



## Rights Lab Submission to the Sub-Committee on the Work of the Independent Commission for Aid Impact

April 2021

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. More information about the Rights Lab is available at [www.nottingham.ac.uk/rights-lab](http://www.nottingham.ac.uk/rights-lab).

This written submission has been prepared for the IDC Sub-Committee on the Work of the Independent Commission for Aid Impact at the request of the Committee clerks, in advance of an oral evidence session on 14<sup>th</sup> April 2021. We have been asked to provide brief comment on the 2020 ICAI report entitled '[The UK's approach to tackling modern slavery through the aid programme](#)', the [UK Government's response](#) to the ICAI review, and to detail any developments that have occurred since the ICAI report's publication that may be relevant to its findings.

[Professor James Cockayne](#), Professor of Global Politics and Anti-Slavery at the Rights Lab will be providing oral evidence to the Sub-Committee on the 14<sup>th</sup> April based on his recent study [Developing Freedom](#).

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1. The Rights Lab warmly welcomed the ICAI review into the UK's approach to tackling modern slavery through the aid programme and broadly agrees with the review's findings. Below we highlight areas of the review of particular resonance and direct the Sub-Committee to further resources that may be of use and interest.

### **A. ICAI Review Findings and Government Response**

**Recommendation 1 (Accepted by the UK Government): Develop a more systematic approach to filling knowledge and evidence gaps, including sex-disaggregated and sector-specific data, gender analysis and more comprehensive evaluations, to guide the choice of interventions.**

2. The review notes that the evidence on 'what works' to tackle modern slavery remains limited, and there lacks a systematic approach to filling evidence gaps to guide the choice of interventions. Since the review's publication, the Rights Lab has published three evidence reviews in December 2020 focusing on answering the question of 'What works to end modern slavery?' The three reviews examine what is known about effective policy to achieve Sustainable Development Goal (SDG) Target 8.7 in the context of, respectively, [Justice](#), [Markets](#) and [Crisis](#), by: (1) collecting and collating existing evidence on what works; (2) identifying the range of claims and hypotheses captured in academic and grey literature, and the evidentiary foundations of these hypotheses; and (3) conducting mixed methods analysis of strengths, weaknesses, and trends in the evidence base. These evidence reviews were prepared for Delta 8.7 at the United Nations University Centre for Policy Research to inform the development of Policy Guides to help identify the mix of multilateral and national policies needed to accelerate progress towards SDG 8.7. The [three draft policy guides](#) were published in February 2021 and are undergoing a period of public consultation.
3. To date, [evaluations of modern slavery interventions](#) have largely been limited to analysis of their processes and outcomes, rather than impact, limiting the opportunity to derive learning about the effectiveness of different approaches. Therefore, in order to address the gaps in knowledge about 'What works?' it is vital that donors, including the UK Government, provide adequate resources for

high quality monitoring and evaluation, which includes qualitative and participatory approaches, fund evaluations of sectoral approaches and broad intersectional interventions, and consistently publish evaluation findings. Further recommendations for addressing knowledge gaps regarding ‘What works?’ can be read [here](#).

**Recommendation 2 (Accepted by the UK Government): Responsible departments should do more to draw on survivor voices, in ethical ways, with a particular focus on inputs to policy and programme design, and to deepening understanding of lifetime experiences and gender dimensions of modern slavery.**

