Global Commission
on Modern Slavery
& Human Trafficking

No country is immune:
working together to end modern slavery & human trafficking

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Foreword

The Rt Hon. the Baroness May of Maidenhead
Chair of the Global Commission on Modern Slavery & Human Trafficking

The world is in crisis. Be it climate change, the mass migration of people, protracted conflict or poverty, state after state across the globe is facing unprecedented challenges, set against a background of increasing volatility in geopolitics, sluggish economies and threats to global trade.

As governments around the globe face these challenges, too often they look to deal with them as one-off issues and fail to see the links between them. We are lulled into thinking that the future relies only on specific policy interventions such as de-carbonisation, support for electric vehicles, or deciding how big the wall at the border should be – literally or metaphorically.

To take this approach is to fail to understand the true impact of such challenges. Because behind the success or failure of these individual policies we are missing the reality of an even greater tragedy: the tragedy of all those who find themselves enslaved and trafficked as a result of climate change, crime, migration or conflict.

The slave drivers and traffickers buy and sell people as commodities, whose only value is in the profit they generate. Scooped-up from the streets to satisfy the personal or commercial interests of the slave drivers, their freedom is cruelly torn from them: they are deprived of their dignity, de-humanised and thrust into a life of misery.

We speak of victims and survivors. But these are not just victims or survivors, they are individuals. Each one of them has a personality, talents, interests, hopes and desires. They are all people of promise who have much to give the world, but whose opportunity to do so has been snatched away by those who profit from them.

> **"** **This is a moral stain on our humanity. Modern slavery and human trafficking is the greatest human rights issue of our time"**
>
> — Theresa May, Chair of the Global Commission

Few politicians or government ministers see their success as being measured in their impact in combatting modern slavery and human trafficking. Few international organisations, responding to the world's major humanitarian crises, see tackling these crimes as a matter of life-saving response. Few businesses understand how their ambitions and hard work are tainted by these human abuses in their supply chains.

So, while the world faces its many challenges, the issue of modern slavery and human trafficking has been left to fall down the political agenda. And as this neglect persists, an increasing number of our fellow human beings are subjected to a life of enslavement.

Over a century and a half after the abolition of the transatlantic slave trade, and with all the advances in international humanitarian law, science and technology that we have witnessed since, we see the very same horrors being experienced in every country today.

This is a moral stain on our humanity. Modern slavery and human trafficking is indeed the greatest human rights issue of our time. If we are to end this degrading and inhumane activity, to give people back their freedom and the right to make choices over their own lives, we need to act and we need to act now.

This report of the Global Commission on Modern Slavery and Human Trafficking is a wake-up call to the world. It is a challenge to governments, businesses and civil society. Above all it is a Call to Action: act on our recommendations and end modern slavery and human trafficking.

Introduction:

Working together to end modern slavery & human trafficking

The Universal Declaration of Human Rights, the bedrock of the United Nations (UN), adopted by the UN General Assembly on 10 December 1948, could not state it more clearly. It establishes in Article 4 that **"No one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms"**[1].

Yet today, in the first half of the 21st century, there are still an estimated 50 million[2] men, women and children trapped in slavery around the world. The stark reality of this level of individual suffering challenges us to ask: why is this still happening? What has gone wrong and, more to the point, what do we need to do as a global community to ensure this terrible injustice finally ends?

This report grapples with these questions. It examines the causes of vulnerability to modern slavery and human trafficking and sets out clear recommendations for urgent action.

If we are to make a difference and reduce, and ultimately eradicate, modern slavery and human trafficking we must all work together, not just in one country or another but across the globe – governments, businesses, civil society and the public.

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1 Universal Declaration of Human Rights, 10 December 1948, General Assembly Resolution 217A.
2 ILO, Walk Free and IOM, *Global Estimates of Modern Slavery: Forced Labour and Forced Marriage*, 2022.

By bringing together survivors, academics, politicians, business leaders and those working in NGOs the Global Commission has been able to unite different perspectives. The members of the Global Commission are listed in Appendix 1. We have been assisted in our work by a Panel of People with Lived Experience (PWLE). This has provided a rounded approach which recognises that the report's recommendations must understand the needs of survivors, acknowledge the requirements of practical politics and recognise the need to support governments in making change. The aim is clear. We want not just to describe what is happening in our world but provide solutions that, if followed, we believe will make a material difference to those vulnerable to being enslaved.

That difference will only be made if all parties act. This is not an issue that governments or even international organisations can solve on their own. Businesses must ensure their supply chains are free of forced labour. Civil society must shine a light on hidden exploitation. Humanitarian organisations must recognise their role in addressing vulnerabilities particularly at times of humanitarian crisis. People must understand the impact of their choices as consumers. To achieve change we must all play our part, but we must also be willing to act together across national and local divides. It is only by doing this that we can free those who are in slavery and protect those who are at risk.

The Global Commission was established to reinvigorate the political will to address the issue of modern slavery and human trafficking. To this end it makes recommendations at an international and national level for governments. But it also recognises the need for the involvement of others and includes recommendations for businesses to adopt in relation to their supply chains and for civil society organisations operating at times of humanitarian crises.

If action is to be taken to end this scourge on humanity it is first necessary to understand what modern slavery and human trafficking is. We have used this term because we believe it covers the various types of exploitation concerned more comprehensively than other terms that are sometimes used.

Modern slavery is a relationship based on exploitation. Fundamentally it is defined by the removal of the freedom of an individual and their effective ownership by others for personal benefit or commercial or criminal gain. It covers a range of practices that include trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour including the unlawful recruitment and use of child soldiers. In recent years other forms of modern slavery have evolved, such as cyber scamming, which is a new destination for the victims of human trafficking.

No country is immune. Modern slavery occurs everywhere in both the Global North and the Global South. Women and children are disproportionately affected. It persists as a silent crime – an invisible war that plays out every minute in our homes, our workplaces, our businesses, our global village. The issue is pervasive, yet largely unrecognised, happening right under our noses and hidden in plain sight.

Faceless casualties are generated every day through the purchasing decisions of unconscious consumption, and the blind eyes of a global economic system that offers little or no transparency in business supply chains. Knowingly or unknowingly, many in our families, our communities and societies are consuming the products, or benefiting from the labour, of human beings working against their will.

A deeper exploration of the various types of exploitation that together form modern slavery and human trafficking is set out in Chapter 1. The figures and geographical spread shown in Chapter 2 makes clear that no country is immune from this scourge.

Modern slavery poses uncomfortable truths for businesses and individuals, and the number of people trapped in it is increasing. Climate change, protracted armed conflicts, the mass displacement of people and organised criminal networks operating across borders are increasing the vulnerability of millions of people to exploitation, whether as factory workers, domestic servants or victims of sexual exploitation. In Chapter 3 we explore these connections. If governments are successfully to address these key collective challenges, they need to stop thinking of them as single issues and understand the way in which decisions taken in one area can increase vulnerability to exploitation and so lead to people being enslaved and trafficked.

This need to look across key challenges in identifying necessary actions is not confined to governments. When companies look at their supply chains with a view to reducing their environmental impact, they need also to consider whether modern slavery exists in those supply chains. The sub-contractor who is abusing the environment may also be abusing their workers. Recognising these interconnections is vital if we are serious about prevention.

We also identify in more detail the root causes of vulnerabilities to modern slavery and human trafficking (Chapter 5) and have set out a prevention tool, published alongside this report, in order to highlight the risk factors and what specifically exposes individuals to each of these risk factors. The tool can therefore be used to identify those likely to be subjected to modern slavery and human trafficking. If governments know who in their communities is most vulnerable, it is easier to identify and tailor effective action to reduce that vulnerability.

Yet sadly what we see is that, at a time when people's vulnerabilities to modern slavery are increasing dramatically, the world's capacity to respond seems to be reducing. Modern slavery is falling down the political agenda as other crises and domestic concerns take precedence.

Considering that millions of people worldwide are being deprived of their most basic freedoms, stripped of their identities and forced to submit to the will and commercial or criminal interests of others, the world should be shocked into action. Ending modern slavery should be a collective priority, yet we see governments, businesses and individuals turn a blind eye to this human rights tragedy.

The Universal Declaration was not the first time that an international statement against slavery had been made. The signatories to the 1926 Slavery Convention committed

> **"(a) To prevent and suppress the slave trade";** and

> **"(b) To bring about, progressively and as soon as possible, the complete abolition of slavery in all its forms"**[3].

These were noble aims, as were all the pieces of national legislation in a variety of countries before and after this time, and the various conventions and treaties that followed at an international level including more recently the Palermo Protocol of 2000, Article 8.7 of the Sustainable Development Goals adopted in 2015, and the Call to Action to End Modern Slavery at the United Nations in 2017 led by the UK.

The history of legislation is considered in more detail in Chapter 6. This chapter examines why the laws in place have not been effective and makes recommendations to both the United Nations and to individual governments about the nature of effective legislation.

This work on the role of governments and international bodies in dealing with modern slavery and human trafficking, mainly through legislation, was one of the three key pieces of work undertaken by the Global Commission. The second looked at the ways in which businesses could address the need to eradicate forced labour in supply chains. The work, set out in Chapter 7, covered legislation and the role of workers' representatives, and also identified what good practices companies should adopt if they are properly to identify issues in their supply chains.

The third area of work is described in Chapter 8. It involved looking at the role of civil society organisations in crisis contexts. This had been a little-considered aspect of international operations, but it is one which is important in reducing vulnerability to slavery and trafficking in areas of humanitarian crisis.

Across these three strands of work the Global Commission has made recommendations which if implemented and followed consistently would make a material difference to the protection of potential victims, freeing those who are enslaved and hence leading to the eradication of modern slavery and human trafficking. Chapter 9 gives a summary of the recommendations.

When we embarked on this work, we recognised that producing recommendations was the beginning of the work, not the end. So, the Global Commission will continue not only to work to ensure that the recommendations are implemented, but also to undertake further research across key areas.

In March 2024 the ILO published a study on the profits generated by forced labour[4]. This suggested that some $236 billion is generated in illegal profits every year. It described these profits as reflecting the **"wages effectively stolen from the pockets of workers by the perpetrators of forced labour through their coercive practices"**. And of course governments lost out on the tax that would have been generated on those wages. In September 2024 the ILO published a further report which highlighted the investment requirements to end forced labour and the related increase in global GDP[5].

Valuable though this work is, taken together these reports were not able to cover the full impact of modern slavery and human trafficking. The Global Commission will work with economists worldwide in the second phase of our work to build a deeper and broader understanding of the mechanisms involved and the economics of modern slavery and human trafficking.

This work strikes at the heart of the exploitation which is modern slavery. If we are to achieve a fairer world then we need to reduce inequalities. One key inequality is between those workers who are paid the proper wage and those who are forced into work without the proper wage. Dealing with this misuse of labour would not only reduce inequality, it would reduce poverty and it would ensure that employers paid their fair share of taxes.

Another aspect of modern slavery is the involvement of criminal gangs, particularly in the trafficking of human beings into exploitation – often sexual exploitation. The gangs buy and sell human beings just as they buy and sell drugs or guns. Dealing with modern slavery and human trafficking involves identifying the criminals behind the trade and being able to act against them and in so doing to reduce their ability to trade in other illegal "commodities".

The fact that criminal gangs are heavily involved in modern slavery and particularly in human trafficking is also an issue of national security. As gangs transport people across borders they can aid the movement of terrorists, but terrorist groups can also use forced labour and forced marriage to aid their criminal activities.

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3 The Convention to Suppress the Slave Trade and Slavery, League of Nations, adopted 25 September 1926.

4 ILO, *Profits and Poverty: The Economics of Forced Labour*, 2024.
5 ILO, *Acting against Forced Labour: An Assessment of Investment Requirements and Economic Benefits*, 2024.

Rapid advances in technology have created new opportunities for exploitation. Recruitment methods used by perpetrators include creating fake job adverts on legitimate employment portals or job boards on social networking websites to deceive potential victims into situations of forced labour or sexual exploitation. Perpetrators can also manipulate digital payroll systems to falsify wage records or artificially inflate debts owed by workers thus perpetuating debt bondage conditions through fabricated financial data. Social media and other apps are also used as marketplaces to identify, target, recruit and exploit people, and to conceal the identity and financial activity of perpetrators through the use of encryption and crypto currencies.

On the other hand, the application of data and technology to combating modern slavery and human trafficking is rapidly evolving, with many examples of emerging good practice. For example, satellite images can be analysed using AI to detect forced labour camps or brick kilns where forced labour is prevalent based on unusual construction patterns and heat signatures. Big data analytics can reveal patterns and trends in human trafficking networks. Analysis of financial transactions, recruitment methods and travel data can help organisations to identify modern slavery hotspots and target interventions towards the most vulnerable groups.

However, civil society, governments and businesses all face challenges in sourcing, accessing, and sharing data on modern slavery. This limits their ability to identify victims, disrupt trafficking networks, and prevent these crimes from taking place.

Data and technology is an area on which the Global Commission will continue to work in our next phase. We will work to identify emerging trends and establish clear priorities for targeted interventions. The trends identified will also be used to drive informed decision-making among leaders in government, business and civil society.

Within our report we also identify various barriers to change. One of the most difficult to address is the challenge of culture. For example, there are certain cultural or societal norms which still consider it acceptable for young girls to be taken or sold into domestic servitude or be taken or sold to be "educated" when in fact they will be taken into servitude or sexual exploitation. It is clear that the risks of being victims of modern slavery and human trafficking are magnified for minorities and marginalised communities.

It is also the case that women and girls form the majority of victims. Another cultural issue is that some governments may welcome any small amount of revenue that those who have been trafficked abroad are able to send back to their families. Changing these attitudes is not just about legislation, and of course is much harder to address.

It is not just culture in certain communities that makes this hard to deal with. There are powerful vested interests at play. The companies who shape their business models around the exploitation of workers, the public who enjoy being able to buy cheap goods without thinking about whether the workers producing them have been forced to do so or whether they are being paid properly, those who pay for sex without a moment's thought about whether the woman or man providing it has been forced to do so. In some countries people in authority, including in the organs of the state whose job it is to protect the public, will be involved in modern slavery and human trafficking or will see it as an acceptable part of life. In some countries the slavery is imposed by the state itself. In addition there is the powerful vested interest of the criminal gangs who make money out of modern slavery and human trafficking and treat individual human beings as commodities to be bought and sold.

We address all of these issues in this report, but we will not change the world simply through one report. Our work will continue.

Working with other key actors in the field to reduce obstacles to international cooperation, the Global Commission calls for immediate action to put a stop to the destruction of millions of lives – to restore to people the right to make choices of their own rather than to be abusively controlled by others. In the numbers affected and the extent of suffering caused, contemporary forms of slavery recall the genocides of the last century or the threatened ecocide of today.

Just as our predecessors ended transatlantic slavery, we have the power and the responsibility to declare "No More". This is not merely a policy issue; it is a profound moral imperative.

We must rise to the challenge and affirm our shared humanity by ending this silent war once and for all.

What is modern slavery and human trafficking?

This chapter explains what the terms "modern slavery" and "human trafficking" mean, highlighting their definitions, key differences, and why the Global Commission uses both terms in its work.

Modern slavery: a spectrum of severe exploitation

> " Slavery is a social phenomenon existing on the far end of a continuum of oppression, where human beings completely dominate and exploit other human beings, and this domination results in physical, psychological, and interpersonal trauma; financial and social instability and inequities; and dilution of the fundamental principles of democracy"[1]
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> — Minh Dang, Co-founder and Executive Director of Survivor Alliance

1 Nicholson, A., Dang, M., Trodd, Z., 'A Full Freedom: Contemporary Survivors' Definitions of Slavery', *Human Rights Law Review*, 18(4), 2018, pp. 689–704. https://doi.org/10.1093/hrlr/ngy032

Modern slavery describes the severe exploitation of people for profit or personal gain. There is a huge power imbalance between the victim and the perpetrator. This exploitation can take many forms, including (but not limited to) forced labour, child labour exploitation, domestic servitude, forced sexual exploitation, forced marriage, forced begging, debt bondage, forced criminality and child soldiering.

Some survivors describe how the person subjected to slavery may lose all sense of their future, while others have felt that their very sense of having an identity was destroyed and their human dignity lost.

Components of modern slavery

The phrase "modern slavery" is not defined in a single international treaty, but it brings together several forms of exploitation that are defined in a range of international legal instruments. Modern slavery typically involves these following elements:

- **Force, coercion or deception:** victims are coerced into or kept in their situation through threats, violence, manipulation or being tied to a debt. This coercion can be both physical and psychological. It may involve threats against family members. Deception can involve false promises about working conditions, wages, or the nature of the job.

- **Restriction of movement:** victims often face restrictions on their freedom to move, making it difficult to escape. This can include confiscation of travel documents or threats of violence.

- **Exploitation of labour:** victims are compelled to work long hours under pressure with little to no pay. This exploitation can take place in any sector including industries such as agriculture, apparel, construction and domestic service, as well as in scamming centres or commercial sex work.

Forms of modern slavery and their legal basis

The Universal Declaration of Human Rights Article 4 is the key reference point. It states that: *"No one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms"[2]*.

Financial disruption of scam centre hubs of forced criminality

Akello, a Ugandan national, travelled from Dubai to Thailand following a job offer posted on LinkedIn. The recruitment process seemed legitimate, including formal interviews and visa arrangements. However, upon arrival, Akello was taken to a river and coerced into boarding a boat, which took him to a heavily guarded compound in Myanmar where he was forced into criminal exploitation, running online scams targeting victims across the world. These scams included romance fraud and crypto investment schemes, generating enormous illicit profits for the traffickers.

Akello contacted STOP THE TRAFFIK, which gathered intelligence and shared it with law enforcement, but the security situation in the compound and local area meant a rescue operation carried significant risk. The situation shifted when key figures behind the scam were arrested in China, disrupting the operation's financial support. As a result, guards at the compound began to leave and Akello and two other victims were freed. Investigations are ongoing, and STOP THE TRAFFIK has used advanced open-source intelligence tools, led by lived experience narratives, to map a linked financial entity chart used to identify new disruption opportunities, including the potential recovery of criminal funds. This case highlights the importance of disrupting traffickers' financial networks to prevent exploitation and reduce crime.

Various forms of modern slavery are defined and prohibited in international treaties and conventions. Some of the most common forms of modern slavery include:

- **Forced labour (including state-imposed forced labour)**
- **Child labour exploitation**
- **Forced marriage**
- **Domestic servitude**
- **Debt bondage**
- **Organ removal and cross-border organ trafficking**
- **Forced criminality**
- **Forced begging**
- **Forced sexual exploitation**
- **Child soldiering**

Forms of Exploitation	Legal Basis
Slavery and slavery-like practices: slavery is defined in the 1956 Slavery Convention as the status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised. In a later treaty, states agreed that there are also certain "slavery-like practices": debt bondage, forced or servile marriage, the sale or exploitation of children (including in armed conflict), and descent-based slavery.	The Slavery Convention 1926 and Supplementary Slavery Convention 1956
Forced labour: all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself or herself voluntarily. State-imposed forced labour occurs when governments compel individuals to work against their will as a form of punishment or for economic gain. This exploitation often involves harsh conditions, low or no pay, and can be a form of political oppression.	ILO Forced Labour Convention, 1930 (No. 29); The Abolition of Forced Labour Convention, 1957 (No. 105)
Debt bondage: the practice of work or service extracted as a means of repayment for a debt.	ILO Bonded Labour Convention, 1930 (No. 107)
Domestic servitude: individuals are forced to work as domestic helpers without freedom. Victims are often unpaid and subjected to long hours and physical, sexual and emotional abuse, and are trapped in a situation of exploitation.	ILO Forced Labour Convention (No. 29)
Forced criminal exploitation: the manipulation of an individual into criminal activity through coercion, threats or deception. This can involve activities such as drug trafficking, theft and scamming.	Generally not explicitly defined, but some relevant issues are addressed under the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, 2000 (Palermo Protocol), UN Convention against Transnational Organized Crime, and ILO Conventions

Forms of Exploitation	Legal Basis
Forced/ servile marriage: a marriage entered into without the full and free consents of both parties. This practice violates human rights, denies individuals their freedom of choice, and can lead to physical and emotional abuse.	UN Convention on the Elimination of All Forms of Discrimination Against Women and Supplementary Slavery Convention 1956
Forced commercial sexual exploitation: occurs when individuals are coerced into engaging in sexual acts for the financial benefit of others. This exploitation can involve violence, threats or manipulation to control victims and force them into sexual acts. This also covers all forms of commercial sexual exploitation of children, including the use, procuring or offering of children for the production of child sexual abuse material.	Treated under Sex Trafficking – Palermo Protocol UN Optional Protocol to the Convention on the Rights of the Child on the Sale of Children, Child Prostitution and Child Pornography
Child soldiering: the recruitment and use of children in armed conflict. These children are often forced to participate in combat, carry weapons, or serve as cooks, messengers or spies. They are exposed to extreme violence and trauma, and are deprived of their childhood.	UN Optional Protocol to the Convention on the Rights of the Child on the Involvement of Children in Armed Conflict
The worst forms of child labour: the exploitation of children through work that is harmful or dangerous, or interferes with their education. Children are often subjected to long hours and hazardous conditions, and are denied the opportunity to attend school.	ILO Convention on the Worst Forms of Child Labour, 1999 (No. 182); UN Convention on the Rights of the Child, 1989

In addition to the Universal Declaration of Human Rights, Article 4, other relevant Conventions include:

- **The League of Nations' Slavery Convention of 1926** defined slavery as *"The status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised"[3]*. The convention aimed to abolish slavery and the slave trade worldwide, and committed signatory countries to prevent and suppress the practice.

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3 OHCHR, Slavery Convention Signed at Geneva on 25 September 1926. https://www.ohchr.org/en/instruments-mechanisms/instruments/slavery-convention

- **The International Labour Organization's (ILO's) Forced Labour Convention of 1930**. The 1930 Convention defined forced labour as *"all work of service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself or herself voluntarily"* and called for its abolition *"in all its forms"*. Yet, the convention condoned forced labour on the grounds of "public purposes", "normal civic obligations for citizens" and minor "communal services"[4].

- **The ILO's Bonded Labour Convention of 1930** prohibited debt bondage – work extracted as a means of repaying a debt.

- **The Supplementary Slavery Convention of 1956** included forced marriage as a form of slavery.

- **The Abolition of Forced Labour Convention, 1957** sought to remove the loopholes left by the 1930 Forced Labour Convention by prohibiting specific forms of forced labour such as politically motivated forced labour, developmental forced labour and disciplinary forced labour (as a means to intimidate potential strikers). The Forced Labour Protocol established obligations to prevent forced labour, protect those subjected to forced labour, and provide them with access to remedies.

- **The UN Convention on Elimination of All Forms of Discrimination against Women of 1979** asserts equal rights of women and men in consenting to marriage. It defines child marriage as a form of forced marriage.

- **The UN Convention on the Rights of the Child of 1989** recognises *"the right of the child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral or social development"*[5].

- **The Rome Statute of the International Criminal Court (ICC) of 1998** classifies "enslavement", "sexual slavery", and "forced prostitution" as "crimes against humanity"[6].

- **The Worst Forms of Child Labour Convention of 1999** commits member states to ending forced child labour, child soldiering, child sexual exploitation, and child criminal exploitation.

- **The Optional Protocol on the Involvement of Children in Armed Conflict of 2000** calls for the prevention and criminalisation of reliance on child soldiering by states and non-state armed groups.

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4 Maul, D., *The International Labour Organization: A 100 Years of Global Social Policy*, 2019, p. 83.
5 UNICEF, *The United Nations Convention on the Rights of the Child*, 2004, p. 10.
6 ICC, *Rome Statute of the International Criminal Court,* 2021, pp. 3-4.

Case study
Phallen's story

For 15-year-old Phallen's* father, the chance to send his daughter to marry a wealthy businessman in China was her pathway to a safer and better future. Phallen's mother died when she was much younger and her father was a poor fisherman. Together with Phallen's step-mother, he arranged to send her away from Cambodia. But Phallen's new life was far from what she had been promised. She was forced to marry a man who was older than her father, and as a pig farmer, had only slightly more money. He had told Phallen's father he wanted someone to look after him and his farm. But he raped and beat her. He took away her passport. Phallen could not speak Chinese, and had no means of contacting anyone for help. This continued for about one year, until one day, when her husband sent her to town on an errand, Phallen found a police station. She was put in touch with the Cambodian embassy, which helped her return to Cambodia.

Name changed to protect identity of the survivor.

- **The Optional Protocol on Child Prostitution and Child Pornography of 2000** prohibits the sale of children, child prostitution and child pornography.

- **The UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children of 2000 (informally known as the Palermo Protocol)** is part of the UN Convention against Transnational Organized Crime. It defines human trafficking as *"the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation, which shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs"*[7]. The Protocol focuses on combating human trafficking through prevention, protection of victims, and prosecution of offenders.

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7 OHCHR, *Protocol to Prevent, Suppress, and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime,* https://www.ohchr.org/en/instruments-mechanisms/instruments/protocol-prevent-suppress-and-punish-trafficking-persons. Definitions of human trafficking nevertheless vary at the national level. For example the US State Department defines "human trafficking" or "trafficking in persons" as "a crime whereby traffickers exploit and profit at the expense of adults or children by compelling them to perform labor or engage in commercial sex". US Department of State, *Understanding Human Trafficking,* https://www.state.gov/what-is-trafficking-in-persons/#:~:text=%E2%80%9CTrafficking%20in%20persons%E2%80%9D%20and%20%E2%80%9C,or%20engage%20in%20commercial%20sex

- **The UN Forced Labour Protocol of 2014** establishes obligations to prevent forced labour, protect those subjected to forced labour, and provide them with access to remedies.
- **The ICC Policy on Slavery Crimes of 2024** "is the first policy issued by an international court or tribunal specifically addressing international slavery crimes". The policy "examines the scope of slavery crimes under the Rome Statute", and acknowledges "the slave trade as a form of slavery crimes and the transnational crime of trafficking in persons"[8].

Why does the Global Commission use both terms: "modern slavery" and "human trafficking"? How are they related? How are they different?

The Global Commission utilises the terms "modern slavery" and "human trafficking" which are both addressed in international conventions aimed at preventing and eradicating these illegal practices. Already during the discussions that surrounded the drafting of the UN's 1948 Universal Declaration of Human Rights, its authors stressed that the Declaration's Article 4 was not exclusively meant to abolish all forms of slavery, but also the "traffic" of individuals and groups for the purpose of exploitation[9]. This early reference to human trafficking indicates that international legal scholars and humanitarians were aware of its close relationship with modern slavery. Human trafficking indeed constitutes one of the necessary conditions for the perpetration of modern slavery. Yet the two terms still describe two different phenomena, and international organisations (IOs) such as UNHCR openly distinguish modern slavery from human trafficking[10]. "Modern slavery" tends to emphasise ongoing control and loss of freedom, regardless of how the person came to be exploited, while "human trafficking" tends to focus more narrowly on the criminal act of transfer into exploitation[11].

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8 ICC Office of the Prosecutor, *Policy on Slavery Crimes*, 2024, p. i.
9 Morsink, J., *The Universal Declaration: Origins, Drafting & Intent*, 1999, p. 41.
10 Civil Society Working Group, *Notes of Key Meetings – UNHCR, IOM, ICRC, IFRC*, p. 2.
11 Given its nature as an act of forced transfer, trafficking is closely intertwined with mixed migration. This close relationship manifests in the form of two different – and yet overlapping – dynamics: "migration-led human trafficking" and "human trafficking-led migration". Migration-led human trafficking "occurs during or after a migration journey" and "it may result from smugglers initially hired as service providers morphing into outright exploiters" or in victims "being sold by smugglers" – or corrupt state officials – "to traffickers". Human trafficking-led migration "results from trafficking activities when victims are transported across national borders for purposes such as labour exploitation, sexual exploitation, slavery, servitude, or the removal of organs, as defined by the Palermo Protocol". Mixed Migration Centre, *Questions of Intent: Where Mixed Migration and Human Trafficking Overlap*: https://mixedmigration.org/questions-of-intent-mixed-migration-human-trafficking/#:~:text=Trafficking%2Dled%20migration%20may%20entail,they%20are%20prevented%20from%20leaving

Case study
Ly-nin's story

When Ly-nin* was 13, someone explained to her parents that they could help their daughter have a better life, with good food, accommodation, clothing and friends. Their lives had been hard, and they'd already experienced prior labour exploitation.

Like most parents, they wanted what was best for their daughter. What they didn't realise was that the person was a broker working with traffickers. The promises for a better life were a terrible lie – and Ly-nin ended up in a brothel in Cambodia. Two years later, she was removed from exploitation during a police raid.

Two years later, in her art therapy programme offered by a local NGO, she drew a picture that captured what "human trafficking" means to her. The picture was of one of her earliest memories: of working in a brick kiln. She and her family had worked from dawn till dusk, surviving day-to-day, living at the kilns with the stench of smoke.

Name changed to protect identity of the survivor.

No country is immune – the global reach of modern slavery

No country is immune from modern slavery. It affects high and low-income countries, the Global North and Global South. It is hidden in plain sight in towns, villages, settlements and cities worldwide.

According to the Global Estimates of Modern Slavery, there were an estimated 50 million people trapped worldwide in forced labour (28 million) or forced marriage (22 million) on any given day in 2021. This equates to nearly 1 in every 150 people[1]. The number of people in modern slavery had increased by an estimated 10 million people between 2016 and 2021[2]. Globally, women and girls are particularly vulnerable to exploitation, making up an estimated 54% of people in modern slavery; nearly one in four victims are children[3].

Modern slavery affects every region

Modern slavery is pervasive across all regions. To fully understand the global impact of modern slavery, it is important to consider both prevalence (the proportion of the population affected) and absolute numbers.

1 Walk Free/ ILO/ IOM, *Global Estimates of Modern Slavery 2022*, 2022, www.walkfree.org/global-slavery-index/methodology/methodology-content/
2 Walk Free's report, the *Global Slavery Index (GSI) 2023*, provides national estimates of modern slavery for 160 countries, www.walkfree.org/global-slavery-index/
3 Walk Free/ ILO/ IOM, *Global Estimates of Modern Slavery 2022*, 2022, www.walkfree.org/global-slavery-index/methodology/methodology-content/

Asia and the Pacific has the highest estimated number of people in modern slavery – nearly 30 million. Arab States have the lowest number but the highest prevalence, with 10.1 people per 1,000 in modern slavery. Europe and Central Asia have lower absolute numbers than Asia and the Pacific (6.4m), but comparable prevalence rates (6.9 per 1,000 vs. 6.8 per 1,000)[4].

