MODERN SLAVERY & HUMAN RIGHTS | POLICY & EVIDENCE CENTRE

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# Integrating policies addressing modern slavery and climate change

## Research Report

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## Content Notice

This report does not explicitly mention any mature/ explicit/ sensitive topics however, discussion will refer and allude to topics of slavery, servitude, human trafficking, forced labour, forced marriage, child marriage, environmental crisis, conflict and forced migration.

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## Contents

# Executive Summary

‘Realigning Modern Slavery and Climate Change for Equitable Governance and Action’ is part of a larger collective of research projects aiming to understand the intersections between climate change and modern slavery and generate new evidence on how policies can recognize, address and positively influence these linkages between modern slavery and climate change. This project focuses on how modern slavery and climate change can be jointly integrated in UK Government and devolved administrations' policies. This pursuit is to demonstrate how modern slavery can be ‘mainstreamed’ into climate change action, and vice versa. The project and this report are the result of collaboration between the Rights Lab (University of Nottingham), Transparentem, and International Justice Mission (IJM) UK.

## Context

Modern slavery and climate change intersect through complex, direct and indirect pathways that span borders and propagate through interconnected human-environmental systems. Climate change can increase vulnerabilities to modern slavery through the occurrence of changing environmental conditions and slow-onset events (such as drought), or rapid-onset events, both of which can cause climate-induced displacement or longer-term migration and heighten vulnerabilities that can be exploited (both in home and receiving countries). In response to changing environmental conditions, people may be forced to enter exploitative situations or engage in exploitative activities to provide alternative livelihoods and survive. In this regard, climate change can exacerbate pre-existing risk factors for modern slavery and disproportionally affect certain groups, notably women and girls.

However, climate change action may also be a driving factor. For instance, planned relocations of communities as part of adaptive, risk management approaches can also create or exacerbate vulnerabilities to modern slavery, particularly if rights and/or livelihood opportunities are limited in receiving locations. Likewise, the ‘race to net zero’ could prompt new businesses to engage in modern slavery and human rights abuses, while the loss of certain industries could create new vulnerabilities in the absence of just transitions. The intersections and cascading risks that exist between climate change and modern slavery make it paramount that the two agendas be addressed together; yet to date, these issues have largely been treated as policy silos.

## Research methods

This research examines the policy intersections and opportunities for strengthening alignment between modern slavery and climate change through UK policies and devolved administrations (Scotland, Wales and Northern Ireland). The research addresses the following questions:

1. To what extent are anti-slavery efforts currently integrated into UK Government and devolved administrations’ climate change policies?
2. How can anti-slavery actions be better aligned and integrated (if at all) into climate change policies through existing and/or new mechanisms (i.e., ‘mainstreaming’)?

To address these questions, we undertook a comprehensive evidence review, alongside policy and legal analyses, both domestically and internationally to identify potential transferable lessons. This was accompanied by in-depth interviews with governance actors (n = 17) and a focus group (October 2023) with those working on modern slavery and/or climate change policies (n = 4).

## Findings and recommendations

Three key emerging findings were identified as part of the study. First, policy silos currently exist because of inaction, a lack of ability and willingness to incorporate combined activities in work and disconnects of scale mean activities to combine modern slavery and climate change action are further ahead in the anti-slavery sector, than the climate change space. Second, there are perceived and real barriers associated with resource and capacity strain which mean the research community should work to support governance actors and provide evidence for the development of new streams of policy action. Finally, domestic and international legislative action can be used as a baseline for combined action addressing modern slavery and climate change. For example, the inclusion of decent work within Scotland and Northern Ireland's climate change policies demonstrates integrated policy achievements.

Our findings highlight several ways through which modern slavery and climate change agendas could be more strongly aligned and strengthened through governance mechanisms. **Seventeen (17) overarching recommendations** are identified according to four core themes – **governance**, **knowledge-to-action**, **capacity building and finance**, and **support, lived experience and inclusion**, and have been assigned an urgency score. The urgency scoring adopts a similar approach to that used by the latest Climate Change Risk Assessment (CCRA3) (HM Government, 2022), taking into account current levels of risks or opportunities, how this is currently being managed and the benefits of further action in the next five years. More action is needed for most recommendations, meaning that new, stronger or different government action is required over and above that already planned in the next five years. It is vital that governments step-up action to address these dual challenges simultaneously to ensure a rights-based, socially just response to climate change.

## Summary of recommendations

### Governance

- G1: Strategic oversight
  - Greater strategic oversight is needed between the leading departments focused on modern slavery (Home Office and Foreign, Commonwealth & Development Office, FCDO), to include and address intersecting issues of modern slavery and climate change at domestic and international scales.
- G2: Problem framing and recognition
  - An overarching human rights lens should be centred at the core of public policy and should be integrated across all departments (national and devolved) and their mandates.
- G3: Enhanced cross-departmental collaboration
  - Mechanisms are needed to overcome current siloed approaches throughout the UK government and devolved administrations, including cross-departmental sub-groups and establishing internal networks.
- G4: Legislative change
  - Consider the development of new combined legislation addressing modern slavery and climate change concerns, and in the interim update current legislation to strengthen UK response to modern slavery and climate change.
- G5: Alignment

    - Inclusion of climate change as an issue of concern in relation to modern slavery as part of the agenda pursued by the Global Commission on Modern Slavery.
- G6: Intergovernmental collaboration
    - The UK should revive its reputation as a multi-lateral governance actor and provide international leadership around climate change and modern slavery through its role within the UN multi-lateral systems, the new Global Commission on Modern Slavery, through the FCDO Modern Slavery Envoy and other multi-lateral systems.

### Knowledge-to-Action

- K1: Addressing evidence gaps
    - There is a pressing need to improve the evidence base, understanding and communication of the cascading risks associated with modern slavery and climate change by researchers – provision of evidence, and actionable recommendations to best support policy development.
- K2: Establishing safe pathways
    - The Home Office and the FCDO should work together to establish safe migration pathways in response to climate and intersecting crises from source to destination. This is pertinent for those moving due to climate disruptions, conflict, and related socio-political instabilities.
- K3: Sensitive language and reflexivity
    - Sensitive language and reflexivity is required when interacting with international programming on both modern slavery and climate change from the UK. Acknowledgement of current and historical drivers of slavery and climate change are important for international cooperation.