4. The ICAI review notes that ‘Survivor voices have been largely absent at policy level, but there has been some involvement of survivors in programme implementation’. The Rights Lab strongly agrees with this finding and is pleased that the Government has accepted the recommendation. A recent ‘[Appreciative Inquiry](#)’ undertaken by the Rights Lab on behalf of the [Survivor Alliance](#), a survivor-led non-governmental organisation (NGO), clearly demonstrated the overwhelming benefits for anti-slavery stakeholders of being survivor-informed and survivor-led.
5. The Government notes in its response that it is ‘exploring the appointment of survivors to advise Ministers on how we can make our interventions more effective’. We would encourage the UK Government to consult with other governments who have already developed similar initiatives, such as the United States, which established the ‘[U.S. Advisory Council on Human Trafficking](#)’, as well as survivors who have taken part in these initiatives, to learn from and build on their experiences.
6. The [New Plan for Immigration](#), published on 24<sup>th</sup> March 2021, notes that the Government will review the ‘2014 Modern Slavery Strategy in order to develop a revised strategic approach’. This review provides a prime opportunity for the Government to implement this recommendation to meaningfully consult with and embed survivors’ voices in its antislavery efforts. The Rights Lab, in collaboration with the Survivor Alliance, has developed [guidance](#) for local and national policy makers in government, business and public services who wish to involve survivors of modern slavery in their work.
7. Recent initiatives of note that seek to meaningfully engage survivor voices include the [International Survivors of Trafficking Advisory Council \(ISTAC\)](#), launched by the OSCE Office for Democratic Institutions and Human Rights (ODIHR) in November 2020, and the recently publicised [Project Officer internship](#) advertised by the UK’s Independent Anti-Slavery Commissioner.
8. Finally, the ICAI Review [Approach Paper](#) makes mention of the Rights Lab’s [VOICES database](#), the world’s largest database of survivor testimonies (now over 1,250), noting that a ‘unique and innovative’ feature of the review’s method will be to mine this data. The Rights Lab wants to alert the Sub-Committee to a soon-to-be published article that analyses the narratives housed in the database and shows that, through survivors’ own accounts that the SDGs are integrated and indivisible. This [short briefing](#) summarises the article’s findings.

**Recommendation 3 (Accepted by the UK Government): The UK government should publish a clear statement of its overall objectives and approach to using UK aid to tackle modern slavery internationally.**

9. A clear statement on the UK Government’s international modern slavery objectives and approach would be warmly welcomed. The Review notes that ‘Combating modern slavery internationally has been a cross-government effort’, we therefore hope the statement reflects this and cross-departmental collaboration continues and strengthens. The Home Office have announced, as part of the New Plan for Immigration, that it will review the 2014 Modern Slavery Strategy, and we hope that a revised strategy will set out the approach to addressing modern slavery internationally as well as domestically.
10. The Review notes that ‘Government programmes have been weak on gender and other cross-cutting analysis’. For in-depth analysis of the gendered nature of modern slavery across the world,

as well as clear recommendations for governments and businesses on reducing women and girls vulnerability to modern slavery, we recommend to the Sub-Committee Walk Free's report '[Stacked Odds: How lifelong inequality shapes women and girls experience of modern slavery](#)' published in 2020.

**Recommendation 4 (Partially accepted): Responsible departments should increase the future impact of programming by examining the scope for more interventions in neglected areas of modern slavery, and mainstreaming modern slavery into other development programmes, including in the COVID-19 response.**

11. The Rights Lab welcomes the Government's commitment to target resources in the areas where 'we think we can make the most difference and to assess what more we can do to strengthen the efficacy of our interventions'. *Developing Freedom* (discussed further below), suggests that 'mainstreaming' anti-slavery efforts into UK Aid efforts requires treating developing freedom – maximizing economic agency – as an explicit goal of global development efforts, alongside economic growth, poverty alleviation or conflict prevention. This must go beyond a tick-a-box exercise. It requires *moving from safeguarding to a strategic approach*, treating developing freedom as an aim of intervention, something to be prioritised and proactively pursued through lending, spending and policy advice. COVID-19 response offers a unique opportunity for this shift of approach, since it has highlighted the need for aid to deliver an economy that *works for people* – an economy that promotes their economic agency and helps them develop their freedom. This can be achieved, in part, by connecting anti-slavery efforts to *ongoing development work* on resilience, empowerment and governance – and especially by drawing on existing learning and expertise, from DfID, on anti-corruption, and community participation.
12. Mainstreaming anti-slavery efforts also requires slavery-proofing development pathways. Here, too, the COVID-19 response provides a unique opportunity, due to the increased state presence in economies. Aid can be used to catalyse and source-in investment aimed not just at macroeconomic growth and social development, but specifically at protecting and maximizing people's economic agency. Pandemic recovery policies should promote a more equal, entrepreneurial and educational growth model than is currently offered in models of incorporation into Global Value Chains (GVC).
13. Drawing on *Developing Freedom*, we suggest aligning this model on five lines:
  - *Emphasizing human capital formation*, including investment in education, life-long learning and skills development, and fostering migrant education, skills recognition and skills development;
  - *Promoting entrepreneurialism and wealth pre-distribution*, through improvements to labour market mobility, financial inclusion, and capital formation – for example through promoting retirement savings, democratizing ownership of new technologies such as green technologies and industrial robots, and fostering use of cooperative production systems;
  - *Providing safety nets*, to protect in crisis and encourage responsible risk-taking, through wage insurance schemes, protection floors, access to healthcare and childcare, and strengthened government-to-person (G2P) platforms;
  - *Promoting high-skilled growth*, for example through industrial policy promoting skills-intensive exports backed up by necessary education, training, wage policy and incentives for private investment; and
  - *Reducing inequality of economic agency*, through progressive taxation, effective competition policy and executive compensation rules.

