

# Protecting human rights during and after the COVID-19 crisis

Response to Joint Questionnaire of Special Procedures with a focus on contemporary forms of slavery and related exploitation

Submission by the Rights Lab, University of Nottingham

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## About the Rights Lab

The Rights Lab delivers research to help end modern slavery. We are the world's largest group of modern slavery researchers, and home to many leading modern slavery experts. Through our five research programmes, we deliver new and cutting-edge research that provides rigorous data, evidence, and discoveries for the global antislavery effort. Our Modern Slavery Evidence Unit is the interface between the Rights Lab research programmes and civil society, business, and government, working closely with stakeholders to address their evidence gaps. More information about the Rights Lab is available at: [www.nottingham.ac.uk/rights-lab](http://www.nottingham.ac.uk/rights-lab).

The COVID-19 pandemic and the measures being undertaken to slow its pace and effect have short, medium, and long-term impacts on the problem of modern slavery. We have developed a research agenda for anti-slavery responses to COVID-19, which calls for a coordinated, systematic and inter-disciplinary research effort. Our research agenda for COVID-19 is available at: [www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/covid-19/index.aspx](http://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/covid-19/index.aspx).

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## 1. Introduction

1. The COVID-19 pandemic has been a substantial, exogenous shock to the world. The pandemic itself, as well as measures adopted in response to the crisis, have had dramatic impacts on the lives and livelihoods of many of the world's citizens. Countries around the world have adopted various measures to limit the spread of the virus, placing limits on economic activities, as well as public and social life, including lockdowns, curfews, travel restrictions, mandatory closures, and social distancing. Governments have also adopted a plethora of mitigation efforts to curb the negative impacts of both the pandemic itself and restrictions imposed to limit its spread.

2. Although these measures may assist in limiting the spread of the virus, they also create and exacerbate vulnerabilities to exploitation, abuse, and modern slavery, and drive crimes such as trafficking in persons further underground. Traffickers and other criminals are adjusting their business models to the 'new normal' created by the pandemic, especially through use of modern communication technologies.<sup>1</sup> The pandemic is exacerbating economic and societal inequalities that are among the root causes of modern slavery.<sup>2</sup> Supply and demand shocks are altering the labour market, access to employment, and the ability to properly monitor labour and supply chains, as well as placing significant pressure on specific high risk industries.<sup>3</sup> Restrictions on movement substantially disrupt efforts to collect data, and effectively monitor and evaluate programming. Concurrently, COVID-19 continues to negatively affect the ability of governments and non-governmental organisations (NGOs) to identify and provide essential services to vulnerable persons, victims, and survivors.

3. The demographics of modern slavery vary by exploitation type, with people subjected to different forms of exploitation also likely to experience the impacts of government measures differently. Disproportionate impacts of modern slavery and exploitation are already felt by particularly vulnerable and high-risk populations, including women, children, people in poverty, persons of African descent, indigenous peoples, LGBT+ persons, persons with disabilities, homeless persons, refugees, and internally displaced persons, and migrant workers. These risks and particular vulnerabilities are likely to be exacerbated by the compounding effects of COVID-19, requiring cross-sectoral responses to mitigate the adverse impacts of the pandemic on people's vulnerability to, experiences of, and recovery from, exploitation and abuse.

4. This submission addresses the impacts of the COVID-19 pandemic on contemporary forms of slavery and related exploitation, impacts on labour and supply chains that increase risks of exploitation, and the implications for monitoring, evaluation, research, and learning processes. It also considers two case studies on the impacts of COVID-19 on specific forms of exploitation: child, early, forced and servile marriage; and child criminal exploitation. Evidence on both the immediate and longer-term consequences is still emerging. Yet, it is already clear that the impacts of COVID-19 on modern slavery and human exploitation are myriad, demanding urgent action and long-term strategic planning to prevent severe forms of exploitation and abuse.

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<sup>1</sup> UNODC, 'Impact of the Covid-19 Pandemic on Trafficking in Persons: Preliminary Findings and Messaging Based on Rapid Stocktaking' (2020), 1.

<sup>2</sup> Ibid; Livia Wager and Thi Hoang, 'Aggravating Circumstances: How Coronavirus Impacts Human Trafficking' (*Global Initiative Against Transnational Organized Crime*, May 2020).

<sup>3</sup> Alexander Trautrim, Martin Schleper, Selim Cakir, and Stefan Gold, 'Survival at the Expense of the Weakest? Managing Modern Slavery Risks in Supply Chains During COVID-19' (2020) *Journal of Risk Research* <<https://www.tandfonline.com/doi/full/10.1080/13669877.2020.1772347>>.