### Capacity Building and Finance

- C1: Adaptation finance
    - There is an urgent need to bolster adaptation finance through Official Development Assistance (ODA) via the FCDO, and domestic funding for projects through relevant departments/bodies (e.g. the Department for Environment, Food and Rural Affairs (Defra), the Climate Change Committee (CCC), the Gangmasters and Labour Abuse Authority (GLAA), the Environment Agency) via the Treasury to support vulnerable communities and build resilience.
- C2: Research funding
    - Research funders should make grants available to address modern slavery and climate change intersections in the UK, and overseas. As well, support for policy institutions and multi-lateral organisations to promote findings and integrate into policy.
- C3: Informed green investment
    - Green investment mechanisms require regulations that must equally consider the social and environmental, with specific guidance for businesses and investors being noted.
- C4: Technological development
    - Investment in climate mitigation technology must limit trade-offs and ensure decent working conditions to avoid unintended consequences for local communities in terms of labour exploitation – thus promoting a ‘Just Transition’.

## Support, Lived Experience and Inclusion

- S1: Lived experience inclusion
    - Lived experience and survivor voices should be included at all stages of policymaking and evidence production, including where modern slavery and climate change policy may intersect. The process should not be extractive but also provide opportunities for involved members.
- S2: Community investment
    - Greater financial investment in community-led climate change and modern slavery organisations is needed to lead in the development of programming to support the needs of the populations they work with and are a part of.
- S3: Independent Anti-Slavery Commissioner (IASC)
    - The role of the IASC should report on the progress of modern slavery and climate change integration across government, as well as implementing a succession plan in place and be extended in term-length to support deeper levels of engagement and meaningful action across departments, including developments in survivor care.
- S4: Expulsion (or revision) of the Illegal Migration Act
    - The Illegal Migration Act is contradictive to the UK's international obligations and creates barriers to maintaining human rights standards as well as reducing the ability for devolved administrations to meet their international obligations. The Act should be removed from the legislative landscape, if not, revised to be appropriate to human rights standards and international obligations.

# Acronyms

| | |
|---|---|
| BHRRC | Business and Human Rights Resource Center |
| CCC | Climate Change Committee |
| CCRA | Climate Change Risk Assessment |
| CEFM | Child, Early, and Forced Marriage |
| CSDDD | Corporate Sustainability Due Diligence Directive |
| CSO | Civil Society Organisation |
| DA | Devolved Administration |
| DEFRA | Department for Environment, Food and Rural Affairs |
| DESNZ | Department for Energy Security and Net Zero |
| EU | European Union |
| FCDO | Foreign, Commonwealth, and Development Office |
| GBV | Gender-based Violence |
| GCRF | Global Challenges Research Fund |
| GLAA | Gangmasters and Labour Abuse Authority |
| IASC | Independent Anti-Slavery Commissioner |
| ILO | International Labour Organization |
| IOM | International Organization for Migration |
| LEAP | Lived Experience Advisory Panel |
| MSIF | Modern Slavery Innovation Fund |
| NAP | National Adaptation Programme |
| NGO | Non-governmental Organisation |
| NRM | National Referral Mechanism |
| ODA | Official Development Assistance |
| OECD | Organisation for Economic Co-operation and Development |
| OHCHR | United Nations Human Rights Office of the High Commissioner |
| PSNI | Police Service of Northern Ireland |
| SDG | Sustainable Development Goals |
| SMART | Specific, Measurable, Achievable, Relevant, and Time-Bound (Targets) |
| UKRI | UK Research and Innovation |
| UN | United Nations |
| UNEP | United Nations Environment Programme |
| UNGP | United Nations Guiding Principles on Business and Human Rights |
| WRO | Withhold and Release Order |

# 1. Introduction

As climate impacts increase in severity and occurrence, the potential vulnerability of populations already subject to economic and social exploitation increases (Coelho 2016). Understanding the intersection between modern slavery and climate change is important, and with new forms of data becoming readily available, addressing the connections across the two fields is vital (Jackson et al. 2021). To date –within the UK governance space – the two issues of climate change and modern slavery have been addressed in silos.

The ways modern slavery and climate change intersect are multi-directional and consist of push and pull drivers (**Figure 1**). Such intersections have been developed theoretically through the 'modern slavery-environmental degradation-climate change nexus' (see Coelho 2016; O'Connell 2021; Brown et al. 2021). Decker Sparks et al. (2021) also identified that there are both constraining and reinforcing factors at work in relation to environmental factors and climate change. In this instance, the ending of modern slavery can have a positive benefit to the achievement of environmental and climate goals; and vice versa, as outlined in the UN Sustainable Development Goals (SDGs) (UN, 2015). However, there are instances where transitioning toward green technologies (e.g., solar panels) may increase vulnerability for some communities towards modern slavery; mainly associated with the raw extraction of materials needed for products such as batteries, and components for green energy manufacturing processes. Thus, the intersections and cascading risks that exist between climate change and modern slavery make it paramount that the two agendas be addressed together. Overall, ending modern slavery is good for the achievement of environmental SDGs (e.g., SDGs 8 'decent work', 13 'climate action', and 16 'strong institutions').