Figure 1: Estimated prevalence of modern slavery per thousand people by region, based on the Walk Free/ ILO/ IOM *Global Estimates of Modern Slavery*, **2022**
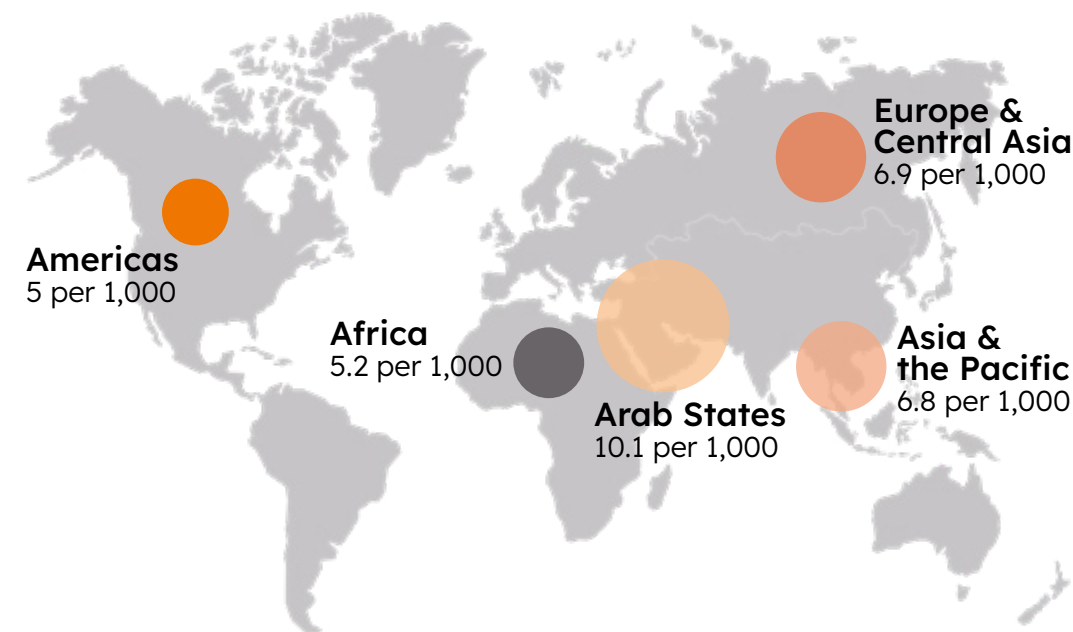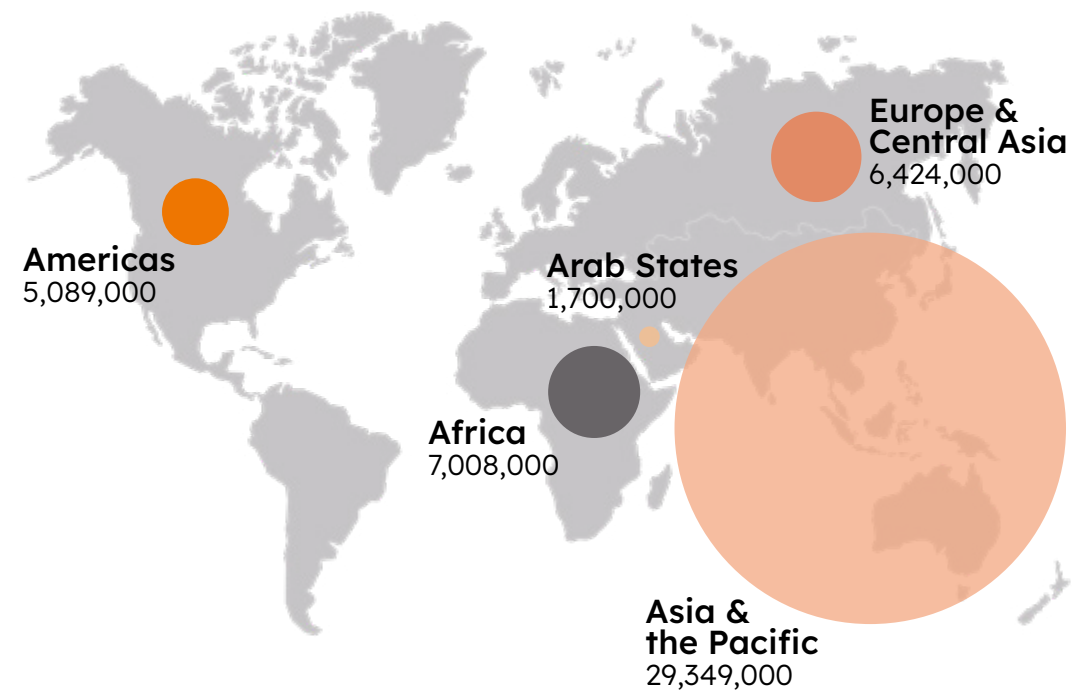

Europe & Central Asia
6.9 per 1,000

Americas
5 per 1,000

Africa
5.2 per 1,000

Asia & the Pacific
6.8 per 1,000

Arab States
10.1 per 1,000

Figure 2: Estimated absolute numbers of people in modern slavery by region, based on the Walk Free/ ILO/ IOM *Global Estimates of Modern Slavery*, **2022**

Europe & Central Asia
6,424,000

Americas
5,089,000

Arab States
1,700,000

Africa
7,008,000

Asia & the Pacific
29,349,000

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4 Walk Free/ ILO/ IOM, *Global Estimates of Modern Slavery 2022*, 2022, www.walkfree.org/global-slavery-index/methodology/methodology-content/

Regional trends in identified cases

Separate from the Global Estimates of Modern Slavery, which estimate the total number of people experiencing modern slavery, the UN Office on Drugs and Crime compiles government statistics on the number of individuals who have been identified as victims of human trafficking. These statistics reveal patterns of reported exploitation across different regions and sub-regions[5]. It is important to note that there are limitations associated with the use of detected cases as a measure, which are considered in the final section of this chapter.

It should be noted that the origins of victims vary significantly within and between regions. For example, most detected victims in North America (75%) and South America (74%) were trafficked domestically, whereas 43% of all detected victims in Gulf Cooperation Council (GCC) countries originated in South Asia and East Asia.

Forced labour is the most detected form of exploitation across **Africa**, making up more than half of all detected cases. More than half of all victims across the continent are children. There is some variation in patterns of exploitation within the region. In sub-Saharan Africa, 42% of victims are girls whereas in North Africa the gender split amongst child victims is fairly even. North Africa has a higher proportion of trafficking for "other purposes" (18%), typically involving child begging.

Sexual exploitation is the largest form of detected exploitation in the **Americas**, comprising more than half of all detected cases, with most victims being women and girls. There are some sub-regional differences in the profile of victims. Over half of all victims detected in Central America and the Caribbean are girls, whereas the percentage of adult female victims is higher in North America (56%). In South America, women comprised the largest number of detected victims (45%), with a higher proportion of adult male victims (34%) than other sub-regions.

In **Arab States**, there are marked differences in patterns of exploitation between GCC countries, where forced labour accounted for 66% of all detected cases, and other Middle Eastern countries, where sexual exploitation was the primary form of exploitation. Across both sub-regions, most victims are women – 81% in GCC countries, and 60% in other Middle East countries.

Patterns of exploitation also differ significantly within **Asia and the Pacific**. For East Asia and the Pacific, there is a fairly even split between forced labour (38%), sexual exploitation (32%) and other forms of exploitation (30%). For South Asia, 55% of detected cases are forced labour, and 30% of cases involve sexual exploitation. Most victims in South Asia are women, and boys comprise a quarter of all detected victims. Women and girls (in nearly equal shares) make up nearly 80% of detected victims in East Asia and the Pacific.

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5 UNODC, *Global Report on Trafficking in Persons 2024*, 2024, www.unodc.org/documents/data-and-analysis/glotip/2024/GLOTIP2024_BOOK.pdf

In **Europe and Central Asia**, sexual exploitation is the most common form of detected exploitation in Eastern Europe (84%), Central Asia (59%), and Central and South-Eastern Europe (50%). By contrast, forced labour is most common in Western and Southern Europe (39%), with an even split between forced labour (22%) and forced criminality (22%). Forced labour is also common in Central and South-Eastern Europe (30%) and Central Asia (20%). Adults make up most detected victims throughout all sub-regions but there are significant variations between sub-regions on gender and age. In Western and Southern Europe, there are more men victims (39%) than women (28%), and boys (24%) are more likely to be victims than girls (9%). In Central and South-Eastern Europe, women constituted nearly half of all victims, with more girls (28%) than men (20%). In Eastern Europe and Central Asia over 50% of victims overall are women. Victims in Eastern Europe are most likely to be women and girls (82%), whereas there is a higher percentage of men victims (34%) in Central Asia.

Data limitations

There are significant challenges in measuring the global and regional scale of modern slavery and human trafficking, although our ability to do so has improved over time. The nature of modern slavery means that it is mostly hidden from direct view, and the limited number of confirmed cases means that sample sizes used to estimate prevalence are small. Disparities in the way in which cases are screened, and data standards used by organisations, further cloud the data picture. The Global Estimates on Modern Slavery have limited coverage in certain regions and countries, and data collection and surveys are often impossible to conduct in conflict zones and areas experiencing profound instability[6].

The UNODC's *Global Report on Trafficking in Persons* presents trends based on reported cases as opposed to estimates. Challenges in identification and reporting may mean that the actual prevalence of less-detected forms of exploitation, in particular forced marriage, may be higher. Women and girls in forced marriages may simultaneously endure sexual exploitation, domestic servitude, and forced labour[7]. This overlapping exploitation, combined with inconsistent definitions and legal frameworks, can make the detection and recording of cases more challenging[8].

6 Walk Free, *Methodology behind the Global Slavery Index.* https://www.walkfree.org/global-slavery-index/methodology/methodology-content/
7 UNODC, *Interlinkages between Trafficking in Persons and Forced Marriage,* 2020. https://www.unodc.org/documents/human-trafficking/2020/UNODC_Interlinkages_Trafficking_in_Persons_and_Marriage.pdf
8 HEUNI, *"Never easy" – Enhancing response and support to victims of forced marriage: Best practice booklet 2024,* 2024, https://heuni.fi/documents/47074104/0/NEVER%20EASY%20Best%20practice%20booklet%202024.pdf/c7b5c619-77aa-ff90-2156-4342307c6808/NEVER%20EASY%20Best%20practice%20booklet%202024.pdf

Case study
Uganda's National Guidelines

Uganda's new National Guidelines on Care and Support for survivors of trafficking in persons were developed through a collaboration between NGOs and the Government.

Previously, the lack of centralised guidance and standards resulted in huge variations and discrepancies in care for survivors, depending on where they lived and what agencies they came into contact with. Lack of knowledge and coordination among and between certain agencies could sometimes undermine the care received by survivors or harm their recovery.

The new guidelines aim to improve this through a set of guiding principles and standard operating procedures, including for shelter services, case work, informed consent, appropriate physical and mental healthcare, trauma-informed counselling, material assistance, legal support, compensation, non-criminalisation, transnational cooperation (and where necessary repatriation), plus community or family re-integration.

Case study
Mateo's story

A South American family arrived in the UK on a tourist visa which expired in October 2022, after they were promised a better life, work and status in the UK.

Mateo*, the father of the family, was exploited and put to work under a different job than initially promised. He was working as a driver for a food-delivery app, under a false profile. He had no access to his own wages because his "boss" controlled the account. He was abused and his family was threatened and made to live in fear. What he had thought was a promising opportunity turned out to be trafficking.

After several months, Mateo disclosed his situation to a person from whom he rented a caravan, and the police were called. The police entered him into the National Referral Mechanism as a potential victim of human trafficking and the family were placed in a safe house in West Yorkshire.

Name changed to protect identity of the survivor.

Chapter 3:
A deepening, interconnected crisis

As of 2025, the global community faces a situation of "radical uncertainty"[1]. The combined threats of climate change, renewed geopolitical confrontation and armed conflict, and the socio-economic shocks derived from the COVID-19 pandemic, have destabilised governments and caused a significant increase in forced migration. Whereas addressing these deeply interconnected challenges requires the political will to adopt new strategic responses, the natural inclination of most governments is to address growing global threats one by one, adopting different and separate policy approaches to each. Yet these challenges do not exist in isolation from each other; on the contrary, they form an intricate web where action relating to one inevitably has consequences for the others.

Modern slavery and armed conflict are embedded within a wider set of global challenges. In turn, human trafficking and modern slavery themselves help to finance and sustain armed conflict, exacerbate socio-economic inequalities aggravate pollution and environmental degradation, and consequently drive forced displacement. Hence, if governments and other relevant national and international stakeholders want to tackle climate change, armed conflict, global inequality, and coercive and exploitative forms of migration, they also must respond to modern slavery and human trafficking – which are not only crimes in their own right, but drivers of these other growing threats. In this chapter we highlight the links between modern slavery, human trafficking, and this complex web of interconnected global challenges.

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1 Daunton, M., *The Economic Government of the World*, 1933-2023, p .x.

Forced displacement – a key driver

There are currently more people on the move without effective protection: by mid-2024 the number of forcibly displaced people had risen to 122.6 million[2]. One in every 69 people is now forcibly displaced, which is nearly double the proportion that was displaced just a decade ago[3]. More than half of these are displaced within their own country, with most others located in neighbouring countries[4]. Armed groups, criminal organisations and unscrupulous profit-seeking individuals prey on vulnerable people who are on the move, trafficking them for exploitative purposes. The implementation of restrictive cross-border policies often exacerbates this situation, as it pushes migrants to seek entry to destination countries via irregular and unsafe pathways, which further exposes potential victims to traffickers. Such restrictive policies can also preclude those vulnerable to modern slavery and human trafficking from accessing vital protection mechanisms following their arrival.

Climate change – a major push factor

Climate-induced disasters, environmental degradation, and scarcity of resources compel people to migrate in search of employment, sustenance or safety, which increases their risk of falling victim to modern slavery and human trafficking. At the same time, those unable to migrate out of the worst affected areas (especially women and children) may face increased exploitation within their home area, including debt bondage, child labour, and child marriage.

In 2021 alone, climate-related natural disasters led to the displacement of nearly 24 million people, and it is estimated that by 2050, 200 million people will have moved within their country's borders to escape the impacts of climate change[5]. Climate change-related phenomena have disruptive effects, especially on rural communities. Whether sudden-onset or slow-onset, the effects serve to *"worsen pre-existing socio-economic vulnerabilities, deepen exclusion and marginalisation, drive displacement and migration, and heighten the risk of contemporary slavery"*[6].

Sudden-onset natural disasters (for example, floods) can drive individuals into negative coping strategies such as forced marriage, forced labour and sexual exploitation. As the IOM points out, the mass displacement that characterises the immediate aftermath of unexpected natural disasters *"gives traffickers space to exploit affected people, and their desire for safety and search for means of income to help restore their lives"*[7].

Also, slow changes in climatic circumstances (e.g. droughts or coastal erosion) force people into pursuing risky migration strategies as they seek to diversify their livelihoods[8]. To cope with climate change-induced losses, affected populations are pushed into the hands of criminal actors, who may traffic and enslave them.

Climate-induced factors also tend to exacerbate existing patterns of exploitation within home communities. For example, in Nepal, climate change is intensifying challenges for people coming out of bonded labour: women and girls have to spend more time on domestic tasks such as collecting water and fuel, leading to more absences from school and heightened risks of child labour. Food shortages worsened by drought and unpredictable rainfall force children to drop out of school because education becomes an "unsustainable expense"[9]. While men may be exploited overseas, most of the women and children remain trapped in an increasingly unliveable environment. The districts where former Kamaiya and Harawa-Charawa bonded labour households live are highly flood-prone. Flooding moves families deeper into debt, forcing them to allow children to become labourers or to be trafficked to India[10]. Likewise, health issues are exacerbated by poor water quality, food shortages, heat exhaustion, cold waves and air pollution[11]. Furthermore, the need for money for treatment is a leading factor in trapping them in bonded labour[12].

Recent studies highlight a reciprocal relationship between modern slavery, human trafficking and climate change[13]: for example, the use of forced labour is pervasive in the world's most environmentally damaging industries such as the palm oil industry in Indonesia and Malaysia[14]. Just as climate change increases vulnerability to all forms of modern slavery and human trafficking, so too modern slavery and human trafficking are shown to be contributing to the climate crisis[15]. Industries such as logging, mining, brick making and fisheries make significant use of people in forms of modern slavery. It is estimated that if slavery were a country, it would have a population of 40 million people and would be the world's third largest emitter of CO_2, after China and the US[16].

2 UNHCR, *Refugee Data Finder*, https://www.unhcr.org/refugee-statistics
3 UNHCR, *Global Trends: Forced Displacement in 2023*, https://www.unhcr.org/global-trends-report-2023
4 UNHCR, *Refugee Data Finder*.
5 Walk Free, *Global Slavery Index 2023*, pp. 62–3.
6 O'Connell, C., *From a Vicious to a Virtuous Cycle: Addressing Climate Change, Environmental Destruction and Contemporary Slavery*, 2021, p. 2. See also Anti-Slavery International, https://www.climate-modern-slavery-hub.org/overview/
7 IOM, *The Climate Change-Human Trafficking Nexus*, 2016, p. 3.

8 IOM, *The Climate Change-Human Trafficking Nexus*, p. 3.
9 The Freedom Fund, *Education Case Studies 2024*, unpublished.
10 Nepal National Planning Commission, *Post Flood Recovery Needs Assessment*, 2017, and *Nepal Hotspot Report*, 2022; the Freedom Fund, *Emerging Forms of Exploitation*.
11 Wu, X., et al. 'Impact of Climate Change on Human Infectious Diseases: Empirical Evidence and Human Adaptation'. *Environment International*, 86, 2016, pp. 14–23.
12 Tied Hands, *Fact Finding Mission Report on Harawa-Charawa: Debt, Poverty and Climate Change in Dhanusha, Nepal*, 2021; Community Self-Reliance Centre, Forum Asia.
13 Climate Change and Modern Slavery Hub: Web platform bringing together evidence on the intersection of climate change, migration and vulnerability to modern slavery. Produced by Anti-Slavery International, IIED and OKUP. https://www.climate-modern-slavery-hub.org/
14 Fair Labour Association, *Assessing Forced Labour Risks in the Palm Oil Sector in Indonesia and Malaysia*, 2018, p. 2.
15 Hope for Justice, *Enhance Ambition, Enable Action: Tackling MSHT, a Crisis within the Climate Crisis: Hope for Justice Recommendations for COP 29*, 2024, p. 3.
16 Bales, K., & Sovacool, B., 'From Forests to Factories: How Modern Slavery Deepens the Crisis of Climate Change;' *Energy Research & Social Science*, 77, 2021, p. 3.

Case study

Anna's story

Karamoja is the most remote region of Uganda, with the country's highest rate of child labour and the lowest Human Development Index score. Climate change and unpredictable rainfall have exacerbated the financial instability of many families, especially those dependent on small-scale farming and cattle-rearing. Anna*, the oldest of seven siblings, grew up in an unstable and very poor family in Karamoja. They could not fund her education, so when a friend encouraged her to cross the border to Nairobi to find work, she was susceptible to this form of "peer trafficking". But those offering to transport the teenagers were linked to an organised criminal group, who used her for forced labour and sexual exploitation. Later, she was among a group of 10 girls rescued by Kenyan and Ugandan law enforcement and taken to a local shelter.

Name changed to protect identity of the survivor.

Slavery in the global economy is not limited to the polluting industries. Research has revealed that even renewable sectors responsible for ensuring the transition to clean energy, such as electric vehicle batteries and solar panel manufacturers, can also rely on forms of slavery[17]. For example, risks have been identified throughout the solar energy value chain, from forced and child labour in cobalt mines in the Democratic Republic of the Congo, to polysilicon in the Xingjian Uyghur Autonomous Region of China[18].

Climate change is also leading to widespread political instability and armed conflict – which in turn leads to heightened prevalence of modern slavery and human trafficking. In part, these issues are interconnected because, as climate change creates food insecurity and high food prices among rural and urban populations, many governments are facing increasing difficulty in preventing public discontent from turning into protests or violent upheaval.

Within regions, the struggle for access to dwindling natural resources leads to conflict between groups. For example, in 2018, Somalia experienced extreme weather, which disrupted access to water and exacerbated food insecurity[19]. The resulting internal displacement of the rural population towards Mogadishu fuelled clan tensions, which escalated into armed conflict, and the enslavement of civilians by armed groups.

17 Cranston, C., *The Unrecognised Intersections between Climate Change and Modern Slavery*, 2022, https://businessfightspoverty.org/the-unrecognised-intersections-between-climate-change-and-modern-slavery/
18 Cockayne, J., Huerta, E. R., & Burcu, O., *'The Energy of Freedom'? Solar energy, Modern Slavery and the Just Transition*, 2022, p. 4.
19 Kuele, G., & Miola, A. C., *Climate Change Is Feeding Armed Conflict in Somalia*, 2018, https://issafrica.org/iss-today/climate-change-is-feeding-armed-conflict-in-somalia

Armed conflict – a risk multiplier

Armed conflict disrupts both community and family networks; it destroys vital domestic and public infrastructures; it compromises vital public institutions and prevents the provision of essential services such as healthcare, education and poor relief; and it can lead to the displacement of entire communities. People who are forcibly displaced by major emergencies (including conflict) are considered to be more at risk of trafficking into forced labour or commercial sexual exploitation than people whose lives are more stable[20]. Among people affected and displaced by conflict, women and children are particularly vulnerable to human trafficking and modern slavery[21].

In certain situations of armed conflict, victims are caught within a combination of existing structural problems (including discrimination and poverty) and the violence caused by protracted conflicts across various regions. An example of this is the 80% of Nigerian women and girls who when moving to Europe were trafficked – with almost all coming from Edo State via Libya. The proliferation of armed groups in Libya following the collapse of Gaddafi's security apparatus in 2011 has allowed for the boom in the illicit economy, with people smuggling and trafficking as one of its main components[22]. Pre-existing arrangements and infrastructure for people smuggling and trafficking in the region have scaled up significantly to accommodate the increase in people moving, with systematic exploitation and violence against these migrants. Elements of European border management have been delegated to Libyan security actors, and these security forces have been found to be both facilitating the movement of people and then being funded to close down these same activities. The pattern results in migrants being detained and suffering extortion and exploitation by the security forces – with these payments from migrants then effectively funding Libya's conflict economy.

Countries which experience conflict and/ or significant displacement, and already have high concentrations of modern slavery, face a perfect storm. These include countries such as Afghanistan and the Democratic Republic of the Congo that are experiencing high levels of conflict; are hosting significant numbers of displaced people; and are already identified by the Global Slavery Index as being particularly vulnerable to modern slavery and human trafficking. Countries such as Turkey with significant conflict at their borders also have increased concentrations of modern slavery.

20 Currently we only have precise data for "migrant workers", who are considered to be three times more at risk. See Walk Free, *Global Slavery Index 2023*, 2023, p. 24.
21 Global Protection Cluster Anti-Trafficking Task Team, *An Introductory Guide to Anti-Trafficking Action in Internal Displacement Contexts*, 2020, pp. 1–2, https://globalprotectioncluster.org/publications/553/policy-and-guidance/guidelines/introductory-guide-anti-trafficking-action-internal
22 The rest of this paragraph draws on Chatham House, *Exploring the "Continuum of Violence" between Nigeria and Libya: How the Movement of People from Edo State Fuels the Libyan Conflict Economy*, 2024, https://www.chathamhouse.org/2024/07/tracing-continuum-violence-between-nigeria-and-libya/05-tracing-continuum-violence

Afghanistan has been in a permanent state of armed conflict since 1978, and there are currently 3,365,623 refugees, asylum seekers, internally displaced persons (IDPs), stateless people and other people of concern to UNHCR in Afghanistan alone[23]. Alongside this high level of conflict, there are currently an estimated 505,000 enslaved people out of a population of about 38.9 million[24]. According to the IOM, as of 2014, modern slavery in Afghanistan is found in agriculture, construction and small-scale industries; forced crime and soldiering; forced commercial sexual exploitation and sexual slavery[25]. Another widespread form of human trafficking identified by the IOM is forced marriage, which as of 2014 accounted for between 59-80% of all marriages in Afghanistan.

Turkey's large refugee population, of 3.3 million people[26], is due to its geographic location, bordering conflict-torn Syria and Iraq, as well as Kurdistan. This proximity of conflict-affected regions is closely linked with having approximately 1.3 million enslaved people within a population of 84.3 million – the highest prevalence of modern slavery in the whole of Eurasia[27]. Modern slavery in Turkey is particularly prevalent in sectors such as the garment industry, where sub-contractors with no official production facilities are informally and illegally employing 250,000-400,000 Syrian refugees[28].

The **Democratic Republic of the Congo (DRC)** provides a further example of the correlation between armed conflict, human trafficking and modern slavery. The DRC currently hosts 8,055,530 refugees, asylum seekers, IDPs, stateless individuals, and other people of concern to UNHCR, making this the fourth largest population in need of humanitarian protection in the world[29]. According to the Global Slavery Index, there are currently 407,000 enslaved people in the DRC, out of a population of 89.5 million[30]. Forms of modern slavery include forced industrial labour (predominantly in mining), commercial sexual exploitation of adults and children, and forced marriage[31]. It is worth highlighting that the indicated figure does not account for the number of children recruited as child soldiers in armed conflicts, which currently involve more than 100 armed groups in the DRC[32]. As illustrated in a joint IOM-ILO-Walk Free study of forced labour performed by IDPs in the North Kivu region, these conflicts are major drivers of human trafficking and modern slavery. Some 75% of the surveyed forced labour activities – fighting, spying, portering and providing support services to armed groups – are directly related to armed conflict[33].

What these country-level case studies illustrate is that armed conflict is a critical driver of forced displacement and forced migration, which in turn fuel modern slavery and human trafficking. As a further sign of how the issues of climate change, conflict and modern slavery fuel each other, a recent report by the Conflict and Environment Observatory and Scientists for Global Responsibility has found that the total military carbon footprint is currently approximately 5.5% of global emissions. If the world's militaries were a country, this figure would mean they have the fourth largest national carbon footprint in the world[34]. War itself is a major contributor to global warming: alongside the tragic loss of life in the Israel-Gaza conflict, according to a study by Queen Mary University, the emissions from the first 120 days of the war exceeded the annual emissions of 26 individual countries[35].

Organised crime – a market mediator

If we conceive of human trafficking as a criminal market – with a demand and supply of cheap products, domestic and sexual services – organised crime emerges as the key political-economic mediator, which manages this market[36]. Criminal organisations not only regulate and manage the supply of the goods and services provided by slave labour, but also the abduction and transfer of the victims of these exploitative practices. According to the Global Organised Crime Index, human trafficking constituted the largest criminal market in the world in 2021, and the second largest in 2022[37]. As the UNODC Director General pointed out, organised criminal groups were responsible for 74% of the human trafficking cases investigated by the agency[38]. Human trafficking is moreover deeply intertwined with other criminal markets such as drug trafficking and cybercrimes, which often involve the exploitation of trafficked individuals[39]. Human trafficking is therefore not a stand-alone criminal market: it is also essential for the functioning of other illicit markets.

23 UNHCR, *Annex 1 – Populations Protected and/ or Assisted by UNHCR by Country/ Territory of Asylum*, 2024. https://www.unhcr.org/refugee-statistics/insights/annexes/trends-annexes.html?situation=1
24 Walk Free, *Global Slavery Index 2023*, 2023, p. 118.
25 IOM, *Old Practice, New Chains: Modern Slavery in Afghanistan: A Study of Human Trafficking from 2003–2013*, 2013. p. 32.
26 UNHCR, *Global Trends 2023*, 2023, p. 20.
27 Walk Free, *Global Slavery Index 2023*, 2023, p. 132.
28 Tartanoglu Bennet, S., *Futures of Work*, 2020. https://futuresofwork.co.uk/2020/02/03/syrian-garment-workers-in-turkey-modern-slavery/
29 UNHCR, *Annex 1 – Populations Protected and/or Assisted by UNHCR by Country/ Territory of Asylum*, 2024.
30 Walk Free, *Global Slavery Index 2023*, 2023, p. 78.
31 Walk Free, *Modern Slavery in the Democratic Republic of the Congo*, https://www.walkfree.org/global-slavery-index/country-studies/democratic-republic-of-the-congo
32 Ibid.
33 IOM, ILO & Walk Free, *No Escape: Assessing the Relationship between Slavery-Related Abuse and Internal Displacement in Nigeria, South Sudan, and the Democratic Republic of the Congo*, 2022, p. 39.

34 SGR & CEOBS, *Estimating the Military's Global Greenhouse Gas Emissions*, 2022, https://ceobs.org/wp-content/uploads/2022/11/SGR-CEOBS_Estimating_Global_MIlitary_GHG_Emissions.pdf
35 Neimark, B., et al., *A Multitemporal Snapshot of Greenhouse Gas Emissions from the Israel-Gaza Conflict*, 2024, https://www.qmul.ac.uk/sbm/media/sbm/documents/Gaza_Carbon_Emissions.pdf
36 This understanding of human trafficking as a criminal market was suggested by Dr Zora Hauser in response to the keynote speech given by UNODC Director General Ghada Waly at Nuffield College on 30 January 2025.
37 Waly, G. *Human Trafficking and Criminal Exploitation in an Age of Change*, Nuffield College, University of Oxford, 30 January 2025, https://www.unodc.org/unodc/en/speeches/2025/300125-nuffield-college_-human-trafficking-and-criminal-exploitation-in-an-age-of-change.html
38 Ibid.
39 Ibid.

Chapter 4:
The global response so far

Despite significant global efforts to tackle modern slavery and human trafficking, the number of people affected by these crimes continues to increase. Systems of slavery are embedding themselves more deeply into global supply chains, into regions facing humanitarian crises, into refugee and migrant flows, as well as into areas most affected by the climate crisis. Collectively, we are failing. With increased attention to the insights of slavery survivors as well as steadily improving data on the scale and nature of modern slavery, we can witness this failure with painful clarity.

However, this chapter shares examples of what can be done to uproot these systems and to create resilience, with collateral benefits across economies and societies. We offer examples of strategies and approaches that have been found to be effective, based on the different responsibilities of government, business and civil society.

Key efforts in addressing modern slavery and human trafficking

Eliminating modern slavery requires a coordinated effort from multiple key players across various sectors and involving stakeholders at local, national, regional and international levels. In recent years, responses by some of these stakeholders have begun integrating ideas and feedback from survivors and from affected communities. This is crucial because, for example, when these communities are closely involved in designing anti-trafficking projects, or when survivors participate in training law enforcement, these efforts are more likely to be relevant, sustainable and effective. Also, with leadership at each level by people who have expertise based on their direct experiences, we can envision a much stronger movement.

Responses by civil society organisations and survivor organisations

Civil society organisations (CSOs) play a pivotal role in anti-slavery and anti-trafficking response and prevention, either independently or in cooperation with IOs and government bodies such as labour ministries, law enforcement agencies and social welfare institutions. CSOs run mobile victim-identification teams and early warning mechanisms, participate in labour inspections, collect data, manage shelters and victim re-integration programmes, advise governments on the improvement of anti-trafficking responses, inform and educate potential victims about their rights as workers and citizens, facilitate reporting and access to justice, and provide legal assistance. In areas particularly affected by ethically and religiously motivated tensions and armed conflict, CSOs also act as cultural mediators in the effort to prevent discrimination, which may lead to modern slavery and human trafficking. Furthermore, multiple types of survivor organisations are emerging, from alliances that provide expertise to collectives influencing national policies, to mutual support groups helping each other access compensation and essential services. All have a vital role and have the potential to transform the current movement against modern slavery, helping to elevate the issue to much greater prominence.

Responses by international and humanitarian organisations

Building on the UN's foundational work through the Universal Declaration of Human Rights and on the other relevant international conventions described above, the United Nations has played an important role through its Global Plan of Action to Combat Trafficking in Persons, which promotes international cooperation and victim protection. This initiative encourages Member States to adopt a victim-centred approach, ensuring that survivors receive adequate support, including medical care, psychological counselling, and assistance with re-integration into society. However, this Global Plan of Action has not yet received the attention it deserves. There are a range of significant initiatives undertaken by UN bodies. For example, the UN Office on Drugs and Crime (UNODC) has established a global database on human trafficking cases, facilitating information sharing and analysis across countries[1].

In addition, issues of modern slavery are embedded in the Sustainable Development Goals, including SDG 8.7, which commits governments and the global community to take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.

Various UN bodies address forms of modern slavery, according to their particular missions and mandates:

- **ILO –** As well as having lead responsibility for UN conventions on forced labour and being the chief promoter of tripartite cooperation between government, business and labour, the ILO collects data on forced labour and forced marriage; provides Member States with guidelines and toolkits for the detection of forced labour in supply chains; and assists Member States in the development of national action plans for its eradication.
- **UNODC –** As well as having lead responsibility for the Palermo Protocol, UNODC assists governments in designing effective laws, policies and interventions against human trafficking, trains practitioners in justice, health, law enforcement and other fields, and carries out research, which constitutes the groundwork of the agency's Global Report on Trafficking in Persons.

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1 UNODC Human Trafficking Case Law Database: https://www.un.org/en/development/desa/population/events/pdf/11/Info_Sheet_CLD_UNODC.pdf

- **UNHCR –** As the key UN agency in charge of refugee protection, UNHCR focuses on the provision of protection to potential victims of human trafficking by leading the Global Protection Cluster (**GPC**) and through its Anti-Trafficking Task Team, which coordinates national anti-trafficking responses.

- **IOM –** As the UN agency tasked with ensuring safe migration, the IOM works to protect people at risk of trafficking, to help enhance anti-trafficking responses by Member States, the private sector and civil society, and to improve the livelihood of former victims.

- **OHCHR –** As the UN office tasked with ensuring Member States' adherence to the Universal Declaration of Human Rights, including Article 4 on the eradication of slavery in all its forms, the OHCHR relies on its Special Rapporteur on Trafficking in Persons and its Special Rapporteur on Contemporary Forms of Slavery, who take action on relevant rights violations – notably in the context of armed conflict – and who publish specific reports on these issues.

- **OCHA –** As the UN's focal point for humanitarian action, OCHA relies on its Humanitarian Coordinators (HCs) – often based in affected countries – to coordinate the efforts of various humanitarian actors, including UN agencies, NGOs and national governments. HCs can play a crucial role, therefore, in coordinating responses to emergencies, including addressing the risks of human trafficking and other forms of exploitation, particularly for the most vulnerable.

- **UNDP –** As part of its work to achieve Sustainable Development Goals 7 and 8 on decent work and economic growth, UNDP manages the Sustainable Finance Hub and the Finance Against Slavery and Trafficking (FAST) Initiative in partnership with the Permanent Mission of Liechtenstein, and has recently published an extensive report on how corruption constitutes an underlying cause and facilitating tool for practices arising from forms of modern slavery.

- **ICAT –** In addition to the GPC, there are also inter-agency initiatives spanning different UN bodies, in particular ICAT, a policy forum mandated by the General Assembly to improve coordination among UN agencies and other relevant IOs to facilitate a holistic and comprehensive approach to preventing and combating trafficking in persons. ICAT provides a platform for exchanges of anti-trafficking experiences and good practices; and promotes the effective use of existing resources, using, to the extent possible, existing regional and national mechanisms.

This list is by no means exhaustive, but nevertheless gives a sense of the range of existing responses to and engagement with modern slavery and human trafficking from specific UN agencies.

Alongside UN bodies, multiple international development agencies, anti-slavery organisations and humanitarian agencies have a growing understanding of the importance of protecting people from modern slavery, as part of their mandates.

Roles for UN and international organisations include:

- Mobilising resources and channelling funds to national and local initiatives.
- Offering technical assistance and capacity building support to countries.
- Protecting vulnerable populations, including refugees and migrants, especially in conflict areas.
- Ensuring that populations most at risk of modern slavery are reached and fully included in climate adaptation programmes and in the UN's loss and damage funding.
- Facilitating regional cooperation.
- Developing international conventions and protocols and setting standards for combatting modern slavery and human trafficking.
- Providing platforms for sharing best practices.
- Producing research and evidence to inform policymaking and highlight emerging trends.

