. More than half of the world's cobalt supply comes from the Democratic Republic of the Congo, and 20% of it is mined by hand.

Nor is slavery found only in distant, less-developed companies. A company making beds in North Yorkshire was found to have been exploiting labourers from Hungary and a high-street sport brand had men in slavery at their warehouse in Derbyshire.

As part of the Evening Standard and The Independent campaign, British firms were encouraged to sign up to a statement pledging vigilance against modern slavery. All the firms represented by members of the roundtable signed the document. So too did Omnia Strategy, Marks & Spencer, Waitrose, Clifford Chance, Subway and the City of London Corporation, among others.

Business Against Slavery, in partnership with the British government, has also seen high-profile CEOs pledge to take the lead on this issue. Last October, the chief executives of Anglo American, Sky, HSBC, Burberry, BT, WPP, Barclays and ABF were announced as the founding members of the organisation. The Co-op is also a member. More should follow their lead in setting an example to the rest of the industry.

**AS PART OF THE EVENING STANDARD & INDEPENDENT CAMPAIGN, BRITISH FIRMS WERE ENCOURAGED TO SIGN UP TO A STATEMENT PLEDGING VIGILANCE AGAINST MODERN SLAVERY.**

The concept of ethical profit, or profit with integrity, could be harnessed to help drive a change in consumer and business culture. Long-term solutions must be market-driven, supported by appropriate regulation. In turn, this regulation should be drafted with the aim of supporting market-based initiatives. These could include training for sustainable employment, use of trade restrictions and incentives, and investments contingent on clean supply chains. Firms and investors must instigate a culture that refuses to tolerate slavery anywhere in supply chains, no matter how complex the product.

However, this culture must begin with the government, which is the biggest commissioner of contracts in the country, to refuse to stand for slavery; the obligations of the Modern Slavery Act should be applied to public bodies as well, as Baroness Young's Private Member's Bill on transparency aims to achieve.

## THE CONCEPT OF ETHICAL PROFIT, OR PROFIT WITH INTEGRITY, COULD BE HARNESSSED TO HELP DRIVE A CHANGE IN CONSUMER AND BUSINESS CULTURE.

This would drive change, by incentivising corporate leaders to be more vigilant about their own supply chains for fear of losing out on the largest contracts. There is no good reason this cannot be done. Companies are already able to trace production through layers and tiers of suppliers, and supply chain optimisation is well-defined. They should be able to manage the risk of slavery like any other in their business.

There are good examples in certain fields. ITV News is signed up to Human Rights Forum, an organisation for broadcasters. The Stop Slavery Award, run by the Thomson Reuters Foundation, awards companies that have done the most to combat slavery in their supply chains. The inaugural winner last year was HPE, Hewlett-Packard Enterprise, with NXP semi-conductors, a Dutch tech firm, also awarded. This year the award was given to Adidas, Intel, C&A and the Co-op – the first UK business to be recognised. Britain is a leader on corporate accountability; its industries with the greatest international profile, such as the Premier League, could set an example and take the lead in stamping out exploitation. In the US, meanwhile, the Federal Acquisition Regulation includes a provision banning the use of human trafficking and forced labour in supply chains.

Financial institutions can make a powerful contribution to the fight against trafficking. In 2014, the Thomson Reuters Foundation founded the Banks Alliance Against Trafficking. This is a series of regional, multi-stakeholder working groups that help banks to use the data they have, including credit card records, to track potential traffickers.

The first Alliance, launched in the US, published a set of red flags that was later incorporated by FinCEN into its Advisory Note on Human Trafficking. This led to an increase in trafficking-related suspicious activity reporting in the US. In 2017, the European Alliance published an Anti-Trafficking Toolkit for Banks, including red flags, which has since been endorsed by the Wolfsberg Group and by the Financial Action Task Force on money laundering as industry best practice. The Alliance model brings together leading financial institutions, expert anti-trafficking NGOs and law enforcement agencies to map the financial footprint of human trafficking in the regions. A similar scheme is being developed for Asia.

As in other areas, training is paramount. Procurement managers, buyers and others on the purchasing side must be taught how to spot the signs of modern slavery in supply chains, report it and refuse to do business where they suspect exploitation. Professionals in every aspect of the business, including law and finance, must be made aware of the scale and breadth of the problem internationally.





## COMMUNITY ENGAGEMENT

**A**s consumers, all members of the public have a role in the fight against modern slavery. While authorities have a duty to ensure as many as possible are equipped to spot the signs, it is up to individuals to remain diligent about noticing and reporting it.

Research conducted by the Co-op in 2017 suggested that 4 out of 10 people in the UK were not sure what modern slavery was. A third of those who had heard of slavery did not believe it happened in their own city or town. Public awareness is a powerful lever for eradicating slavery, and more must be done to raise awareness by Government, civic society and business.

There is only so much that can be done top-down by corporate bodies and the Government. Consumers and communities have a vital role in eliminating slavery from supply chains and, just as importantly, from our streets. Any business is sensitive to three key perspectives: that of investors, consumers and the media. Once any of these categories respond negatively in any number, the firm will quickly change its practices.