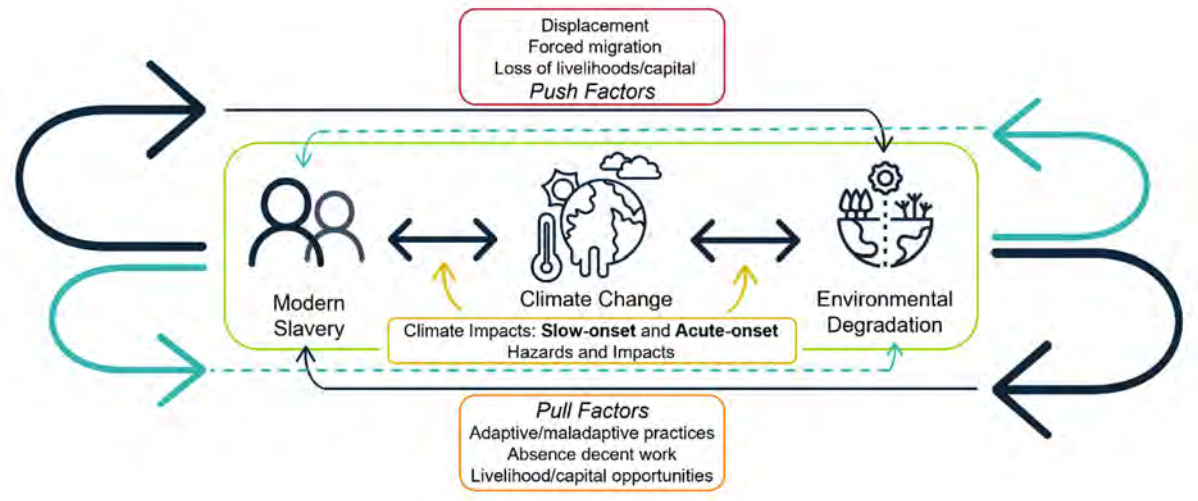


*Figure 1: Conceptual framework of the modern slavery-climate change-environmental degradation nexus exploring the multi-directional complex feedback loops that results in both push and pull factors, which affect communities. Both changes to the environment (outside of climate change) and climate change itself (including hazard exposure) can both push and pull communities toward situations of modern slavery, as well as modern slavery pushing them into situations that exacerbate anthropogenic climate change.*

To address these concerns, governance actors must play a leading role in combined action around modern slavery and climate change in a way that has not previously been seen. There have been some recent marked changes in the governance landscape that show encouraging signs for combined action. For example, the calls for loss and damage support have been made internationally, with support for those with experiences of modern slavery and climate change being identified as key recipients for support (Balch 2022; Jackson 2021; Jackson 2023). The recent movement at COP28 has also included multiple references to climate-induced migration (UNFCCC 2023) which has been linked to risks of modern slavery (Jackson 2023). Moreover, the recent EU Directive on Corporate Sustainability Due Diligence which covers human rights and environmental conditions shows developments in regional combined legislative efforts addressing social and ecological risk. New outputs argue that a 'Just Transition'[1] would integrate modern slavery concerns within climate responses (Cockayne 2021), and active integration of modern slavery risk and climate change would 'mainstream' the anti-slavery efforts of UK Government and Devolved Administrations (DAs) (Hesketh and Balch 2021).

This report examines the policy intersections and opportunities for strengthening alignment between modern slavery and climate change through UK policies and devolved administrations (Scotland, Wales and Northern Ireland). To achieve this, we combined desk-based analysis with primary data collection through interviews with UK-based governance actors working on modern slavery and climate change policy. A series of tailored recommendations developed through focus-group engagement with governance actors have been produced to strengthen combined UK action on modern slavery and climate change.

## 1.1 Research Questions

1. To what extent are anti-slavery efforts currently integrated into UK Government and devolved administrations' climate change policies?
2. How can anti-slavery actions be better aligned and integrated (if at all) into climate change policies through existing and/or new mechanisms (i.e., 'mainstreaming')?

## 1.2 Aims

1. Establish and evaluate current governance arrangements (actors, 'rules' including policies and legislation, and resources) associated with modern slavery risk and climate change.
2. Evaluate an intersectional approach (where 'intersectional' is defined as one that incorporates and values the views of all parties) to issues of antislavery and climate change within the UK governance space.
3. Provide recommendations for improving or establishing new governance mechanisms to strengthen and enhance the response to compounded modern slavery and climate change risks.

[1] Used often within the climate change adaptation and mitigation space, the concept of 'just transitions' reflects "a set of principles, processes and practices that aim to ensure that no people, workers, places, sectors, countries or regions are left behind in the transition from a high-carbon to a low-carbon economy" (IPCC 2022).

## 1.3 Structure of this report

This report is structured as follows. Firstly, the report summarises the current evidence on the connections between modern slavery and climate change. This evidence was assessed to identify the current recommendation trends provided to a range of stakeholders and helped to structure the recommendations developed in this research (**Section 2**). Second, the current legislative landscape is assessed to identify gaps, good practice, and avenues for combining modern slavery and climate change legislation based on current policy (**Section 3**). Third, **Section 4** assesses policies enacted in jurisdictions beyond the UK to identify potential transferable lessons for the UK. Finally, **Section 5** reports the interview findings conducted with key governance actors with expertise in both modern slavery and/or climate change, from the UK national government and all three Devolved Administrations (Scotland, Wales, and Northern Ireland) (undertaken in summer 2023). Combing all the evidence gathered throughout the research, **Section 6** outlines a series of recommendations for governance actors across the UK to assist in addressing modern slavery and climate change in a more intersectional manner.

# 2. Evidence Review

Previous research has sought to assess the interlinkages between modern slavery and climate change in relation to the Sustainable Development Goals (SDGs) (Decker Sparks et al. 2021) but there has not been a full assessment of the recommendations being provided by those seeking to address modern slavery and climate change through a governance lens. Our scoping of the evidence examined both academic sources and grey literature (sourced from Non-governmental Organisations, NGOs), and governmental and inter-governmental sources. This evidence was assessed to I) better understand the drivers and areas of research that are being undertaken to understand the connections between modern slavery and climate change, as well as to ii) assess the scope and quality of recommendations that are being provided for potential policy improvements.

To assess the current trends in modern slavery and climate change connections we undertook a review of academic and grey literature sources. These sources were reviewed and scored for their relevancy to the topics. Further, we assessed assess the typologies of recommendations that were provided. For the details of the methodology applied, see **Annex A**.

In total **95 articles and grey literature** (reports, book chapters, blogs) were included in the full evidence review analysis (for the full list see **Annex A**).