Agencies working in humanitarian crises have a special responsibility to help prevent modern slavery and human trafficking in these contexts of heightened risks. To strengthen anti-slavery protections by these agencies, it is important that risks of exploitation are given prominence and resources within the UN-led Protection Clusters. These are the national or regional coordination networks that bring together relief agencies during these crises to share information and respond to all kinds of civilian protection needs. To address this need, with support from the Protection Clusters, humanitarian agencies need to firstly ensure that training to identify trafficking reaches the frontline workers and peacekeeping forces, and that they are clear on how to respond. In addition, recently, there has been a greater recognition of the effectiveness of working with locally-based grassroots organisations, noting that even in refugee and IDP camps or after a disaster in the affected locations, trained community members are often able to take action to protect each other, to raise awareness and to report on cases of exploitation.

Given this persistent local capacity, there are examples of funders enabling financial support to go directly and immediately to such groups, with few strings attached.

Given the demands on humanitarian agencies, guidance on good practices in relation to modern slavery and trafficking is important. The UN's Global Protection Cluster is a useful source for this. This global network brings together NGOs, international organisations and UN agencies engaged in protection work in humanitarian crises. Its mandate includes addressing risks of forced labour and trafficking during armed conflict and other disasters. It assists regional and in-country Protection Clusters that are operating in different crisis contexts. As part of this, it has produced an *Introductory Guide to Anti-Trafficking Action in Internal Displacement Contexts 2020*. The manual offers guidance on all phases of crisis, including in preparedness efforts, throughout acute and protracted crisis situations, during stabilisation and in recovery phases. The Guide is intended for all humanitarian practitioners who may come into contact with trafficking situations. It focuses on initial identification of victims, verification by interview, case management and referral to services[2].

Responses by national governments & regional inter-governmental bodies

Many countries have strengthened their legal frameworks in recent years, criminalising human trafficking, increasing penalties for offenders, and starting to create frameworks for corporate accountability on modern slavery. These legislative measures aim to create a more robust deterrent effect and provide law enforcement agencies with the necessary tools to prosecute traffickers. Some nations have also introduced training programmes for judges, prosecutors and police to enhance their capacity to handle modern slavery and human trafficking cases effectively.

Additionally, some governments have made efforts to ensure that welfare support and social protection are reaching those most at risk (for example, through school meals programmes or informal sector workers' insurance schemes) and to address root causes of vulnerability. However, most countries have had difficulties in implementing their laws and policies due to limited budgets and human capacity, especially in the local areas where exploitation is most concentrated.

Awareness campaigns have been launched to educate the public and potential victims about the risks and signs of trafficking. These efforts disseminate information through various social media, public service announcements, and community outreach programmes. These campaigns aim to reduce vulnerability and encourage reporting of suspected cases.

Within government-supported services the following types of agencies have special responsibilities and opportunities:

- **Law enforcement agencies and labour ministries:** Setting up specialised units can enable law enforcement officials to handle the complexities of trafficking cases. To be effective, police, prosecutors and judges need to ensure that the safety and basic needs of victims are the highest priority. Law enforcement need specialist expertise in financial investigations to trace and seize traffickers' assets; in digital forensics; and undercover operations. They also need cross-border collaboration to dismantle international trafficking networks. Judicial systems in most countries need additional training to improve understanding of trafficking issues and the factors that enable survivors to be able to testify accurately. Labour ministries collect data and conduct inspections aimed at identifying reliance on forced labour within national and international supply chains. They also promote and protect freedom of organisation and collective bargaining rights, and ensure business compliance with national and international health and safety standards.

- **Educational institutions:** Schools are a vital frontline protective factor for children, and teachers need to be watchful for children dropping out, going missing, or showing signs of exploitation. Schools and universities can incorporate modern slavery awareness into curricula as well as developing specialist courses. They can conduct research within and between multiple disciplines to inform evidence-based interventions.

- **Trade Unions:** Trade unions empower employees to organise and stand up for their basic rights as workers in terms of wages, working hours, health and safety, with the overall aim of safeguarding the workplace from exploitation. Unions also promote the workers' participation in the management of businesses, governmental bodies, and international organisations. In the absence of effective government regulation of potentially exploitative economic activities, trade unions can provide workers with the "countervailing power" necessary to combat and prevent exploitation.

- **Healthcare providers:** Healthcare workers play a critical role in identifying and assisting trafficking victims. They need training to recognise signs of trafficking, provide trauma-informed care, and connect victims with appropriate support services. This involves using protocols for screening patients and ensuring confidentiality. Mental health professionals are particularly important in helping survivors recover from the psychological impacts of being trafficked. They need specialised training in treating complex trauma, cultural competence, and long-term recovery support.

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2 Global Protection Cluster, *Human Trafficking: The Issue.* https://www.globalprotectioncluster.org/index.php/issues/anti_trafficking

- **Departments responsible for migration and for support for refugees:** As noted in Chapter 3, governments should consider whether specific restrictions in their migration policies and practices are pushing migrants or asylum seekers into the hands of traffickers, for example through visas tied to only one employer, or punitive use of detention against asylum seekers. Relevant departments should promote safe and orderly migration through providing a range of safe migration pathways both for those seeking asylum and for those seeking work. These departments should take part in regional inter-governmental processes to enable all governments to meet their obligations under international law while sharing responsibilities equitably between countries. Relevant departments in migrant-sending countries should implement a wide range of policies to protect their citizens working abroad.

Several governments have recently adopted measures to curb slavery in business supply chains:

Australia has passed the Modern Slavery Act, which requires companies with a consolidated revenue of over AU$100 million (approx. US$67 million) per year to report on modern slavery risks in their supply chain and actions they are taking to respond.

Norway, France, Switzerland and Germany have implemented mandatory Human Rights Due Diligence (mHRDD) legislation, which holds businesses accountable if they fail to identify and act upon the actual and potential risks for workers in their operations and supply chains, including the risk of forced labour. The strongest mHRDD legislation includes penalties for a company's failure to prevent forced labour in supply chains and includes a right of action for those who have been impacted.

The **United States** has implemented import controls, such as the Tariff Act and the 2021 Uyghur Forced Labour Prevention Act to prevent entry of goods produced by forced labour.

The **United Kingdom** has used Magnitsky legislation to impose travel bans and sanctions on individuals who exploit forced labour.

The **Democratic Republic of the Congo (DRC)** has created a regulatory authority to tackle child labour in cobalt and coltan mines.

Responses by the private sector and finance institutions

Good practices by businesses to protect their enterprises from modern slavery include:

- Stabilising their supply chains, so they can work positively with suppliers over time, understanding the true costs of production including living wages for workers

- Proactively cooperating with national regulations requiring companies to disclose their efforts to eradicate slavery from their supply chains

- Having robust systems for due diligence in their second and third tiers of production, including worker-led approaches to identifying and remediating poor working conditions and recruitment processes, and upholding labour rights

- Disclosing the full range of suppliers and publishing transparency reports

- Ensuring that production processes and extraction of raw materials do not contribute to climate change and environmental degradation, which would also exacerbate risks of modern slavery.

Industries such as hospitality, transportation, and technology can also contribute by training staff to recognise signs of trafficking and implementing reporting protocols.

Financial institutions are key players in detecting and preventing slavery-related transactions. By implementing robust anti-money-laundering measures and collaborating with law enforcement, banks and other financial services can help disrupt trafficking operations and trace illicit funds. Investment institutions and pension funds can use their financial power to incentivise businesses to undertake the good practices mentioned above, and to exclude negligent actors from access to investment. Financial institutions can also play a role in supporting survivors by providing access to banking services.

Worker-Driven Social Responsibility – programmes to tackle exploitation at sea

In order to monitor labour standards in business supply chains, retailers have often relied on third-party social audits. However, tragedies such as the Rana Plaza collapse in Bangladesh and multiple revelations of slavery within audited supply chains have highlighted serious weaknesses, significantly undermining confidence in social auditing. The concern is that these monitoring systems have tended to reassure businesses and consumers but have not created spaces where workers can safely report on their real conditions.

Worker-Driven Social Responsibility (WSR) is emerging as an effective alternative for both monitoring and actually improving conditions. It has been successfully tested in several different complex supply chains, especially through the Fair Food Program. Key aspects of WSR are:

- Enabling producers and buyers to sign up to legally binding agreements to implement a worker-informed "Code of Conduct" outlining protections for workers. This agreement includes a willingness to suspend purchases from producers failing to comply with the Code of Conduct. It creates a market incentive for fair labour practices.

- Through their purchasing, buyers ensure that the price they pay translates into decent wages for the workers and that suppliers are assisted to meet the labour standards.

- The Code of Conduct covers issues such as hours of work, freedom from retaliation, and health and safety measures.

- WSR relies on providing properly resourced worker-to-worker education, so that workers know their rights and understand the Code of Conduct.

- Independent auditing gives priority to first-hand safe feedback from workers, giving them an effective voice in protection of their rights.

- When workers suffer a potential violation, they have access to a fast and effective complaints process, with a trusted agency investigating and working for a resolution.

The Brazilian Government's Special Mobile Inspection Unit

One of the good practice models supported and shared by the ILO is the Brazilian Federal Government's Special Mobile Inspection Unit, originally created in June 1995. The functioning of this unit addresses the challenges sometimes experienced by local police forces around the world that are tackling forms of modern slavery. It especially works to overcome risks of corruption, lack of support by higher authorities, and difficulties delivering rapid and tangible assistance to survivors. Since 1995, it has rescued more than 55,000 workers from slave labour.

The Brazilian Mobile Inspection Unit organises squads of labour inspectors and federal police officers, accompanied by labour judges, with the task of investigating allegations of forced labour on work sites, often rural farms or ranches, including in remote areas of the Amazon. These Federal inspectors do not operate in their own state of residence, which helps with their personal safety as well as their independence from local pressures. The presence of the labour judges means that prosecution can begin on site, and workers often receive compensation for back wages as well as documentation for social security on the spot.

Evaluations of this unit have pointed to two main criteria for effectiveness: centralised organisation and secrecy in planning, so that news of inspection raids does not reach the managers or landowners in advance, enabling the employers to disperse workers or to cover up the situation. Although funding for the squads was reduced and their role severely curtailed during earlier governments, more recently, in some cases the squads have been operating in coordination with the government's environmental inspection units, so that crimes of slave labour and environmental damage (such as illegal logging) can be tackled more effectively.

Vulnerability to modern slavery & human trafficking: who is affected?

Understanding vulnerability to modern slavery and human trafficking is essential if we are to eradicate these crimes. By focusing on vulnerability the Global Commission will better understand what makes people susceptible to exploitation, and will be better able to help develop policies and interventions that mitigate risks, address the specific needs of at-risk populations, and facilitate preventive action against modern slavery and human trafficking.

How do we define and understand vulnerability to modern slavery and human trafficking and their risk factors?

The United Nations defines vulnerability as "a condition resulting from how individuals negatively experience the complex interaction of social, cultural, economic, political, and environmental factors that shape their communities"[1]. These **risk factors** compound in a way that means a person is less able to protect themselves from exploitation, thus increasing the likelihood of modern slavery and human trafficking.

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1 UNDRR, *Definition: Vulnerability.* https://www.undrr.org/terminology/vulnerability

Risk factors can be **structural**, such as the weakness of public institutions, while others are intertwined with more **dynamic** circumstances, such as the sudden outbreak of ethnic violence. Some risk factors that increase the likelihood of modern slavery and human trafficking are also drivers of other crimes, including smuggling, drug trafficking, sexual and child abuse, and atrocity crimes. Other risk factors are more specific to modern slavery and human trafficking, or to either of the two.

The Inter-Agency Coordination Group against Trafficking (ICAT) categorises risk factors into three types:

1. **Personal factors:** inherent traits such as age, gender, and ethnicity.
2. **Situational factors:** temporary challenges such as destitution, illness, unemployment and legal status.
3. **Contextual factors:** external influences such as crisis contexts, discriminatory laws, policies and social norms.

Vulnerability indicators help to measure how present each risk factor is in a given situation. Effective vulnerability risk assessments need accurate and reliable data based on these risk factors and indicators.

Who is most vulnerable?

Victims of modern slavery and human trafficking victims can be any age, nationality, gender or background, but these crimes disproportionately affect individuals and groups who are disadvantaged, marginalised and discriminated against. Victims are therefore found among the poorest strata of society, as well as within those groups that are structurally underprivileged and marginalised on the grounds of their ethnicity, disability, age, caste, sexual identity or gender identity.

Undocumented migrants who flee their countries because of economic hardship, political and ethnic persecution, armed conflict and climate change are also particularly vulnerable. The same applies to stateless people and internally displaced persons (IDPs). Traffickers take advantage of this wide range of vulnerabilities by resorting to false promises, debt bondage or violent abduction, in order to coerce victims into exploitation.

Vulnerability to modern slavery and human trafficking is increasing

When people are displaced by conflict or natural disaster (either within the crisis-affected country or in neighbouring countries) they lose their livelihoods and any resilience they previously had, thus compounding the risk of modern slavery and human trafficking. Data on the impact of global events and macro trends suggests that vulnerability to modern slavery and human trafficking is increasing. Recent crises such as armed conflicts, natural

disasters, economic shocks and pandemics have contributed to a new wave of forced population displacement, which has significantly increased individual and collective vulnerability to modern slavery and human trafficking. According to UNHCR, 117.3 million people were forcibly displaced by the end of 2023, and this figure rose to 122.6 million – a 5% increase – by mid-2024[2]. As the 2023 Global Organized Crime Index points out, "an enormous portion" of these people have turned to smugglers "to help them escape challenging circumstances", hence increasing the likelihood of trafficking and exploitation[3].

The 2023 Global Slavery Index identified armed conflict – now surging at a level unprecedented since the Second World War – as a primary driver of vulnerability to modern slavery and human trafficking[4]. Armed conflicts such as those in Ukraine, Gaza, Sudan and Ethiopia are disrupting communal and family networks, compromising vital public institutions, preventing the provision of essential welfare and healthcare services, and driving the forced displacement of entire communities. Countries (and their neighbours) which experience conflict and significant displacement figure quite highly on the Global Slavery Index. These include the previously mentioned national case studies of Afghanistan, Turkey and the Democratic Republic of the Congo (DRC)[5]. What these country-level case studies illustrate is that armed conflict is a critical driver of increased forced displacement and forced migration, which in turn fuel further vulnerability to modern slavery and human trafficking.

Poverty, exacerbated by the COVID-19 pandemic, also remains a significant driver of exploitation. According to UNDP, recovery of pre-pandemic Human Development Index (HDI) levels among the least developed countries by 2023 has been highly unequal, as 51% of the least developed countries were unable to recover[6]. As a result, "divergence between the very high and low human development index groups of countries, after decades of convergence, is going up"[7]. UNDP's data shows that at least 4 of the top 10 countries with the greatest prevalence of modern slavery – Eritrea, Mauritania, Tajikistan and Afghanistan – figure among the bottom 50 least developed UN Member States[8]. The top five countries with the highest vulnerability to modern slavery in Africa – Eritrea, Mauritania, South Sudan, the DRC and Nigeria – also belong to this group[9]. UNDP identifies inadequate responses to COVID-19, "tentative progress on mitigation of climate change" and the increased spread of armed conflict as the key drivers of the recent poverty surge in the least developed countries[10]. This further suggests that armed conflict, climate change and global pandemics figure highly among the disruptive forces that drive vulnerability to modern slavery and human trafficking.

2 UNHCR, *Global Trends: Forced Displacement in 2023*, 2023, p. 2; UNHCR, *Mid-Year Trends, 2024*, p. 5.
3 Global Initiative against Organized Crime, *Global Organized Crime Index 2023*, 2023, p. 28.
4 Walk Free, *Global Slavery Index 2023*, 2023, pp. 60–1.
5 See Chapter 3, pp. 36-7.
6 UNDP, *Human Development Report 2023/2024*, 2024, p. 4.
7 Ibid., p. 28.
8 Walk Free, *Global Slavery Index 2023*, 2023, p. 25; UNDP, Human Development Insights, https://hdr.undp.org/data-center/country-insights#/ranks
9 Walk Free, *Global Slavery Index 2023*, 2023, p. 78; UNDP, *Human Development Insights*, https://hdr.undp.org/data-center/country-insights#/ranks
10 UNDP, *Human Development Report 2023/2024*, p. 28.

Although data on global events and macro trends suggests that vulnerability to modern slavery and human trafficking is increasing, we don't yet know enough about how and why it is increasing, where vulnerability is highest, who is most vulnerable, and therefore how most effectively to target interventions to prevent it.

The Global Commission's Prevention Framework will help to improve our understanding of vulnerability and how to prevent it

In July 2014, Adama Dieng, United Nations Under-Secretary-General and Special Adviser for the Prevention of Genocide, developed a Framework of Analysis for Atrocity Crimes. This Framework is internationally recognised as an important tool to help identify where there is a risk of atrocity crimes happening, and to guide preventive approaches.

Inspired by this model, the Global Commission has created a new Prevention Framework, which adapts existing frameworks to provide an integrated analysis and risk assessment tool for modern slavery and human trafficking. The Framework also draws on the 2020 International Organization for Migration (IOM) framework on managing human trafficking information in emergency contexts. The Framework is published as a separate document alongside this report[11].

The Global Commission's Framework differs from other approaches by focusing on individual, family and community risk factors, and also by providing clear indicators to identify the root causes of trafficking. While similar to the IOM's 2020 framework on human trafficking information management, the Global Commission's Framework goes further by offering a comprehensive tool for field analysis and prevention. The Framework has two main purposes: to identify the key risk factors and indicators that increase people's vulnerability to modern slavery and human trafficking; and to act as a guide for strengthening preventive action by national, regional and international actors involved in the policy making process.

The Global Commission recommends its use with the aim of helping to:
- Identify potential victims including through targeted efforts in high-risk communities and locations
- Develop an understanding of the cultural and societal norms that push people into exploitation
- Develop more effective, targeted strategies to prevent and respond more effectively to these crimes

- Develop an understanding of how vulnerable individuals, communities and groups can be provided with viable, legal and safe alternatives to unreliable, illegal and unsafe survival strategies that may lead to trafficking and exploitation
- Train staff in CSOs, multilateral organisations, businesses and governments to become aware of and alert to the circumstances that increase vulnerability to these crimes.

Contextualising vulnerability: risk factors and indicators in the Global Commission's Framework

The Global Commission's Framework identifies nine key risk factors that increase people's vulnerability to modern slavery and human trafficking. These risk factors were selected because they represent common and critical conditions that increase vulnerability to modern slavery and human trafficking. The indicators beneath each risk factor help to assess the presence and severity of these conditions in specific contexts, making the Framework a valuable resource for policymakers and humanitarian actors.

Below is a summary of the nine risk factors in the Global Commission's Framework. Further detail, including vulnerability indicators, can be found in the Framework document published alongside this report.

General risk factors:
- Situations of armed conflict and instability
- Record of serious violations of human rights
- Weakness of state structures

Specific risk factors:
- Vulnerabilities arising from personal/ family background
- Established cultural practices and behaviours
- Extreme poverty, deprivation and harsh living environments
- Displacement, smuggling and the breakdown of family networks
- Lack of effective humanitarian protection
- Poor border controls, law enforcement and prosecution of victims

11 Thompson, A., Vagge, C., & Tiburcio-Carneiro, M., *Framework of Analysis on Modern Slavery & Human Trafficking: A Tool for Prevention*.

Chapter 6:

Effective implementation of international commitments and national legislation

I. Executive summary

The Global Commission is making four main recommendations to ensure the effective implementation of international commitments and of national legislation on modern slavery and human trafficking.

- **Member States of the United Nations who do not have domestic legislation enacting their international legal obligations on slavery should enact such domestic legislation**
- **Those Member States that have inadequate domestic legislation should revise it to make it comprehensive and reflect their international obligations in full**
- **All Member States should ensure they have effective arrangements in place to enforce the legislation**
- **The United Nations should assist Member States by:**
    - a) **Establishing a legal definition of modern slavery and human trafficking which could be used in domestic legislation. This should cover all forms of modern slavery and human trafficking i.e. including related activities such as servitude and the slave trade**

b) Ensuring that the 15th Session of the Working Group on Trafficking in Persons under the United Nations Convention Against Transnational Organized Crime opens a dialogue on the value of strengthening/revitalising the Palermo Protocol. This should be a standing annual agenda item.

These recommendations are elaborated at the end of this chapter, with relevant actions.

This chapter sets out the legislative background to efforts to address modern slavery and human trafficking. The world has not been lacking in international agreements to end slavery and human trafficking. What has been lacking is effective domestic legislation to ensure the implementation of those international commitments. We consider the barriers to effective action, including issues around the enforcement of legislation, as well as the advantages and disadvantages of different legislative approaches.

II. The legislative background

The United Nations Universal Declaration of Human Rights, which was adopted in December 1948, is not only the bedrock of the United Nations; it also serves as a key document for legislation and practice in addressing the issue of modern slavery and human trafficking. The Declaration is absolutely clear in its admonitions and in its expectation of state action. In Article 4 it states that *"No one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms"*[1].

This is the first Article in the Declaration that defines an action which shall be prohibited. The prominence of this Article shows both the concern that was felt at the time about the issue of slavery and the determination of United Nations Member States to deal with the issue.

The adoption of the UN Declaration was not the first time that states had come together to express their intent to deal with slavery and the slave trade. The signatories to the General Act of the Brussels Conference of 1889-90 had declared their intention to put an end to the trafficking of African slaves. The Convention of St-Germain-en-Laye in 1919 set out an intention to achieve the complete suppression of slavery in all its forms, and the end of the slave trade by land and sea.

Then in 1926 the League of Nations (the predecessor of the United Nations) recognised that practical effect needed to be given to the 1919 Convention, and therefore more detailed steps needed to be agreed for the ending of slavery and the slave trade. This led to the 1926 Slavery Convention in which the contracting parties agreed in regard to the territories over which they had responsibility:

a) *To prevent and suppress the slave trade;*

b) *To bring about, progressively and as soon as possible, the complete abolition of slavery in all its forms*[2].

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1 Universal Declaration of Human Rights, 10 December 1948, General Assembly Resolution 217A.
2 The Convention to Suppress the Slave Trade and Slavery, League of Nations, adopted 25 September 1926.

The League of Nations collapsed, and in its place the United Nations was formed. The United Nations describes its Universal Declaration of Human Rights as *"a milestone document in the history of human rights. Drafted [...] as a common standard of achievements for all peoples and all nations. It sets out, for the first time, fundamental human rights to be universally protected"*[3].

Clear though the Declaration was, it was not the last time that agreements were made at the international level to stop slavery and human trafficking in all or some of its forms. In 2000 what has become known as the Palermo Protocol was agreed by the United Nations. This is the "Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime".

The Protocol states that its purposes are:

a) *To prevent and combat trafficking in persons, paying particular attention to women and children;*

b) *To protect and assist the victims of such trafficking, with full respect for their human rights; and*

c) *To promote cooperation among States Parties in order to meet those objectives*[4].

This Protocol forms the basis for the domestic legislation of a number of states, but not all have adopted its provisions in their totality. The role of the Palermo Protocol is considered further in section VI. iii.

In 2015 all United Nations Member States adopted the 2030 Agenda for Sustainable Development. The 17 Sustainable Development Goals are due to be achieved by 2030. Goal 8 relates to economic growth, full and productive employment and decent work for all. Target 8.7 is to *"End modern slavery, trafficking and child labour"* and commits to *"Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms"*[5].

The target to end child labour in all its forms by 2025 has clearly not been met. Moreover, the most recent UN report on progress against the Goals shows regression in relation to child labour. That report did not address the wider target in relation to modern slavery and human trafficking, but it is clear that we are not currently on track to meet the 2030 target[6].

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3 United Nations website.
4 United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention against Transnational Organized Crime, adopted 15 November 2000, General Assembly Resolution 55/25.
5 2030 Agenda for Sustainable Development adopted at the United Nations Sustainable Development Summit, 25 September 2015.
6 United Nations, *The Sustainable Development Goals Report*, 2024.

While not a convention, in 2017 during the 72nd meeting of the United Nations General Assembly a "Call to Action to End Forced Labour, Modern Slavery and Human Trafficking" was launched by the UK. This cited a number of areas in which the signatories committed to use their endeavours to deal with the issues of modern slavery and human trafficking, in order to achieve Sustainable Development Goal Target 8.7. These included to:

- *Develop and publish national strategies*
- *Strengthen law enforcement and criminal justice responses*
- *Put victims first*
- *Eradicate forced labour, modern slavery, human trafficking, and the worst forms of child labour from our economies,* and to
- *Strengthen cooperation regionally and internationally* [7].

A number of legislative approaches and conventions have also been agreed over the years at regional level. The following are examples.

The African Charter adopted by the Organization for African Unity in 1981 states that *"All forms of exploitation and degradation of man particularly slavery, slave trade, torture, cruel, inhuman or degrading punishment and treatment shall be prohibited"*[8].

In 2011, the European Union adopted Directive 2011/36/EU *"on preventing and combating trafficking in human beings and protecting its victims"*. This is described as *"establishing minimum rules concerning the definition of criminal offences and sanctions in the area of trafficking in human beings"*. It also introduces common provisions, taking into account the gender perspective, to strengthen the prevention of this crime and the protection of the victims thereof[9].

This was amended by *Directive (EU) 2024/1712, which* criminalised *"the use of a service provided by a victim of trafficking in human beings when the user of the service has knowledge that the person providing the service is a victim"*[10].

In 2024 the EU adopted the *Directive on corporate sustainability due diligence*[11] which will ensure that those companies which are in the scope of the Directive identify and address adverse human rights (including forced labour) impacts of their actions inside and outside Europe, in their operations and across their global supply chains.

III. Why do we need to act now?

With all of these international agreements it would be easy to assume that modern slavery and human trafficking is being eliminated around the world. Sadly, this could not be further from the truth. As has already been referred to in Chapter 2, the most recent piece of work on the number of people in slavery, the Global Estimates of Modern Slavery produced by the International Labour Organization (ILO), the International Organization for Migration (IOM) and Walk Free, shows that there were 50 million men, women, boys and girls in slavery of some form around the world in 2021[12]. That translates to almost 1 out of every 150 people in the world being in slavery.

What is even more shocking is that this figure shows an increase of 10 million on the previous figure, from the same sources, in 2016. The research also shows that being enslaved can last for years.

To compound the problem, we have grounds for believing that people's vulnerabilities to modern slavery and human trafficking are increasing. This is the result of a number of factors, such as climate change, displacement of people and conflict, all of which are discussed elsewhere in this report.

The majority of the 50 million people – 54% – are women and girls and over one-fifth – 12 million – are children.

Of the 50 million, some 27.6 million are in forced labour. This is an increase of 2.7 million on the previous figure and shows a rise in the prevalence of forced labour. About 12% of those in forced labour are children but, as admitted in the Global Estimates, because of data constraints these figures may be *"just the tip of the iceberg"*[13]. This brings into sharp relief the failure of the world to meet its target of ending modern slavery among children by 2025. It should also be noted that the estimates suggest that nearly four million people are in state-imposed forced labour at any point in time.

The Global Estimates also show a rise in the number and prevalence of men, women and children in forced marriage. Over two-thirds of those forced into marriage are female. Forced marriage also brings greater risk of sexual exploitation, violence, domestic servitude and other forms of forced labour. These further abuses may take place outside the home as well as within it.

7 UK Government 'Call to Action to End Forced Labour, Modern Slavery and Human Trafficking'. 2017. https://assets.publishing.service.gov.uk/media/5bfd164440f0b65aed43f3dc/End-Forced-Labour-Modern-Slavery1.pdf
8 Organization of African Unity, African Charter on Human and Peoples' Rights, adopted June 1981.
9 Directive 2011/36/EU of the European Parliament and of the Council of 5 April 2011.
10 Directive 2024/1712 of the European Parliament and of the Council of 13 June 2024, amending Directive 2011/36/EU.
11 Directive 2024/1760 of the European Parliament and of the Council of 13 June 2024.

12 ILO, Walk Free and IOM, *Global Estimates of Modern Slavery: Forced Labour and Forced Marriage*, 2022.
13 Ibid., p. 4.

IV. Barriers to effective action

There are many international agreements outlawing modern slavery and human trafficking, yet many millions of people are still in slavery. Why is that? First not all states have translated their international commitments into domestic legislation. And where there is domestic legislation it is often not effective or it is not enforced effectively. There is a lack of political will, there is a lack of agreed legal definitions, and there are other relevant factors such as culture and a lack of resources.

As the work to identify the number of people subject to modern slavery and human trafficking is enhanced, it may be that an increase reflects a better understanding of the issue and improved reporting. In other words, maybe there have always been this number of people in slavery. Even if that is the case, however, it does not absolve the world from action to eradicate slavery. We should be ashamed that in 2025 there are so many millions of people around the globe who are in some form of slavery.

We have to ask: where have we gone wrong? More to the point we need to ask what we can do to deliver on the commitments made over the years to eradicate modern slavery and human trafficking.

(i) Lack of legislation

The international conventions described in section II set out various obligations for different parties, but how those obligations are enforced depends on the action of states and the drafting of domestic laws. Not all states have incorporated prohibitions against slavery and human trafficking into their domestic legislation. Of those that have, not all define their terms in the same way.

Where states have introduced national legislation aimed at combatting modern slavery and human trafficking a variety of approaches have been taken. Key types of legislation are as follows:

(i)   *References in states' constitutions and/ or Penal Codes*

(ii)   *Specific modern slavery laws*

(iii)   *Import bans*

(iv)   *Coverage in general labour laws*

(v)   *Business supply chain legislation.*

In some states the issue of modern slavery and human trafficking is dealt with across a number of pieces of legislation. Moreover, these crimes are sometimes prosecuted under alternative legal frameworks. For example, in New Zealand the Prostitution Reform Act 2003 and the Crimes Act 1961 may be used. One specific example is where an offence involving child trafficking for sexual exploitation may be prosecuted under offences relating to sexual conduct with minors.

The effectiveness of different legislative approaches specific to modern slavery and human trafficking is explored in more detail in section IV. iv. But even before considering what sort of legislation should be adopted to give effect to states' international obligations, the most basic issue is to ensure that all states have brought into domestic legislation measures which give effect to those international obligations.

There are a number of initiatives in place to encourage this. Alliance 8.7 is a global partnership whose aim is to accelerate efforts to achieve SDG Target 8.7. The alliance brings governments together with UN agencies and also civil society organisations, businesses and other stakeholders to promote cooperation and coordinated action, to share knowledge and to drive innovation. For UN Member States, the first step is to become a Pathfinding country. There are 31 Pathfinding Countries that are committed to working towards Target 8.7 with tailored national strategies.

The Bali Process on People Smuggling, Trafficking in Persons and Related Transnational Crime was set up in 2002 to enable policy dialogue, information sharing and capacity building, focusing on combating people smuggling, human trafficking and related crimes in the Asia-Pacific region. As such it goes beyond modern slavery and human trafficking, dealing with issues such as border control, the prevention of illegal movement and best practice in asylum management. It does however encourage members to *"effectively criminalise people smuggling and trafficking in persons in accordance with international law, and regional instruments"*[14].

Separately, the Commonwealth Parliamentary Association has initiated a number of projects encouraging parliamentarians to promote legislation where necessary in Member States.

In its next phase of work the Global Commission will be considering what support it can provide to states in their efforts to ensure that their domestic legislation reflects their international obligations.

(ii) Lack of political will

Sadly, one of the elements that has impacted on the ability to act is a lack of political will. There have been points in the recent past when it has seemed that governments recognised the imperative of action against modern slavery and human trafficking and were willing to prioritise the issue – as with the Call to Action at the UN in 2017. Other developments, however, notably the COVID-19 pandemic, climate change, mass migration and conflict, have taken the oxygen out of the political debate on modern slavery and human trafficking and meant that it has dropped down the political agenda.

As we set out in chapter 3 these issues are in fact all linked, and they are also inextricably connected to the growth of modern slavery and human trafficking. The government that wants to tackle climate change should not do so without recognising that the actions it takes will have an impact on vulnerability to modern slavery and human trafficking.

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14 Bali Declaration on People Smuggling, Trafficking in Persons, and Related Transnational Crime, 23 March 2016.

Climate change is also linked to migration as it has exacerbated (and will continue to exacerbate) the desire and need of people to move elsewhere for their very existence and for a better life; in that migration comes with vulnerability to being trafficked and enslaved. All of these issues can lead to conflict, which again increases vulnerability to slavery and trafficking. Governments cannot address one of these issues without considering them all.

The lack of political will can be seen in other ways too. There are states that effectively sponsor modern slavery and human trafficking. The forced labour of the Uyghur population in Xinjiang province in China is one example. There are also states who will turn a blind eye to the forced labour of their citizens abroad if it results in some monies – however small – being sent back to boost their economy.