## 2. The impact of COVID-19 on contemporary forms of slavery<sup>4</sup>

5. COVID-19 and government measures taken in response to the crisis impact people's vulnerability to, experiences of, and ability to exit modern slavery, as well as affecting efforts to address the practice and support victims. Identification of victims and measures to address situations of exploitation are made more difficult by social distancing, isolation, and lockdown. Further, the profile of modern slavery around the world is already shifting, as new vulnerabilities and risks emerge, patterns of abuse shift, and exploiters find new ways around restrictions.

6. Emerging evidence highlights practical difficulties faced by victims and service providers around the world as a result of existing measures, as well as cases of denial of service and support for potential victims. Reports from across the globe indicate major disruption to, or cessation of, programming, difficulties reaching vulnerable groups, and increases in the demands on services, against a background of significant funding cuts, with disproportionate impacts on those operating in the Global South.<sup>5</sup>

### 2.1. The impact of COVID-19 on contemporary forms of slavery in the UK

7. Immediate health risks associated with COVID-19, as well as the introduction of 'lockdown' measures in the UK in March,<sup>6</sup> have had a significant impact on the identification of survivors of modern slavery and on the provision of support. Support provision for survivors has been significantly disrupted, in some instances creating situations of precarity that place survivors at risk of re-trafficking and interfere with their recovery. Challenges reported in the UK antislavery sector include:<sup>7</sup>

- Caseworkers experiencing COVID-19 symptoms and having to self-isolate, resulting in services having reduced capacity and reduction in face-to-face support for clients.
- Greater reliance on telephone contact and video conferencing technology to deliver support, resulting in reduced provision as many clients do not have access to the internet. One service provider reported that 67% of those in their service did not have access to internet. Without the internet, survivors are unable to access remote services, including medical care, food deliveries, and counselling.
- Case workers being unable to travel to survivors (or vice versa) to provide them with their cash subsistence payments, requiring rapid adaptation of service to use of prepaid cards.
- Survivors not being able to buy and store sufficient food with the limited subsistence allowance they received.

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<sup>4</sup> Contribution by [Vicky Brotherton](#), Rights Lab Head of Policy Engagement, and [Dr Katarina Schwarz](#), Rights Lab Associate Director and Assistant Professor in Antislavery Law and Policy. See further Katarina Schwarz, 'The Government's Response to COVID-19: Human Rights Implications Related to Modern Slavery' (*The Rights Lab*, April 2020) <<https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/mseu/mseu-resources/2020/april/covid-hr.pdf>>

<sup>5</sup> Free the Slaves, 'Freedom from Slavery Forum Virtual Event' (*Vimeo*, May 2020); International Anti-Human Trafficking Network, 'Survey Responses: Initial Findings' (5 June 2020) – for further details contact [info@iahtnetwork.org](mailto:info@iahtnetwork.org).

<sup>6</sup> These measures prohibited all 'non-essential' travel, as well as contact with people outside one's household, and schools and other public amenities were closed.

<sup>7</sup> As reported by UK service providers at the Human Trafficking Foundation's inaugural COVID Forum, 'Human Trafficking Foundation COVID Forum Minutes', (7 May 2020), contact [info@humantraffickingfoundation.org](mailto:info@humantraffickingfoundation.org) for further information.

- Survivors feeling isolated due to being unable to attend college or access peer group/support meetings, and reporting deteriorating mental health.
- Survivors being unable to attend routine healthcare appointments, and complex trauma work being put on hold.
- Increased challenges in accessing legal advice and regularising status.

8. The UK Government, through the Home Office Modern Slavery Unit, responded to the crisis and challenges faced by service providers in a number of ways. These efforts have been effective at mitigating some of the adverse impacts of COVID-19 on modern slavery victims, although significant obstacles to ongoing and effective support remain. The government's response efforts include:

- Providing an additional £1.73m funding to support victims of modern slavery through the Victim Care Contract, within a broader allocation of £76 million to support the most vulnerable people in society during the pandemic.<sup>8</sup>
- Working with the Care Quality Commission to set up a dedicated email address for subcontractors to raise concerns related to accessing healthcare.
- Approving business cases for the purchase of additional laptops and mobile phones so that support workers could work from home and adhere to government lock-down guidelines.
- Providing funds to enable individuals to access English for Speakers of Other Languages (ESOL) classes online and for children to access teaching resources from their schools.
- Producing a flyer for non-first responders to help identify potential victims of modern slavery.

9. At the beginning of lockdown, there were reports of survivors being exited from National Referral Mechanism (NRM) accommodation who had no recourse to public funds, so were not eligible for housing or to support from the local No Recourse to Public Funds team as they had no proof of local connection, and therefore were at risk of destitution. On 6 April 2020, the Government announced that those with a positive or negative Conclusive Grounds Decision in the NRM could remain in accommodation until 6 July.<sup>9</sup> The policy is to be reviewed at the end of June in light of the Government's latest COVID-19 advice.