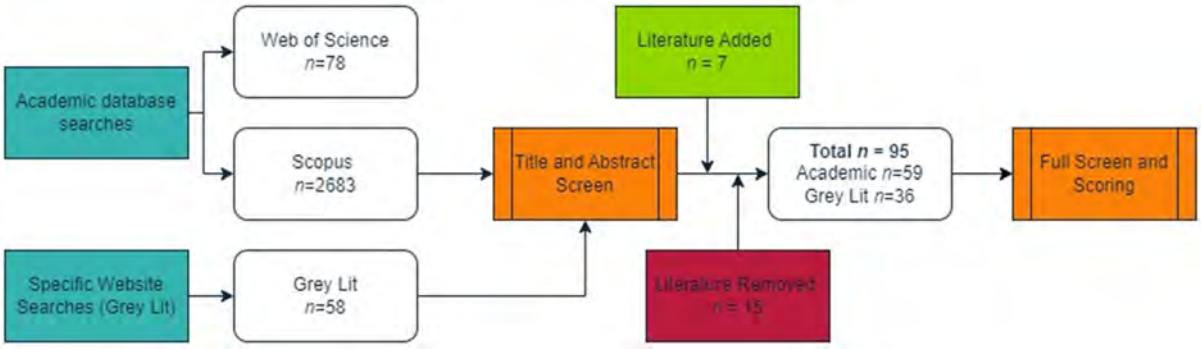


*Figure 2: Structure of the search for data related to the scoping review of academic and grey literature associated with climate change and modern slavery.*

## 2.1 Outcomes

Of the 95 sources that were reviewed, **three main themes** emerged from the evidence:

1. climate change leads to modern slavery, such as causing environmental migratory patterns linked to high risk for exploitation;
2. climate change increases pre-existing vulnerabilities to modern slavery;
3. modern slavery is part of unsustainable industries that contribute to climate change.

These themes related to the ways in which modern slavery and climate change are discussed in terms of their connections and the way in which corresponding recommendations are

informed – they are also each highly interconnected. What is clear within all three scenarios mentioned, is that a shift in any of the contributing risk factors can set in motion a series of effects that can drive both modern slavery and climate change simultaneously (**Figure 3**).

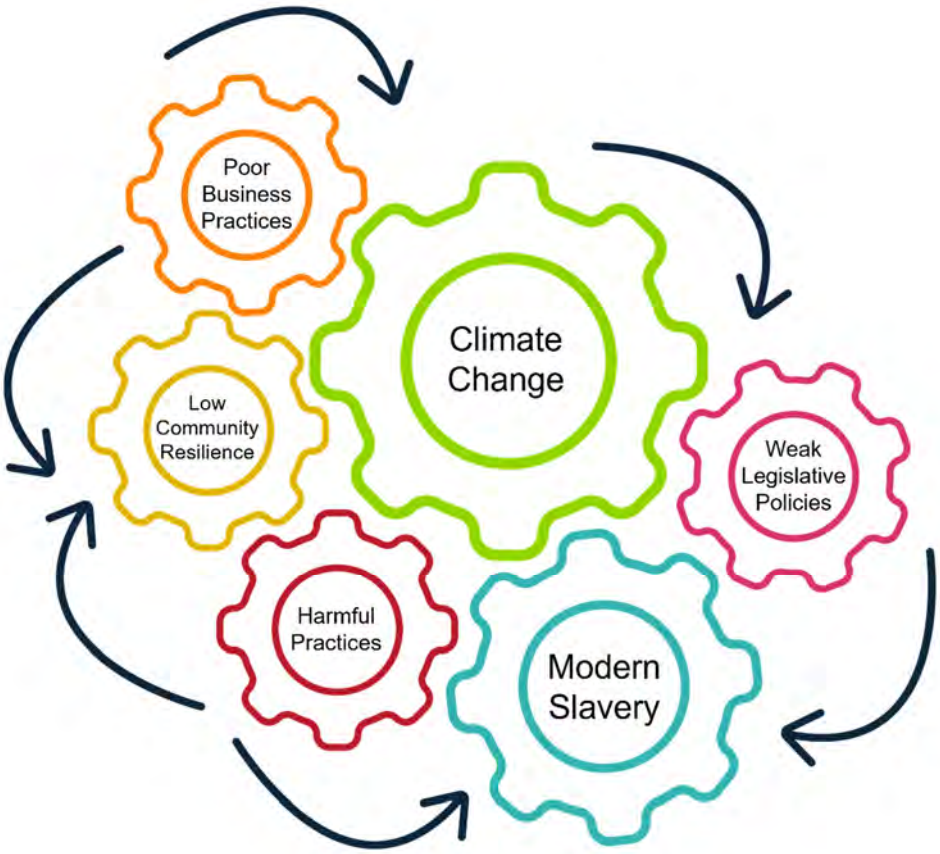


*Figure 3: Cog network of the climate change-modern slavery interconnectivity. All factors that impact individuals and communities can occur in isolation, however, each factor can exacerbate the effect of another. Once one vulnerability factor is in motion the others will follow with climate change and modern slavery being the two main risk factors. In the same influence, reducing any of these factors through support or action can help to slow or mitigate the impacts of the others they intersect with.*

### 2.1.1 Climate change leading to modern slavery

Climate change has been associated with 'pushing' communities who would otherwise remain in place to migrate (see McAlpine et al. 2021), as migration has been noted as a compounding risk factor for modern slavery (Brickell et al. 2018; Bharadwaj et al. 2021a, 2021b, 2022; ILO 2022; Jackson 2023). Such risks intersect with inequities communities face around access to resources, the impacts of caste, gender, and poverty as well as the risks of climate change upon the environment (Mondal and Chakraborty 2022). For example, changes to seasonal rainfall can cause drought and effect a community's access to food and water security, which can destabilise a community (Fisher 2016). In response, members of the community may decide to migrate to another location; thus, the overall effects of climate change have been associated with migration (Coelho 2016; UNODC 2022). The risks, therefore, are placed upon three stages of the community; 1) those who have migrated to a new location; 2) those who are in the process of migrating; and 3) those who have to or choose to remain. At each stage there can be entry points for risks of modern slavery. Munns and Katz (2023), for example, note entry points including:

- Vulnerable individuals may accept false job offers and be trafficked directly from their community into a situation of exploitation.
- Vulnerable people may enter smuggling routes as part of their migration, and may fall into debt through fees, thus entering debt bondage. This coercion can lead to different forms of sexual exploitation, forced labour, or domestic servitude.
- Those who have migrated to a new community may then enter exploitative situations, which can include modern slavery – this can occur in both unfamiliar locations and within hostile destinations when migrants have irregular and limited rights, and thus may be reliant on exploitative operations to obtain livelihoods (see Ranjan 2016).