For some governments modern slavery and human trafficking are seen as tools to be used to de-stabilise other states. A prime example of this is the government in Iran. In 2021 the United Nations Office on Drugs and Crime reported that *"Iran is a key transit country for human trafficking networks that exploit vulnerable populations, including refugees and migrants. These networks often operate with the tacit approval of Iranian authorities and contribute to regional instability"*[15]. Similarly, Human Rights Watch reported that *"Iranian authorities have facilitated the trafficking of Afghan refugees, including women and children, for forced labour and sexual exploitation. These activities are part of a broader pattern of human rights abuses that contribute to instability in the region"*[16].

There are five reasons why governments should be acting to eradicate modern slavery and human trafficking:

1. **Morality.** This is the greatest human rights issue of our time.

2. **Legality.** Governments have signed up to international obligations on the issue and need to deliver on those obligations.

3. **Politics.** Modern slavery and human trafficking are linked to other key issues that governments are addressing, and they cannot deal with these issues separately.

4. **Security.** States that use modern slavery and human trafficking to de-stabilise regions of the world, and the criminal gangs behind modern slavery and human trafficking, are both a threat to national security.

5. **Economics.** Modern slavery and human trafficking has an impact on individual states' economies. Not only is there a cost, for example, to supporting victims and to providing resources for law enforcement and in the criminal justice system, but there will also be a loss of tax revenues and a potential impact on productivity and business development.

In the next phase of our work we will be undertaking in-depth research not just on the wider economic impacts of modern slavery and human trafficking, but on the underlying mechanisms. This research will give a better understanding of the issue and enable better identification of the actions that will be effective in combating modern slavery and human trafficking.

(iii) Lack of an agreed legal definition of the issue

If governments are going to increase the momentum in dealing with modern slavery and human trafficking, there needs to be a collective and agreed understanding of the issue and of the most effective ways to address it. Currently there is no globally agreed legal definition which is used comprehensively in domestic legislation.

Does the existence of a number of different definitions of the problem matter? Yes, for two reasons. First, if different definitions are used in legislation it means that not all states are addressing the issue comprehensively. The analysis of domestic legislation undertaken by the University of Nottingham and the University of Monash shows that prohibitions against slavery, and practices similar to slavery, servitude and forced labour, are not yet reflected in the penal law of a significant number of states. This is in contrast to the issue of human trafficking. More recent agreements to prohibit human trafficking have been implemented at domestic level in some form of penal sanction in 185 of the 193 UN Member States (96%)[17].

Secondly the lack of a single definition used by everyone means that it can be harder to compare or exchange data, agree collective action or deal effectively with criminal cases against perpetrators on a cross-border basis.

The term modern slavery has no internationally agreed legal definition, although it is often accepted as an umbrella term that covers a variety of types of slavery, servitude, forced labour, exploitation and human trafficking. The term is enshrined in Sustainable Development Goal Target 8.7, but while it may be considered that it has only come into use recently, in fact in the aftermath of the 1926 Anti-Slavery Convention the ILO was charged with work *"to prevent compulsory labour or forced labour from developing into modern slavery"*[18]. So, the term has been in use for nearly a century.

What unites all of the above – and more – is one human being, for their own advantage, acting to remove the freedom of another human being, forcing them to perform certain functions and taking away their ability to make decisions for themselves about their lives.

Removing someone's freedom in this way means stripping them of their human rights and destroying their human dignity. Setting definitions in law is necessary to ensure that all parties understand the actions that are outlawed and to enable the investigation and prosecution of perpetrators, but it is hard for legal definitions to convey the human cost that is paid by the victims of modern slavery and human trafficking.

15 United Nations Office on Drugs and Crime (UNODC), *Global Report on Trafficking in Persons*, 2021.
16 Human Rights Watch, *"They Burned My Heart": War Crimes in Ghazni, Afghanistan*, 2022.

17 University of Nottingham and University of Monash, *Antislavery in Domestic Legislation*, 2020.
18 Maul, D., *The International Labour Organization: 100 Years of Global Social Policy*, 2019, p. 83.

It is important for governments and others to understand the lived experience of victims so that they can ensure that laws properly reflect the nature of the crimes concerned.

The following paragraphs give some examples of agreed international definitions of slavery and trafficking to exemplify the wide variety of their causes.

The Slavery Convention of 1926 defines slavery as *"The status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised"*. It goes on to say that *"The slave trade includes all acts involved in the capture, acquisition or disposal of a person with intent to reduce him to slavery; all acts involved in the acquisition of a slave with a view to selling or exchanging him; all acts of disposal by sale or exchange of a slave acquired with a view to being sold or exchanged, and in general, every act of trade or transport in slaves"*[19].

It could be argued that these definitions covered all that is necessary to understand the problem that needs to be addressed. In later years, however, legislators at all levels have added further definitions to the lexicon (and with different instruments). For example, the 1930 Forced Labour Convention defines forced or compulsory labour as *"All work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily"*[20].

The 1956 Supplementary Convention on the Abolition of Slavery, the Slave Trade, and Institutions and Practices Similar to Slavery requires that four practices similar to slavery should be abolished and abandoned. These are debt bondage, serfdom, servile matrimonial transactions and the delivery of children for exploitation.

Another example is the Palermo Protocol of 2000, which defines trafficking as the *"recruitment, transportation, transfer, harbouring or receipt of persons by means of threat, or use of force, coercion or deception […] to achieve the consent of a person having control over another person, for the purpose of exploitation"*.

Other definitions have been developed in case law. For example, in a case before the European Court of Human Rights in 2013 servitude was distinguished from forced or compulsory labour: *"servitude corresponds to a special type of forced or compulsory labour or, in other words, 'aggravated' forced or compulsory labour. As a matter of fact, the fundamental distinguishing feature between servitude and forced or compulsory labour within the meaning of Article 4 of the Convention lies in the victim's feeling that their condition is permanent and that the situation is unlikely to change"*[21].

In addition to all of these there are definitions which are introduced in national legislation. For example, the Modern Slavery Act 2018 in Australia defines modern slavery in relation to offences under the country's criminal code, trafficking in persons as defined in the Palermo Protocol and the worst forms of child labour as defined in the ILO Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour.

In the UK the Modern Slavery Act 2015 set out separate definitions of slavery, servitude and forced or compulsory labour, human trafficking and exploitation. In Kenya statements that a person shall not be held in slavery or servitude, and that a person shall not be required to perform forced labour, are embedded in the country's constitution. In Indonesia article 281 of the Constitution recognises freedom from slavery as a right which cannot be limited in any circumstances, and the Penal Code prohibits dealing in slaves or committing any act of dealing in slaves. The Indonesian Government went further in 2007, introducing Law 21 on the Eradication of the Criminal Act of Trafficking in Persons.

Not all definitions in national legislation reflect definitions in international law. The extent to which this creates difficulties for those investigating or prosecuting cases varies. The question is whether, against the background of a plethora of definitions or interpretations of definitions, it is too easy for states and others to "game" the situation. Certainly, it makes it harder for states to work across borders in order to eliminate modern slavery and human trafficking, particularly when it comes to identifying slave drivers and taking law enforcement action against them. Moreover, any differences in definition can make it harder for companies operating internationally to understand their responsibilities, and can make it costlier for them to abide by the requirements of different legislatures.

Using a single definition globally could therefore be a distinct advantage. It would set clearer expectations of states in terms of the legislation needed. It would provide a clearer legal and policy framework, and would make it easier for the wide variety of players (such as multinational corporations involved in dealing with slavery and trafficking) to ensure that they met applicable legal requirements and standards that were internationally recognised. It would also make the sharing of data across borders easier and therefore more effective.

In setting such a definition, however, it would be necessary to balance the need for simplicity and clarity with the need to ensure that all forms of slavery and human trafficking are covered. A further difficulty is the need, as far as possible, to future-proof definitions, that is to try to ensure that the definition will cover possible developments in the way that people are taken into slavery, or in the nature of that slavery, so that constant revision of the definition (and hence of legislation) is not necessary.

(iv) Ineffectiveness of legislation

The challenge for any government in drafting legislation is to draft laws that will work in practice. Where they do not have the desired effect, this can arise for a variety of reasons. It may be that the law is not comprehensive and that a key issue or issues are

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19 The Convention to Suppress the Slave Trade and Slavery, League of Nations, adopted 25 September 1926.
20 Forced Labour Convention 1930, Article 2, adopted 28 June 1930.
21 C. N. and V. v. France. European Court of Human Rights, 11 January 2013, para 91.

not addressed. It may be that the law has left loopholes which enable those aiming to defy the law to do just that. It may be because of ineffective enforcement – this is considered in the section v. It may be that the impact of the punitive measures is not understood and therefore does not act as a deterrent. Or the failure of the legislation may be due to a combination of these elements.

Many states have developed their legislative approach to modern slavery and human trafficking over the years through a variety of legislative measures. In this section we consider the pros and cons of the various approaches to legislation to combat modern slavery and human trafficking, while recognising that in many states these approaches will be combined.

Constitutions and Penal Codes

A number of states include a ban against slavery in their constitution. Simply including such statements in their constitutions does not necessarily provide for the domestic measures necessary to address modern slavery and human trafficking; and while the statements against slavery in constitutions may be strong, they do not identify the individual measures necessary for effective action. In some cases, the constitution will be backed-up by the criminalisation of aspects of modern slavery and human trafficking in the state's Penal Code.

Laws relating to business supply chains

Chapter 7 sets this issue against the background of the United Nations Guiding Principles on Business and Human Rights. Those Principles identify that:

In order to meet their responsibility to respect human rights, business enterprises should have in place policies and processes appropriate to their size and circumstances, including:

> *(a) A policy commitment to meet their responsibility to respect human rights;*

> *(b) A human rights due diligence process to identify, prevent, mitigate and account for how they address their impacts on human rights;*

> *(c) Processes to enable the remediation of any adverse human rights impacts they cause or to which they contribute*[22].

Requirements on business to identify their impacts on human rights generally, and modern slavery and human trafficking in particular, can take a number of forms in legislation.

One approach is that of transparency, as in Clause 54 of the UK's Modern Slavery Act 2015. This simply requires companies of above a certain annual turnover to *"prepare a slavery and human trafficking statement for each financial year of the organisation"*[23].

There are several problems with this legislation. First, it simply requires a statement to be made. It does not require that statement to show that the company has actively investigated its supply chain for forced labour and taken steps to ensure that modern slavery and human trafficking are not taking place in its supply chain or in its business. It is specified in the legislation that the statement could say that *"the organisation has taken no such steps"*[24]. While there are businesses which have actively investigated their supply chains, it is open to companies not to do so.

The second problem is that there is no specified penalty for a business that does not make such a statement – even a statement of inaction. The duties imposed are enforceable by the Government by bringing civil proceedings for an injunction in the High Court. But these would be proceedings relating to the failure to make a statement as required, rather than the failure to ensure that slavery and human trafficking are not taking place in the company's business or supply chain.

The weakness of this approach is that it is relatively easy for a company to get away with taking no action to either investigate the presence or otherwise of modern slavery and human trafficking in its supply chain, or to eradicate slavery and human trafficking from its supply chain.

Increasingly states are focusing on mandatory human rights due diligence as a more effective approach. This is based on the United Nations Guiding Principles on Business and Human Rights. Quijano and Lopez have described the move in this way: *"Human rights due diligence (HRDD) has become the buzzword of much of the advocacy and work today around business and human rights. This is reflected not only in emerging business practice but also in a growing number of civil society campaigns and legislative initiatives"*[25].

We see this approach in the French Duty of Vigilance Law (2017), the German Supply Chain Due Diligence Act (LkSG) (2021) and the EU Corporate Sustainability Due Diligence Directive 2024. There are differences between the details of these different pieces of legislation, and as the EU Directive covers all EU Member States it will need to be reflected in the legislation in France and Germany. But what unites them is the requirement on businesses above a certain size to exercise due diligence or vigilance across their operations and their supply chains in order to prevent human rights abuses including forced labour and, in some cases, environmental harm.

As with all legislation, this overarching human rights due diligence approach is not without potential risks, of which those implementing it need to be aware. The first is the risk that, while companies focus on wider aspects of human rights, action on slavery and trafficking – forced labour – does not get the attention it requires. In practice companies currently using these principles report that the opposite is the case, and that focusing attention on labour rights abuses raises red flags that enable them to identify forced labour.

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22 United Nations Human Rights Office of the Commissioner, *Guiding Principles on Business and Human Rights*, 2011.
23 UK Modern Slavery Act 2015, Clause 54 (1).

24 UK Modern Slavery Act 2015, Clause 54 (4) (b).
25 Quijano, G., & Lopez, C., 'Rise of Mandatory Human Rights Due Diligence: A Beacon of Hope or a Double-Edged Sword?', *Business and Human Rights Journal,* 6, 2021, p. 252.

The second risk is that companies adopt a tick-box approach to the issue, out-sourcing the work to investigate what happens in their supply chains or merely going through procedural steps and relying on having taken the minimum action necessary as a defence. In this case the victims of human rights abuses (including modern slavery and human trafficking) could find themselves in a worse position, because laws which allow for a procedural due diligence approach could make it easier for companies to defend their position, and hence harder for victims to access remedy. Companies have identified that this risk is greater if the matter is dealt with as simply a legal compliance issue.

The third risk, which also applies to transparency requirements, is that if companies identify modern slavery and human trafficking in their supply chains they simply take that supplier out of their supply chain and do nothing to improve the conditions of the workers at that supplier. In this circumstance the legislation will not have had an impact on those in forced labour, and will merely have led to a company changing its suppliers.

The risks involved in human rights due diligence legislation were summed up by Quijano and Lopez as follows: *"Firstly, the risk of creating the appearance of progress with hollow HRDD laws that, while doing little to change the status quo in practice, will effectively bring legislative efforts to an end, at least for the foreseeable future.*

Secondly, the risk of inadvertently providing companies with a tool that they hitherto did not have to show respect for human rights and rebut charges of liability with little bearing on effective respect for human rights on the ground"[26].

What underlies these approaches is the need to encourage or mandate businesses to investigate their own operations and supply chains, identify where there is forced labour and act to eliminate it – find it, fix it, prevent it. The next chapter considers and makes recommendations on how best to achieve these fundamental requirements, including in some cases through well-crafted legislation that avoids the challenges set out above.

Import bans

The United States in particular has introduced bans on the import of goods made with forced labour, such as the 1930 Smoot-Hawley Tariff Act. More recently the Uyghur Forced Labour Prevention Act was passed, which requires importers to show that their goods have not been produced in the Xinjiang province of China using forced labour.

There is a need for more evidence on the effectiveness of import bans. This is because while the introduction of import bans can appear to be a positive act by a state, and enables the state concerned to show that it has taken action, it may not always have the intended impact in reducing forced labour. First, it may be possible for companies to get around the injunction by using more complex supply chain routes.

Secondly, unless the import ban is universal, companies may be able to switch their market to a state without such an import ban. Thirdly, affected companies could stop using the relevant supplier, but that would not stop other companies from stepping-in and selling to markets, which are free of the prohibition. In all these cases it will still be possible for the supplier to use forced labour.

Perhaps of more significance is the fact that an import ban does not automatically lead to a change in the circumstances of those in forced labour. In July 2020 US Customs and Border Protection issued a Withhold Release Order against two subsidiaries of the world's largest rubber glove company, Top Glove in Malaysia. As a result the company agreed to refund those foreign workers (10,000 of them) who had paid recruitment fees to agents. This was a positive act of remediation.

In considering this case, however, Anti-Slavery International said: *"The positive remediation impact of the US bans to date, contrasted with the ambiguity and the gaps that remain in the US system, attest to the importance of import bans to be designed to drive a positive impact for workers, This includes by making sure that bans are tied to explicit remediation requirements within a broader verified plan of long-term corrective action to prevent recurrence of forced labour"*[27].

So, an import ban alone, while it could reduce the market for products made with forced labour, does not in itself lead to the improvement of the situation of the workers who are the victims. Other provisions (such as the right to remediation) are necessary, as is effective enforcement of the law.

Moreover, import bans are viewed with scepticism in some parts of the world; they are seen as being introduced less as a measure to improve human rights and more as a protectionist measure. This issue was raised with us in discussions with representatives from African states, and was also referred to in discussions with civil society organisations. The issue of import bans is considered further in the next chapter.

Labour laws

Both human rights due diligence and import bans focus on the actions of companies in relation to their supply chains. At a state level governments can impact the conditions in which people work – and hence prohibit forced labour – through specific labour laws.

The effectiveness of such legislation depends on the ability to enforce those laws. In addition to passing the relevant law, it is necessary to establish a body or bodies whose responsibility it is to inspect employers – or at least to respond to complaints about working conditions under particular employers. As part of the legislation, it is also necessary to establish penalties for those employers that break the law. An example of

26 Ibid., p. 254.

27 Anti-Slavery International, ECCHR, The Greens/ EFA in the European Parliament, *Progressing the Proposed EU Regulation on Prohibiting Products Made with Forced Labour: A Model Law*, 2022.

Bahrain's LMRA Expatriate Protection Centre: a model for migrant worker support

Bahrain's Labour Market Regulatory Authority (LMRA) established an Expatriate Protection Centre as a comprehensive response to vulnerabilities faced by migrant workers. This initiative forms part of Bahrain's broader efforts to reform its labour migration governance and prevent exploitation.

The Protection Centre provides a coordinated, multi-faceted approach to migrant worker support through:

- A 24/7 multilingual hotline enabling workers to report abuse in their native languages, as well as around-the-clock "walk-in" assistance and protection;

- A dedicated shelter offering temporary accommodation for vulnerable workers;

- Case management services including legal aid, medical assistance and psychological support;

- Coordination mechanisms linking government agencies, embassies, and civil society organisations.

The Centre complements Bahrain's structural reforms, including the Flexi-Permit system that allows eligible workers to self-sponsor rather than being tied to a single employer, reducing vulnerability to exploitation.

Since its establishment, the Protection Centre has assisted over 8,500 migrant workers, contributing to a measurable decrease in trafficking-related complaints. The model demonstrates how accessible reporting mechanisms, combined with direct support services, can effectively interrupt exploitation patterns.

Challenges remain, particularly in reaching domestic workers and addressing implementation gaps. However, the LMRA continues to expand its services and strengthen enforcement mechanisms.

The Expatriate Protection Centre represents a promising institutional model for protecting migrant workers, that could be adapted to other contexts where workers face similar vulnerabilities.

this approach is seen in Bahrain, which has set up the Labour Market Regulatory Authority that enables migrant workers to report problems, such as having their passport removed from them by their employer or not receiving their wages, and takes action against the employers concerned.

Even the use of labour laws can have disadvantages. The resources necessary to ensure comprehensive coverage of employers are considerable. A more difficult problem, restricting the effectiveness of this approach, is that in many cases where people are the victims of forced labour it is not possible for them to complain, or they will not do so for fear of retribution. Action can only be taken against employers who have been identified as breaking the relevant labour laws.

Specific modern slavery legislation

The types of legislation described above each deal only with certain aspects of modern slavery and human trafficking, and only in relation to business supply chains or workers' rights. In both the UK and Australia, for example, a different approach has been taken, in an attempt to cover in a single piece of legislation the various actions that the state and others need to take.

While this approach has the benefit of consolidating relevant law, rather than leaving it spread across various pieces of legislation, it can suffer from not aligning with other approaches being taken internationally. This is particularly relevant for businesses in dealing both with their own operations and their supply chains. International business will always want to see a consistent approach, which is less burdensome for them to respond to than having to deal with a variety of rules in the different countries in which they operate. The ability to respond to legal requirements around modern slavery and human trafficking in the same way, across their operations and their suppliers' operations around the globe, reduces the cost to the business, and for some it may make it more likely that they will act.

(v) Lack of enforcement/ penalties

The existence of a law prohibiting slavery is not sufficient to ensure that slavery is eradicated. As we know with other offences, such as murder or burglary, the existence of laws prohibiting these actions does not mean that they no longer happen. So it is with slavery.

In order to get closer to eradicating the outlawed behaviour it is necessary to have the right structures and powers in place for action to be taken to enforce the law. Again, as we see with other crimes, even then that may not be sufficient to stop the behaviour of those who would exploit others for their personal gain. But without such structures and powers it is certain that slavery will grow rather than be reduced to the point of eradication.

Many civil society organisations with experience of dealing with enforcement bodies, in the identification and protection of victims and the prosecution of perpetrators, will have valuable input as to how these bodies should interact with civil society. They will also have evidence about any problems generated by the approach taken by enforcement bodies.

This is a sensitive area on which to make recommendations. In an ideal world it would be sufficient to say that each state must ensure that it has given its law enforcement bodies – police and others – the necessary powers to be able to enforce the law, and that these bodies are able to operate within structures – e.g. a criminal justice system – that provides for the proper and effective exercise of those powers. But, as we have heard in evidence, there are cases where the bodies enforcing the law are themselves complicit in the crimes being committed; and there may be states where political and societal cultures enable that complicity.

Notwithstanding this complication, without effective enforcement legislation is toothless.

Experience also shows that investigation and prosecution of crimes relating to slavery is only possible with the willing involvement of, and evidence from, victims. If this is to be provided by victims, they need support to provide them with the confidence to come forward.

(vi) Culture

If we are to eradicate modern modern slavery and human trafficking, we need to change cultures and attitudes that see slavery and trafficking as acceptable. It is also crucial that governments are held accountable when such agreed standards are violated.

Legislation which outlaws such practices (and criminalises them) should be sufficient, but sadly there are societies, and communities within societies, that consider actions that put individuals into slavery as acceptable within their culture, and do not consider these actions as falling within the legislative prohibitions of slavery.

This is particularly true of the acceptance of forced marriage and domestic servitude. (It should be clarified that forced marriage is different from arranged marriage.) It is truly shocking that there are some 12 million children around the world who have been forced into child marriage[28]. That is the equivalent of one child being married every three seconds. Yet in a number of societies this has been normalised through the generations in a way that makes many feel it is hard to challenge. In some countries it has also been considered, and is still considered, acceptable for families in rural communities to allow their children (mainly girls) to be taken by wealthy families in predominantly urban communities to "be educated", when in fact this means they are being taken to be subjected to domestic servitude.

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28 According to UNICEF's child marriage database 2020, 12 million girls are married before the age of 18 each year.

The issue of cultural attitudes is not confined to certain parts of the world. There will be aspects of it everywhere. We see it in all countries where people in vulnerable circumstances are viewed in some sense as second class citizens open to being exploited. We also see it where people's consumerist drive leads them to ignore or not question the circumstances under which products are manufactured.

Those in slavery are sometimes able to remit some money back to their families. In some societies and communities that money is so welcome that the conditions under which it is being earned are disregarded. Indeed, governments may welcome the injection of money into these communities regardless of the source.

Some aspects of this can be addressed through legislation, e.g. through laws around the age of marriage. But even legislation cannot entirely break through societal acceptance of aspects of modern slavery and human trafficking if these have been accepted from generation to generation.

(vii) State action

Reference was made in Section IV. i to the way in which state action can support or exacerbate modern slavery and human trafficking, e.g. through state-sponsored forced labour or the use of modern slavery and human trafficking as a destabilising tool in a region.

State action can also increase vulnerability to modern slavery and human trafficking. The recent decision by the administration in the US to stop US AID payments, and reduction in funding for aid in countries like the UK and the Netherlands, means that across the globe there will be many people who no longer have sufficient food, and for whom the temptation to accept the offer of "good jobs" or even just food and shelter, will become irresistible, regardless of who the offer comes from. The danger is that this will lead even more people into being trafficked and taken into slavery in one form or another.

(viii) Lack of resources

Any action to address modern slavery and human trafficking requires resources, be it for the operations of enforcement bodies, the provision of support for victims, or action to reduce vulnerability to slavery and human trafficking, for example through programmes to reduce poverty. In today's environment, resources are limited. That is why it is particularly important for states to be able to identify the most effective ways of dealing with modern slavery and human trafficking. The Prevention Framework which we are publishing as part of this report is one way of identifying, for states, the areas that they need to address.

(ix) Public procurement

Governments can address modern slavery and human trafficking through legislation, through enforcement, and by acting to reduce vulnerability, but they can also make a difference by ensuring that their own public procurement measures do not allow forced

labour in their supply chains. A significant share of the total global economy is accounted-for by governments' purchasing. Worldwide the value is around $13 trillion or 15% of global GDP, and for OECD countries it represents on average around 13% of GDP[29].

This shows that governments can play an important role in eradicating forced labour in supply chains across the world. The main barrier to this is the fact that most governments divorce their public procurement policies from their wider moral and social considerations. The legal framework within which most states operate is the WTO Government Procurement Agreement (GPA) (2012) which is based on the principles of efficiency (value for money), non-discrimination between tenderers, and open competition. As Berman and Martin-Ortega say: *"states find themselves operating within an international legal regime that poses significant tensions between international trade obligations on the one hand, and international human and labour rights and environmental law on the other"*[30].

(x) Lack of action against criminal gangs

There are a number of parties who traffic people and who enslave people. These can be family and friends of the individual victim or other members of their community.

They can be businesses that either turn a blind eye to what is happening in supply chains or whose business model is based on the use of forced labour. And (as set out above) they can be states. But a key group of perpetrators is made up of the criminal gangs that buy, sell and abuse human beings, in the same way that they buy and sell drugs or weapons. These gangs see vulnerable people as a commodity from whom a profit can be made.

Some gangs will operate within a state; others work across state borders. Lack of effective action against the criminal gangs is a barrier to eradicating modern slavery and human trafficking. This action can be hampered by lack of understanding of the problem, lack of support to enable victims to describe their experience and (if needed) provide the evidence necessary to catch and prosecute the gangs, lack of police resources, corruption in the criminal justice system, or a lack of cooperation and coordination between law enforcement bodies across borders.

(xi) The evolving nature of the problem

One final barrier to eradicating modern slavery and human trafficking is the evolving nature of this form of human rights abuse, particularly as regards the actions of criminal gangs. A clear example of this is the development of the trafficking of people to work in call centres which are running scams: this is something which has developed over recent years, and is particularly prevalent in East Asia. It shows that it is not good enough to deal with the type of modern slavery and human trafficking that is known at any point in time. The current

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29 Berman, C., & Martin-Ortega, O., *Public Procurement, Modern Slavery and Human Rights: Report for the Global Commission on Modern Slavery and Human Trafficking*, 2024.
30 Ibid.

figure for people who are in slavery across the globe, 50 million, focuses on those in forced labour and forced marriage. Yet there will be people in slavery of other forms around the globe, including in new evolving forms of slavery.

In order to eradicate modern slavery and human trafficking it is necessary to be able to look ahead and try to stop the development of new forms of these crimes. It is also necessary to reduce vulnerability to slavery and trafficking by addressing the root causes of that vulnerability, such as poverty and lack of education.

V. Our aim: recommendations that are deliverable

Throughout our work we have focused on delivering recommendations that we believe will not only make a difference, but that will be deliverable and address the key issues that governments around the world need to address.

It is critical that the proposals are deliverable. We do not want to make recommendations for the sake of it. The aim of this report is to urge governments to take action which will have an impact on the lives of those currently in slavery, and which will reduce the vulnerability of others to being enslaved. There will be issues around which it is hard to identify recommendations but which it is important to raise, in order to highlight all aspects of the abuse of human rights that is modern slavery and human trafficking.

A key example of such an issue is culture, and social acceptance of slavery and servitude. The fact that modern slavery and human trafficking exist in every country shows that these issues are present in every country. But there are places where modern slavery and human trafficking are more driven by existing culture than elsewhere. A key example here is the issue of forced marriage and child marriage. To an extent action against child marriage can be taken through the adoption of laws setting the minimum age for someone to marry, but in some communities it will be hard for the authorities to enforce such laws, particularly when the marriage is driven by cultural norms or poverty.

VI. What is the answer?

Modern slavery and human trafficking would not exist if there were not people willing to treat other human beings as commodities to be bought, sold, used and abused for the perpetrator's advantage. Changing humanity is beyond the scope of the Global Commission – or indeed of any individual body around the world. But we can identify steps that can be taken, on the one hand to reduce vulnerability to modern slavery and human trafficking, and on the other to reduce opportunities for the slave drivers and ensure that they pay a penalty for their inhumanity.

The sections below set out a number of steps that can and should be taken if we are to start to turn the tide on modern slavery and human trafficking.

(i) Legislation

All states need to ensure that they have legislation in place domestically that enables them to meet their international legal obligations to eradicate modern slavery and human trafficking and to stop the slave trade. Work by the University of Nottingham Human Rights Lab in 2020 identified 90 states around the world that did not have legislation in place to apply criminal sanctions to the prohibition of slavery and the slave trade[31].

This most basic need could be assisted by establishing an internationally agreed legal definition of modern slavery and human trafficking which could be used in such legislation. This would also enhance the ability for states to coordinate action across borders.

(ii) Elements of effective legislation

The key element – and the most basic – is to outlaw slavery, but also to make provision that people have an inalienable right not to be subjected to acts constituting slavery. The definition of slavery is critical here. It can be drawn-up so as to include trafficking and activities such as servitude. Even more widely it can include other activities considered to be akin to slavery. The perennial question for legislators is always whether to use a wide definition without specific examples, or to include a list of examples of the activity in question. Both can lead to lengthy legal argument about why an activity was not listed and whether the failure to be listed renders it effectively lawful.

An answer to this problem can be to use exemplary law, i.e. to say that a definition includes, but is not limited to, certain activities. Such an open list has the added advantage of ensuring that the legislation is adaptable and "living" and can accommodate evolving forms of modern slavery and human trafficking.

Work on model legislation by Nottingham University has identified a number of what they describe as Guiding Principles in establishing anti-slavery legislation[32]. These are:

Effective Legislation – every state has a legal requirement to have national legislation, which reflects its international obligations, i.e. its obligations to prohibit slavery, the slave trade, servitude, forced or compulsory labour, or institutions and practices similar to slavery.

1. *Full Jurisdictional Reach – every state should ensure that its domestic legislation gives effect to the full reach of its jurisdiction as set out above.*

2. *Effective Investigation, Prosecution and Punishment – every state has a legal obligation to investigate, prosecute and punish violations of the prohibitions set out above.*

3. *Effective Remedies – every state has an obligation to provide an effective remedy to victims.*

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31 University of Nottingham Rights Lab, *Antislavery in Domestic Legislation*, 2020.
32 Allain, J., & Schwarz, K., *Anti-Slavery Model Legislation: Guide to Domestic Legislation on Prohibited Forms of Human Exploitation*, forthcoming (available on request).

Hence, beyond the definitions of slavery, trafficking and the slave trade (and therefore of the activities to be outlawed, i.e. the offences that could be committed), there are other elements that should be contained in anti-slavery legislation to ensure both support for victims and survivors and that perpetrators can be identified, caught and prosecuted. These are:

- Identification and verification of victims
- Support for victims
- Specific support for/ approaches to child victims
- Powers for police and other law enforcement bodies
- Penalties and sentencing for perpetrators
- Approaches to criminal activities that individuals in slavery are forced to commit as part of their slavery
- Requirements on businesses re their operations and supply chains – this should mandate the investigation of their operations and supply chains for forced labour, accountability through reporting what they find, and requirements to remedy the situation
- Penalties for businesses that fail to meet the requirements set
- Requirements on governments re public procurement and supply chains
- Establishment of oversight or enforcement bodies
- Linkages to money laundering and financial crimes.

(iii) Palermo Protocol

As of October 2024, 180 UN Member States had ratified the Palermo Protocol and a number of states had based their anti-slavery legislation on the Protocol. However, the Protocol addresses the issue of human trafficking for specific purposes, rather than the wider issue of modern slavery and human trafficking. It attempts to define trafficking in persons, but it is targeted towards women and children with a focus on sexual exploitation. It does not reflect multiple forms of trafficking for the purposes of criminal exploitation such as scamming, cannabis cultivation and drug trafficking, and does not reflect emerging forms of recruitment such as through the use of digital technology. Moreover, it was established as a baseline for anti-trafficking legislation rather than a comprehensive framework, and so does not reflect definitions of broader forms of forced labour, servitude and debt bondage. It also takes an organised-crime-centric approach which does not cover the broader and more complex socio-economic, technological and structural causes of modern slavery beyond criminal networks.

The Protocol was negotiated in the 1990s and signed in 2000. As such it reflects the understanding of modern slavery and human trafficking at the time of its drafting, and has not kept pace with the recent evolution of these crimes. As the Director General of UNODC Ghada Waly recently said: *"human trafficking […] involves patterns of exploitation that are changing with our times"*[33].

Application of the Protocol has led to inconsistent legal interpretations. What is more it accompanies the Smuggling Protocol, and as a result has inadvertently led to a blurring of the lines between people smuggling and human trafficking[34]. If the Palermo Protocol is to have maximum impact it also needs to have strong links with wider international treaties and standards on money laundering and financial crimes, alongside comprehensive domestic legislation (as outlined above). Strengthening the Protocol could also enable better protection of and assistance to victims and could include measures to improve training of law enforcement officers, social workers and other relevant parties.

(iv) Effective victim support and enforcement of laws

Legislation on its own is not sufficient to make a difference to the number of people who become victims of modern slavery and human trafficking. It is also necessary to have in place effective support for victims and enforcement of legislation.

As identified in earlier sections, if perpetrators are to be identified and prosecuted victims need to have the support to enable them to come forward and explain their experience; this can then be used as evidence in pursuing, catching and prosecuting perpetrators.

States need to have in place the necessary victim support. They also need to identify enforcement bodies and ensure they are given the powers they need to enable them to enforce the law.