**Recommendation 5 (Partially accepted): Responsible departments should strengthen partnerships on modern slavery, including deepening engagement with the private sector and working with partner governments to develop locally owned action plans covering origin, transit, and destination countries.**

14. *Developing Freedom* argues for development actors to use their resources and leverage to encourage responsible business conduct in global value chains, prioritising sectors and value-chains where COVID-19 has most severely reduced economic agency. UK Aid and development instrumentalities, including [CDC Group](#), could encourage companies and suppliers to which they are connected to protect people as effective economic agents, for the long-term health of the whole economy. This includes:
- *Protecting workers' health, incomes and livelihoods*, through workplace safety measures, maintaining supplier relationships, promoting wage subsidies, loan guarantees and flexible payment arrangements. Remedial measures may also be needed where supplier decisions have contributed to or caused increased modern slavery risks.
  - *Working together*, through joint approaches to high-risk supply-chains, social dialogue, promoting worker voice, managing migrant labour repatriations, and mobilising around shared GVC transformation plans.
15. Realising these goals may require working across multiple institutional levels and action in new forums (such as the UN Regional Economic Commissions and Regional Fisheries Management Organizations). Pandemic recovery offers a new start – a chance for governments and development actors to work with value-chain stakeholders to reshape those value chains, collaborating, rather than competing. This could begin with the development of a set of shared expectations of suppliers in high-risk value chains – such as PPE.
16. *Developing Freedom* also argues for the development sector to take a more active role using its collective leverage to shape how capital markets address modern slavery risks. The UK government is uniquely positioned to take this approach, given the influence the City has over financial rules, norms and flows.
17. In the short term, during pandemic recovery, this should focus on keeping people afloat, by:
- *Increasing liquidity at all levels*, to help governments and enterprises access needed resources, including by enlisting intermediary financial institutions;
  - *Pushing for a microfinance rescue plan*, to ensure that hundreds of millions of at-risk households and enterprises survive the global economic downturn;
  - *Increasing digital financial inclusion*, using the opportunity created by the crisis to invest in efforts to address the 1.7 billion people who remain unbanked, and to improve access to working capital for the SMEs and micro-contractors that may be most prone to use forced labour.
18. In the longer term, the focus should be on collective leverage to ensure capital markets accurately price modern slavery risks, including:
- *Coordinated exclusion* of known modern slavery risks from public financing, lending and investment;
  - *Active participation in the construction of a harmonized ESG risk information infrastructure*;
  - *systemic risk monitoring* to identify when privately incurred ESG risks are reaching toxic levels; and
  - *Concerted action to tackle illicit financial flows* connected to systematic forced labour, including stolen asset recovery and disrupting the recruitment fee system.

## **B. Relevant Developments since the ICAI Review's Publication**

### **Proposed reduction of the UK aid budget from 0.7 percent to 0.5 percent of gross national income (GNI)**

19. The Integrated Review of Security, Defence, Development and Foreign Policy (March 2021) notes that, 'The UK will remain a world leader in international development and we will return to our

commitment to spend 0.7% of gross national income on development when the fiscal situation allows'. No time limit has been placed on the return to this 0.7% commitment, nor a practical roadmap for achieving this. Given the vital work that the UK Aid budget funds, we would urge the UK Government to reverse the UK ODA aid budget cut and return ODA spending to at least 0.7% GNI.

20. A number of Rights Lab research projects, funded through the Global Challenges Research Fund (GCRF), [have been impacted](#) by this reduction in ODA funding, [including one involving the UK Space Agency](#) to develop a stakeholder-informed, data-driven Earth Observation (EO) approach to support anti-trafficking efforts in Uganda.