### 2.1.2 Climate change increases pre-existing vulnerabilities

Climate change has been noted as being a stress multiplier and can exacerbate pre-existing vulnerabilities that communities and individuals already face (Bharadwaj et al. 2021a, 2022). For example, gender is a pre-existing risk factor and was explored in 21 of the sources reviewed. Gender has always been understood as playing a key role in the potential risk of people being exploited and affecting the types of exploitation that are faced. Climate change and the presence of associated hazards has thus been noted as disproportionately affecting women and girls (Asadullah et al. 2020; Tearne et al. 2021; UNODC 2022).

For example, climate change can lead to some families engaging in the practice of child, early and forced marriage (CEFM) as a maladaptive climate change strategy to reduce the economic vulnerability a family may face (Alston et al. 2014). Carrico et al. (2020) find that the likelihood of CEFM increases in the year of and subsequent years following a heatwave, as well as noting that gender-based violence (GBV) is more likely to occur within such marriages. Further, in Mozambique, early marriage has been noted as a response to the effects of drought (Fischer 2016), with cyclones and flooding amongst other climate change impacts also being noted as risks for GBV against women and girls in the wider literature (see van Daalen et al. 2022). This connection between forced marriage and climate change is dependent on the cultural context of a community (Mitu et al. 2022) and the types of marriage systems in place (whether bride price or dowries are used) (Asadullah et al. 2020), as well as the extent to which destabilisation of livelihoods occur (Alston et al. 2014). This contextual information is important as the impact of slow- and sudden-onset variations can play a role in whether CEFM takes place.

### 2.1.3 Modern slavery as part of unsustainable industries

There are two ways that unsustainable industries – often linked to sustainable supply chains practices in the literature reviewed – connect modern slavery and climate change:

- Where the connection is the unsustainable industry that utilizes practices of modern slavery and contributes to climate change.
- Where the connection is climate change drawing vulnerable individuals into exploitation within unsustainable industries, which then contribute to climate change.

Both scenarios can be cyclical (Jackson et al. 2021) but they are not inherently cyclical, ultimately being impacted by the overall level of environmental variability.

For example, illegal deforestation in the Amazon Rainforest is known to use workers subjected to modern slavery (Brown et al. 2021). Deforestation contributes towards climate change through the release of $CO_2$ and a reduction in the ability of the forest to continue to be a carbon sink (Jackson and Decker Sparks 2020; O'Connell et al. 2021). As such, this can have an overall impact on the climate systems globally. Whereas, in the fishing industry unsustainable fishing has caused collapses in fish stocks and required fishers to travel further, for longer

periods to gather than same volume of produce. Furthermore, coastal fishing communities are under threat, with some resorting to migration, or other maladaptive solutions (noted previously), or being drawn into the example mentioned above and continuing with their livelihood but under more extreme conditions.

## 2.2 Evidence Gaps and Recommendations

The main knowledge gaps that were identified as part of the evidence review are outlined in **Table 3**.

*Table 1: Evidence gaps identified as part of the evidence review and within the governance actor interviews that are most relevant for addressing the linkages of modern slavery and climate change.*

| | |
|---|---|
| **Temporal and Spatial Scope** | More research into the quantifiable connections of modern slavery and climate change are needed (across geographies, industries, climate variables) |
| | Research and evidence on the varied impacts of slow-onset climate change factors should be linked to long-term response priorities. Rapid-onset climate change factors should be linked to short-term responses |
| | Assessments of the extents to which climate change futures (various scenarios) could affect modern slavery, and where/when this may occur |
| | Refocusing research priorities on gathering evidence of some of the risks from climate change and modern slavery in the UK domestic context |
| | Recognition and rescaling of the attributions that can be made between climate change data (where there are long-timescales at high-resolution) and modern slavery data (addressing hidden populations, with small-scale and sporadic data) |
| **Just Transitions** | Understanding unintended consequences of Net Zero policies and climate mitigation activities on vulnerabilities/prevalence of modern slavery |
| | Opportunities identified for the delivery of co-benefits through Net Zero and adaptation policies that could help to reduce and mitigate the risks of modern slavery |
| **Stakeholder Involvement** | Inclusion and action from a broader and more diverse range of stakeholder groups, including the development of novel alternatives rooted in evidence and local knowledge from persons affected by modern slavery and climate change |
| | Partnerships must include those who have experiences of climate change and/or modern slavery (appropriateness for the work being undertaken – whether research or intervention), and involve those with expertise in the geographical context |
| **Business Responses** | More specific evidence is needed into the drivers of modern slavery and climate change interactions within the context of a capitalist economic system |
| | Understanding of the impact of climate change upon UK supply chains (domestic and import-based) that are exposed to risks of modern slavery |
| **Social Risks** | Migration factors in response to climate change and links to increased modern slavery vulnerability must be combined. Joint action on the intersections and the provision of what a safe and dignified migration pathway looks like need to be understood |
| | Improvements needed in the granularity of data on all forms of work associated with the impacts of climate change, but also in relation to |

| | |
|---|---|
| | modern slavery, and the impacts of transitioning economies to minimise unintended consequences |
| | Greater understanding of the gendered impacts of climate change and modern slavery intersections – both on women/girls and the effects on men/boys |

In our review of the recommendations we identified four main pillars that were commonly provided to policy makers in the review materials: **governance, knowledge to action, financial mechanisms**, and **support mechanisms** (**Figure 4**). Further, our group discussion highlighted three topics – survivor and worker voices, further research and evidence integration, and the concept of the 'just transition' – were elements that sat across the four main recommendations pillars most seen in the work previously undertaken on the modern slavery-climate change nexus. A core issue that was seen was the fact that the recommendations provided previously were vague in many contexts, and arguably lacked the precision needed by policymakers to enact change.