An example is the work of Stop the Traffik, which has shown how analysing intelligence from multiple sources, including the experience of victims and survivors, can enable action to disrupt trafficking routes and hotspots and produce safeguarding interventions to protect people at risk.

States need to listen to those with lived experience and to work with bodies that understand how traffickers and slave drivers pursue their victims.

States need to establish effective means of enforcing the law, including effective means of ensuring that the voice of workers is heard so that forced labour in the workplace can be identified and dealt with.

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33 Waly, G., *Human Trafficking and Criminal Exploitation in an Age of Change*, Nuffield College, University of Oxford, 30 January 2025, https://www.unodc.org/unodc/en/speeches/2025/300125-nuffield-college_-human-trafficking-and-criminal-exploitation-in-an-age-of-change.html
34 People smuggling involves individuals who consent to be smuggled into a country illegally. Human trafficking involves exploitation of the individual.

(v) Effective use of public procurement

States should commit to not using public funds to purchase goods and services provided through the use of modern slavery, forced labour or human trafficking, and to consider modern slavery risks and incidence at all stages in their procurement cycle. They should set clear objectives and standards across the whole of government to ensure that there is no contradiction between policy commitments on modern slavery and their purchasing practices or aims.

VII. Recommendations – actions required

Recommendation 1:

Member States of the United Nations who do not have domestic legislation enacting their international legal obligations on slavery should enact such domestic legislation.

Actions arising:

- The United Nations should maintain a public list of those Member States that do not have comprehensive domestic legislation in place.
- International groupings, such as the G7, G20 and BRICS, should have modern slavery and human trafficking as an agenda item for their annual meetings.
- Modern slavery and human trafficking should be a regular item on the agenda of regional groupings such as ASEAN, the African Union and the EU.

Recommendation 2:

Those Member States that have inadequate domestic legislation should revise it to make it comprehensive and reflect their international obligations in full.

Actions arising:

- In addition to outlawing activities identified under international obligations, including but not limited to slavery, human trafficking, and servitude, Member States' domestic legislation should cover government support for victims, the responsibilities of businesses in ensuring that there is no forced labour in their supply chains (and the penalties that will be applied if they do not), the powers of law enforcement, interaction with other criminal and civil law, public procurement requirements and the establishment of oversight bodies. Member States should ensure that they have suitable provision in place to support the victims of modern slavery and human trafficking. This should

recognise the traumatic nature of being enslaved and trafficked, the length of time it takes for a victim to be able to resume a free life, and the need for support for those who wish to provide evidence against perpetrators.

Recommendation 3:

All Member States should ensure they have effective arrangements in place to enforce the legislation.

Actions arising:

- Member States should provide appropriate training for all branches of law enforcement and for those in the criminal justice system (including the judiciary), so that they have a full understanding of the nature of modern slavery and human trafficking.
- Member States should make proper provision for the enforcement of labour laws.
- Member States should outlaw child marriage and take steps to ensure compliance.
- Member States should ensure that their public procurement rules include both the need to provide good value and the need to recognise international obligations to end slavery and trafficking. Those making procurement decisions should be trained in ensuring that there is no forced labour in relevant supply chains.

Recommendation 4 (a):

The United Nations should assist Member States by establishing a legal definition of modern slavery and human trafficking which could be used in domestic legislation. This should cover all forms of modern slavery and human trafficking i.e. including related activities such as servitude and the slave trade.

Current international definitions tend to focus on either modern slavery or human trafficking, and can reflect the context in which they were developed. As that context changes there is a need to develop new definitions.

Actions arising:

- Any definition developed following this recommendation should take cognisance of the different definitions currently used within the United Nations, it should be comprehensive, it should reflect the views of survivors,

and it should not reflect a particular geopolitical environment. It should also be capable of covering evolving forms of modern slavery and human trafficking.

- The Global Commission stands ready to work with the UN and its Member States to address this problem, for example by supporting Member States' consultations with stakeholders, including survivors and civil society, and working with UN working groups or specialised committees set up to consider this issue.

Recommendation 4 (b):

The United Nations should assist Member States by ensuring that the 15th Session of the Working Group on Trafficking in Persons under the United Nations Convention Against Transnational Organized Crime opens a dialogue on the value of strengthening/ revitalising the Palermo Protocol. This should be a standing annual agenda item.

Actions arising:

- The Working Group should report on the development of this dialogue and on actions taken.
- Civil society organisations should be involved in the dialogue and related work.
- The Global Commission stands ready to support that dialogue.

VIII. Next steps

The Global Commission on Modern Slavery and Human Trafficking will work with United Nations Member States and Agencies to gain commitment to futher action on modern slavery and human trafficking at the United Nations. We will also work with regional bodies to promote the need for action, and stand ready to support governments in identifying necessary legislation for implementation, in providing examples of relevant legislation, and in supporting the introduction of necessary legislation. We will work with governments to encourage improvement in public procurement practices. We stand ready to support the United Nations and its Agencies in developing an agreed legal definition of modern slavery and human trafficking, and engaging in dialogue on the strengthening/ revitalising of the Palermo Protocol.

Chapter 7:

Addressing forced labour in global supply chains

I. Executive summary

This chapter looks at the ways in which forced labour is embedded in global supply chains, and the actions needed to drive systemic change to address the issue. We make four primary recommendations:

- **The UN Guiding Principles on Business and Human Rights (UNGPs) should be the foundation for how governments and companies address modern slavery, including forced labour in supply chains.**

- **Human rights due diligence (HRDD) is the most effective tool available to companies to address forced labour in their operations and supply chains. To drive the systemic change needed to address its root causes, governments should move beyond voluntary measures and enact well-designed legislation mandating HRDD for companies, in full alignment with the UNGPs.**

- **For HRDD to be effective in addressing forced labour, it needs to be embedded across a company's operations and supply chains. Companies should develop a robust set of good practices using the UNGPs framework, covering leadership, strategy, governance, resourcing, due diligence, policies, measurement and reporting, remediation, and stakeholder engagement.**

- **Workers need to be at the centre of HRDD. Companies should explore worker-driven models and the power of contracts to develop responsible practices in areas with known links to forced labour and worker exploitation, such as recruitment, procurement, wages, and working conditions.**

The rest of this chapter builds on the reasons for these recommendations and lays out the proposed next steps for future work.

II. Overview: why is forced labour an issue, and how big is the problem?

Forced labour is embedded in global supply chains

Forced labour is a type of modern slavery that happens when governments or private actors exploit people for gain against their will[1].

Forced labour is not limited to a single country or industry[2], it has been detected in supply chains worldwide[3]. From factory floors in the Global South to transport networks and farms in the Global North[4], forced labour is deeply embedded in how goods and services are made and delivered[5,6]. These tainted products and services often move through standard trade channels fuelled by a cycle of supply and demand, and consumers may be contributing to the problem without even knowing it[7].

Tackling forced labour is a key priority for the Global Commission. It is a widespread, growing problem in need of solutions that address its root causes[8].

The scope of the problem is staggering. The ILO estimates that 27.6 million people were trapped in forced labour on any given day in 2021[9]. Between 2014 and 2021, labour exploitation in the private economy rose by 26%, generating $63.9 billion in illegal profits[10,11].

These illegal profits come at a high cost: stolen wages for workers, lost tax revenue for governments, and millions subjected to abuse[12]. Today, the numbers are likely to be higher.

But why is forced labour still an issue? Why is it being used to make the goods we all consume?

Current business models, as constructed, are propped up by forced labour[13]. Entire industries – from fast fashion[14] to agriculture[15] – rely on exploited workers to meet global demand. Contract negotiations often prioritise cost-cutting and fast production, while deceptive recruitment schemes take advantage of workers and create risks for employers[16,17]. Weak labour laws and enforcement, and a lack of worker protections, especially for migrants, allow these abuses to go unchecked[18].

Simply put, labour exploitation has become part of doing business for many, leaving workers with little to no recourse.

Solutions to forced labour must drive systemic change

Forced labour is a crime, and profiting from it should be illegal[19]. While not everyone benefiting from forced labour is acting maliciously, global supply chains are built on this status quo, requiring systemic change. Bad actors do exist, and companies operating in good faith deserve a fair, level playing field where unethical practices are not rewarded.

As explored in other chapters of this report, global crises worsen forced labour risks and highlight the need for urgent change. For example, the COVID-19 pandemic exposed harsh inequalities for many workers, hitting the lower-tier of the supply chain – especially women – the hardest[20]. The climate crisis is accelerating migration and increasing exploitation risks for people[21]. Meanwhile, evolving digital technologies link forced labour to cybercrime, again targeting the most vulnerable[22].

1 ILO, *What Is Forced Labour?* https://www.ilo.org/topics/forced-labour-modern-slavery-and-trafficking-persons/what-forced-labour. See also Anti-Slavery International, *What Is Forced Labour?* https://www.antislavery.org/slavery-today/forced-labour/
2 ILO, Walk Free, IOM, *Global Estimates of Modern Slavery: Forced Labour and Forced Marriage*, 2022, pp. 2–4, 23.
3 LeBaron, G., Howard, N., Thibos, C., & Kyritsis, P., *Confronting Root Causes: Forced Labour in Global Supply Chains.* openDemocracy and the Sheffield Political Economy Research Institute (SPERI), 2018, p. 40.
4 For example, see International Transport Workers' Federation, *A one-way ticket to labour exploitation: How Transit Visa Loopholes Are Being Used to Exploit Migrant Fishers on UK Fishing Vessels*, 2022. See also International Transport Workers' Federation, *Exposed: European Trucking's Systemic Exploitation of Workers*, 2025.
5 See Walk Free's Global Slavery Index (GSI): https://www.walkfree.org/global-slavery-index/; see also *supra* note 2.
6 FLA, *Fair Labor Association Forced Labor Guidance Update: July 2019*, 2019.
7 See *supra* note 3, pp. 8, 53-54.
8 See *supra* note 3, pp. 62–68.
9 Of these, 23.6 million (or 86%) were exploited by private actors, with 17.4 million (or 63%) trapped in forced labour exploitation. See ILO, *Profits and Poverty: The Economics of Forced Labour*, 2024, pp. 3–4.
10 Forced labour exploitation is defined by the ILO as "forced labour in the private economy imposed by individuals, groups, or companies in any industry, with the exception of commercial sexual exploitation". See ILO, *Profits and Poverty: The Economics of Forced Labour*, 2024, p. 5.
11 Figures exclude state-imposed forced labour and the 2014 estimate is based on a forced labour population in the private economy of almost 18.7 million. ILO, *Profits and Poverty: The Economics of Forced Labour*, 2024, p. 13.

12 ILO, *Profits and Poverty: The Economics of Forced Labour*, 2024, p. 1.
13 Crane, A., LeBaron, G., Phung, K., Behbahani, L., & Allain, J., 'Confronting the Business Models of Modern Slavery'. *Journal of Management Inquiry*, 31(3), 264–285, 2022.
14 See generally, Unseen UK, *Modern slavery in Fashion–What You Need to Know*, 2023. See also, Labour Behind the Label, *Annual Report 2024*, 2024.
15 ILO, *Profits and Poverty: The Economics of Forced Labour*, 2024, p. 16. See generally, Rights Lab, University of Nottingham, *Agriculture and Modern Slavery Act Reporting: January 2024*, 2024. See also, Coalition of Immokalee Workers, *Slavery in the food system*, CIW Online, https://ciw-online.org/slavery/
16 ILO, *Profits and Poverty: The Economics of Forced Labour*, 2024, p. 48. See also, Desiderio, M. V., *Responsible Recruitment of Migrant Workers: Connecting Business Practices and Development Outcomes*, IHRB, 2021, p. 15.
17 ManpowerGroup & Verité, *An Ethical Framework for Cross-Border Labor Recruitment: An Industry/ Stakeholder Collaboration to Reduce the Risks of Forced Labor and Human Trafficking*, 2016, pp. 6–8.
18 See *supra* note 3, pp. 30-34.
19 ILO, *Profits and Poverty: The Economics of Forced Labour*, 2024, p. 8.
20 United Nations Human Rights Council, *The Coronavirus Disease Pandemic: Lessons Learned and Moving Forward: Report of the Working Group on the Issue of Human Rights and Transnational Corporations and Other Business Enterprises (A/HRC/50/40)*, 2022, p. 4.
21 See Anti-Slavery International, *Climate-Induced Migration and Modern Slavery: A Toolkit for Policy-Makers*, 2021, pp. 20–27.
22 United Nations General Assembly, *Contemporary Forms of Slavery, including Its causes and consequences: Report of the Special Rapporteur on Contemporary Forms of Slavery, including Its Causes and Consequences (A/78/161)*, 2023, p. 5.

Strong action is needed to drive systemic change against forced labour and address these newer risks. At the same time, forced labour cannot be addressed in isolation without looking at related human rights abuses that are fuelling the cycle of exploitation. Business models and regulations must be reformed, and economies need to be reshaped in a rights-respecting way[23]. Companies are not expected to solve this alone – governments need to enact and enforce effective laws, financial markets can help shape corporate behaviour, and civil society plays a critical role in driving accountability. Through targeted action, we must work to free more people from exploitation and ensure fairer, more socially sustainable gains from business.

III. Working to tackle forced labour: our approach and definitions

In developing recommendations to address forced labour in supply chains, the Global Commission and its Supply Chain Work Group aimed to build on existing global efforts without duplicating them. To do this, we started by researching the scale of the problem, then reviewed what others were already doing to find solutions, considering where the gaps might be. Our first set of recommendations is informed by this work.

This chapter was created with input from a diverse group of global experts from civil society and the private sector, including academics, NGOs, business organisations, and individual companies with complex supply chains. Survivor experts are a crucial part of our team, sharing their lived experiences to help us better understand the need for survivor-centred solutions.

Our approach included a review of existing laws, research, and guidance on modern slavery and forced labour. We also held discussions with stakeholders from civil society, the private sector, and industry leaders worldwide. Our research and engagement are ongoing and will continue to shape our work.

Defining forced labour

We have adopted the ILO definition of forced labour as our working definition, which describes forced labour as work imposed under threat and without consent[24], and use the ILO indicators of forced labour for additional guidance[25].

In this first phase, focused on forced labour in global supply chains, we narrowed our scope to forced labour exploitation (FLE)[26], which covers the private economy and excludes both state-imposed forced labour (SIFL) and forced commercial sexual exploitation (FCSE). We understand FLE to include the worst forms of child labour relevant to private-sector supply chains, as derived from Article 3 of the ILO Worst Forms of Child Labour Convention[27]. While some of our recommendations may also address SIFL and FCSE, these categories are not the main focus of our work.

To align with the UNGPs, we interpret a company's human rights impacts, including forced labour, as applying to its activities and business relationships[28].

Throughout this chapter, the terms "forced labour" and "forced labour exploitation" are used interchangeably.

IV. Recommendations: addressing forced labour in supply chains

Our initial recommendations focus on four key areas: foundational principles, regulatory measures, implementation strategies for companies, and worker-centred solutions. These serve as the first guideposts: a starting point for future work.

Recommendation 1:

The UN Guiding Principles on Business and Human Rights (UNGPs) should be the foundation for how governments and companies address modern slavery, including forced labour in supply chains.

As part of our first recommendation, this section provides an overview of the UNGPs, which many readers may already be familiar with. Later recommendations will outline how companies can apply the UNGPs to address forced labour in their operations and supply chains.

23 See United Nations Human Rights Council, *The Coronavirus Disease Pandemic: Lessons Learned and Moving Forward: Report of the Working Group on the Issue of Human Rights and Transnational Corporations and Other Business Enterprises (A/HRC/50/40)*, 2022, p. 5.
24 ILO, *Forced Labour Convention, 1930* (No. 29), Art 2.
25 ILO, *ILO Indicators of Forced Labour*, 2012.

26 ILO, *Profits and Poverty: The Economics of Forced Labour*, 2024, p. 5.
27 ILO C182 – *Worst Forms of Child Labour Convention*, 1999 (No. 182), Art 3. (a), (d).
28 UNGPs Art.13 and Commentary, pp. 14–15.

The Guiding Principles provide governments and companies with a framework to uphold internationally recognised human rights, including those that prohibit slavery

The Universal Declaration of Human Rights (UDHR) prohibits all forms of slavery[29]. For many years, there was no framework for businesses to uphold the UDHR and other internationally recognised human rights[30], or for governments to hold them accountable for violations[31].

The UN Guiding Principles on Business and Human Rights, sometimes referred to as "The Ruggie Principles" in reference to their author, Professor John Ruggie, filled this gap[32].

They have set the global standard for corporate responsibility and offer a structured yet flexible approach to address human rights, including in relation to forced labour.

Built on three pillars – the State Duty to Protect, the Corporate Responsibility to Respect, and Access to Remedy[33] – the UNGPs are not rigid rules but core principles that apply across business sectors and legal systems. They encourage governments to adopt a "smart mix" of mandatory and voluntary measures to prevent human rights abuses by third parties, including businesses[34]. For companies, the core concept is human rights due diligence (HRDD)[35], a promising tool to address forced labour, which we will explore later in this chapter.

Under the UNGPs, companies must "know and show" their respect for human rights[36]. This global standard of conduct requires companies to "avoid infringing on the human rights of others and address adverse impacts with which they are involved"[37], and this includes addressing forced labour in their operations and supply chains.

Unanimously endorsed by the UN Human Rights Council in 2011[38], the UNGPs are the most authoritative global framework for addressing human rights impacts when doing business. As governments introduce new laws on modern slavery and forced labour, aligning them with the UNGPs is critical to maintaining strong, globally consistent human rights protections.

HRDD, as outlined in the Guiding Principles, is well-suited for preventing and addressing forced labour in a company's operations and supply chains

The HRDD framework, as set out in Pillar II of the UNGPs[39], provides a sound methodology for companies to address modern slavery risks, such as forced labour.

The framework is comprehensive, designed to be embedded across business functions[40,41], and requires periodic reviews[42]. It is not a single prescriptive formula[43], and it is not intended to act as an audit or compliance mechanism.

It is a risk-based approach that directs companies to be proactive about "identifying, preventing, mitigating and accounting for" the human rights impacts that stem from doing business. In practice, this means a company should assess their actual and potential impacts, integrate findings, track responses, and be transparent about their actions. Because these assessments are meant to be ongoing, companies can become more attuned to their *true* impact[44], increasing the chance of finding problems early.

HRDD drives companies to act when forced labour risks are found. When conducting their human rights impact assessments, forced labour risks should immediately rise to the top as a priority. This is because HRDD requires companies to address their most salient risks first[45] – those that cause "the most severe harm to people or where delayed response would make them irremediable"[46]. Given the serious harm caused by forced labour, companies should classify it as one of the highest risks, compelling prompt action when it is detected. This makes human rights due diligence a critical tool in addressing forced labour[47].

HRDD not only helps companies respond to forced labour risks, it helps prevent them. Whereas audits and compliance mechanisms may miss early signs of labour exploitation, HRDD is meant to do the opposite. When these warning signs appear, businesses that have adopted HRDD are better prepared to recognise these risks and can act before forced labour fully manifests, which can reduce harm to people. Companies must learn from these critical lessons and incorporate changes to reduce these human rights risks, which in turn leads to more ethical and resilient supply chains.

29 UN Universal Declaration of Human Rights, Art. 4.
30 See UNGPs Art. 12., Commentary, pp. 13–14.
31 See Ruggie, J. G., *Just business: Multinational corporations and human rights*, 2013, pp. 47-55.
32 Ibid.
33 United Nations, *Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework*. United Nations Office of the High Commissioner for Human Rights, 2011.
34 UNGPs Art. 1, p. 3; see also, UNGPs I. State Duty to Protect, B. Operational Principles, Commentary, pp. 5–6.
35 UNGPs II. The Corporate Responsibility to Respect Human Rights, B. Operational Principles, pp. 16–26.
36 UNGPs Art. 11, p. 13.
37 Ibid.
38 United Nations Human Rights Council, *Resolution 17/4: Human Rights and Transnational Corporations and Other Business Enterprises*, 2011.

39 See *supra* note 34.
40 United Nations Office of the High Commissioner for Human Rights, *The Corporate Responsibility to Respect Human Rights: An Interpretive Guide* ("UNGPs Interpretive Guide"), 2012, III. Operational Principles, B. Human Rights Due Diligence, Guiding Principle 17, pp. 31–32.
41 UNGPs Art. 19, Commentary, 2012, pp. 21–22.
42 Ibid.; see also UNGPs Art. 12, pp. 13-14; Art. 18, pp. 19–20.
43 UNGPs Interpretive Guide, 2012, p. 32.
44 UNGPs Art. 18, pp. 19–20; see also UNGPs Interpretive Guide (2012). III. Operational Principles, B. Human Rights Due Diligence, Guiding Principle 18, Q36. *When Should Impact be Bssessed?* pp. 37–38.
45 UNGPs Interpretive Guide (2012), p. 8; see also UNGPs Interpretive Guide (2012), Q15, pp. 20-21 and Q23, p. 28.
46 UNGPs Art. 24, p. 26; see also UNGPs Art. 12, pp. 13–14.
47 For an example of how this might apply to SMEs, see UN Global Compact Network Australia, *Modern Slavery Risk Management: A Playbook for Australian SMEs to Identify, Manage, and Mitigate Modern Slavery Risks*, 2023. https://unglobalcompact.org.au/wp-content/uploads/2023/06/UNGCNA-Modern-Slavery-Risk-Management-2023.pdf

Coupled with effective enforcement mechanisms, this proactive approach increases accountability for companies, making HRDD an excellent tool for forced labour prevention.

To effectively implement due diligence, companies may refer to guidance that is based on the UNGPs, such as the *OECD Due Diligence Guidance on Responsible Business Conduct*[48].

As governments shift towards enacting mandatory human rights due diligence laws, the UNGPs become even more relevant, setting the global standard on how to address modern slavery risks such as forced labour

Leading businesses, civil society stakeholders, and governments alike recognise the need to shift from voluntary to mandatory HRDD (mHRDD) through legislation[49,50].

But as these new laws emerge, will the UNGPs still matter?

The Guiding Principles will continue to be relevant, *especially* as corporate human rights laws evolve, including those that address modern slavery risks such as forced labour.

Designed to drive systemic change[51] – the kind needed to address the root causes of forced labour[52] – the UNGPs have been described as the most effective way for governments to create a "level playing field" for businesses, ensuring fair competition through stronger and more consistent standards for all[53].

The UNGPs provide an excellent set of guidelines for governments and a set of tools that many leading companies already use to address human rights risks in their operations, even before laws have required them to do so[54]. They also offer a common language for companies, policymakers, civil society and other stakeholders to address human rights issues, without companies constantly having to renegotiate the scope of their responsibilities, because the UNGPs already define them[55].

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48 OECD, *OECD Due Diligence Guidance for Responsible Business Conduct*, 2018.
49 See generally, Office of the United Nations High Commissioner for Human Rights, *Mandatory Human Rights Due Diligence (mHRDD)*, https://www.ohchr.org/en/special-procedures/wg-business/mandatory-human-rights-due-diligence-mhrdd
50 See, Business & Human Rights Resource Centre, *UK Business Statement: Calling for a New UK Law Mandating Human Rights and Environmental Due Diligence for Companies and Investors*, 2022. https://media.business-humanrights.org/media/documents/UK_BUSINESS_STATEMENT_MHREDD_Aug22_BxsbbeA.pdf
51 See generally, Ruggie, J. G., *Introductory Remarks at Project Launch of 'Business & Human Rights – Towards a Decade of Global Implementation'*, 2020. https://shiftproject.org/john-ruggie-remarks-decade-global-implementation/; see also, Office of the United Nations High Commissioner for Human Rights, *UNGPs 10+ stocktaking: A Road Map for the Next Decade of Business and Human Rights*, 2021, and Office of the United Nations High Commissioner for Human Rights, *The UNGPs 10+ Roadmap: Next Decade of Business and Human Rights*, 2021.
52 See *supra* note 7, pp. 61–68.
53 Shemberg, A., *Attention Business Leaders: Now Is the Time to Double Down on Your UNGPs Commitment.* Global Business Initiative on Human Rights, 2024. https://gbihr.org/updates/attention-business-leadersnow-is-the-time-to-double-down-on-your-ungps-commitment
54 Ibid.
55 Ibid.

As regulations catch up, the Guiding Principles can also help companies "future-proof" their operations by going beyond compliance-based approaches and embedding HRDD into their business strategies[56]. HRDD can help businesses stay ahead of issues such as modern slavery and forced labour and adapt more quickly to shifts in regulation. This adaptability is one of the key benefits of HRDD[57].

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Recommendation 2:

Human rights due diligence (HRDD) is the most effective tool available to companies to address forced labour in their operations and supply chains. To drive the systemic change needed to address its root causes, governments should move beyond voluntary measures and enact well-designed legislation mandating HRDD for companies, in full alignment with the UNGPs.

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To address forced labour and similar abuses, companies should conduct human rights due diligence throughout their operations and supply chains by implementing practices that are specifically designed to address these risks

The imperative for businesses to conduct effective HRDD in their supply chains is driven by moral, business, and legal considerations.

The moral imperative: a human rights issue, not just a business issue

Forced labour is among the most egregious human rights violations, yet legal frameworks to address it in global supply chains are sometimes lacking. The UNGPs emphasise that companies have a responsibility to respect internationally recognised human rights wherever they operate, independently of governments "abilities and/ or willingness to fulfil their own human rights obligations"[58]. Therefore, with clear evidence of rising cases of forced labour in global supply chains, companies must ask themselves: Do they want their success to be built on exploitation?

Beyond reputational risks, evidence shows that failing to address forced labour contributes to human suffering, perpetuating cycles of poverty, exploitation, and abuse. By embedding human rights due diligence into their operations, companies can help ensure that their success is not derived from unethical practices.

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56 Ibid.
57 Ibid.
58 UNGPs Art. 11, p.13.

The business imperative: productivity, competitiveness, and risk management

High human rights standards in a company's operations and supply chain improves resilience and operational efficiency:

- **Operational productivity**: suppliers that uphold fair labour standards tend to experience lower employee turnover, increased worker satisfaction and improved overall productivity. By insisting on these ethical standards, buyers can experience greater predictability and stability in their business relationships, leading to greater productivity in their overall operations.

- **Competitiveness**: just as anti-bribery and corruption regulations have created a more level playing field, businesses that engage in HRDD gain a competitive advantage in markets that demand ethical sourcing. Companies that fail to implement HRDD may be excluded from contracts with responsible businesses, investors and governments.

- **Risk mitigation:** companies that fail to address forced labour in their operations and supply chains risk reputational damage, financial losses, and disruptions, such as those resulting from the enforcement of a forced labour import ban.

The legal imperative: an evolving regulatory landscape

The legal environment is rapidly changing, with increasing regulatory requirements that mandate HRDD. Companies that are unprepared or fail to conduct adequate HRDD may eventually face legal and financial consequences, including fines, sanctions and exclusion from key markets. As more jurisdictions implement binding HRDD laws, companies that proactively align with the UNGPs will be better positioned to comply with evolving regulations and avoid legal risks.

Addressing forced labour should not just be a matter of compliance – it should be driven by moral, business, and legal imperatives that demonstrate a company's respect for human rights. The UNGPs emphasise that this responsibility to respect human rights should be a fundamental part of doing business, and HRDD is the framework through which companies can achieve this.

Policymakers should incorporate human rights due diligence into law, to strengthen existing measures against forced labour, ensuring greater corporate accountability

We know that companies are expected to integrate their respect for human rights as a core part of their operations, yet modern slavery and forced labour cases continue to rise[59]. We also know that governments worldwide have been working to incorporate elements of mandatory HRDD into legislation[60]. To more effectively drive the systemic change needed to eliminate these human rights abuses, governments must review their existing measures and evaluate how to incorporate UNGP-centred HRDD into legislation, to ensure that companies are taking action and to hold them accountable as a matter of law[61].

Where do existing modern slavery and transparency laws fit in?

Transparency and modern slavery laws have already been introduced by various governments to address human trafficking and modern slavery[62]. While this is an important first step, these laws mostly require companies to report on their voluntary efforts rather than prove they are taking meaningful action. There are no requirements for companies to actively address risks or undertake remediation. Enforcement has also been a challenge. To improve accountability and close existing gaps, newer modern slavery laws include penalties for persons or entities that fail to comply[63].

However, as assessments of these laws have shown, reporting on risks alone has not moved the needle towards more responsible corporate behaviour[64]. Governments must require companies to address human rights abuses in their operations, not just to disclose their voluntary actions. This is where HRDD fills the gap – by providing a positive obligation on companies to take action to address human rights risks. Transparency laws may still play a role in the broader regulatory ecosystem, but HRDD provides the structure needed to drive meaningful corporate action.

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59 See Holman, M., *Modern Slavery Cases in Britain Reach Record High*, 2025; see also United Nations Office on Drugs and Crime, *UNODC Global Human Trafficking Report: Detected Victims up 25 Per Cent as More Children are Exploited and Forced Labour Cases Spike*, 2024.
60 See Business & Human Rights Resource Centre, *Mandatory Due Diligence: The Growing Worldwide Movement to Legally Require Companies to Undertake Human Rights and Environmental Due Diligence* (n.d.).
61 UNGPs Art. 3, pp. 4–6; see generally, Office of the United Nations High Commissioner for Human Rights, *UNGPs 10+ Stocktaking: A Road Map for the Next Decade of Business and Human Rights*, 2021.
62 For example, California's Transparency in Supply Chains Act, UK's Modern Slavery Act 2015, and Australia's Modern Slavery Act 2018.
63 For example, Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, which has offences and penalty provisions under Sections 18–20. See Government of Canada, *Fighting against Forced Labour and Child Labour in Supply Chains Act*, S.C. 2023, c. 26, 2023.
64 See Field, F., Miller, M., & Butler-Sloss, E., *Independent Review of the Modern Slavery Act 2015: Final Report*, Presented to Parliament by the Secretary of State for the Home Department by Command of Her Majesty, 2019; see also Australian Government, *Report of the Statutory Review of the Modern Slavery Act 2018 (Cth)*, Attorney-General's Department, 2023.

But why due diligence? Why not another framework?

The Guiding Principles introduce a key innovation by taking a well-established concept from corporate law – due diligence[65,66] – and transforming it into a tool for addressing risks to people, not just risks to business[67].

Other forms of corporate due diligence have traditionally been applied in areas such as mergers and acquisitions, environmental protection, anti-corruption and finance[68] to assess and manage issues that might lead to material risks to business. In the human rights context, companies are asked to assess risks to people by carefully examining how business activities create, contribute to, or are linked to harm[69]. Companies must take concrete steps to address harms to people proactively. This shift – placing people or rights holders at the centre of corporate responsibility – is what makes HRDD a powerful tool in driving change.

Because companies are generally familiar with due diligence practices, HRDD can be effectively integrated into existing management systems. It can be designed to align with processes that already emphasise measurable outcomes and operate within existing units and workflows, while specifically targeting human rights risks such as forced labour.

Mandatory HRDD must align with the UNGPs to drive meaningful action against modern slavery risks like forced labour

The UNGPs and the corresponding concept of HRDD are voluntary standards, but as governments incorporate them into law, they must ensure true alignment with the UNGPs while balancing strict legal requirements with flexibility to fit business realities[70]. Soft laws risk complacency, while rigid laws may push companies toward box-ticking instead of meaningful action[71]. To make mHRDD effective, governments must consider adopting a range of additional tools such as supply chain transparency laws, import restrictions, ethical recruitment policies, financial incentives, and guidance, as part of a full "smart mix" of measures envisioned by the UNGPs.

The HRDD framework is not meant to overburden businesses, nor should mHRDD. Governments must design mHRDD in collaboration with trade unions, worker representatives, companies, and other key stakeholders to drive solutions that are grounded in good practice and focused on achieving positive impact for workers.

Voluntary initiatives and disclosures have not solved modern slavery and forced labour on their own, but they might complement mHRDD. When well-designed and paired with supporting measures, mHRDD can drive early detection and targeted action, reducing harm to people and lowering supply chain risks for companies.

The UNGPs provide a comprehensive framework for governments to incorporate HRDD into law. Partial adoption may undermine its effectiveness.

The purpose of human rights due diligence under the UNGPs is to ensure that companies "identify, prevent, mitigate, and account for" their negative human rights impacts, to drive change. The HRDD framework set forth in the UNGPs consists of four main elements:

- Identifying and assessing actual and potential adverse human rights impacts
- Integrating findings into company processes and acting upon the findings
- Tracking responses
- Communicating how impacts are addressed

The UNGPs also outline key considerations for the way that HRDD should be implemented:

- HRDD should cover impacts that a company causes, contributes to or is directly linked to[72].
- Scope and complexity should vary based on company size, the severity of impact, and the nature and context of operations[73].
- HRDD should be ongoing, recognising that human rights risks and companies change over time[74].
- Companies should engage internal and external human rights expertise as needed[75].
- HRDD should involve meaningful consultation with affected groups and stakeholders, appropriate to the company's size, industry and risk exposure[76].