### **Publication of the Integrated Review of Security, Defence, Development and Foreign Policy in March 2021**

21. It is positive that the [Integrated Review](#) confirms in writing the UK Government's continued commitments to achieving the Sustainable Development Goals (SDGs). Likewise welcome are the commitments made to addressing climate change, conflict resolution and to tackling the drivers of instability that can increase vulnerability to modern slavery. However, limited mention is made in the Integrated Review to gender and inclusion strategies, aside from the commitments made to funding girls' education (although welcome, this is only one part of a comprehensive approach to gender equality), which are essential to sustainable development and to addressing modern slavery.
22. The Rights Lab welcomes the business measures [introduced by the Foreign Secretary](#) in January 2021 to help ensure that British organisations are not complicit in, nor profiting from, human rights violations relating to the Xinjiang region of China. The Rights Lab [submitted evidence](#) to the BEIS Committee [Inquiry on 'Forced labour in UK value chains'](#), which explored the extent to which business in the UK are exploiting the forced labour of Uyghurs in the Xinjiang region of China, and hopes the UK Government will also take heed of the [resulting report and recommendations made](#). These recommendations go further than the package of measures announced by the Foreign Secretary.
23. In relation to migration, the Integrated Review notes that 'cross-border migration will likely increase over the coming decade' and that whilst the UK welcomes migrants who have moved through safe and legal routes, it is committed to 'tackling irregular migration' and 'address organised immigration crime, which exploits the vulnerable'. It further notes the [introduction of the new points-based immigration system](#) (in place since 1<sup>st</sup> January 2021) following the UK's departure from the EU, to give priority to those with the 'highest skills and greatest talents'. Whilst the Home Secretary has asserted that this new system will make the UK safer, evidence shows that [restrictive immigration policies](#) and temporary work schemes, such as Seasonal Workers Pilot which was extended to 10,000 to 30,000 places in 2021, can increase worker vulnerability to exploitation and modern slavery. [Recent research](#) on the UK Seasonal Workers Pilot Scheme, based on nearly 250 responses from agricultural workers, found that serious risk of forced labour was present on the Scheme due to the conditions in place for workers. These included risk of unfree recruitment based on a discrepancy between information workers received about the nature of the work and the reality upon arrival, risk of work and life under duress (66% of Seasonal Worker Visa (SWV) workers reported receiving threats of loss of work and 17% reported threats of deportation from their employer), and difficulties in leaving an employer.
24. Another area in which there is an opportunity for impact in the UK Aid programme, highlighted by the Integrated Review, is the government's stated **commitment to tackling climate change**. [Developing Freedom](#) (discussed further below) and [Rights Lab research](#) explain how modern slavery results in market failure from mispricing forced labour, similar to and intertwined with the market failures that have mispriced carbon. A transition to a decarbonised economy will not be a 'Just Transition' if it treats environmental harms and social impacts as trade-offs. **A Just Transition requires decarbonisation without increased exploitation**. Key opportunities for the UK Aid programme include:

- **Targeting efforts to slavery-proof renewable energy supply-chains.** Cobalt, solar panels and biofuels (ethanol and palm oil) are all currently significant sites of modern slavery. Aid programming and other government and commercial interventions could help upgrade these supply-chains so that they meet international labour standards.
- **Climate adaptation and resilience to mitigate modern slavery risks arising from climate displacement.** Opportunities exist in particular in the Sahel and the Pacific.

The Rights Lab eagerly awaits the publication of the new international development strategy and hopes that it will be developed in close collaboration with experts from the development and human rights sector.

**Publication of the ‘Developing Freedom: The Sustainable Development Case for Ending Modern Slavery, Forced labour and Human Trafficking’ report (in February 2021)**