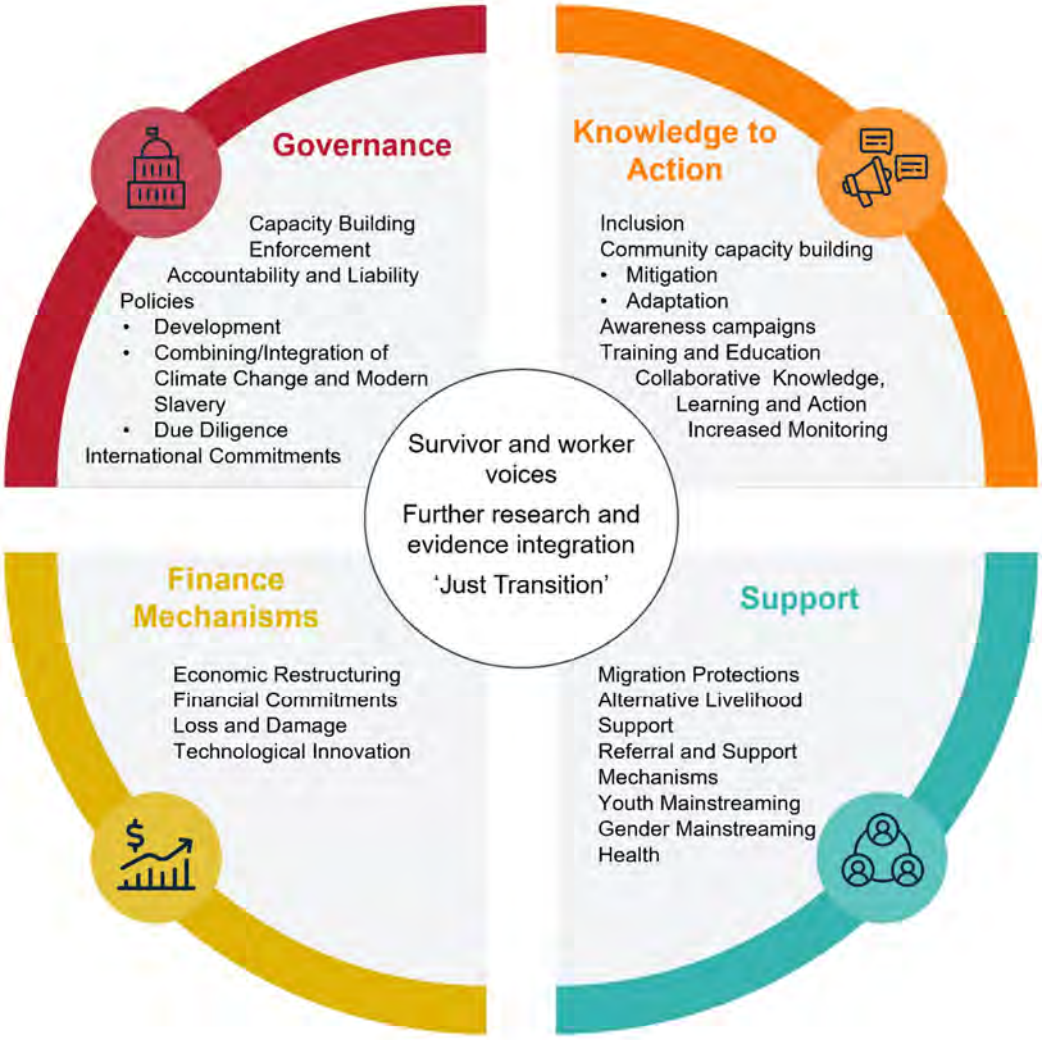


*Figure 4: Combined groupings of the main thematic areas of recommendations provided within the evidence that was reviewed, noting that three areas (demarcated in the central circle) intersect with all four of the equally weighted pillars.*

# 3. Legislative Review

Actors from anti-slavery and environmental policy areas have increasingly called for more joint policy efforts in the UK (Anti-Slavery International 2021; Global Witness 2021, 2022). For instance, more than 100 companies/investors and 220 NGOs/CSOs responded to the European Union's Corporate Sustainability Due Diligence Law[2] calling for expansion across all sectors, business sizes, and the supply chain; mandatory response at board level, stakeholder engagement and civil liability provisions (European Coalition for Corporate Justice 2022; BHRRC 2022). Such calls are beyond current UK legislative coverage to address either modern slavery or climate change. A review of the key UK and devolved legislation related to the environment to scope current efforts to address the risks of modern slavery and climate change was completed, and an assessment to assess extent to which they are considered in combination.

## 3.1 Approach

Using the UK Legislation Database (https://www.legislation.gov.uk/) we searched for all UK Legislation – excluding those originating from the EU (obligations that have not been explicitly incorporated into UK domestic legislation) to assess the domestic legislative governance landscape related to modern slavery and climate change. All available records were searched, and coverage included UK national legislation, and from the Scottish Parliament, the Welsh Assembly and the Northern Ireland Assembly. Searches were conducted using terminology relevant to the study including climate change, modern slavery, human rights, human trafficking, environment, sustainability, and supply chain. An additional search using the term due diligence was used but returned no results.

Both primary and secondary legislation were identified through this search with more than 400 pieces of legislation identified (**Figure 5**). Following a review of the primary and secondary titles – it was determined that there were **17 pieces of legislation that were to be reviewed in full** (see **Annex B** for the list) as they directly covered climate change, modern slavery and related issues. Of these 12 are primary legislative instruments (with a mix of UK national, n = 6; and devolved national acts, Scotland n = 3, Wales n = 1, Northern Ireland n = 2), with a further two statutory instruments from the UK, and three from Wales.