10. Beyond the immediate impacts on support provision, identification, and survivor wellbeing, COVID-19 is also likely to present persistent and longer-term challenges for survivors of modern slavery. The impacts of lockdown and isolation on survivors' physical and mental health, and the backlog in criminal cases and trials as a result of court closures, will need to be carefully addressed as restrictions are eased and countries 'return to normal'. Officials and service providers will also have to grapple with the shifts in perpetrator offending patterns as criminals seek to circumvent the lockdown rules, which are likely to reshape patterns of exploitation and criminality in the medium and longer-term.

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<sup>8</sup> 'Emergency Funding to Support Most Vulnerable in Society During Pandemic' (*UK Government*, 2 May 2020).

<sup>9</sup> 'Support for Modern Slavery Victims Affected by Coronavirus' (*UK Government*, 6 April 2020).

## 2.2. Data on modern slavery in the UK

11. NRM statistics for the first quarter of 2020 were published on 4 June 2020,<sup>10</sup> with 2,871 referrals of potential victims of modern slavery. This represents a 14% decrease in referrals compared to the previous quarter (3,347), reported to be due to the impact of restrictions imposed due to the COVID-19 pandemic. However, this also represented a 33% increase in referrals from the same quarter in 2019, meaning that the overall impact of COVID-19 on NRM referrals is not yet clear.

12. Labour exploitation was the most common exploitation type for adults referred between January and March 2020 (36%), whilst criminal exploitation was most commonly reported amongst child referrals (44%). This is consistent with referrals from the previous quarter, with 39% of adult referrals in labour exploitation and 46% of child referrals in criminal exploitation.<sup>11</sup> Potential victims from the UK, Albania, and Vietnam were the three most common nationalities to be referred to the NRM, as in the previous quarter.

13. Overall, of the 2,871 potential victims referred this quarter, 72% were male and 28% (793) were female, compared to 70% male and 30% female in the previous quarter. For adult potential victims, 68% (1,009) were male and 32% (477) were female (against the previous 64% and 36%), whilst for child potential victims, 76% (944) were male and 23% (285) were female (previously 76% and 24%).

## 3. The impact of COVID-19 on labour and supply chains<sup>12</sup>

14. COVID-19 created a global supply and demand shock, with extreme shifts in demand patterns, disruptions to supply flows, and diminished risk management and mitigation efforts.<sup>13</sup> The pandemic has resulted in the prioritisation of supply continuity, with commercial pressures and government restrictions resulting in a related de-prioritisation of due diligence and rigorous supplier selection.<sup>14</sup> Travel restrictions limit options for social audits and supplier visits, reducing potential to identify isolated and exploited workers and approach them safely. Inability to conduct in-person inductions with new workers also removes a key prevention measure from many companies, increasing risks of imposter or substitute recruitment.<sup>15</sup> These conditions exacerbate workers' vulnerability to exploitation and modern slavery.

15. Not only have business and supply conditions changed the labour environment for vulnerable workers, but governments have also relaxed some oversight and prevention mechanisms to prevent against abuses. For instance, the UK Gangmasters and Labour Abuse Authority (GLAA) introduced a temporary licence scheme to facilitate the supply of workers for food production.<sup>16</sup> This scheme relaxed standard GLAA rules, making it easier

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<sup>10</sup> Home Office, 'National Referral Mechanisms Statistics UK, Quarter 1 2020 – January to March' (*UK Government*, 4 June 2020)

<sup>11</sup> Home Office, 'National Referral Mechanisms Statistics UK, Quarter 4 2019 – October to December: Data Tables' (*UK Government*, 2 April 2020).

<sup>12</sup> Contribution by the Rights Lab [Business and Economies Programme](#), and [Dr Katarina Schwarz](#), Rights Lab Associate Director and Assistant Professor of Antislavery Law and Policy. See further Arianne Griffith, 'The Impact of COVID-19 on Business and Workers: Industries at High Risk of Modern Slavery' (*The Rights Lab*, April 2020) <<https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/mseu/mseu-resources/2020/april/the-impact-of-covid-19-on-business-and-workers-industries-at-high-risk-of-modern-slavery.pdf>>; Hannah Lerigo-Stephens, 'Labour in the Food Supply Chain DEFRA Inquiry' (*The Rights Lab*, April 2020) <<https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/mseu/mseu-resources/2020/april/environment-food-and-rural-affairs-committee.pdf>>.

<sup>13</sup> Alexander Trautrim, Martin Schleper, Selim Cakir, and Stefan Gold, 'Survival at the Expense of the Weakest? Managing Modern Slavery Risks in Supply Chains During COVID-19' (2020) *Journal of Risk Research* <<https://www.tandfonline.com/doi/full/10.1080/13669877.2020.1772347>>, 1-2.