25. This report, funded by the UK Government (namely the Foreign and Commonwealth Office, with operational support from DfID) and written over eighteen months, includes research contributions from Rights Lab academics and seeks to provide the answers to the question ‘How can fighting slavery contribute to sustainable development?’. The research found that slavery impedes development in 10 key ways, including by reducing productivity, creating intergenerational poverty, and institutionalising inequality. Through surveying practitioners from across 16 countries it found that the development community has a ‘blind-spot on slavery’ with 67 per cent of respondents stating that ‘their organization saw slavery as a social or criminal justice policy concern, not as an economic, trade or industrial policy concern’. It also found that Official Development Assistance (ODA) commitments are low and fragmented and that, on average, ‘less than USD 12 per victim was committed in aggregate ODA, globally, each year’.
26. The report provides ‘an agenda for developing freedom’, recommending that development actors should:
1. **Commit to develop freedom:** make maximizing economic agency a development goal, alongside economic growth and poverty alleviation, shaping lending, spending and policy advice.
  2. **Slavery-proof development pathways:** harness the increased State presence in the economy resulting from COVID-19 responses to promote a more equal, entrepreneurial and educational growth model through: i) emphasizing human capital formation; ii) promoting entrepreneurialism and wealth pre-distribution; iii) providing safety nets; iv) promoting high-skilled growth; and v) reducing inequality of economic agency.
  3. **Supply freedom:** use the pandemic to turn GVC practices towards responsible business conduct.
  4. **Finance freedom** - keep people afloat: then use collective leverage to ensure markets price modern slavery risks accurately, through exclusions, risk metrics, systemic risk monitoring, and action on illicit financial flows.
  5. **Organize communities for freedom:** create a Developing Freedom Forum for information-sharing, learning and strategic coordination around substantive reform agendas for specific value chains. Use this forum to coordinate leverage to effectively mobilize disruption, transformation and empowerment strategies to end modern slavery, forced labour and human trafficking, at scale.

The Rights Lab commends the report to the Sub-Committee and urges members to review its contents in detail.

**Ongoing fall-out from the COVID-19 pandemic**

27. As the review notes ‘the COVID-19 pandemic is likely to give rise to new modern slavery challenges’. Not only has the pandemic brought about direct health harms, it has brought about rapid social and economic change that has created additional risks and challenges to victims and

survivors of modern slavery and has exacerbated existing ones. Some of these risks and impacts are related to exposure to the virus itself whereas many risks emerge or are exacerbated as a consequence of wider measures to contain the spread of the virus, for instance, border closures, social distancing, and lockdowns.

28. The Rights Lab wishes to draw members' attention to recently published research on COVID-19 that may be of interest. As part of a UKRI-funded project, the Rights Lab conducted a [rapid evidence review](#) reviewing grey literature sources published between 1 March – 31 October 2020 on the actual impacts and potential risks of COVID-19 on victims and survivors of modern slavery. The key themes that emerged included: barriers to accessing basic amenities and financial assistance; risk of exposure to and transmission of COVID-19; actual impacts and potential risks to mental health; heightened risk of exploitation; and a heightened risk of being re-trafficked.
29. The Rights Lab is also involved in a [number of ongoing COVID-19 related research projects](#), funded by UKRI. One of these ongoing projects of potential interest to the Committee is exploring the impact of COVID-19 on modern slavery in Sudan. The research is analysing different aspects of this impact, considering local, regional, and international developments, particularly in key trafficking routes in Darfur, South Kordofan, and the Blue Nile. [Emerging findings](#) suggest that restrictions introduced in response to COVID-19 – particularly border closures and restrictions on mobility – are having three significant impacts on practices of modern slavery, including trafficking in and through Sudan. These include: adaptation in migration, smuggling and trafficking routes; increased vulnerability to exploitation amongst specific populations (namely vulnerable refugees, internally displaced persons, and migrants; children and in particular girls who have left school due to the pandemic; workers in the informal sector, seasonal agriculture, and domestic work) and limitations on support and assistance for vulnerable populations.
30. Other recently published COVID-19 research that may be of interest to the Committee include:
- [Understanding the Effect of the COVID-19 Pandemic on Informal Apparel Workers in Bangladesh](#) (2020, Global Fund to End Modern Slavery)
  - [Reflecting on the year that was: Lessons from the COVID frontlines](#) (2021, Freedom Fund)

Further information regarding the Rights Lab's COVID-19 response, as well as links to other relevant research and policy responses can be read here:

<https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/COVID-19/index.aspx>

**Relevant updates from the Special Rapporteur on contemporary forms of slavery, including its causes and consequences**

31. Early in 2021, the Special Rapporteur, Tomoya Obokata, launched a [Call for Input](#) on the Nexus between Forced Displacement and Contemporary Forms of Slavery. The call was intended to support the Special Rapporteur in the development of a comprehensive report on displaced persons, including stateless persons, with regard to contemporary forms of slavery, to be presented to the Human Rights Council in September 2021. The Rights Lab submitted a response to this call for input, which has now been [published](#). Mr Obokata's priorities for his tenure as Special Rapporteur are set out in [his first report](#) to the General Assembly.