[2] The EU Corporate Sustainability and Due Diligence Directive (CSDDD) is a new policy adopted by the European Union and due to be implemented in EU member national laws in 2024. The directive works toward sustainable and responsible business practices for large companies that operate within EU member states. Both climate and environmental impacts (such as degradation through greenhouse gas emissions, pollution, and biodiversity loss are covered), as well as human rights issues such as forced labour, child labour and labour exploitation are explicitly noted (European Commission 2022a). The rules have two forms of enforcement, administrative supervision – including fines and compliance orders nationally, and the establishment of a European Network of Supervisory Authorities for coordinated action. As well as civil liability rights to ensure compensation resulting from company failure to comply with the obligations (including climate action and worker exploitation) (European Commission 2022b).

| | UK Government | Scottish Parliament | Welsh Assembly | Northern Ireland Assembly |
|---|---|---|---|---|
| Primary Legislation | 14 UK Public General Acts<br><br>(6 reviewed in full) | 8 Acts of the Scottish Parliament<br><br>(3 reviewed in full) | 2 Acts of the National Assembly for Wales<br><br>(1 reviewed in full) | 4 Acts of the Northern Ireland Assembly<br><br>(2 reviewed in full) |
| Secondary Legislation | 228 UK Statutory Instruments<br><br>(2 reviewed in full) | 104 Scottish Statutory Instruments<br><br>(None included in the full review) | 32 Wales Statutory Instruments<br><br>(3 reviewed in full) | 43 Northern Ireland Statutory Rules<br>2 Northern Ireland Orders in Council<br>(None included in the full review) |

*Figure 5: Number of identified policies across the four governance branches in the UK, and the number of those deemed relevant to the study and reviewed in full. These are marked by their structure as either primary or secondary legislation.*

## 3.2 Findings

Within the legislation there are formal governance mechanisms dealing with climate change and environmental issues, and separate mechanisms that aim to tackle human rights issues including modern slavery risks. The two issues in current UK and devolved administration legislation (and corresponding policies) are siloed.

Modern slavery is covered by the UK Modern Slavery Act 2015 with variations related to the prosecutorial and support mechanisms also noted in the additional legislation present in both Scotland and Northern Ireland. All three forms of legislation contain provisions for victims' support and address a variation in the typologies of modern slavery (used as an umbrella term in the legislation) and thus address slavery, servitude, and forced/compulsory labour, human trafficking, sexual exploitation, and securing services from children and vulnerable persons amongst others. Furthermore, slavery is noted within the Human Rights Act 1998 – Article 4: Prohibition of slavery and forced labour – and as such should be considered a universal human right that could apply to all risks across legislative actions, however this does not appear to be clear in other policy. What is missing in all legislation linked to modern slavery in the UK are reference to the drivers of modern slavery (climate is also not mentioned in the HM Government (2014) Modern Slavery Strategy) and how they may be addressed. For example, climate change is not mentioned in any of the socially oriented legislation reviewed suggesting a large gap in the legislation at present.

Current climate change legislation does not consider the driving factors that may exacerbate vulnerabilities (e.g., loss of livelihoods, displacement, health effects) for populations. Instead, most emphasis is placed on international mechanisms such as carbon credits and limiting domestic carbon emissions. In more recent legislation, there has been slightly more emphasis on the impact of climate change on people – and in particular the link to working conditions. For example, Scotland and Northern Ireland have taken a lead on the inclusion of ‘decent work’ (Ghai 2002, 2003) within the Climate Change (Scotland) Act 2009 and the updated 2019 version, as well as the Climate Change Act (Northern Ireland) 2022. Scotland aims to achieve through the engagement of “workers, trade unions, communities, non-governmental organisations, representatives of the interests of business and industry” and the creation of “decent, fair and high-value work in a way which does not negatively affect the current workforce and overall economy” (Climate Change (Emissions Reduction Targets) (Scotland)

Act 2019: p.25-26), signalling that a just transition is vital when considering climate change. Such a 'just transition' lens is one that has also been highlighted as being able to tackle issues of modern slavery through development initiatives (Cockayne 2021). The Northern Ireland legislation includes the above language of the Scottish legislation, but also references other social justice issues which have more relevance to addressing some of the vulnerability drivers of modern slavery. Northern Ireland's Climate Change Act (2022: p.15) notes that actions in the legislation include:

> "(g) supporting persons who are most affected by climate change, particularly those who may have done the least to cause it or may be the least equipped to adapt to its effects,
> (h) reducing, with a view to eliminating, poverty, inequality and social deprivation,
> (i) eliminating gender inequality and advancing equality of opportunity between men and women..."

which suggests advanced understanding and development of more integrated methods of climate change legislation. Incorporation of socially oriented actions are needed to adapt and mitigate against the risks of climate change which have been found to have an impact on vulnerabilities such as modern slavery.

One commonality present across the climate change and modern slavery legislation is the establishment and/or development of an independent body to commission knowledge, disseminate key evidence and advise legislative authorities – across all four governance mechanisms – to assist in the division of evidence-based policy development. The Climate Change Committee (CCC) plays the key role, and for the anti-slavery space, the Independent Anti-Slavery Commissioner (IASC) is the leader in this area. There are however clear and defined roles for each of the groups/individual offices and whilst they both provide helpful evidence to ensure legislation is supported by research, there appears to be very little overlap or opportunity for these independent bodies to cross-pollinate ideas or develop joint strategies to inform their relevant ministerial or policy-development bodies.

Whilst the UK legislative landscape is addressing both modern slavery and climate change, the siloed development and implementation of such policies mean that addressing both issues concurrently is difficult to achieve at present. Such a gap has been highlighted in the activism space previously, with the Corporate Justice Coalition and its members leading the call for the UK to introduce what they term "A Business, Human Rights and Environment Act", which would hold businesses, financial institutions, and the public sector to account when human rights and environmental (see CJC 2020).

The fact the two issues of modern slavery and climate change are not considered in the current legislative landscape in the UK means populations facing multiple vulnerabilities are not able to access nuanced support. Moreover, if it is not embedded in legislation, successfully tackling the drivers of climate change (which can often be linked to labour exploitation), nor labour exploitation (which can often be linked to climate change) can be achieved – see **Figure 1**).