<sup>14</sup> Ibid.

<sup>15</sup> Ibid.

<sup>16</sup> GLAA, 'GLAA Brief: Temporary Licensing and COVID 19' (Issue 62, March 2020).

to supply labour into industries with the highest risks of exploitation without direct supervision or licencing by the government. While the scheme anticipates risk assessments being conducted by the GLAA, the intention to make decisions within 5 working days engages the possibility of insufficient oversight and due diligence to protect against exploitation. In the US, Customs and Border Protection revoked the Withhold Release Order blocking import of rubber gloves from a company previously connected to forced labour.<sup>17</sup>

16. Dramatic drops in demand, cancellation of contracts, and closure of workplaces have significantly impacted workers in some sectors, resulting in massive increases in unemployment, particularly amongst informal workers. Migrant workers in India's construction sector,<sup>18</sup> the global ready-made garment industry,<sup>19</sup> and the one billion people in the informal economy<sup>20</sup> are amongst those hardest hit by the pandemic. Access to government support is often only available for those working in the formal economy, and in some cases only for specific forms of labour, leaving many precarious workers without access to livelihood support.

17. Conversely, the workers in sectors experiencing increases or continuation in demand (notably essential production) are placed at increased risk as oversight mechanisms are relaxed or removed, and operational pressures increase. This places their physical safety at risk as a result of shortages of PPE and overcrowding in accommodation, as well as increasing risks of exploitation. Migrant agricultural workers, for instance, are kept in group accommodation, risking spreading the virus.<sup>21</sup> Maximum driving hours for lorry drivers in the UK have been relaxed to increase capacity, creating increased risks of harmful working conditions.<sup>22</sup> As many people remain at home, demand on some domestic workers increases, they face higher risk of abuse, and are placed at increased risk of contracting the virus as a result of care responsibilities and being sent out on the frontlines in place of family members.<sup>23</sup>

18. Care workers have also been disproportionately impacted by COVID-19 and government response measures. The rate of death due to COVID-19 amongst social care workers in the UK is twice that of the general population, and access to PPE has been a significant issue.<sup>24</sup> Further, in response to the pandemic, some care workers have been asked to live in the care homes in which they work to limit risks of contamination from the outside world. Care workers are often poorly paid, on insecure contracts, and face risks of

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<sup>17</sup> US Customs and Border Protection, 'CBP Revokes Withhold Release Order on Disposable Rubber Gloves' (24 March 2020).

<sup>18</sup> Jan Sahas, 'Voices of the Invisible Citizens: A Rapid Assessment on the Impact of COVID-19 Lockdown on Internal Migrant Workers Recommendations for the State, Industry & Philanthropies' (2020).

<sup>19</sup> Bangladesh alone had received work order cancellations worth nearly \$3 billion (US) by mid-April. M Shahriar Azad Bhuiyan, 'COVID-19 and its Impact on Bangladesh Economy' (*The Business Standard*, 15 April 2020).

<sup>20</sup> ILO, 'ILO Monitor: Covid-19 and the world of work' (3<sup>rd</sup> edn, 29 April 2020), 1.

<sup>21</sup> Agriculture and Horticulture Development Board, 'Best Practice to Avoid the Spread of Coronavirus for Seasonal Workers on Fruit and Vegetable Farms' (*AHDB*, April 2020).

<sup>22</sup> Department for Transport and Driver and Vehicle Standards Agency, 'Coronavirus (COVID-19): Drivers' Hours Relaxations' (*UK Government*, 20 March 2020).

<sup>23</sup> Griffith, above n 12, 4-5; Freedom Fund, 'On the Frontlines of Vulnerability: Research in the Time of Pandemic' (Webinar, 9 June 2020).

<sup>24</sup> This calculation controls for age and sex. The Health Foundation, 'What Has Been the Impact of COVID-19 on Care Homes and the Social Care Workforce?' (15 May 2020).

exploitation and abuse in a fragmented sector.<sup>25</sup> Four types of labour exploitation that may lead to modern slavery risk have been identified in English Adult Social Care:<sup>26</sup>

- recruitment and selection risks, including informal recruitment and use of unscrupulous agencies, which are particularly acute during periods of labour shortage;
- operational practices, including workers being required to stay with care recipients with complex care needs (potentially involving a propensity for emotional or physical violence) in isolated situations, excessive working hours, and relaxation of oversight and monitoring mechanisms;
- financial irregularities, including workers being forced to work during designated periods of rest or leave, and reliance on the 'grey market' and informal labour to meet care needs; and
- debt bondage risks, associated with requirements to pay recruitment fees and unstable contracts.

Without intervention, the COVID-19 epidemic threatens to exacerbate these risks, placing care workers at increased risk of exploitative working conditions.