65 French, D., & Stephens, T., *ILA Study Group on Due Diligence in International Law: First Report*, International Law Association, 2014.
66 See generally, De Schutter, O., Ramasastry, A., Taylor, M. B., & Thompson, R. C., *Human Rights Due Diligence: The Role of States*, International Corporate Accountability Roundtable, European Coalition for Corporate Justice, and Canadian Network on Corporate Accountability, 2012.
67 UNGPs Art. 17, Commentary, pp. 18–19.
68 See *supra* note 66.
69 UNGPs Art. 17, pp. 17–19.
70 See British Institute of International and Comparative Law, A*lignment with the Spirit of the UN Guiding Principles on Business and Human Rights (blog series: Towards new HREDD laws)*. https://www.biicl.org/blog/87/alignment-with-the-spirit-of-the-un-guiding-principles-on-business-and-human-rights-blog-series-towards-new-hredd-laws
71 Ibid.

72 "Caused or contributed through its own activities, or directly linked to its operations, products or services by its business relationships". See UNGPs Art. 17 (a), p. 17.
73 UNGPs Art. 17 (b), p. 18.
74 UNGPs Art. 17 (c), p. 18.
75 UNGPs Art. 18 (a), p. 19.
76 UNGPs Art. 18 (b), p. 19.

- Companies should effectively integrate findings[77], take appropriate action[78], and track the effectiveness of their responses[79].

- Companies should communicate transparently about how they are addressing their human rights impacts[80].

- When harm occurs, companies should provide for or cooperate in remediation, depending on whether they have caused or contributed to the harm or are directly linked to it[81].

To date, legislative efforts focused on mHRDD have applied UNGP elements with mixed success. French and German laws reference international standards but lack full alignment with the Guiding Principles[82]. The EU Corporate Sustainability Due Diligence Directive (CS3D) includes key UNGP elements but has shortcomings in scope, value chain coverage, and stakeholder engagement. Experts have urged CS3D policymakers to adopt a true risk-based approach, clearly differentiate expectations based on causation of harm, put rights holders at the centre of the due diligence process, and implement meaningful accountability measures, including administrative supervision and civil liability[83].

To ensure mHRDD laws drive real change, they need to fully align with the UNGPs, uphold protections, and hold companies accountable. This includes mandating HRDD across all business activities and relationships, particularly in lower supply chain tiers where forced labour is most prevalent.

Import bans can be an effective trade-based tool against forced labour, if they are designed and enforced well

Import bans, such as the US Tariff Act and the UFLPA, plus the upcoming EU Forced Labour Ban, are additional regulatory tools designed to address forced labour. Trade-based restrictions that are already in force have proven to be powerful in tackling the problem[84]. They can prevent goods made under exploitative conditions from entering domestic markets[85]. Companies must prove that their goods have not been made using forced labour to avoid penalties, empowering governments to address labour issues globally[86,87].

These laws carry enforceable sanctions and create real reputational and financial risks for companies[88]. For example, in the United States, Customs and Border Protection (CBP) can stop, seize or destroy suspected forced labour goods, disrupting supply chains and damaging reputations[89]. While not without its criticisms[90], when combined with HRDD, import bans can apply real pressure on companies, forcing them to examine their supply chains and mitigate forced labour risks. These bans may also act as a safety net if due diligence falls short, preventing loopholes allowing illicit goods from less regulated areas to slip unnoticed into the market[91].

At the same time these laws, as currently drafted, do not provide for remedies for victims of forced labour. They also do not provide opportunities for companies to improve their processes as a condition for having restrictions lifted. More effective import controls would require companies to be transparent about their supply chains, compel them to adopt human rights due diligence, and support victim remediation[92]. To ensure meaningful impact, worker consultation should precede a ban, and remediation should be a precondition for lifting it[93]. These conditions would also work to ensure the positive impact of import bans, and prevent companies from leaving markets altogether.

Sector-specific regulations that target high-risk industries can add an additional layer of protection for workers trapped in forced labour

Sector-specific initiatives have emerged to regulate industries with known forced labour risks. For example, the EU Conflict Minerals Regulation and the US Dodd-Frank Act requires importers of specific minerals to use due diligence on their supply chains to assess forced labour[94]. The Harkin-Engel Protocol establishes similar requirements for cocoa production[95]. These efforts require companies either implicitly or explicitly to conduct human rights due diligence as a means of identifying harms, including forced labour and child labour.

77 UNGPs Art. 19 (a), p. 20.
78 UNGPs Art. 19 (b), p. 21.
79 UNGPs Art. 20, pp. 22–23.
80 Per UNGPs Art. 21, Commentary, pp. 23–24, "The responsibility to respect human rights requires that business enterprises have in place policies and processes through which they can both know and show that they respect human rights in practice. Showing involves communication, providing a measure of transparency and accountability to individuals or groups who may be impacted and to other relevant stakeholders, including investors."
81 UNGPs Art. 22, pp. 24–25.
82 Bright, C., da Graça Pires, C., Streibelt, M., & Schönfelder, D., *A Comparative Analysis between the Corporate Sustainability Due Diligence Directive and the French and German Legislation*, 2024.
83 Office of the United Nations High Commissioner for Human Rights *Final Call for Alignment: Aligning the EU Corporate Sustainability Due Diligence Directive (CS3D) with the UN Guiding Principles on Business and Human Rights (UNGPs)*, 2023.
84 The Remedy Project, *Putting Things Right: Remediation of Forced Labour under the Tariff Act 1930*, 2023.
85 United States Tariff Act of 1930, 19 U.S.C. § 1307.
86 Ibid.
87 Anti-Slavery International, *FAQ: Addressing Forced Labour in Global Supply Chains*, p. 4.

88 For example, executive sanctions such as asset-blocking and the denial or revocation of visas, as in the case of the Uyghur Forced Labour Prevention Act, Pub. L. No. 117–78, § 8(c) (1–2), 135 Stat. 1525 (2021); see also Congressional Research Service, 'Section 307 and Imports Produced by Forced Labor', CRS In Focus, IF11360.
89 For example, Section 307 of the Tariff Act of 1930, 19 U.S.C. § 1307 (1930), or the EU Forced Labour Ban. See generally, Nissen, A., & González De Aguinaga, S., *Drivers of Forced Labour Import Bans*, 2024.
90 See Fanou, T., *Literature Review: Forced Labour Import Bans: Governing Forced Labour in Supply Chains*, 2023, p. 2, citing Shehadi, S., & van der Merwe, B., *Why Doesn't Forced Labour in Supply Chains Matter to Western Governments? Investment Monitor*, 2021.
91 See Human Trafficking Legal Center, *CSO Statement on Import Bans against Forced Labour*, 2023. https://htlegalcenter.org/wp-content/uploads/December-11-CSO-Statement-on-Import-Bans-Against-Forced-Labour.pdf
92 Anti-Slavery International, *A Call for UK Ban on Products Tainted with Forced Labour*, 2024. https://www.antislavery.org/wp-content/uploads/2024/07/ASI_import_control_briefing_July_FULL-1.pdf
93 Ibid., p. 2.
94 Dodd-Frank Wall Street Reform and Consumer Protection Act, Pub. L. No. 111-203, § 1502, 124 Stat. 1376, 2213 (2010); European Union, Regulation (EU) 2024/1252 of the European Parliament and of the Council of 11 April 2024, establishing a framework for ensuring a secure and sustainable supply of critical raw materials and amending Regulations (EU) No.'s 168/2013, (EU) 2018/858, (EU) 2018/1724 and (EU) 2019/1020.
95 Chocolate Manufacturers Association, *Protocol for the Growing and Processing of Cocoa Beans and their Derivative Products in a Manner that Complies with ILO Convention 182 Concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour*, 2001.

These measures can help provide an additional layer of protection for workers trapped in these exploitative conditions, provided they are aligned with the Guiding Principles.

Modern slavery laws were an important first step. A more critical step involves having companies engage in human rights due diligence.

Modern slavery laws have been an important step towards increasing corporate transparency regarding human rights. However, a more critical step in addressing modern slavery, and driving solutions, should see companies integrate UNGP-centred HRDD into their operations and supply chains. An independent review of the Australian Modern Slavery Act, for example, recommended that it include a due diligence requirement as part of its legislation to address modern slavery. The Australian government has noted this recommendation and has committed to conduct further consultations to examine how human rights due diligence can be better incorporated into the law.

Recommendation 3:

For HRDD to be effective in addressing forced labour, it needs to be embedded across a company's operations and supply chains. Companies should develop a robust set of good practices using the UNGPs framework, covering leadership, strategy, governance, resourcing, due diligence, policies, measurement and reporting, remediation, and stakeholder engagement.

This section of the chapter outlines a holistic framework for action for companies. Addressing only some of these areas in a business reduces the likelihood of structural and systematic change and improvement. Action across all these areas is likely to lead to enduring positive change.

These recommendations are drawn from the Supply Chain Work Group's consultations and research across individual companies, business organisations, and civil society experts. They draw on excellent guidelines developed by the OECD and Know the Chain, the World Benchmarking Alliance's Corporate Human Rights Benchmark, and related standards.

Summary of action areas to reduce the risk of forced labour in business supply chains.

#	Area	Description
1	Leadership	Tackling forced labour and modern slavery in company operations and supply chains should be an expressed priority for the Board, CEO and C-suite.
2	Strategy	Strong human rights standards should be visible in company strategy and business models, including explicitly outlining the business case for embedding human rights standards.
3	Resources	Human rights policies in the organisation should be supported with dedicated, expert resources, particularly in large organisations.
4	Due diligence	Internally resourced and independent third-party due diligence should be risk-based, proportional to the business size and capability, and focused on remediation.
5	Policies	The organisation should have strong human rights policies in place; for example, regarding procurement, recruitment, living wages, freedom of association and worker feedback.
6	Measurement & reporting	The organisation should have a strong commitment to and capability in regularly measuring and reporting on human rights standards in its operations and supply chain.
7	Remediation	There should be an active programme of remediation where policies and standards have not been met, and shortcomings have been identified.
8	Stakeholder engagement	Companies should have effective mechanisms to engage workers and other stakeholders in the fight against forced labour in their supply chains.

In the next phase of the Global Commission's work, this framework will be expanded and translated into a practical toolkit for companies. Examples of existing best practice are captured and referenced in Appendix 3.

Recommendation 4:

Workers need to be at the centre of HRDD. Companies should explore worker-driven models and the power of contracts to develop responsible practices in areas with known links to forced labour and worker exploitation, such as recruitment, procurement, wages, and working conditions.

4A. Putting workers at the centre of human rights due diligence

Companies may try to address issues of forced labour from the top down, devising policies and processes at their headquarters. The UN Guiding Principles ask companies to engage actively with stakeholders, including workers, as a means of gathering accurate information as to the extent and nature of human rights abuses that exist in a supply chain.

Throughout our consultations, we heard about the need to engage workers in the design of human rights due diligence programmes to address forced labour exploitation. There is a need to create credible methods of addressing human rights abuses from the bottom up, not just from the corporate boardroom. There is also a need to include the voices of workers from across the globe, including from the Global South, in designing models that are fit for purpose and tailored to make a difference to rights holders. Recommendation four is a small step in recognising this need for a paradigm shift, acknowledging that we have miles to go to centre worker voice in designing solutions.

There are a variety of initiatives that focus on worker-driven models, involving workers in the design of human rights due diligence programmes, ongoing monitoring of working conditions, and engagement with remediation. This section highlights a few of these existing models. We note that companies should examine how to embed such concepts into their own supply chains and business activities, and how to partner with civil society organisations, workers and trade unions through multi-stakeholder initiatives and other forms of collective action to empower workers to participate in the different stages of due diligence.

Worker-Driven Social Responsibility

Worker-Driven Social Responsibility (WSR) is a model for tackling labour abuse and exploitation in supply chains. There are a variety of examples from over a decade, in industries as diverse as seafood production, textiles and apparel. The WSR model is designed to address the power imbalances that exist between workers and employers, as well as between buyers and suppliers: these power imbalances are part of underlying issues that may give rise to forced labour exploitation in global markets. WSR involves workers establishing human rights codes, active engagement in monitoring, and enforcing their own rights. The Worker-Driven Social Responsibility Network provides a useful catalogue of existing and successful WSR initiatives in different countries[96].

The earliest example of a WSR initiative is the Fair Food Program (FFP), which was launched by the Coalition of Immokalee Workers in 2011 in the Florida tomato sector. The FFP is a unique partnership among farmers, farmworkers and food companies that safeguards humane wages and working conditions. Through the FFP farmworkers have built an initiative that encourages retail food companies to use their purchasing power for good by agreeing only to purchase from suppliers who meet key human rights standards and to pay a small premium to help improve farm workers' incomes. The FFP has entered into Fair Food Agreements with more than a dozen of the world's largest food companies, including Whole Foods, Walmart and Ahold[97]. When workers encounter a potential violation of the Code of Conduct, the programme provides them with access to a fast and effective complaint process, with strict consequences for retaliation against workers who make a report.

Involving trade unions in human rights due diligence

While WSR models are a vital innovation, trade unions have an important role to play in securing worker rights and preventing exploitation. Another example of worker involvement relates to engaging trade unions as key partners in human rights due diligence progress and monitoring. For example, UK apparel brand New Look and the International Transport Workers' Federation (ITF) are now working together to ensure that transport workers' human rights and labour rights are protected in New Look's supply chain. Under a memorandum of understanding, New Look will carry out human rights due diligence in its transport supply chain, in full consultation with the ITF in its directly operated and sub-contracted transport operations[98]. New Look has also committed to provide for or cooperate in remediation, when appropriate, through collective bargaining with the ITF and/ or the respective affiliated trade unions in their areas of jurisdiction.

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96 Worker-Driven Social Responsibility Network: https://wsr-network.org/

97 Fair Food Standards – Participating Buyers: https://www.fairfoodstandards.org/resources/participating-buyers/

98 International Transport Workers' Federation, *Press Release: New Look and ITF Begin Joint Work to Empower Transport Workers to Organise and Be Protected from Labour Rights Abuses*, 2024, https://www.itfseafarers.org/en/news/new-look-and-itf-join-forces-protect-transport-supply-chain-workers-human-rights-due-diligence

Empowering worker voice in reporting forced labour

There has been considerable focus on the use of technology, such as hotlines and apps, to allow workers to file complaints and grievances. The global proliferation of apps and other technology solutions – including SMS, hotlines, and other methods – offers new opportunities to reach workers at different layers of supply chains and to help companies to prevent forced labour exploitation. At the same time, applications and solutions driven by top-down models are not without their limitations[99].

One recent research study, funded by the British Academy, evaluated a variety of new technology tools. The study concluded that "'Tech in a vacuum' should be avoided, as well as problematic assumptions that technology directly benefits vulnerable populations. Instead, clear communications channels between companies and workers should be created"[100]. The study concluded that while "due diligence-oriented technology tools were found to help control risk in supply chain hotspots [they] rarely identified modern slavery due to gaining little trust from workers, and also due to business clients not being ready to expose or address modern slavery. Empowerment-oriented worker feedback tools tended to regularly identify modern slavery, forced labour and human trafficking, and assist exploited workers, but most had no connection to businesses' due diligence"[101].

While attention is often given to companies using hotlines and other types of technology to reach workers and to engage with workers to identify problems, this has been criticised for being too focused on what is efficient and useful for the company. As an alternative model, the Issara Institute (Issara) has focused on combining technology with a strong network of workers and advocates on the ground, to create trusted channels of communication for workers to report issues of forced labour exploitation. As Issara notes: "we are on the ground, operating as a network, speaking the many languages and dialects of job seekers and workers in Asia. Being on the ground, trusted, and connected to both workers and business allows us to receive, cross-check, and action emerging issues. As frontline service providers we also safeguard workers reporting issues"[102].

Worker involvement with access to remedy

In addition to engaging workers in reporting channels, there is also a need to think about engaging workers in the design of grievance mechanisms. In early 2023 Oxfam Business Advisory Service, Reckitt and the trade association AIM-Progress collaborated on a project relating to a site-level grievance mechanism for 19 tier-one suppliers of three corporate members of AIM-Progress. It was initially challenging to get suppliers to involve workers in the operation and governance of grievance mechanisms: Oxfam, however, urged suppliers to try holding workers' elections of grievance officers, appointing spokespeople, setting up committees or engaging with trade unions where present. As a result of the project: "workers got more involved, and their trust in the mechanism grew at nine suppliers [...] Workers saw their suggested improvements acted upon, contributing to an atmosphere of positivity and productivity, also at nine suppliers." For example, "[a] supplier in India had specific representatives for contracted workers to ensure inclusivity and alleviate workers' fears about raising concerns".

For many of the participating suppliers, the project resulted in a shift in the mindset of management to engage with and listen to workers[103].

4B. The power of contract

As noted above, there are larger systemic issues which arise relating to forced labour in global supply chains and markets. The ways in which contracts are structured between purchasers and suppliers often means that there is an economic imbalance that leads to cost-cutting and to forced labour and labour exploitation, due to the lack of resources at the lower tiers of the chain, and with sub-contractors. Even as companies work hard to adopt more robust human rights due diligence processes, purchasing practices have the potential to undermine efforts for responsible contracting that leads to better working conditions. Conventional purchasing practices tend to shift risks to suppliers, lowering their profit margins and putting them under pressure to deliver in very short time frames, encouraging the cutting of corners. Companies should consider changes such as entering into longer term contracts with suppliers, to provide suppliers with the security needed to also invest in labour rights and worker protections.

99 Farbenblum Laurie Bangla, K., *Transformative Technology for Migrant Workers: Opportunities, Challenges and Risks*, 2018. https://ssrn.com/abstract=3295430
100 Dlitz, B., Shih, E., & Rende-Taylor, L., *Considering Ethics Alongside Efficacy of Worker Voice Technologies in Combating Modern Slavery*, 2018. https://www.thebritishacademy.ac.uk/documents/1825/Shih_Note.pdf
101 Rende-Taylor, L., & Smith, E., 'Worker Feedback Technologies and Combating Modern Slavery in Global Supply Chains', *Journal of the British Academy* 7(s1), 131–165. https://doi.org/10.5871/jba/007s1.131
102 Issara Institute, *The Issara Model*, (n.d.). https://www.issarainstitute.org/the-issara-model

103 AIM-Progress, *Grievance Mechanism Roll-Out Project – Executive Summary*, https://aim-progress.com/resource/aim-progress-grievance-mechanism-roll-out-project-executive-summary

The **Better Buying Institute** and **Oxfam** help companies in their journey towards more responsible procurement and contracting practices. The Better Buying Purchasing Practices Index provides companies with insights from their suppliers on how the suppliers experience the buying practices of their buyers. The Five Principles of Responsible Purchasing were created by the Better Buying Institute and include a focus on visibility, stability, time, financials and shared responsibility. This information provides a key first step that can give companies a snapshot of the effect of buying practices on suppliers and points to particular areas that need improvement[104]. Oxfam also assists companies revise their purchasing practices through its Business Advisory Services.

The Responsible Contracting Project is a hub for a series of initiatives focused on providing model contract clauses that address responsible purchasing practices and terms between purchaser and suppliers. These initiatives include the American Bar Association's Model Contractual Clauses 2.0 Project, as well as the European Responsible Contracting Initiative[105]. According to the Responsible Contracting Project, the three "Rs" of responsible contracting are[106]:

- **Responsible allocation of risks and obligations:** Set aside supplier-only guaranties of perfect compliance in favour of a joint commitment to cooperate in carrying out human rights and environmental due diligence (HREDD).

- **Responsible purchasing practices:** Commit the buyer to engage in purchasing practices that can support effective HREDD.

- **Remediation first and responsible exit:** If an adverse impact happens, provide remedy to victims and take measures to ensure the harm stops and does not reoccur before turning to traditional contract remedies (e.g. suspending payment and cancelling orders). Exit should only be pursued as a last resort, taking measures to mitigate the impact.

In these model contractual frameworks, the buyer and the supplier share responsibility for upholding human rights standards, and both commit to avoid causing or contributing to adverse human rights impacts. The buyer commits to supporting the supplier's human rights performance, including through its purchasing practices (e.g. responsible pricing, assistance, changes and exit).

The Accord on Fire and Building Safety in Bangladesh is an example of a contractual innovation as well as a model that engages workers directly as participants in enforcement of commitments by purchasers (major brands). After the tragic Rana Plaza building collapse in 2013, major apparel companies signed on to the Accord on Fire and Building Safety in Bangladesh ("the Accord"). This was an unprecedented agreement, in which companies

committed not only to require suppliers to take steps to address fire and building safety but also provided support in the form of increased prices, low-cost loans or direct payments for renovations so that factories could make the repairs necessary to operate safely. Unlike existing multi-stakeholder initiatives, the Accord is a legally binding and enforceable agreement, in which brands are obligated to implement their commitments under the programme.

The Accord has had a strong positive impact on safety conditions in the Bangladesh garment industry. More than 300 joint labour-management Safety Committees have been created and trained to monitor safety conditions. The Accord's complaint mechanism has resolved more than 290 safety complaints from workers and their representatives. In December 2022 the Pakistan Accord on Health and Safety in the Textile and Garment Industry was announced, and it took effect in January 2023. In November 2023 a combined International Accord for Bangladesh and Pakistan was renewed through December 2026.

V. Future phases of our work

The next phase of the Supply Chain Work Group's research in this area will see continued consultations with key stakeholders to better understand which models are truly driving impact and where critical gaps remain. We aim to expand and translate the implementation framework, described under Recommendation 3 of this chapter, into a practical toolkit for companies. In addition, we are considering the following areas of research:

- **The role of law: mapping legal measures and assessing their effectiveness.** We are considering mapping legal measures that address modern slavery and forced labour, to understand their areas of overlap, effectiveness and gaps. This includes transparency laws, import bans, public procurement policies, safe harbour laws, and emerging mHRDD legislation, amongst others. Engaging with businesses and civil society practitioners will help understand if these laws are making a tangible difference to workers.

- **Exploring the role of worker-centred models, labour unions, and ethical recruitment practices.** Our initial research has only scratched the surface of worker-centred models, and we plan to conduct further analysis on how these approaches – along with the role of labour unions and ethical recruitment – can be leveraged to strengthen worker protections. A key focus will be understanding known challenges around scalability, and how worker-driven initiatives can work to complement other due diligence efforts.

- **Sector-specific challenges and solutions.** We are considering a deeper dive by sector to understand the specific barriers that companies face when tackling forced labour. We hope to explore implementation strategies that might require more nuanced approaches to tackle these challenges.

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104 Better Buying Institute: https://betterbuying.org
105 Responsible Contracting Project: https://www.responsiblecontracting.org
106 Responsible Contracting Project, Core Principles: https://www.responsiblecontracting.org/principles

Chapter 8:
Civil society & crisis contexts

I. Executive summary: crisis situations increase people's vulnerability to modern slavery and human trafficking

This chapter makes four primary recommendations:

Recommendation 1:

System level: elevate global leadership around anti-trafficking as a protection issue in crisis contexts, and formally recognise the elimination of trafficking and modern slavery as life-saving interventions across the humanitarian system.

Recommendation 2:

IOs, INGOs and the Red Cross & Red Crescent Movement: all IOs/ INGOs – especially those directly involved in humanitarian work – should explicitly recognise anti-slavery and anti-trafficking efforts – prevention, protection, prosecution and partnership – as part of their institutional strategies.

Recommendation 3:

National and regional CSOs: regional bodies, such as the African Union, European Union, Community of Latin American and Caribbean States and Association of Southeast Asian Nations, to work with other key stakeholders to establish strong regional alliances, to ensure better coordination of anti-trafficking and anti-slavery efforts at a regional level. These alliances should comprise CSOs, IOs, INGOs and relevant national authorities on labour, law enforcement and social welfare.

The Global Commission will use its convening power to bring these stakeholders together, and to discuss with civil society actors who would be well-placed to organise and coordinate these alliances.

Recommendation 4:

Governments. The Global Commission in its next phase of work will test a number of propositions for governments that have emerged from our engagement with civil society groups.

Addressing modern slavery and human trafficking in crisis situations is vital for a more comprehensive and truly global response to the issue. Our aim is to identify the systemic changes needed in the way that key humanitarian actors operate in these contexts, so they can better prevent, detect and respond to modern slavery and human trafficking. We offer practical recommendations to make that happen. There are several key existing UN frameworks which we have drawn upon in framing this chapter and from which many of our recommendations emerge[1].

We focus on the strategies and programming of IOs or Specialised Agencies (SAs) inside the United Nations framework, international organisations outside the UN, such as the International Federation of the Red Cross and Red Crescent Societies (IFRC) and the International Committee of the Red Cross (ICRC), international humanitarian NGOs and local, national and regional Civil Society Organisations (CSOs). We also give careful attention to the relationship between CSOs and national governments, with a view to diagnosing possible approaches to strengthen civil society's role as frontline responders within the overall humanitarian aid system.

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1 These include: Global Protection Cluster, *An Introductory Guide to Anti-Trafficking Action in Internal Displacement Contexts*, 2020; Global Protection Cluster, *Protection Analytical Framework*, 2021; ICAT, *Addressing Vulnerability to Trafficking in Persons*, 2022; IOM, *IOM Handbook on Protection and Assistance for Migrants Vulnerable to Violence, Exploitation and Abuse*, 2019; IOM, *Counter-Trafficking in Emergencies: Information Management Guide*, 2020; IOM-UNHCR, *Framework on Developing Standard Operating Procedures to Facilitate the Identification and Protection of Victims of Trafficking*, 2020; Special Rapporteur on Trafficking in Persons, *Child Trafficking and Armed Conflict*, 2024; OHCHR, *Optional Protocol to the Convention on the Rights of the Child on the Involvement of Children in Armed Conflict*, 2007.

To achieve this purpose, we have sought to deepen our understanding of the increased vulnerabilities to modern slavery and human trafficking that manifest themselves in different crisis contexts, especially in parts of the world affected by protracted armed conflict and/or climate change, where many resort to high-risk behaviours and potentially dangerous coping strategies[2]. Whether conducted within or between states, armed conflict is one of the root causes of vulnerability to modern slavery and human trafficking, with conflicts now spreading on a scale unseen since the Second World War. Alongside and interwoven with climate change, extreme poverty and political oppression, armed conflict is responsible for unprecedented numbers of people being forcibly displaced from their homes for extended periods of time.

II. Our work: understanding the issue and identifying good practice

Dissecting the relationships between modern slavery and human trafficking, and other crimes that occur in crisis contexts (in particular, sexual and gender-based violence, child abuse, and drug trafficking), is an important and ongoing aspect of our work. To identify patterns of vulnerability, as well as what leads to vulnerability, we need to understand what makes some people more susceptible to exploitation, relative to others, in emergency situations.

We have assessed the level of strategic attention given to modern slavery and human trafficking by an array of local, national, regional and international actors. This exercise does not limit itself to the identification of gaps, obstacles and missed opportunities, which negatively condition and constrain anti-slavery and anti-trafficking efforts. Our evidence-gathering has also found examples of feasible and scalable good practice in humanitarian crisis responses, which have the potential to be applied in different regional contexts.

Based on our insights, we offer for the first time a series of practical recommendations for the full range of humanitarian actors involved in crisis response:

- The first set is aimed at the humanitarian system as a whole.
- The second set targets the institutional arrangements and priorities of organisations within the UN system and the Red Cross and Red Crescent movement, and of the large international NGOs involved in crisis response.
- The third set concerns regional, national and local CSOs, that may need to factor into our recommendations the importance of geographical context and the regional drivers and dynamics of modern slavery and human trafficking.
- A final group is targeted at national governments (including National Human Rights Institutions), seeking in particular to strengthen governmental cooperation with civil society in developing action against modern slavery and human trafficking.

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2 Justice & Care, *Anti-Trafficking in Humanitarian Settings: Gaps and Priorities for a More Systematic Response*, 2024, p. 3.

III. Why do we need to take action? The context of humanitarian response

Modern slavery and human trafficking are growing problems in the context of the many and varied crises which are fuelling the forced migration of people – in mid-2024 UNHCR estimated that a record 122.6 million people worldwide are forcibly displaced[3].

What we are currently witnessing in these different crises is a violent vicious circle. Armed conflict creates a situation of state fragility where judicial institutions and civil society organisations break down, allowing perpetrators to carry out their activities in a more favourable environment[4]. At the same time, modern slavery and human trafficking actively contribute to this vicious circle, with armed groups using these illegal practices as a war strategy and recruitment tool, relying on their exploitation of victims[5] to finance their activities. These risks are further multiplied by the impacts of climate change. So taking action to improve the humanitarian response to trafficking and slavery can also counter the effects of armed conflict and climate change.

Seeking to unpick the intricate and complex web of relationships between armed conflict, climate change and organised crime, our analysis shows that:

First: there is a clear correlation between countries which figure highly on the Global Slavery Index, countries where people are moving without protection, and countries experiencing the worst armed conflicts: for example, Afghanistan, parts of the Democratic Republic of the Congo and Myanmar. Research at the levels both of country and migration trail could do even more to unpick these relationships, and to shed light on the underlying, structural aspects of vulnerability to modern slavery and human trafficking arising from 21st century geopolitical upheaval.

Second: modern slavery increasingly "exists as a crisis within an environmental and a humanitarian one"[6]. In 2021 alone, climate-related disasters led to the displacement of nearly 24 million people, and it is estimated that, by 2050, 200 million people will have moved within their country's borders to escape the effects of climate change[7]. We need to know more about the causal pathways which connect climate change with modern slavery and human trafficking.

We need to understand the coping strategies of people exposed both to sudden-onset and slow-onset disasters[8], including selling assets and allowing young family members to leave with strangers promising work opportunities, and high-risk migration strategies resulting from ecological changes which are causing armed conflict.

Third: according to estimates from the Global Organized Crime Index, in 2022 human trafficking was second only to financial crimes in global prevalence, and was often connected both to financial and to other crimes – so-called "crime convergence"[9]. The United Nations Office on Drugs and Crime (UNODC) has used law enforcement data to identify over 200,000 victims of human trafficking in the period 2020–23, increasing by 25% over three years[10]. It is likely that this is a significant underestimate, especially given the huge number of people displaced globally and the undetected nature of many incidents of trafficking. What we do know is that human trafficking is often linked with other offences perpetrated by organised crime syndicates, including migrant smuggling, drug trafficking, extortion, money laundering, document fraud, payment card fraud, property crimes and cybercrime[11]. Combating and preventing modern slavery is therefore likely to have the effect of offsetting one of the risk amplifiers of international organised crime by cutting one of its chief sources of funding.

IV. The current state of humanitarian response

Although modern slavery and human trafficking are major humanitarian issues in their own right, and are significantly interconnected with other global ills, our findings suggest that they do not have a high profile in global humanitarian discourse. With notable exceptions, such as the Russia/ Ukraine crisis, they have not been prioritised as a policy or protection issue. There is a lack of organisational capacity and in-field trafficking expertise, and a lack of knowledge among frontline humanitarian workers[12]. Strikingly, organisations sometimes even fail to acknowledge how efforts to tackle these illegal activities constitute a life-saving response.

Consequently, modern slavery and human trafficking do not figure highly or systematically in institutional strategies, humanitarian risk assessments or reporting. Indeed, they are often not picked-up as a key risk area in crisis response. This may partly be because of the challenge of collecting data and measuring outcomes in an area where activity is clandestine and often not detected. The result is that not enough action is undertaken in both preventing and combating modern slavery and human trafficking. We need to elevate modern slavery and human trafficking as key issues in global humanitarian discourse, strategy, policy and response in crisis contexts.

3 UNHCR Refugee data finder: www.unhcr.org/refugee-statistics?form=MG0AV3
4 University of Nottingham & Free the Slaves, *Modern Slavery and the United Nations Security Council: Summary Report*, 2024, p. 4.
5 Although sometimes used interchangeably alongside "survivor", we have tried to use the word "victim" as a legal term, which denotes a person's right to seek justice and remediation, whereas "survivor" is often the preferred choice in activism movements, as the term acknowledges the agency of the person and encourages their sense of empowerment in overcoming the situation. See UNODC, *The Crime of Trafficking in Persons*, https://www.unodc.org/e4j/en/tip-and-som/module-6/key-issues/crime-of-trafficking-in-persons.html#:~:text=Trafficking%20in%20Persons%20shall%20mean,or%20receiving%20of%20payments%20or
6 Hope for Justice, *Enhance Ambition, Enable Action: Tackling MSHT, a Crisis within the Climate Crisis, Hope for Justice Recommendations for COP 29*, 2024, p. 1.
7 Walk Free, *Global Slavery Index 2023*, 2023, pp. 62–3.

8 Our understanding of natural disasters includes loss of biodiversity and subsequent food security, as well as human-induced hazards.
9 Global Initiative against Transnational Organized Crime, *Global Organized Crime Index 2023*, 2023, p. 10.
10 UNODC, *Global Report on Trafficking in Persons 2024*, 2024, pp. 10, 20.
11 Waly, G., *Human Trafficking and Criminal Exploitation in an Age of Change*, Nuffield College, University of Oxford, 30 January 2025.
12 Justice & Care, *Anti-Trafficking in Humanitarian Settings*, pp. 6–7.

It is important to remember that there are legal obligations to take more radical action against modern slavery and human trafficking – obligations originating from nearly a century of international agreements and conventions to eradicate these illegal practices. At the centre of these obligations sits the United Nations Universal Declaration of Human Rights (1948), which became a key reference point for any further legal texts.

The wording of Article 4 of the Universal Declaration is highly instructive: for the first time, it urged Member States to eradicate slavery and the slave trade **"in all their forms"**[13]**.** The problem, however, is that (as history has shown us) in a highly dynamic and volatile geopolitical environment, the forms of slavery are constantly in flux. Put another way, as the Director General of UNODC, Ghada Waly, has recently observed, human trafficking "involves patterns of exploitation that are changing with our times"[14].