Likewise, as members of the public are made aware of the scale and importance of the issue, they are more likely to report issues. For a good example, see the British Transport Police's national "See it, say it, sorted" campaign for encouraging reporting of suspicious activities. A similar approach could be adopted for modern slavery.

Local churches, faith groups, councillors and other neighbourhood organisations, in being the "eyes and ears" of identifying potential survivors and possible slavery, are key. There could be scope for improving communication of "what to look for and where to go for help", a template for which could be designed nationally but used locally. An example is the guidance produced by the Local Government Association with the IASC, providing guidance for a wide range of resources. The major churches and faith groups are already informing their communities and congregations, but it could be given greater resourcing and momentum by government nationally. However, we must remain wary of the difference between public vigilance and a vigilante culture. Many modern slavery situations are complex and sensitive, and require professional expertise. No amateur sleuth would be equipped to handle a delicate, dangerous rescue from sexual exploitation, for example. Local organisations must educate their audiences about the correct lines of reporting and not walk blindly into creating services or support that could even heighten risks to survivors.

Direct consumer action against slavery has a rich history. Parliament rejected the abolition bill in 1791, which prompted abolitionists to call for a boycott on all slave-grown sugar. Within a year, nearly half a million people were boycotting slave-grown sugar, and in parts of the country sales of sugar dropped by more than a third. The movement brought together abolitionists and showed consumers the power they had, at a time when only a small part of the population was able to vote.

Might such a strategy work today? If companies are thought to be using exploitative labour, consumers could choose to boycott those firms. Even better,

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they could favour companies that have particularly impressive policies, or who have been acknowledged by awards or third-party auditors. The Modern Slavery Act's reporting provisions provide an opportunity to empower consumers to make such choices. In an era of social media, corporate reputations can be destroyed overnight.

However, boycotting is not without risks. The market has changed considerably since the 18th century. A modern boycott could have unintended effects, such as driving companies "underground" rather than incentivising them to bring issues to light and address them. It is better to work with companies to ensure they are doing their utmost to fight slavery. Local vigilance on high-risk businesses, such as nail bars and car washes, will be more effective than national "boycotts".

It is crucial that products pass market tests: consumers will not accept a premium for products to be guaranteed slave-free, and so meeting the market is key to sustainable action against modern slavery. Nor should it cost more to do what is right. The concept of ethical profit must be adapted by every part of the supply chain and market. Once the public finds slavery unacceptable, it will become unacceptable.

Brand association is more valuable than ever. For example, Tiffany & Co., the jeweller, knows that its products carry a high risk of potential contamination by modern slavery. As a result, and being aware of the concern its customers place on ethical responsibility, the firm sources all its stones, and almost all of its precious metals, from mines it knows or controls. Similar diligence should be applied by all brands, especially those with especially complex or risky supply chains.

Responsible investors, as well as individual consumers, can help to make a difference. They can choose to direct trillions of investment dollars to companies with strong human rights policies and clean supply chains. But returns must also be there: it cannot be an act of charity, or it will be unsustainable. Companies must show consumers and investors that their improved supply chain, through improved procurement practices, can lead to better returns, too.



## STATUTORY AUTHORITIES

**M**any forms of authority have a part to play in fighting modern slavery. Law enforcement is key, as they are often the first line of intervention, but they are not alone. Healthcare workers, lawyers, immigration officials, local government and social workers, among others, all have a part to play: anywhere where victims come into contact with some form of authority could potentially be a point of prevention or rescue.

Support for survivors remains on a somewhat discretionary footing, although there is potential, through the Modern Slavery Act 2015, for the United Kingdom to introduce statutory guidance and regulations on victim support, which would rectify this current gap. The Modern Slavery Act also placed a duty on police, immigration enforcement, the NHS and local government all have a duty to co-operate with the Independent Anti-Slavery Commissioner (IASC) to ensure victims of the crime are identified and protected and perpetrators are brought to justice.

Theresa May deserves praise for taking the lead on this issue. More recently, long-called-for reforms to the National Referral Mechanism (NRM) have gone some way to improving the situation for survivors. It remains far from perfect, however. One particular concern is for those of uncertain immigration status, who often perceive they are unable to access services for fear of deportation. Support needs to be designed to meet the needs of all victims, irrespective of their immigration status. A recent Work and Pensions Committee inquiry into modern slavery recommended a series of reforms, including that all confirmed victims should be allowed to remain in the UK for a year to access support. While in some cases the leave to remain may not be necessary, it should be routinely considered and be more readily accessible.

Immigration is an ongoing issue with regards to supporting survivors of modern slavery. It is also the subject of entrenched political views and is often conflated with the desire for the UK to exit the European Union. The cross-party political support of the Modern Slavery Act must be vehemently preserved to ensure those who are vulnerable do not get further marginalised.

While the country is a world leader in terms of legislation, this is not always necessarily represented at every statutory level. There needs to be consistency and accountability at every level of authority, from the Home Office down to primary care providers with inbuilt systems and training packages to ensure this issue doesn't fall through the cracks.