19. The economic and social impacts of COVID-19 will exacerbate the 'push factors' that lead to increased migration and vulnerability to modern slavery, such as poverty, inequality, and lack of opportunities for decent work.<sup>27</sup> Mass unemployment, high debt and little government safety nets create opportunities for business owners, as well as traffickers, as financial losses suffered during the crisis can be covered by exploiting the cheap labour of people who have suffered sudden unemployment, once global demand resumes.<sup>28</sup>

#### 4. Case study: The impact of COVID-19 on child, early, forced, and servile marriage<sup>29</sup>

20. Victims of child, early, forced, and servile marriage (CEFSM), as well as those vulnerable to CEFSM, face additional risks due to the COVID-19 outbreak as a result of isolation, economic instability, and reduced access to support services. Opportunities for reporting and identification are diminished by restrictions on movement, and victims confined to the home face increased risk of exploitation and abuse within existing marriages.

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<sup>25</sup> Caroline Emberson and Alexander Trautrim, 'Evaluating Modern Slavery Risks in Adult Social Care Procurement in the UK' <<https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/mseu/mseu-resources/2019/september/adult-social-care-procurement.pdf>>.

<sup>26</sup> Caroline Emberson and Alexander Trautrim, 'How Might Modern Slavery Risk in English Adult Social Care Procurement be Reduced?' *Public Procurement Law Review* (forthcoming).

<sup>27</sup> Walk Free Foundation, 'Protecting people in a pandemic: Urgent collaboration is needed to protect vulnerable workers and prevent exploitation' (2020).

<sup>28</sup> Anti-Slavery International, 'Leaving no-one behind: Guidance for policymakers, donors and business leaders to ensure that responses to Covid-19 reach victims of modern slavery and people vulnerable to slavery' (April 2020), 8.

<sup>29</sup> Contribution by [Dr Helen McCabe](#), Rights Lab Forced Marriage Lead and Assistant Professor in Political Theory, and [Dr Katarina Schwarz](#), Rights Lab Associate Director and Assistant Professor in Antislavery Law and Policy. See further Helen McCabe and Katarina Schwarz, 'The Government's response to COVID-19: Human Rights Implications related to Child, Early and Forced Marriage' (*The Rights Lab*, 2020) <<https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/mseu/mseu-resources/2020/april/covid-forced-marriage.pdf>>.

### Vulnerability to CEFSM

21. Travel restrictions and social isolation diminish some risks related to CEFSM, including immediate risks of being taken abroad for marriages, or having a prospective spouse arrive from abroad. Closures of registry offices and religious premises, and restrictions on movement and gathering, may also decrease risks of CEFSM ceremonies being conducted where marriage culturally necessitates a large event. However, it should many CEFSMs involve customary and religious ceremonies which may still proceed during restrictions. Disengagement from registry offices in such cases can remove an important external safe-guard against coercion. Further, CEFSM may still be arranged while government restrictions are in place, and lockdowns and restrictions on movement increase opportunities for familial pressure.

22. The removal of children and adolescents from school (as a result of school closures and social distancing) may increase risk of CEFSM, as it is sometimes only culturally appropriate for girls not to be married after reaching puberty and/or age 16 because they are still in school.<sup>30</sup> The expectation in such cases is that girls will marry as soon as they finish their education. Limitations on, and disengagement from, education opportunities is closely connected to risk of CEFSM.<sup>31</sup> Some children at risk of CEFSM will already be known to be at risk, and will therefore have been classed as 'vulnerable children' who ought to remain in school, even during lockdown. However, with no power to compel attendance, and evidence suggesting very few vulnerable children have been attending school during lockdown,<sup>32</sup> these children are at further risk of coercive control, abuse, and CEFSM as they remain at home.

23. Although the economic impacts of COVID-19 are hard to determine, the immediate impacts of shutdowns on livelihoods and longer-term economic consequences are likely to have significant effects on CEFSM globally. Where people look to marry their children (generally daughters) because of economic pressure on the household, this may increase due to COVID-19.<sup>33</sup> Where dowries and/or bride-price is the cultural norm, economic implications of COVID-19 may see a reduction in the demand for marriages. However, these financial transfers also incentivise CEFSM amongst the most economically vulnerable.

24. For those already in CEFSMs, lockdown may increase the risk of violence and abuse, as well as narrowing down alternative options and making it more difficult to leave. Many countries have experienced spikes in domestic violence during lockdown, as people are confined at home with abusive family members and environmental stresses are acute.<sup>34</sup> These increases in abuse are likely to be more harshly felt by those experiencing already exploitative relationships of CEFSM.

### Identification

25. Government responses to COVID-19, particularly school closures and social distancing measures, have decreased opportunities for third-parties to identify signs of vulnerability and abuse. This has a significant impact on the identification of CEFSM, as

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<sup>30</sup> McCabe and Schwarz, above n 29, 3.