We are faced therefore with a situation characterised not only by a growth in the number of identified victims, but the reality of a wider range of victims, falling prey to multiple perpetrators, including state- and non-state actors, criminal gangs and often exploitative corporations. Armed conflict and climate change thus have a dual effect. They entrench established patterns of exploitation, such as sexual slavery (affecting not only adults but the lives of many children), child marriage, domestic servitude and forced labour. At the same time, in an increasingly unstable international environment, they are paving the way for newer forms of exploitation, including trafficking in human remains, organ removal, illegal inter-country adoption, forced criminality, and the use of children as active combatants or in support roles in conflict[15]. Since their scope now extends well beyond the realm of supply chains, greater concerted humanitarian action is urgently needed to eradicate the different – and expanding – forms of modern slavery and human trafficking that are emerging from crisis contexts, and continuing into post-crisis settings.

V. Our approach: diversity of perspectives

From conversations with key stakeholders, we have recognised the critical importance of having a diversity of perspectives to inform our work: those of survivors, global humanitarian and developmental leaders, technical practitioners and local and national CSOs as frontline responders. We have been working closely with each of these communities, chosen from the interconnected worlds of international organisations, national policy-making, non-governmental international humanitarian intervention, human rights activism, academia, and people with lived experience (or survivors) of modern slavery and human trafficking. We have divided our approach into three major work streams.

13 Forms of slavery discussed by the article's authors included the forced abduction and trafficking of human beings for exploitative purposes lying beyond the scope of mere forced labour, such as servitude and forced sexual exploitation. For more info, see: Morsink, J., *The Universal Declaration of Human Rights: Origins, Drafting, and Intent*, 1999, pp. 41–4.
14 Waly, G., *Human Trafficking and Criminal Exploitation in an Age of Change*, Nuffield College, University of Oxford, 30 January 2025.
15 Office of the Special Representative of the Secretary-General for Children and Armed Conflict, *Child Trafficking and Armed Conflict*, 2023, pp. 1, 11.

Case study
Perspectives from a former child soldier

James*, 17, is the eldest of three brothers from the Democratic Republic of the Congo. Their father died and their mother worked in the fields to support their family. One day, James was walking home from school with three friends from his village when he heard someone calling his name. As they crossed the fruit plantation, a boy of about 10 years old suddenly appeared. He amused James by telling him stories and asking strange questions, so James told his friends to go ahead. Then, everything changed.

"Four armed men appeared and forced me to go with them, knocking me about and striking me with a whip. That is how I found myself recruited into an armed group".

While held by the armed group, James was forced to learn about their ideology and received training in military intelligence, armed robbery, weapons, livestock theft and intimidation methods for robbing people on the road or in the fields, or abducting them. He was forced to perform many jobs, starting as a cook before being promoted to bodyguard of the camp commander, and was eventually made to lead operations on a national road. He was sometimes sent with other children to support joint operations with different armed groups.

"There were times when I cried, especially when I thought about my mother and my two brothers, but I couldn't leave the bush because all the paths out were watched by members of the armed group. They also kept a watch on me".

One day, during an operation to steal livestock, James seized his opportunity to escape. He left his weapon on the roadside and reported to the United Nations Organization Stabilization Mission in the Democratic Republic of the Congo, who took him to Uvira where the International Committee of the Red Cross helped him to find his family.

James was happy to be reunited with his mother. He received assistance from an NGO to start his own hairdressing salon, which now enables him to support himself and his mother. He is starting to think about having his own family.

"I think the armed groups should lay down their arms and stop recruiting children because it's not right".

James shared his story for the 2019 *International Review of the Red Cross*, which features the experiences of former child soldiers recruited in the Democratic Republic of the Congo, their difficulties, and hopes for a new life.

*Not his real name.

Based on "Testimonies of former child soldiers in the Democratic Republic of the Congo", International Review of the Red Cross 911, 2019.

First, we have aimed to learn from the major international organisations and international NGOs involved in crisis response, through reviews of their strategic documentation, and through interviews with their senior leaders and technical leads. We have sought to locate the place of anti-slavery and anti-trafficking efforts in the strategic and operational plans of these organisations. Our analysis has paid attention to their definitions of modern slavery and human trafficking; to their ability to identify the key risk factors that make groups and individuals vulnerable to traffickers and exploiters; and to their awareness of the gaps in humanitarian response. The organisations we engaged with include:

- **The Inter-Agency Coordination Group against Trafficking in Persons (ICAT)**
- **The International Organization for Migration (IOM)**
- **The United Nations Development Programme (UNDP)**
- **The United Nations High Commissioner for Refugees (UNHCR)**
- **The United Nations Office for the Coordination of Humanitarian Affairs (OCHA)**
- **The United Nations Office of the High Commissioner for Human Rights (OHCHR)**
- **The United Nations Office for Drugs and Crime (UNODC)**
- **The International Federation of the Red Cross (IFRC)**
- **The International Committee of the Red Cross (ICRC)**
- **The International Rescue Committee (IRC)**
- **Save the Children**
- **Oxfam**
- **Plan International.**

Our second work stream has consisted of engagement with regionally based civil society – or "deep dives" – to analyse anti-slavery and anti-trafficking responses by an array of local, national and regional CSOs. Thus far we have looked at four key contexts: the (West) Balkans; Western, Central and Eastern Africa; Central and South America; and South-East Asia. We have interviewed members of a total of 39 CSOs, covering 24 UN Member States, and we plan to further expand our geographical reach in the next phase of the Global Commission's work. We engaged these groups in interactive online workshops, and produced a series of co-authored records of these gatherings, including the participants' specific suggestions and detailed recommendations for improving the current situation. All of the CSOs we spoke to had experience of operating in crisis contexts, and were either entirely devoted to anti-slavery and anti-trafficking efforts, or encountered modern slavery and human trafficking while addressing related issues such as armed conflict, racial discrimination, sexual and gender-based violence and child abuse.

VI. *Prevention Framework for Human Trafficking and Modern Slavery*

Our third work stream centred upon understanding vulnerabilities to modern slavery and human trafficking. For this purpose we have designed a new *Prevention Framework for Human Trafficking and Modern Slavery*. This *Prevention Framework*, which is being published in full alongside this report, is intended to raise awareness of, and better target responses to, these illegal activities. To prevent and protect, one first has to understand the complex sets of reasons why people become victims. The *Prevention Framework* thus seeks to pinpoint the range of situations that expose populations to exploitation. It is an analytical tool, framed around a series of general and specific risk factors: together these risk factors are responsible for increasing individual and collective vulnerabilities, and for shaping the modus operandi of traffickers and exploiters.

To produce this framework, we have drawn on insights and information from over fifty leading reports published by IOs and INGOs, as well as academic journals, and we have consulted closely with diverse experts and stakeholders. We are particularly grateful for the detailed feedback provided by UNHCR, and the representatives of both the Organization for Security and Cooperation in Europe (OSCE) and the Counter-Terrorism Committee Executive Directorate (CTED) within the Inter-Agency Coordination Group against Trafficking in Persons (ICAT). Our framework draws on a similar tool focusing on atrocity crimes, developed in 2014 by Adama Dieng, former UN Under-Secretary-General for the Prevention of Genocide (and a fellow member of the Global Commission) who has also been closely advising us on this work.

VII. What do we need to do?

Introduction – what we found

Our research has confirmed that trafficking and modern slavery cannot be looked at through a single lens – they are caused by multiple factors, which interact with and compound each other in crisis and emergency contexts.

These factors include:

- Firstly, the **environment** that trafficked individuals come from. This covers situations of conflict and crisis, climate-related displacement, lack of food security and loss of livelihood.
- Secondly, the capacity of **individuals themselves**, arising from their gender, age, ethnicity, socio-economic background, education, access to social protection, and previous histories of forced labour and child labour, racial discrimination and child and sexual abuse.
- Thirdly, the presence of **exploitative economic actors** in the affected area and weak or authoritarian governments/ institutional arrangements.

These factors compound to make negative coping strategies and trafficking in contexts of armed conflict, socio-economic crisis and natural disaster more likely. It becomes more difficult to develop strategies to tackle trafficking and modern slavery in these circumstances, because there is not a widely used and cross-referenced single definition of trafficking and modern slavery, and there are no reliable global figures on the numbers of people being trafficked in crisis and emergency contexts. The numbers we do have are likely to be a very significant underestimation, for a variety of reasons, including:

- The hidden nature of the crime, or at least the weaknesses in our systems for detecting it;
- The cross-border nature of the crime, which leads to under-reporting by victims[16];
- Inconsistent definitions and data collection;
- Limited resources among law enforcement organisations and NGOs;
- Stigma and shame, particularly in the case of sexual exploitation of victims;
- The complexity of cases.

We welcome the efforts being made at a global level to address this, through the publication by IOM and UNODC in December 2023 of the International Classification Standard for Trafficking in Persons Administrative Data (ICS-TIP). This recognises that, while data on human trafficking does exist, "there is no uniform framework or standard practice for measuring the crime of trafficking in persons: indicators on its different aspects vary from country to country, or even from organisation to organisation within countries, presenting obstacles to comparison and analysis"[17].

We also welcome the launch of the Standard Tools for Analysis of Trafficking in Persons (STATIP) programme. However, we note that collection, measurement and analysis of data will still be very difficult in some of the most challenging contexts, such as in relation to conflict and climate-related displacement, where the risk of trafficking is at its highest, and where government is often significantly decentralised.

Both of these initiatives to improve the quality of data are steps in the right direction, to underpin our understanding of and response to trafficking.

A further critical issue in tackling trafficking is the ambiguity of leadership around the issue. While the Inter-agency Coordination Group against Trafficking in Persons (ICAT) serves as a key coordinating body for policy in relation to trafficking, there is no single agency with a mandate to drive the collective improvement of outcomes throughout the humanitarian system. Trafficking in crisis contexts also does not systematically feature in any reporting to the Security Council, for example as part of the Protection of Civilians aide-memoire that focuses on armed conflict.

We have examined the overarching strategy documents of nine key international humanitarian organisations working in crisis contexts. References to modern slavery and human trafficking are noticeable by their infrequency or complete absence. They are more frequently made in strategy documents relating to migration and displacement.

Our interviews with stakeholders have shown that trafficking is often not seen as a life-saving protection issue compared to other risks, and therefore may not be prioritised. There are exceptions, such as the Ukraine crisis and the conflict in Libya, in which trafficking has been specifically recognised and responded to, but these have not been consistent and may reflect the particular context of access to the European Union[18]. While it is difficult to measure the impact of anti-trafficking efforts, we found little evidence that this was a priority for organisations, and this was compounded by the wide range of ways in which any data is collected and of the definitions used, as described above. The international organisations which we engaged with were well aware of the important role of local, sometimes specialist, civil society organisations (CSOs) in preventing and detecting modern slavery and human trafficking in emergencies, but did not always have the time or skill to engage with them effectively. This has been confirmed through the workshops that we are running with CSOs across five continents.

Furthermore, it is clear both from the literature and from our interviews that overall approaches to protection issues in the round are currently the subject of much scrutiny and concerns about their effectiveness. Current approaches are seen as being siloed and under-funded. Individual organisations tend to look at protection risks through the lens of their own mandates, rather than with detailed analysis of the protection risks of the affected populations as a whole[19]. While significant efforts have been made in this area, such as those by the GPC Anti-Trafficking Task Team, the lack of a single agency with a dedicated mandate can still prevent trafficking from being recognised as a protection issue in crisis contexts. We welcome the current, soon-to-report review and mapping of UN protection frameworks.

16 As human trafficking is a cross-border crime, multiple governments and agencies (international and cross-sector) are responsible for collecting data and reporting on numbers, which may lead to inadequate reporting. See: Department of State, *Trafficking in Persons Report 2024*, 2024, p. 13. Furthermore, it is worth noting that "data collection systems on migration are typically not designed to record the possible involvement of smugglers." See: https://www.migrationdataportal.org/blog/why-are-data-trafficking-persons-and-smuggling-migrants-important-and-why-do-we-need-improve
17 IOM & UNODC, *Making Each Case Count, Leveraging Administrative Data on Trafficking in Persons*, 2023, p. 2.

18 Justice & Care, *Anti-Trafficking in Humanitarian Contexts*, p. 25.
19 For example, "Protection is interpreted differently across the humanitarian sector and has not been a collective priority for IASC leaders. The direction has therefore not been set for ensuring protection is at the core of humanitarian action." See Cocking, J., Finney, N., Lilly, D., McGoldrick, J., & Spencer, A., *Independent Review of the Implementation of the IASC Protection Policy*, 2022, p. 10.

Bringing about change depends on the decisions and actions of the key humanitarian and developmental actors. Our recommendations are grouped accordingly, by:

- Global system leaders
- Global IOs/ INGOs and the Red Cross & Red Crescent movement
- Regional/ national/ local CSOs
- Governments that are competent to deal with modern slavery and human trafficking.

Although the majority of our recommendations pertain directly and explicitly to crisis contexts, there are a smaller number which we believe have relevance both inside and outside of these contexts. We have therefore (with the encouragement of the CSOs we engaged) included some actions the scope of which extends beyond this chapter. We recognise that each actor has a different mandate, purpose and capability, which may relate differently to the issue of human trafficking.

That said, we see trafficking as a cross-cutting humanitarian issue, requiring shared and specific commitments from all actors to help address both gaps and overlaps and to improve outcomes. In each section below, we identify one overarching recommendation and then the actions that will support progress on it. The further development of some of these will form part of our ongoing work in the Global Commission.

Recommendation 1:

System level: elevate global leadership around anti-trafficking as a protection issue in crisis contexts, and formally recognise the elimination of trafficking and modern slavery as life-saving interventions across the humanitarian system.

Action 1.1: Establish a two-year Strategy & Delivery Group under the auspices of the Executive Office of the UN Secretary-General, and with survivor perspectives at its heart, to elevate awareness of trafficking as a protection issue in all parts of the international humanitarian aid system, and embed responsibilities in every aspect of preparedness and response, including (but not limited to) operational planning, role descriptions, leadership development, performance measurement and integration of lived experience..

Action 1.2: Evaluate the options for long-term leadership of human trafficking as a global protection issue in crisis contexts, either by a strengthened multi-agency approach that builds on the foundations laid by ICAT, or by giving responsibility to a specific UN agency to carry the mandate and create a centre of excellence that spreads good practice, raises awareness and shares knowledge throughout the system as part of a revitalised approach to protection.

Action 1.3: Elevate trafficking in armed conflict as a key Protection of Civilians issue to be considered in the UN Secretary-General's regular aide-memoire to the Security Council, and resource it accordingly.

Action 1.4: Prepare a resolution, on the concerted actions needed to prevent trafficking, to the UN Economic & Social Council (ECOSOC), with a view to a full UN General Assembly debate.

Action 1.5: Develop and adopt a single, or at least connected, definition of modern slavery and human trafficking, and invest in systematic, disaggregated data collection to build a meaningful estimate of its prevalence at the national, regional and global level in crisis/ emergency situations.

Action 1.6: Encourage rigorous interdisciplinary academic research on the historical roots and contemporary manifestations of modern slavery and human trafficking in crisis contexts, such that national funding agencies elevate this field as a top priority for investing in policy-based research by universities. Quantitative research, for example into the cost-effectiveness and return on investments of interventions to counter modern slavery and human trafficking, as well as the role of technology in this area for good or ill, should be especially encouraged, with the potential to repurpose cutting-edge social science research methods and techniques in adjacent fields of scholarly inquiry on the subject of modern slavery and human trafficking.

Recommendation 2:

IOs, INGOs and the Red Cross & Red Crescent Movement: all IOs/ INGOs – especially those directly involved in humanitarian work – should explicitly recognise anti-slavery and anti-trafficking efforts – prevention, protection, prosecution and partnership – as part of their institutional strategies.

Action 2.1: IOs/ NGOs should prioritise the elimination of modern slavery and human trafficking as life-saving actions, and work more cohesively and coherently to contain and reduce them in crisis contexts. All Humanitarian Response Plans and Regional Migrant Response Plans should integrate a capability to prevent and respond to trafficking. They should ensure that there is operational capability to prevent, detect and respond to such needs when they arise. All responses should be survivor-centred, trauma-informed, gender and child-sensitive and context-specific.

Action 2.2: Global approaches to protection, for example via ICAT, the Inter-Agency Standing Commission or the wider humanitarian system, should explicitly recognise the risk of trafficking, alongside other risks such as sexual and gender-based violence, and drive a holistic approach to the assessment of and response to risk for the protection of affected populations at every level from the outset of an emergency.

Action 2.3: International humanitarian agencies should invest in the development of their skills in partnership and capacity building with national and local civil society actors in crisis contexts which are responding to trafficking, and make this an explicit part of their institutional strategies. Survivors and survivor-led organisations should be integrated into the evaluation process for programmes and become key advisers to international decision-makers, especially within the UN system.

Action 2.4: International humanitarian and developmental agencies should integrate human trafficking issues into individual organisational and inter-agency training and learning, alongside other protection risks such as sexual and gender-based violence, and risks around child protection. They should ensure that modern slavery and human trafficking are explicitly included in the UN Humanitarian Coordinator's governance, training guides and manuals, as well as the UNHCR-led Cluster system and emergency handbook, including for risk reduction as well as response. Attention to specific counter-trafficking measures should be reinforced, for example in the design of reception centres and awareness-raising.

Action 2.5: International humanitarian agencies should ensure that there is alignment between policy and practice, in responding to human trafficking, between humanitarian crisis response and climate action initiatives, especially in regions identified as climate displacement hotspots.

Action 2.6: International humanitarian agencies should develop an impact measurement framework for their anti-trafficking efforts, perhaps equivalent to SPHERE standards for assistance.

Action 2.7: International humanitarian agencies and researchers should take the learning from specific contexts in which trafficking has been well-managed, such as Ukraine, documenting the regional and country protection structures and embedding this learning into operations strategy and protocols.

Recommendation 3:

National and regional CSOs: regional bodies, such as the African Union, European Union, Community of Latin American and Caribbean States and Association of Southeast Asian Nations, to work with other key stakeholders to establish strong regional alliances, to ensure better coordination of anti-trafficking and anti-slavery efforts at a regional level. These alliances should comprise CSOs, IOs, INGOs and relevant national authorities on labour, law enforcement and social welfare.

The Global Commission will use its convening power to bring these stakeholders together, and to discuss with civil society actors who would be well-placed to organise and coordinate these alliances.

Action 3.1: Regional alliances, once established, formally recognise the critical strategic role of local and national CSOs as key partners in decision-making in global crisis response structures, and frontline humanitarian responders in addressing modern slavery and trafficking; foster partnership and learning opportunities between and from local and national CSOs; and strengthen their dialogue with IOs, INGOs and key national government agencies.

Action 3.2: Embed CSOs into international decision-making bodies (e.g. UN-led humanitarian task forces) to ensure that they become central agents of systemic change alongside both governments and IOs/ INGOs.

Action 3.5: Wherever CSOs are weak or absent, other relevant actors (such as other CSOs, INGOs or governments) to sensitise local community leaders, religious leaders, community health workers and teachers to the need to implement anti-trafficking and anti-slavery civic education.

Action 3.6: CSOs to work with government and other partners to invest in early warning mechanisms to detect and act on movement in the factors which contribute to modern slavery and human trafficking.

Action 3.7: Regional and national CSOs to recognise survivors and survivor-led organisations as being essential in the development of ethical, victim-centred, trauma-informed, and culturally, gender- and child-sensitive crisis-response anti-slavery and anti-trafficking strategies.

Action 3.8: Regional and national CSOs to partner with competent authorities and other actors to make the case for and seek long-term funding of shelters for victims of modern slavery and human trafficking, and to design and support context-specific re-integration programmes.

Action 3.9: Regional and national CSOs to work with border agencies to appoint and train mobile identification teams in high-prevalence border areas, staffed with psychosocial workers and CSO staff.

Recommendation 4:

Governments. The Global Commission in its next phase of work will test a number of propositions for governments that have emerged from our engagement with civil society groups.

Inevitably, our research and evidence-gathering has identified issues around which governments play a key role, though we have not specifically spoken to governments at this stage. Sometimes the government role is direct, for example in developing effective legislative frameworks; at other times it is indirect, for example in creating a supportive environment for CSOs to undertake their work in the prevention of trafficking and the protection of people affected by it. These emerging propositions will be tested and integrated into the Global Commission's future work examining the role of government.

1. Recognise those with lived experience, communities at risk and civil society as central actors and change-makers in the elaboration and implementation of national anti-trafficking strategies, programme design and evaluation. Governments should therefore facilitate the creation of an institutional infrastructure designed to support the influence of CSOs in the development of these strategies, and ensure that CSOs can operate without any form of repression.

2. Expand the number and range of legal pathways available for persons with international protection needs to be admitted to or resettled in third countries, as well as other pathways to facilitate access to protection and solutions, including action on the basis of Article 7 of the Palermo Protocol, which calls on countries to offer a temporary or permanent right to remain to victims of trafficking.

3. Provide training and promote awareness-raising around modern slavery and human trafficking for frontline CSO personnel and other frontline actors.

4. Consider commissioning research into the impact of restrictive border controls on the likelihood of human trafficking, and ways to mitigate the risks of not identifying victims of trafficking in this context.

5. Develop programmes, in partnership with those with lived experience, communities at risk and CSOs, to change harmful social norms that perpetuate negative gender, racial or religious stereotypes, or discriminate against certain groups and minorities who are particularly vulnerable to modern slavery and human trafficking.

6. Because the forms of exploitation are constantly evolving, governments need to broaden the focus of anti-trafficking activities from supply chains to other specific contexts, such as humanitarian crises, and other forms of modern slavery and human trafficking, such as forced marriage, forced sex work, forced criminality and forced begging. Broadening the focus of anti-trafficking efforts should involve the support of survivor-led organisations.

7. Allocate public funds to strengthen the capacities and mechanisms for the identification and provision of assistance and support to victims of human trafficking, including, for example, increasing the territorial scope and sustainability of mobile teams or strengthening access to support online.

8. Establish high standards of cyber security and safety in technological products used by children and adolescents, including educational programmes to minimise exposure to the risk of human trafficking, and improve the detection of such cases, in partnership with tech companies and CSOs.

9. Create public compensation funds and deepen support for victims of modern slavery and human trafficking, including through regularisation of status.

10. Where trust in the authorities is workable, provide police protection to humanitarian staff and psychosocial aid mobile units appointed by CSOs (if this is necessary) for their safety.

VIII. Next steps

In the first phase of the Global Commission's work, we have made a series of practical recommendations aimed at reducing the incidence of trafficking and modern slavery in crisis contexts for the long term. In the second phase we will carry out further in-depth work to bring those recommendations to life, both globally and in different regional crisis contexts.

These next steps are grouped around the following themes:

- Bringing people together
- Harnessing data and technology for good
- Understanding funding flows and developing alternative funding mechanisms
- Specifying an implementation and integration plan for the Prevention Framework
- Possible fields of future research.

Bringing people together

Human trafficking and modern slavery as they occur in crisis contexts are systemic issues, to which there are not simple solutions that can be implemented by a single organisation. Rather, what is called-for is concerted action across the system, to enable the protection of those most at risk. This requires effective collaboration between governments, international agencies, NGOs and local & national CSOs, including:

- The alignment of leadership priorities and practices;
- Enabling models of governance which combine accountability for funding with accountability to survivors and people at risk of trafficking;
- The optimisation of funding flows (see below).

The work plan to bring people together has three components:

a) **To address systemic issues, design a framework and develop an action plan for embedding modern slavery and human trafficking in all aspects of humanitarian response within the UN system and beyond.**

As recommended in our report, we envisage that this role could be played through the establishment of a two-year Strategy & Delivery Group under the auspices of the Office of the Secretary-General, involving the full range of IOs responding to humanitarian emergencies, and with survivor perspectives at its heart.

b) **To enhance regional solutions, design a framework and develop an action plan for the creation of regional alliances to increase regional collaboration in containing modern slavery and human trafficking.**

There needs to be a bridge from the global level to the national level if we are to support learning and continuous improvement in the ways that we address modern slavery and human trafficking in crisis contexts. We believe that regional organisations such as the African Union, European Union, OSCE, ASEAN and OAS could help play this bridging role.

These arrangements need to be tailored to context, and flexible enough to evolve according to what works, while enabling the right balance of accountability. In the next stage of our work we will liaise with other partners, such as Alliance 8.7, to ensure that we build on existing good practice where it exists.

Building upon our regional engagement workshops, we will consult with regional organisations and civil society partners about what might work, learning from regional coordination on other equivalent issues and develop proposals tailored to regional contexts.

    c) **Design a model partnership framework and develop an adoption strategy for governments and CSOs to counter trafficking in crisis contexts.**

Governments have a critical role to play in putting into place practical arrangements, and creating a culture, to help harness the capacities and capabilities of national and local CSOs that respond to human trafficking in crisis contexts. This should be seen as a partnership, though the initial power imbalance means that governments should play a leading facilitative role.

Where government capacity is weak, for example in fragile states, international organisations and INGOs may need to be part of these efforts.

We recognise the work being undertaken in other parts of the system, such as the Alliance 8.7 Pathfinder programme (which is not focused on crisis contexts specifically, but from which we may be able to learn).

There is no single blueprint, but we will research what works and seek out common principles that could underpin model partnership frameworks, and promote these in key fora.

Mobilising data and technology

The report highlights our support for recent UN initiatives on data collection and measurement. We will explore how we can best partner with the key UN agencies to accelerate support for and adoption of these programmes.

We also recognise that technology is a force both for good and ill in tackling trafficking in crisis contexts, for example around the roles of social media, information, identity, encrypted communication, data sharing, financial flows and others.

We do not see ourselves as the experts in this area, and there are others who are playing a leadership role. That said, the advent of artificial intelligence means that we all need to step-up our understanding and skills in this space.

We will bring together leading technology thinkers with those working on trafficking in crisis contexts, to identify how all our recommendations and follow-up actions integrate the possibilities that technology can offer, and counter its worst effects. We will also explore how data science could be harnessed to provide more robust quantitative measurement of vulnerability indicators in the Prevention Framework.

Understanding funding flows and developing alternative funding mechanisms

Our work to date has confirmed that the implementation of global protection policies and strategies, in relation to victims of trafficking and other groups, is inconsistent and siloed. While we welcome the recent UN announcement of a new Agenda for Protection, within the Pact for the Future, as well as a collective commitment to protect people in the midst of crises, and recognising that member states have the primary responsibility for this protection, there are many aspects of its implementation that are unclear, including its implications for survivors and people at risk of trafficking.

Therefore, to ensure that there is follow-through on our recommendations, there is a need to develop a more detailed assessment of operational gaps and funding flows within the humanitarian and developmental system, that affect whether resources are available at the front line to support anti-trafficking activities.

In particular, we will endeavour to:

    a. Track funding for protection activity – how well does it specifically recognise trafficking, and does the funding reach the ground?

    b. Review what structures are in place at different levels and what works in different contexts; for example, some Protection Clusters have a standing working group on anti-trafficking, together with GBV and Child Protection Areas of Responsibility, while others do not. A possible outcome of this review can be a Conference of Parties, which could lead to the adoption of a new optional Protocol to the Convention against Transnational Organized Crime.

    c. Assess at what level (global, regional or national) trafficking should be singled-out as a protection issue, with resources allocated to address it.

    d. Develop an innovative funding system and explore additional funding streams, including connection to relevant industry bodies such as airlines.

    e. Develop an agenda for action.

Specifying an implementation and integration plan for the Prevention Framework

Creating a clear plan for implementing and mainstreaming the Prevention Framework on modern slavery and human trafficking will need to start with identifying specific needs and gaps in current prevention efforts. Next, specific goals and objectives for the Prevention Framework will have to be defined. Further, the strategies and actions needed to achieve the objectives will have to be based on close collaboration with Member States, government agencies, NGOs, community-based organisations, corporations, business organisations, trade unions, business organisations, financial institutions and other relevant stakeholders. Collaboration and partnerships between stakeholders will need to be fostered to ensure that there is a coordinated approach, while establishing implementing bodies and securing adequate funding sources to support the various activities and initiatives, as well as providing training materials and education for stakeholders on modern slavery and human trafficking, and awareness campaigns. In addition, prevention activities and support for victims and survivors, including legal aid, mental health services and vocational training programmes, would be necessary ingredients for the plan. Based on reliable data collection and rigorous evaluation, this plan must also hold stakeholders accountable for their roles and responsibilities.

Possible fields of further research

We have identified the following fields where there is an urgent need of further research, and below we have provided illustrative lists of research questions for each of the fields:

- Improving data and harnessing technology;
- Understanding the funding flows in humanitarian response, to develop more detailed assessments of operational gaps and funding flows;
- Mobilising historical knowledge and learning from past experience;
- Enhancing our understanding of the current operational humanitarian environment.

Indicative further research questions

Improving data & harnessing technology:

- How many people are at risk of trafficking in crisis and emergency contexts right now?
- How many people are actually trafficked each year by region, country and context?
- What specific factors contribute to the risk of trafficking in various crisis contexts?
- How can we harness AI & Data Science to populate the Prevention Framework with up-to-date data, and to quantify the relevant vulnerability indicators attached to the various risk factors?

Understanding the funding flows in humanitarian response to develop more detailed assessment of operational gaps and funding flows

- How can we track funding for protection activity – especially, how well does it specifically recognise trafficking, and does the funding reach the ground?
- What structures are in place at different levels, and what works? For example, some Protection Clusters have a standing working group on anti-trafficking, together with GBV and Child Protection Areas of Responsibility?
- What is the nature of the overlap between issues of trafficking, SGBV and child protection? Is one a predictor/ indicator of another – if so to what degree?
- How do funding flows for protection – small, unremarked – drive both silos and failure to protect the most marginalised?

Mobilising historical knowledge and learning from past experience

- What light do the historical roots of modern slavery and human trafficking, as they vary between different cultures, countries and continents, shed on contemporary practices and cultural understandings of these crimes?
- What has historically determined the mutation of modern slavery and human trafficking?
- What are the leading examples, either from the more recent or from the deeper past, of effective humanitarian interventions in crisis contexts (to include organisations, strategies and individuals)?

Enhancing our understanding of the current operational humanitarian environment

- What proportion of humanitarian workers has received training in the detection and prevention of trafficking, and response to victims of trafficking?
- How can we develop a more robust analysis of the intersection between armed conflict and human trafficking, including how armed conflict may affect or empower such networks, in order to develop tailored context-specific and evidence-based responses, rather than one-size-fits-all recommendations?
- What kind of collaborations do we need between humanitarian and developmental agencies, tech companies and governments, to detect trafficking in emergencies and fragile or failed states?

Chapter 9:

Summary of recommendations & actions required

9.1 Recommendations and actions required for effective implementation of international commitments and national legislation.

9.1.1 Member States of the United Nations who do not have domestic legislation enacting their international legal obligations on slavery should enact such domestic legislation.

Actions arising:

- The United Nations should maintain a public list of those Member States that do not have comprehensive domestic legislation in place.
- International groupings, such as the G7, G20 and BRICS, should have modern slavery and human trafficking as an agenda item for their annual meetings.
- Modern slavery and human trafficking should be a regular item on the agenda of regional groupings such as ASEAN, the African Union and the EU.

9.1.2 Those Member States that have inadequate domestic legislation should revise it to make it comprehensive and reflect their international obligations in full.

Actions arising:

- In addition to outlawing activities identified under international obligations, such as slavery, human trafficking and servitude, Member States' domestic legislation should cover government support for victims, the responsibilities of businesses in ensuring that there is no forced labour in their supply chains

(and the penalties that will be applied if they do not), the powers of law enforcement, interaction with other criminal and civil law, public procurement requirements and the establishment of oversight bodies.

- Member States should ensure that they have suitable provision in place to support the victims of modern slavery and human trafficking. This should recognise the traumatic nature of being enslaved and trafficked, the length of time it takes for a victim to be able to resume a free life, and the need for support for those who wish to provide evidence against perpetrators.

9.1.3   All Member States should ensure they have effective arrangements in place to enforce the legislation.

Actions arising:

- Member States should provide appropriate training for all branches of law enforcement and for those in the criminal justice system (including the judiciary), so that they have a full understanding of the nature of modern slavery and human trafficking.
- Member States should make proper provision for the enforcement of labour laws.
- Member States should outlaw child marriage and take steps to ensure compliance.
- Member States should ensure that their public procurement rules include both the need to ensure good value and the need to recognise international obligations to end slavery and trafficking. Those making procurement decisions should be trained in ensuring that there is no forced labour in relevant supply chains.

9.1.4(a) The United Nations should assist Member States by establishing a legal definition of modern slavery and human trafficking which could be used in domestic legislation. This should cover all forms of modern slavery and human trafficking i.e. including related activities such as servitude and the slave trade.

Actions arising:

- Any definition developed following this recommendation should take cognisance of the different definitions currently used within the United Nations, it should be comprehensive, it should reflect the views of survivors, and it should not reflect a particular geopolitical environment. It should also be capable of covering evolving forms of modern slavery and human trafficking.

- The Global Commission stands ready to work with the UN and its Member States to address this problem, for example by supporting Member States' consultations with stakeholders, including survivors and civil society organisations, and working with UN working groups or specialised committees set up to consider this issue.