London is an international hub for modern slavery, with survivors from all over the world, and key routes from Albania, Vietnam and Nigeria. The Mayor of London should be crucial in combating slavery wherever it occurs in the capital, working with law enforcement and also in prioritising survivor support. Officials should be proactive,

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going into the key areas of exploitation, such as car washes, brothels and nail bars.

The Mayor of London has delivered a London-based Victim Commissioner. The mayor also pledged extra community officers who can assess and gather local information on local slavery issues, and a single point of contact for each borough to liaise across sectors and provide expert advice. If London is to set a global example, it is essential that the mayor expedites these appointments.

It's crucial that the statutory authorities are able to look at the granular causes of modern slavery, rather than a top-down, whole-picture approach. Nottingham has launched an initiative to become a slavery-free city, using existing community relations, and could be a model for other cities in the UK. Within London, the Borough of Enfield is working closely with the IASC to ensure the issue of modern slavery is brought into the curriculum at every level of schooling and within safeguarding.

Large, resource-heavy campaigns are one thing, but the reality of modern slavery in Britain is that it is complex and varied. It can happen in city centres and suburbs alike. Survivors may be British citizens, but specific international communities can also be intentionally targeted. For example, young Vietnamese men, women and children are smuggled into the UK to work in nail bars or cannabis farms. The nail bars can be used to launder the money made from the sale of drugs. The survivors will often speak little or no English, and be unaware of the support available to them. Once freed from exploitation, they can still often find themselves in precarious situations, with uncertainty around their immigration status and vulnerable to re-trafficking. Minors in particular are often rescued and placed in care, but are under such control of their exploiters that they disappear from care within a matter of days and return to their traffickers.

Law enforcement and other authorities must seek to work in the language of the survivors, in a specific, accountable manner. They should also ensure they understand the survivors' culture, perhaps through employing representatives from those communities. The charity Refuge, for example, has two Vietnamese Community Workers who come from Vietnam. Their cultural understanding improves the quality of their work. Finally, those on the frontline should be shaping policy. Clear pathways are needed, from calling the modern slavery helpline all the way up through the statutory system.

## LAW ENFORCEMENT

Law enforcement remains key to fighting modern slavery. This requires excellent standards in recording crime, the efficient sharing and use of intelligence, and for the local police and other national agencies such as the National Crime Agency to set an international benchmark of cooperation.

**This should be a priority for forces around the country. Working together, the 43 national police forces have the scope and authority to take action around the country. For example, no single group could investigate all the nail bars in England. But if the country's police worked together, they could. A focus on issues at local level will help achieve national objectives.**

**Police forces, like the public, businesses and other groups, need to be trained to spot the signs of slavery, and taught to look out for it when they are policing other issues.**

**Law enforcement must balance attacking this serious organised crime with protecting survivors.**







**As this report demonstrates, government cannot afford to be complacent about modern slavery. Huge challenges remain. Despite recent reforms to the NRM, survivor support is still not on a statutory footing. Public awareness is improving, thanks in part to media campaigns, but remains low. In turn, this means consumers are less likely to vote with their purses to support businesses associated with ethical supply chains, while there is insufficient enforcement of existing regulations on corporate diligence.**

**Yet in theory, many of the elements needed to fight modern slavery are now in place. Between government, law enforcement and survivor support agencies, resources to combat this scourge are available. What is called for is a holistic, joined-up approach, with stakeholders working in concert to help bring justice to the perpetrators of this serious, organised, widespread crime, and comfort and support to its survivors. It is hoped this report is useful to those involved at every stage of the fight.**

## **KEY FINDINGS**

- ◆ Government must put victim support on a statutory footing as part of the statutory guidance
- ◆ Longer term support for victims and survivors is the key to breaking the cycle of slavery and should be available to survivors irrespective of immigration status
- ◆ The likelihood of modern slavery in supply chains is high. Non-compliance with s54 of the Modern Slavery Act must be identifiable through a recognised process and result in sanctions
- ◆ Companies should be encouraged to pursue profit with integrity, and compliance with modern slavery should be on the same footing as other sustainability goals
- ◆ Any corporate regulation must be in support of market-driven solutions
- ◆ Companies should band together by sector or industry to have greater clout
- ◆ Consumers should vote with their purses, and support brands associated with ethical supply chains
- ◆ Increased pressure on immigration must not be at the expense of the most vulnerable in society
- ◆ Modern Slavery must become a coordinated national policing priority. All constabularies must focus on the issues at hand locally in order for national solutions to be delivered
- ◆ Statutory agencies must professionalise their responses, ensuring it fits within 'business as usual' and not just occasional interventions
- ◆ Media has a duty to report accurately and sensitively, with the security and wishes of survivors paramount and a view to the long-term tackling of the issue

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**“I DON'T WANT PEOPLE TO LOOK AT ME AND FEEL PITY,” SHE SAYS. “FOR ME, IT'S LIKE A LIGHT. THIS HAS PASSED, AND I'M STILL ALIVE. I THANK GOD AND THE UNIVERSE. HE GAVE ME THIS LESSON, AND I WANT TO HELP PREVENT THIS HAPPENING TO SOMEONE ELSE.”**

*'Hannah', survivor of modern slavery,  
reported in the Evening Standard*

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