<sup>31</sup> See for instance Girls Not Brides, 'What is the Impact of Child Marriage: Education'.

<sup>32</sup> See, for instance, Together, 'Vulnerable Pupils Not Accessing School Hubs during COVID-19' (*Together: Scottish Alliance for Children's Rights*, 1 May 2020)

<sup>33</sup> See, for instance, James Hitchings-Hales, 'Child Marriage Could Spike in England and Wales as COVID-19 Lockdown Eases, Experts Say' (*Global Citizen* 20 May 2020).

<sup>34</sup> European Institute for Gender Equality, 'COVID-19 and Gender-Based Violence: Has the Pandemic Taught Us Anything?' (9 June 2020).



the majority of cases in many contexts are reported by third parties.<sup>35</sup> For instance, teachers and school staff are important sources of support for people at risk of CEFSM, and are often the first to report potential risks to national helplines and other support agencies, the police, and social care. Victims and potential victims also have less privacy to self-report from home as family members spend less time away and victims have fewer 'legitimate' reasons to be out themselves (e.g. studying or work). Government restrictions related to COVID-19 are further likely to impact the stage of the violation at which cases are identified and reported, in particular limiting identification at the crucial preparation stages while CEFSM ceremonies are being arranged.

### Support

26. Many places that might offer support (e.g. faith groups, extended family and friends, women's refuges, and other NGOs) are closed or more difficult to access as a result of COVID-19 and Government response measures. There are already relatively few safe places for victims of CEFSM to go. These are currently diminished via closure of hotels and B&Bs, and an understandable health concern about moving (particularly with children) into unknown spaces shared by strangers (e.g. at shelters or refuges that remain open). People who had already been taken abroad have also found it much harder to access support from consulates and NGOs.

### Resourcing

27. Like the broader antislavery sector, organisations and agencies addressing CEFSM are facing funding and resource constraints that inhibit their ability to effectively address abuses and support victims. For CEFSM victims with dependants, this is particularly acute as support needs are more complex. Although responders and support providers have continued to operate during the pandemic, many have faced additional demands on their time. Working from home has placed strain on support workers, dealing with technical challenges, shifting to work from (often unsuitable) new environments, and being required to respond to traumatic cases in isolation, without the direct support of a team. The pandemic therefore has negative mental health impacts on support workers, as well as affecting victims and survivors. The implications of COVID-19 on resourcing and funding may impact the landscape well beyond the immediate crisis, requiring continued attention be paid to avoid de-prioritisation of CEFSM efforts.

### Key lessons and recommendations

- The immediate and longer-term economic consequences of COVID-19 are likely to increase risks of CEFSM, particularly amongst already vulnerable groups. Government and community efforts to minimise economic instability resulting from COVID-19 (including cash transfers, social insurance, and basic income grants) are therefore critical for protecting against CEFSM.
- COVID-19 and government response measures have disrupted efforts to identify and address CEFSM. While restrictions on movement remain in place, governments and organisations should therefore adapt alternative mechanisms for identifying cases, including through community, social media, and traditional media outreach.
- COVID-19 impacts the ability of support providers to deliver necessary support to victims of CEFSM in the usual way. Service providers should therefore consider appropriate and ongoing adaptations to provision, including mobile and remote

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<sup>35</sup> In the UK, for instance, 81% of referrals to the Forced Marriage Unit come from third parties (professionals, friends, family, and colleagues) – Home Office and Foreign and Commonwealth Office, 'Forced Marriage Unit Statistics 2018' (April 2020), 7.

delivery.<sup>36</sup> Governments and other donors should also consider increasing funding for support providers, and make this more flexible so that these organisations can respond to the needs and realities of the changing context.<sup>37</sup>

- Return to education and continued support to ensure children and adolescents are able to remain in education are critical to preventing CEFSM. Governments and education providers should therefore seek to re-open schools as soon as it is safe to do so, and in the meantime adapt provision for remote learning through e.g. online platforms, radio, and/or home delivery of learning resources.

## 5. Case study: The impact of COVID-19 on child criminal exploitation in the UK<sup>38</sup>

COVID-19 has had a discernible impact on Child Criminal Exploitation (CCE) in the UK, affecting both the illegal activity itself and responses to it. The social economics of CCE and 'county lines' drug distribution,<sup>39</sup> including the grooming of vulnerable children and teens, the cuckooing of residential properties as distribution ('trap') houses, and the physical transportation and sale of illegal narcotics, have traditionally relied on face-to-face interaction. These activities have been inhibited by the social distancing measures introduced to slow down rates of infection, meaning the grooming techniques used by criminals to coerce children into drug-related criminality have had to adapt.