9.1.4(b) The United Nations should assist Member States by ensuring that the 15th Session of the Working Group on Trafficking in Persons under the United Nations Convention Against Transnational Organized Crime opens a dialogue on the value of strengthening/ revitalising the Palermo Protocol. This should be a standing annual agenda item.

Actions arising:

- The Working Group should report on the development of this dialogue and on actions taken.
- Civil society organisations should be involved in the dialogue and related work.
- The Commission stands ready to support that dialogue.

9.2   Recommendations and actions required for addressing forced labour in global supply chains

9.2.1   The UN Guiding Principles on Business and Human Rights (UNGPs) should be the foundation for how governments and companies address modern slavery, including forced labour in supply chains.

9.2.2   Human rights due diligence (HRDD) is the most effective tool available to companies to address forced labour in their operations and supply chains. To drive the systemic change needed to address its root causes, governments should move beyond voluntary measures and enact well-designed legislation mandating HRDD for companies, in full alignment with the UNGPs.

Actions arising:

- To address forced labour and similar abuses, companies should conduct human rights due diligence throughout their operations and supply chains by implementing practices that are specifically designed to address these risks.
- Policymakers should incorporate human rights due diligence into law, to strengthen existing measures against forced labour, ensuring greater corporate accountability.

9.2.3 For HRDD to be effective in addressing forced labour, it needs to be embedded across a company's operations and supply chains. Companies should develop a robust set of good practices using the UNGPs framework, covering leadership, strategy, governance, resourcing, due diligence, policies, measurement and reporting, remediation, and stakeholder engagement.

Actions arising:

- Tackling forced labour and modern slavery in company operations and supply chains should be an expressed priority for the Board, CEO and C-suite.
- Strong human rights standards should be visible in company strategy and business models, including explicitly outlining the business case for embedding human rights standards.
- Human rights policies in the organisation should be supported with dedicated, expert resources, particularly in large organisations.
- Internally resourced and independent third-party due diligence should be risk-based, proportional to the business size and capability, and focused on remediation.
- The organisation should have strong human rights policies in place; for example, regarding procurement, recruitment, living wages, freedom of association and worker feedback.
- The organisation should have a strong commitment to and capability in regularly measuring and reporting on human rights standards in its operations and supply chains.
- There should be an active programme of remediation where policies and standards have not been met, and shortcomings have been identified.
- Companies should have effective mechanisms to engage workers and other stakeholders in the fight against forced labour in their supply chains.

9.2.4 Workers need to be at the centre of HRDD. Companies should explore worker-driven models and the power of contracts to develop responsible practices in areas with known links to forced labour and worker exploitation, such as recruitment, procurement, wages, and working conditions.

9.3 Recommendations and actions required for civil society and crisis contexts.

9.3.1 System level: elevate global leadership around anti-trafficking as a protection issue in crisis contexts, and formally recognise the elimination of trafficking and modern slavery as life-saving interventions across the humanitarian system.

Actions arising:

- Establish a two-year Strategy & Delivery Group under the auspices of the Executive Office of the UN Secretary-General, and with survivor perspectives at its heart, to elevate awareness of trafficking as a protection issue in all parts of the international humanitarian aid system, and embed responsibilities in every aspect of preparedness and response, including (but not limited to) operational planning, role descriptions, leadership development, performance measurement and integration of lived experience.
- Evaluate the options for long-term leadership on human trafficking as a global protection issue in crisis contexts, either by a strengthened multi-agency approach that builds on the foundations laid by ICAT, or by giving responsibility to a specific UN agency to carry the mandate and create a centre of excellence that spreads good practice, raises awareness, and shares knowledge throughout the system as part of a revitalised approach to protection.
- Elevate trafficking in armed conflict as a key Protection of Civilians issue to be considered in the UN Secretary-General's regular aide-memoire to the Security Council, and resource it accordingly.
- Prepare a resolution, on the concerted actions needed to prevent trafficking, to the UN Economic & Social Council (ECOSOC), with a view to a full UN General Assembly debate.
- Encourage rigorous interdisciplinary academic research on the historical roots and contemporary manifestations of modern slavery and human trafficking in crisis contexts, such that national funding agencies elevate this field as a top priority for investing in policy-based research by universities. Quantitative research, for example into the cost-effectiveness and return on investments of interventions to counter modern slavery and human trafficking, as well as the role of technology in this area for good or ill, should be especially encouraged, with the potential to repurpose cutting-edge social science research methods and techniques in adjacent fields of scholarly inquiry on the subject of modern slavery and human trafficking.

9.3.2 IOs, INGOs and the Red Cross & Red Crescent Movement: all IOs/ INGOs – especially those directly involved in humanitarian work – should explicitly recognise anti-slavery and anti-trafficking efforts – prevention, protection, prosecution and partnership – as part of their institutional strategies.

Actions arising:

- IOs/ NGOs should prioritise the elimination of modern slavery and human trafficking as life-saving actions, and work more cohesively and coherently to contain and reduce them in crisis contexts. All Humanitarian Response Plans and Regional Migrant Response Plans should integrate a capability to prevent and respond to trafficking. They should ensure that there is operational capability to prevent, detect and respond to such needs when they arise. All responses should be survivor-centred, trauma-informed, gender-and-child-sensitive and context-specific.

- Global approaches to protection, for example via ICAT, the Inter-Agency Standing Commission or the wider humanitarian system, should explicitly recognise the risk of trafficking, alongside other risks such as sexual and gender-based violence, and drive a holistic approach to the assessment of and response to risk for the protection of affected populations at every level from the outset of an emergency.
- International humanitarian agencies should invest in the development of their skills in partnership and capacity building with national and local civil society actors in crisis contexts which are responding to trafficking, and make this an explicit part of their institutional strategies. Survivors and survivor-led organisations should be integrated into the evaluation process for programmes and become key advisers to international decision-makers, especially within the UN system.
- International humanitarian and developmental agencies should integrate human trafficking issues into individual organisational and inter-agency training and learning, alongside other protection risks such as the risk of sexual and gender-based violence, and risks around child protection. They should ensure that modern slavery and human trafficking are explicitly included in the UN Humanitarian Coordinator's governance, training guides and manuals, as well as the UNHCR-led Cluster system and emergency handbook, including for risk reduction as well as response. Attention to specific counter-trafficking measures should be reinforced, for example in the design of reception centres and awareness-raising.
- International humanitarian agencies should ensure that there is alignment between policy and practice, in responding to human trafficking, between humanitarian crisis response and climate action initiatives, especially in regions identified as climate displacement hotspots.
- International humanitarian agencies should develop an impact measurement framework for their anti-trafficking efforts, perhaps equivalent to SPHERE standards for assistance.
- International humanitarian agencies and researchers should take the learning from specific contexts in which trafficking has been well-managed, such as Ukraine, documenting the regional and country protection structures and embedding this learning into operations strategy and protocols.

9.3.3   National and regional CSOs: regional bodies, such as the African Union, European Union, Community of Latin American and Caribbean States and Association of Southeast Asian Nations, to work with other key stakeholders to establish strong regional alliances, to ensure better coordination of anti-trafficking and anti-slavery efforts at a regional level. These alliances should comprise CSOs, IOs, INGOs and relevant national authorities on labour, law enforcement and social welfare.

The Global Commission will use its convening power to bring these stakeholders together, and to discuss with civil society actors who would be well-placed to organise and coordinate these alliances.

Actions arising:

- Regional alliances, once established, formally to recognise the critical strategic role of local and national CSOs as key partners in decision-making in global crisis response structures, and frontline humanitarian responders in addressing modern slavery and trafficking; foster partnership and learning opportunities between and from local and national CSOs; and strengthen their dialogue with IOs, INGOs and key national government agencies.
- Embed CSOs into international decision-making bodies (e.g. UN-led humanitarian task forces) to ensure that they become central agents of systemic change alongside both governments and IOs/ INGOs.
- Wherever CSOs are weak or absent, other relevant actors (such as other CSOs, INGOs or governments) to sensitise local community leaders, religious leaders, community health workers and teachers to the need to implement anti-trafficking and anti-slavery civic education.
- CSOs to work with government and other partners to invest in early warning mechanisms to detect and act on movement in the factors which contribute to modern slavery and human trafficking.
- Regional and national CSOs to partner with competent authorities and other actors to make the case for and seek long-term funding of shelters for victims of modern slavery and human trafficking, and to design and support context-specific re-integration programmes.
- Regional and national CSOs to work with border agencies to appoint and train mobile identification teams in high-prevalence border areas, staffed with psychosocial workers and CSO staff.

9.3.4   Government. The Global Commission in its next phase of work will test a number of propositions for governments that have emerged from our engagement with civil society groups.

Actions arising:

- Recognise those with lived experience, communities at risk and civil society organisations as central actors and change-makers in the elaboration and implementation of national anti-trafficking strategies, programme design and evaluation. Governments should therefore facilitate the creation of an institutional infrastructure designed to support the influence of CSOs in the development of these strategies, and ensure that CSOs can operate without any form of repression.

- Expand the number and range of legal pathways available for persons with international protection needs to be admitted to or resettled in third countries, as well as other pathways to facilitate access to protection and solutions, including action on the basis of Article 7 of the Palermo Protocol, which calls on countries to offer a temporary or permanent right to remain to victims of trafficking.

- Provide training and promote awareness-raising around modern slavery and human trafficking for frontline CSO personnel and other frontline actors.

- Consider commissioning research into the impact of restrictive border controls on the likelihood of human trafficking, and ways to mitigate the risks of not identifying victims of trafficking in this context.

- Develop programmes, in partnership with those with lived experience, communities at risk and CSOs, to change harmful social norms that perpetuate negative gender, racial or religious stereotypes, or discriminate against certain groups and minorities who are particularly vulnerable to modern slavery and human trafficking.

- Because the forms of exploitation are constantly evolving, governments need to broaden the focus of anti-trafficking activities from supply chains to other specific contexts, such as humanitarian crises, and other forms of modern slavery and human trafficking, such as forced marriage, forced sex work, forced criminality and forced begging. Broadening the focus of anti-trafficking efforts should involve the support of survivor-led organisations.

- Allocate public funds to strengthen capacities and mechanisms for the identification and provision of assistance and support to victims of human trafficking, including, for example, increasing the territorial scope and sustainability of mobile teams or strengthening access to support online.

- Establish high standards of cyber security and safety in technological products used by children and adolescents, including educational programmes to minimise exposure to the risk of human trafficking, and improve the detection of such cases, in partnership with tech companies and CSOs.

- Create public compensation funds and deepen support for victims of modern slavery and human trafficking, including through regularisation of status.

- Where trust in the authorities is workable, provide police protection to humanitarian staff and psychosocial aid mobile units appointed by CSOs (if this is necessary) for their safety.

Appendix 1:
List of Commissioners

The Rt Hon. the Baroness May of Maidenhead Chair of the Global Commission on Modern Slavery & Human Trafficking, Former Prime Minister of the United Kingdom of Great Britain and Northern Ireland

Adama Dieng Vice Chair of the Global Commission on Modern Slavery & Human Trafficking, Former UN Under-Secretary-General and Special Adviser on the Prevention of Genocide

Sophie Otiende Vice Chair of the Global Commission on Modern Slavery & Human Trafficking, Founder of Azadi Community

Alan Jope Former CEO of Unilever, Director of Accenture, Chair of Leverhulme Trust, Visiting Fellow at Said Business School, Oxford University

Ausamah Alabsi Ambassador of the Kingdom of Bahrain to the Italian Republic, Former Chief Executive Officer, Labour Market Regulatory Authority, and Former Chairman, National Committee for Combating Trafficking in Persons in Bahrain

Sir Edward Braham Chair of M&G and formerly the Senior Partner of Freshfields LLP

Epsy Campbell-Barr Former First Vice-President of Costa Rica

Grace Forrest Human rights activist and Founding Director of Walk Free

Havovi Wadia Director of Programs at the Freedom Fund

Ilwad Elman Chief Operating Officer, Elman Peace Centre

Jose Manuel Barroso Former President of the European Commission, Former Prime Minister of Portugal, and Chair of GAVI

John Studzinski CBE Investment banker and philanthropist

Manvinder (Vindi) Banga Chair of UK Government Investments

Nasreen Sheikh Survivor of modern slavery, social entrepreneur and author

Professor Andrew Thompson CBE Professor of Global and Imperial History at Oxford University, Former CEO of the Arts and Humanities Research Council

Professor Anita Ramasastry Henry M. Jackson Professor of Law and Director of the Sustainable International Development Graduate Program at the University of Washington

Appendix 2:
Acknowledgements

The following shows those organisations and individuals who have been consulted, or have provided information, in the course of the Global Commission's work: we are grateful to all who have contributed. The report is the work of the Global Commission.

We are grateful to the Global Commission's Panel of People with Lived Experience for their vital expertise and insights. Their direct contributions have been fundamental to the development of this report, ensuring the perspectives of those directly affected underpin our findings: Chris Ash, Co-Founder, Collective Threads Initiative; Synteche Collins; Karsiwen, Chairperson KABAR BUMI (Association of Indonesian Migrant Workers Families); Mahendra Pandey, Director, Humanity United, and founder of the Global Migrant Workers Network (GMWN).

- Action Aid – Wangari Kinoti, Global Lead
- Adamson, Michael CBE – Former CEO of the British Red Cross and Former Interim Director of the Global Commission on Modern Slavery and Human Trafficking
- African Leadership Centre – Shuvay Nyoni, Director
- African Migration and Development Policy Centre – Linda Oucho, Executive Director
- Aithei Foundation – Animu Aithei, Founder
- Alliance 8.7
- Amka Africa Justice Initiative – Milka Wahu, Founder and Director
- Amnesty International – May Romanos, Gulf Researcher, Migrants Rights
- Amos, Baroness Valerie LG, CH, PC – Master of University College, Oxford, Former Head of OCHA and Former UK Secretary of State for International Development
- Anti-Slavery International – Chloe Cranston

- Artisanal Gold Miners – Edward Bickham
- Association pour l'action humanitaire et le développement durable – Idriss Abdelkérim Foudoussia, President
- Astra – Marja Andjelkovic, President and CEO
- Atina – Marijana Savic, Founder and Executive Director; Jelena, Hrnjak, Programme Manager
- Australian Human Rights Institute, UNSW Sydney
- Azadi Community, Kenya – Faith Wanjiku, Director; Mariam Onyachi, Programme Manager
- Berman, Cindy
- Blue Dragon – Luong Le
- BrightLine
- Busia Beyond Crime – Major Titus Wabire, Founder
- BSR
- CALP Network – Karen Peachey, Former Director
- Cana Family – Charles Mukabi, Coordinator
- CARE International
- Catholic Relief Services – Mainga Timon, Programme Manager
- Center to Combat Corruption and Cronyism – Pushpan Murugiah, CEO
- Centre for Social Cohesion, Peace and Empowerment – Abubakar Abdullahi, Executive Director
- Centre for Sustainable Conflict Resolution – Ramadan Aula, Director
- CMMB – James Kisia, Country Director, Kenya
- Coalition Communitaire pour la paix et la promotion du Vivre Ensemble – Harouna Saley Abdoulaye, President
- Coalition on Violence Against Women
- Commonwealth Parliamentary Association
- Concordia
- COTU – Damaris Muhika, Public Health Expert
- Counter Human Trafficking Trust East Africa – Mutuku Nguli, CEO
- CREAW Kenya
- CTED – Svetlana Martynova, Countering the Financing of Terrorism Coordinator
- Daccord, Yves – Former Director General of the ICRC, Director of the Edgelands Institute
- Dalit Solidarity Network UK (DSN UK)
- Danish Refugee Council – Simon Nzioka
- Destructive Fishing Watch Indonesia – Nabila Tauhida
- Different and Equal – Mariana Meshi, Executive Director
- Djuraskovic, Mitar – Former National Anti-Trafficking Coordinator, Republic of Serbia and Project Associate at Freedom Has No Price

- Eleanor Lyons, Independent Anti-Slavery Commissioner, UK
- Elman Peace Centre – Warsame Korio, Warsame Korio, Conflict Transformation and Development Expert
- Emmaus – Amela Efendic, Representative for Europe and Central Asia
- Environmental Justice Foundation – Dominic Thomson, Director and Project Manager for Southeast Asia
- European Centre for Minority Issues – Cameron Macbride
- Europol
- Everfree Uganda – Kelsey Morgan, CEO
- FEMNET
- Fondación Conclave Educativo de Ciencias Jurídicas – Michel Joseph, President
- Finance Against Slavery and Trafficking Initiative, Sustainable Finance Hub, UNDP
- Fondación Conclave Educativo de Ciencias Jurídicas – Michel Joseph
- Footprints of Freedom – Fauzia Wanjiru, Survivor Advocate
- Freedom Fund – Art Prapha, Senior Programme Manager; Ruth Kimani, Senior Programme Manager
- Freedom Has No Price – Dobrila Markovic, Executive Director
- Freshfields – Georgia Dawson; David Mendel; with particular thanks to Ali Kirby-Harris
- Fund for Global Human Rights – Kalvinder Dhillon
- Gangmasters and Labour Abuse Authority, UK
- Girls Not Brides – Nerida Nthamburi, Head of Africa Engagement
- GIZ – Better Migration Management Programme – Silke Hampson, Former Regional Coordinator, Kenya/ Somalia
- Grass Roots Empowerment Organization – Jaffar Njenga, Programmes Director
- Greenpeace USA
- H&M – Payal Jain
- Haart Kenya – Winnie Akinyi, Outreach Care Manager
- Caroline Haughey, KC
- Hyland, Kevin
- Hakluyt & Company – Andrew Hilland, Director
- HIAS Kenya
- HIWA Organization – Nura Ahmed Abdalla
- Hope for Justice – Tim Nelson, CEO; Sarah Butler, United States Programme Director; Philippa Roberts, Director of Legal Policy
- Howitt, Richard, former member of the EU Parliament
- HP Enterprise – John Schultz
- Human Trafficking Legal Center
- Hurst, Rosey

- Inter-Agency Coordination Group against Trafficking in Persons (ICAT)
- ICRC – Angela Cotroneo, Global Internal Displacement and Migration Adviser; Sarah Klingeberg, Regional Adviser for Europe
- IFRC – Asha Mohammed, Permanent Representative at African Union and IOs in Adis Ababa; May Maloney, Addressing Sexual Violence Adviser
- ILO – Francesca Francavilla, Senior Economist; Chris Duncan Agunga, Technical Officer; Alix Nasri, Labour Migration Officer
- Institute for Human Rights and Business (IHRB)
- International Justice Mission – Andrey Sawchenko
- International Transport Workers Federation (ITF) – Ruban Subasinghe, Legal Director
- IOM – Rosalyn Mae Borland, Head of Assisted Voluntary Return and Integration; Jennifer Dew, Programme Officer; Yitna Getachew, Interim Director of Protection Division; Ihma Sharif, Chief of Mission, IOM Bahrain
- IRC – Stefan Lehmeir, Programme Officer
- JAMAA Grands Lacs – Mumbere Sivihwa, Founder and Executive Director
- Juntas de Prietas – Ruth Pion, Co-Founder
- Justice and Care – Louise Gleich, Policy Research and Advocacy Lead
- Kenyan Red Cross – Ahmed Idris, General Secretary
- KUDHEIHA – Ruth Khakame, Chair
- Lowcock, Mark KCB – Former Head of OCHA and Former Permanent Secretary of the Department for International Development, UK
- MAST Human – Dornapha Sukkree, Executive Director and Co-Founder
- Maisha Girls Safe House – Florence Keah and all the workers at the Safe House
- Margery Consulting – Tim Pilch
- MAST Human – Dornnapha Sukkree
- Médecins Sans Frontières – Mildred Wanyonyi, East Africa Press Officer
- Migrant Workers Network – Savitri Wisnuwardhani, National Secretary
- Migrant Community Leaders in Bahrain
- Migrant Workers Network – Savitri Wisnuwardhani, National Secretary
- Mixed Migration Centre – Fiona Robertson, Manager for Asia and Pacific
- Modern Slavery Intelligence Network (MSIN)
- Morton, Victoria
- Nduwamahoro-NVA – Juvénal Nddaykeza
- Nisma Arsis – Ana Majko, Executive Director
- North-South Initiative – Adrian Anthony Pereira, Executive Director
- Northwell Health
- Norwegian Refugee Council
- Novartis – Aditi Wanchoo

- OCHA –Ramesh Rajasingham, Director of Coordination Division; Gemma Connell, Programme Officer
- OCS Group – Peter Seeley
- Okoa Sasa – Grace Ademba
- Organización El Paso – Yandira Alvarez
- OSCE – Marianne Angvik, Executive Programme Officer, Office of the Special Representative and Coordinator for Combating Trafficking in Human Beings
- Oxfam
- Partners in Change – Pradeep Narayanan
- Plan International – Rose Caldwell, CEO
- Policy and Evidence Centre on Modern Slavery – Prof. Murray Hunt, Director
- Polycom Development – Anne Agar, Managing Director
- Professor Dame Sara Thornton DBE QPM
- Programa Multidisciplinar "Mais Humanos"
- Project ECHO – Caroline Ksia, Africa Director
- RCCI-Uvira – Justin R. Samuracwa
- Re: Structure Lab
- Red Dominicana de Estudios y Empoderamento Afrodescendente-Red Afros – Dario Solano, Coordinator
- Refuge Point
- RefuShe
- Sainsbury's – Andy Hickman
- Save the Children – Gareth Owen, Former Humanitarian Director
- Serikat Buruh Migran Indonesia (SBMI) – Rizky Oktaviana, Coordinator
- Set Free to Thrive – Lilian Nyangasi, Programmes Director
- Stolen Dreams – Ishaan Shah
- SHOFCO – Joseph Amisi, General Counsel
- Slave-Free Alliance
- SOS Niksic – Natasa Medjedovic, Executive Coordinator
- TDH – Magdalene Mwanza
- Tech Against Trafficking
- The Anti-Slavery Collective
- The Consumer Goods Forum
- The Global Business Initiative on Human Rights (GBI), and many of its members, including BP, Hydro, NXP, Siemens and Trafigura, as well as two other companies Ikea and Samsung, which engaged with the commission in person and online
- The Lutheran World Federation
- The Mekong Club
- Tony's Chocolonely – Joke Aerts, Belinda Borcke

Appendix 3:

Resources to address modern slavery & human trafficking

	FRAMEWORKS / GUIDANCE	BUSINESS CASES / STATEMENTS / POLICIES	ORGANISATIONS
LEADERSHIP	**UN Guiding Principles on Business and Human Rights:** https://www.ohchr.org/ sites/default/files/documents/publications/ guidingprinciplesbusinesshr_en.pdf **B Team: Eradicating Modern Slavery:** http://bteam.niceandserious.com/assets/ reports/Eradicating-Modern-Slavery-A-Guide-for-CEOs.pdf **We Forum: Boards Engaging Affected Stakeholders:** https://www.weforum.org/ publications/engaging-affected-stakeholders-guidance-for-board-members-from-the-global-future-council-on-human-rights/ **WBCSD: CEO Guide:** https://humanrights. wbcsd.org/ceo-guide-call-to-action/ **The UNGP Reporting Framework:** https:// www.ungpreporting.org/resources/the-ungps/ **UNGP 31: Questions with implementation guidance:** https:// www.ungpreporting.org/wp-content/ uploads/UNGPReportingFramework_ withguidance2017.pdf	**Patagonia Inc.: Modern Slavery Statement:** https:// www.patagonia.com/ static/on/demandware. static/-/Library-Sites-PatagoniaShared/default/ dwd52f9d06/PDF-US/ PAT_2023_LegalDocuments-ModernSlaveryAct-012423.pdf **Tony Chocolonely: Tony's Open Chain:** https://www. tonysopenchain.com/ **Unilever: Responsible Sourcing Policy:** https://www.unilever. com/files/e6e301e3-7e20-4363-b6aa-ef0f4a4e3322/ responsible-sourcing-policy-interactive-final.pdf	**UN Global Compact:** https://www. unglobalcompact. org.uk https://www. unglobalcompact. org.uk/modern-slavery-working-group/ **International Labour Organization:** https://www.ilo.org
RESOURCE	**ILO: Fair Recruitment Guidelines:** https://www.ilo.org/sites/default/files/ wcmsp5/groups/public/@ed_protect/@ protrav/@migrant/documents/publication/ wcms_703485.pdf www.ilo.org **Decent Work Toolkit for Sustainable Procurement (UNGC):** https://sustainableprocurement. unglobalcompact.org/	**Responsible Recruitment:** https://impacttlimited. com/blog/case-studies/ responsible-recruitment-training-for-a-uk-retailers-suppliers-in-malaysia	**Issara:** https://www. issarainstitute.org **Impactt:** https:// impacttlimited.com/ about/our-story/
STRATEGY	**UNGPs on Human Rights in Business:** https://www.ungpreporting.org/framework-guidance/download-the-reporting-framework/ **Combating Forced Labour Handbooks:** https://bhr-navigator.unglobalcompact.org/ issues/forced-labour/ **ILO: Combating Forced Labour:** https:// www.ilo.org/publications/combating-forced-labour-handbook-employers-and-business-0	**Garment Industry: Benefits for Workers and Business:** https://impacttlimited.com/ wp-content/uploads/2024/07/ Report170x240v4-1.pdf **Unilever: Human Rights Report:** https://www.unilever. com/files/2d5cebae-87d6-4411-817d-22757e597cbf/ human-rights-report-interim-https://update-2022.pdf	**Shift:** https:// shiftproject.org/ what-we-do/ **Impactt:** https:// impacttlimited.com/ about/our-story/

	FRAMEWORKS / GUIDANCE	BUSINESS CASES / STATEMENTS / POLICIES	ORGANISATIONS
STRATEGY	**Worker-Driven Social Responsibility Network:** https://wsr-network.org **Office of the High Commission on Human Rights:** https://www.ohchr.org/en/topic/slavery-and-trafficking **UN Global Compact: Business and Human Rights Navigator:** https://bhr-navigator.unglobalcompact.org/issues/forced-labour/	**Coca Cola: Human Rights Policy:** https://www.coca-colacompany.com/social/human-rights	**Fair Labour Association (FLA):** https://www.fairlabor.org/
DUE DILIGENCE	**UNGC Guidance on Integration of Due Diligence:** unglobalcompact.org.au/ung_publications/business-integration-of-human-rights-due-diligence-in-australia-modern-slavery-and-beyond/ **Accord Report on working with brands / workers:** internationalaccord.org **ILO Forced Labour Indicators to capture the experience of workers:** www.ilo.org/global/topics/forced-labour/publications/WCMS_101171/lang--en/index.htm	**M&S: Corporate Modern Slavery Toolkit:** https://corporate.marksandspencer.com/sites/marksandspencer/files/marks-spencer/human-rights-and-our-supply/mns-modern-slavery-toolkit.pdf **Cleaning Accountability Framework:** http://www.cleaningaccountability.org.au **Sainsbury's:** https://www.about.sainsburys.co.uk/~/media/Files/S/Sainsburys/CRS%20Policies%20and%20Reports/2024/Modern%20Slavery%20Report%2023-24.pdf **Pentland:** http://pentlandbrands.com/wp-content/uploads/2018/10/Pentland-Modern-Slavery-Report-2018.pdf	**UN Global Compact:** http://unglobalcompact.org **Accord:** http://internationalaccord.org
POLICIES	**Better Buying:** https://betterbuying.org/ **IHRB Employer Pays Principle:** www.ihrb.org/projects/employer-pays-principle **IHRB Six Steps to Responsible Recruitment Implementing the Employer Pays Principle:** https://ihrb-org.files.svdcdn.com/staging/assets/uploads/member-uploads/Six_Steps_to_Responsible_Recruitment_-_Implementing_the_Employer_Pays_Principle.pdf **IOM IRIS The IRIS Standard for Responsible Recruitment:** https://iris.iom.int/sites/g/files/tmzbdl201/files/documents/IRIS%20Standard%20Report%20.pdf **FLEX Worker Engagement:** https://lawrs.org.uk/wp-content/uploads/2024/04/FLEX-Worker-Engagement-in-HRDD_Final-Learnings-Report-1.pdf	**Tony Chocolonely sourcing principles:** https://uk.tonyschocolonely.com/pages/tonys-5-sourcing-principles **Improving Livelihoods (Unilever):** https://www.unilever.com/sustainability/livelihoods/ **Ikea - IWAY Code of Conduct:** https://www.ikea.com/global/en/our-business/how-we-work/iway-our-supplier-code-of-conduct/ **Adidas Human Rights:** https://www.adidas-group.com/en/sustainability/people/human-rights	

	FRAMEWORKS / GUIDANCE	BUSINESS CASES / STATEMENTS / POLICIES	ORGANISATIONS
POLICIES		**Issara:** https://impacttlimited.com/reports/ **Unilever Living Wage:** https://www.unilever.co.uk/news/2025/living-wage-key-lessons-from-a-decade-of-progress/	
MEASURE & REPORTING	**Transparency in Supply Chains:** https://assets.publishing.service.gov.uk/media/61b7401d8fa8f5037778c389/Transparency_in_Supply_Chains_A_Practical_Guide_2017_final.pdf	**Microsoft Annual Human Rights Report:** https://www.microsoft.com/en-us/corporate-responsibility/human-rights-statement **Unilever Human Rights Report:** https://www.unilever.com/files/317c8e2f-a798-4f00-a1a1-dc4a1c806f45/unilever-human-rights-policy-statement-march-2023.pdf **Patagonia Inc. History of Social Responsibility:** https://eu.patagonia.com/gb/en/our-footprint/corporate-social-responsibility-history.html **Tony's Open Chain: Impact Report 2023-24:** https://online.flippingbook.com/view/296860704/	
REMEDIATION	**Repayment of Recruitment Migrant Workers (Impactt):** https://impacttlimited.com/our-services/change-at-scale/principles-for-repayment-of-recruitment-fees/ **UN Human Rights:** Access to Remedy in Cases of Business-Related Human Rights Abuse: Interpretive Guidance **UN Human Rights:** OHCHR Accountability and Remedy Project (ARP): Meeting the UNGPs' Effectiveness Criteria, the full ARP III report and its addendum **Shift & Equator Principles:** Tools to Enhance Access to Effective Grievance Mechanisms and Enable Effective Remedy **Worker-Driven Social Responsibility (Fair Food Program):** https://fairfoodprogram.org/worker-driven-social-responsibility/ **The Remedy Project:** Putting things right: Remediation under the Tariff Act 1930 **Modern Slavery Grievance Mechanisms (UNGC):** https://unglobalcompact.org.au/wp-content/uploads/2021/03/4261-UNGC-Grievance-Mechanisms-GUIDANCE-DOC_28pp-9-FA.pdf	**Repayment of Recruitment Fees Garment Industry (Impactt):** https://impacttlimited.com/blog/case-studies/repayment-of-recruitment-fees-in-the-garment-sector-in-malaysia/ **ESCP Employer Pays (Toy manufacture):** https://www.ethicalsupplychain.org/news-events/case-study-implementing-employer-pays-principle#:~:text=The%20Employer%20Pays%20Principle **Nottingham University: What can small businesses do?** https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2021/october/modern-slavery-what-can-small-businesses-do.pdf	**The Remedy Project:** https://www.remedyproject.co **Impactt:** https://impacttlimited.com/our-services/ **Shift:** https://shiftproject.org/ **GBI:** https://gbihr.org/

	FRAMEWORKS / GUIDANCE	BUSINESS CASES / STATEMENTS / POLICIES	ORGANISATIONS
STAKEHOLDER ENGAGEMENT	**UNGC:** https://www.globalcompact.de/migrated_files/wAssets/docs/Menschenrechte/stakeholder_engagement_in_humanrights_due_diligence.pdf https://www.globalcompact.de/fileadmin/user_upload/Dokumente_PDFs/UN_GCD_Insights_Series_HR_Due_Diligence_Stakeholderengagement_english.pdf https://unglobalcompact.org/library/981 **GBI:** https://gbihr.org/business-practice-portal/multistakeholder-engagement **SHIFT:** https://shiftproject.org/meaningful-engagement-with-affected-stakeholders/	**RSPO - Labour Rights Task Force:** https://rspo.org/formation-of-the-rspo-labour-rights-task-force-ltf/ **FLA Living Wage for Garment Workers:** https://www.fairlabor.org/projects/reaching-living-wage-for-garment-workers/ **GBI Remedy through Multi-Stakeholder Engagement in Myanmar and South Africa:** https://gbihr.org/business-practice-portal/multistakeholder-engagement	**Shift:** https://shiftproject.org/ **Better Cotton Initiative:** https://bettercotton.org/ **Roundtable on Sustainable Palm Oil (RSPO):** promotes sustainable palm oil production, involving producers, retailers, and NGOs: https://rspo.org/ **UN Global Compact: Principle 4 relates to anti-corruption & human rights in work:** https://unglobalcompact.org/what-is-gc/mission/principles/principle-4 **Fair Labor Association: working to improve labor conditions in factories and supply chains:** https://www.fairlabor.org/

Global Commission
on Modern Slavery
& Human Trafficking

The Global Commission on Modern Slavery and Human Trafficking (https://www.modernslaverycommission.org) is an international initiative, led by Baroness May of Maidenhead, to exert high-level political leverage to restore political momentum towards achieving UN Sustainable Development Goal 8.7: to eradicate forced labour, and to end modern slavery and human trafficking.