Law enforcement's understanding of CCE and county lines is a developing area, but significant gaps still remain.<sup>40</sup> These knowledge gaps have been exacerbated by COVID-19, as models of drug distribution and grooming have been forced to reconstitute to avoid detection. While wholesale supply chains for class-A drugs have been interrupted, market demand for these substances persists. Reduced freedom of movement and closed public services have meant that private property and cars are increasingly required in lieu of access to hotels and public transport.<sup>41</sup> In some areas, there have even been reports of dealers posing as healthcare workers or joggers to avoid detection by police.<sup>42</sup>

While factors such as school exclusion and missing persons occurrence have previously been linked to a heightened exploitation risk among children, there is no sound evidence-base from which to predict how school closure and lack of face-to-face social care opportunities have impacted susceptibility to exploitation during lockdown. The UK's Victims Commissioner has suggested that lockdown measures could intensify the risk of child domestic abuse – a factor considered as a key determinant of future offending behaviour and CCE.<sup>43</sup> Youth groups in the UK have warned that the closure of schools and community centres might place young people on the peripheries of crime at greater risk of recruitment into criminal groups and gangs, as they fight boredom and the social

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<sup>36</sup> See further International Rescue Committee, 'Guidelines for Mobile and Remote Gender-Based Violence Service Delivery' (*GBV Responders' Network*, 2018).

<sup>37</sup> See further Girls Not Brides, 'COVID-19 and Child, Early and Forced Marriage: An Agenda for Action' (April 2020), 2.

<sup>38</sup> Contribution by [Dr Ben Brewster](#), Rights Lab Research Fellow in Antislavery Policy and Communities.

<sup>39</sup> County Lines is a practice wherein drugs are transported from one area to another – often from larger metropolitan areas to smaller towns and villages. This is usually conducted by groomed children or vulnerable people who are coerced into it by gangs. National Crime Agency, 'County Lines'.

<sup>40</sup> HMICFRS, 'Both sides of the coin: An inspection of how the police and National Crime Agency consider vulnerable people who are both victims and offenders in "county lines" drug offending' (2020).

<sup>41</sup> Tony Siggers, 'Part 2: How COVID-19 Is Affecting County Lines', *RUSI*, 2020.

<sup>42</sup> Yohannes Lowe, 'Gang Members Wearing "Coronavirus Medical Masks to Disguise Themselves"', (*The Telegraph*, 21 March 2020).

<sup>43</sup> Elaine Wedlock and Julian Melina, 'Sowing the Seeds: Children's Experience of Domestic Abuse and Criminality' (*Victims Commissioner*, 2020).

constraints of lockdown.<sup>44</sup> There is also a risk that while face-to-face opportunities for grooming and coercion have been restricted due to school closures, these activities may now be taking place online, or through other forms of technology-mediated communication.

Monitoring children and staging preventive interventions in vulnerable communities become increasingly difficult when teachers, community leaders, social workers and other points of outreach are also confined indoors, particularly as CCE victims are often frequent missing persons and hostile to law enforcement, parents and other figures of authority. It is not only children from deprived or adverse backgrounds that fall victim to criminal exploitation.<sup>45</sup> Yet, it is these types of intervention that are often considered crucial in reducing exposure and risk to those already trapped within this most vicious form of exploitation.<sup>46</sup>

In some cases police have reported lockdown measures have made it easier to detect dealers within communities<sup>47</sup>. However, there are no current studies or reliable statistics on the connected exploitation of cuckooing or the evolution of criminal tactics due to restricted movement. It is likely that children and adults already in situations of exploitation face heightened risk, and will experience prolonged exposure to exploitation to compensate for the inability to groom or recruit new entrants.

While the full implications resulting from the reconstitution of county lines and drug crime following COVID-19, and the net impact of economic downturn, are unclear, it is likely children will remain at significant risk of exploitation at the hands of criminal gangs seeking to exploit them to distribute drugs around the county.

### Key lessons and recommendations

- COVID-19, social distancing, and lockdown measures have shifted patterns of CCE, and the existing knowledge gap on CCE has been exacerbated by the COVID-19 crisis. Further research into CCE and the impacts of COVID-19 on this form of exploitation is therefore required.<sup>48</sup>
- Young people potentially face increased risk of grooming and coercion online as a result school closures and limits on in-person socialising opportunities. Awareness should therefore be raised regarding the risk posed by online grooming and recruitment activities amongst the general public, internet service providers and online platforms, community actors, social services, and other support providers. These should also be closely monitored by relevant authorities, including police and social services.
- Reductions in opportunities for in-person social care and safeguarding leave the most vulnerable children isolated and facing increased risk, while those already in situations of exploitation find their situations exacerbated. Where social distancing and lockdown measures continue, opportunities to resume in-person care should therefore be explored by support providers, schools, and community centres, and cases involving those with previous or suspected involvement with county lines monitored closely.

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<sup>44</sup> Jamie Grierson, 'Drug dealers posing as joggers and NHS staff in Covid-19 lockdown', (*The Guardian*, 7 May 2020).

<sup>45</sup> SPACE, 'Just Another Nuisance Misper or a Trafficked Victim?' (*Policing Oracle*, 2020).

<sup>46</sup> Ministry of Justice (2019) 'County Lines Exploitation: Practice guidance for YOTs and frontline practitioners' (1 October 2019).

<sup>47</sup> Jamie Grierson and Amy Walker, 'Gangs still forcing children into 'county lines' drug trafficking' (*The Guardian*, 13 April 2020).

<sup>48</sup> The Rights Lab have been awarded funding by UKRI for the project "Closing Urgent Knowledge and Data Gaps on the Implications of Pandemic for County Lines" to investigate this issue further.

- When schools and community centres reopen, increased attention should be paid to the risks of CCE amongst particularly vulnerable groups, such as frequent missing persons, and those from homes with histories of domestic abuse.

## 6. The impact of COVID-19 on monitoring, evaluation, research and learning<sup>49</sup>

28. Before the COVID-19 pandemic began, efforts to conduct rigorous, wide-scale, comparative assessments of what works to end modern slavery were already hampered by a limited evidence base.<sup>50</sup> Monitoring, evaluation, research and learning (MERL), contextualised through the expertise of on-the-ground antislavery actors, is a critical tool for building this knowledge base. However, operationally this requires a funding landscape that encourages (and funds) high-quality outcome evaluations, the development and promotion of standardised metrics, and sufficient support for organisations to design and deliver quality evaluations.<sup>51</sup> COVID-19 presents a significant challenge to antislavery MERL and the establishment of the evidence base needed to advance effective antislavery action.

29. COVID-19 has resulted in significant disruption of antislavery programming, including cuts to crucial funding.<sup>52</sup> In other humanitarian sectors, such as food security, this disruption is having clear downstream impacts on MERL practice. These include:<sup>53</sup>

- delays or cessation of programming derailing monitoring and evaluation;
- restrictions on movement preventing in-country and in-person data collection;
- difficulties establishing and maintaining contact with local beneficiary groups inhibiting remote and in-person data collection;
- challenges obtaining informed consent from participants; and
- obstacles to conducting data quality assurance processes with local partners operating under severe organisational stress.

These challenges also apply in antislavery and broader human rights programming contexts.

30. COVID-19 not only has devastating consequences for individuals, communities, and organisations, it also threatens the broader antislavery movement's capacity to accumulate valuable evidence, prolonging critical assessments of effectiveness and scalability. COVID-19 may be the first of multiple waves of health, economic, and environmental shocks, and points to an urgent need for coordinated communication and data systems that can underpin wide-scale rapid-response needs assessments across CSO

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<sup>49</sup> Contribution by [Dr Emily Wyman](#), Rights Lab Monitoring, Evaluation and Learning Manager.

<sup>50</sup> UNHRC, 'Current and Emerging Forms of Slavery, Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences' (25 July 2019) UN Doc A/HRC/42/44.

<sup>51</sup> Katharine Bryant and Todd Landman, 'Combatting Human Trafficking since Palermo: What Do We Know about What Works?' (2020) 6(2) *Journal of Human Trafficking* 119 <<https://www.tandfonline.com/doi/full/10.1080/23322705.2020.1690097>>; Deanna Davy, 'Anti-Human Trafficking Interventions: How Do We Know if They Are Working?' (2016) 37(4) *American Journal of Evaluation* 486.

<sup>52</sup> Free the Slaves, 'Freedom from Slavery Forum Virtual Event' (*Vimeo*, May 2020); International Anti-Human Trafficking Network, 'Survey Responses: Initial Findings' (5 June 2020) – for further details contact [info@iahtnetwork.org](mailto:info@iahtnetwork.org).

<sup>53</sup> See USAID, 'Guide for Adopting Remote Monitoring Approaches During COVID-19' (May 2020); Food Security and Nutrition Network, 'COVID-19 Resources'.

networks, coordinated emergency funding efforts by CSOs, and fast dissemination of MERL support to enhance antislavery movement resilience.

31. Organisations and funders should continue to engage in, and advocate for, coordinated, systematic, rigorous, and comparable MERL, collecting and sharing data on what works. Antislavery CSOs are already demonstrating resilience in multiple domains: switching priorities to meet basic community needs for food and sanitation; working with key community networks to reach especially isolated groups; and enhancing the use of digital technology for continued programming and data collection. The cultural shift the pandemic has triggered may help to facilitate the production of quality MERL, highlighting new approaches and methods for flexible adaptation. By sharing these insights and lessons learned, organisations can help embed best practice both in the crisis context and in the post-COVID world.