## Examining the Illegal Migration Act 2023

The Illegal Migration Act 2023 (which includes references to modern slavery provisions) has the potential to place strain on coordinated efforts to address modern slavery and climate change concurrently. Part of these strains come from the ability to provide support to public and private sector organisations to address issues including modern slavery. This includes OSCE advice on Due Diligence, which supports UK businesses to remain competitive in an international market that is increasingly conscious of responsible business practises. A wide range of organisations have published their understanding of the situation mentioned above including the United Nations; European Parliament; various research bodies including the Rights Lab; and civil society, including IJM, the Northern Ireland Human Rights Commission, and Amnesty International to name just a few.

The Illegal Migration Act is of particular concern to this project as it creates a barrier to the UK being able to address the intersections between modern slavery and climate change and risks criminalising climate migrants who are displaced due in part to historical and continued inequalities related climate change drivers. The Act at present includes the criminalisation of entry through trafficking leaves communities exposed and does not account for the reasons populations may have been coerced and controlled (there is a growing body of evidence linking climate change and trafficking; e.g., Bharadwaj et al. 2022; Jackson 2023). It also demonstrates a lack of consideration to the complex nature of modern slavery and trafficking whereby people may not know / have known they were entering the country illegally or have had choice in doing so.

Concerns regarding the Act's unsuitability to address the reality of the UK migration, its potential to be used for discriminative criminalisation, or its violation of international obligations were reflected in our interviews with UK and DA policymakers (see **Section 5**).

# 4. Comparative Governance Globally

In the vein of the calls for combined legislation in the UK (e.g., by the CJC 2020), learning from promising developments in other geographies, is important to develop and tailor recommendations for the UK and devolved nations, and in relation to the effectiveness of the UK's domestic and ODA activities. We looked at multiple forms of legislation – including those that assess labour rights, environmental protections, modern slavery and human trafficking, and combined responses; building upon previous assessments (e.g., Anti-Slavery International 2021; Pietropaoli et al. 2021; Johnstone and Hesketh 2022). There were three main typologies of relevant legislation noted globally: 1) disclosure and transparency regulations; 2) mandatory human rights and environmental due diligence frameworks and legislation; and 3) the use of import bans. These legislative typologies aligned with those recently reported by Walk Free (2023) as key for combined action to address modern slavery and climate change.

Globally, the UN Guiding Principles (UNGPs) on Business and Human Rights (UN OHCHR 2011) are seen as the global framework for considered engagement with human rights in supply chains. As such, National Action Plan implementation related to the domestic codification of such principles – both foundational and operational – are noted across several forms of legislation in the global governance review. At the global multi-lateral level, organisations such as the OECD (2018) have also worked to provide guidance around responsible business conduct through due diligence frameworks. , Further, the multi-lateral action for due diligence in the climate space is reflected through the structure of international agreements such as the Paris Agreement (see Rajamani 2020), yet the connections made in relation to the modern slavery-climate change nexus are not included.

The geographical scope of the governance assessment was global (see **Figure 6**). However, legislation based in Europe and the US showed the most promise to identify similarities and improvements in the UK addressing modern slavery and climate change through combined policy.

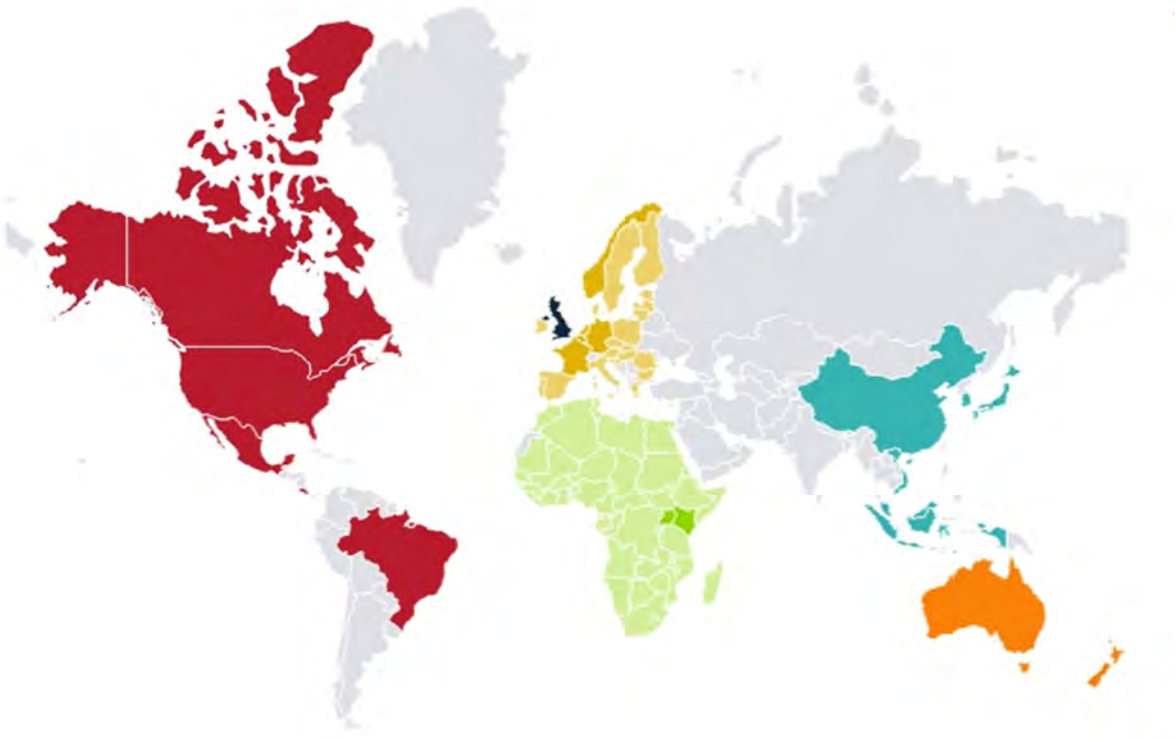

*Figure 6: Summary of the geographic coverage of the international legislation reviewed those that address either climate change, the environment, labour conditions and/or modern slavery to identify learnings to include in the strengthening the mainstreaming of combined policy action on modern slavery and climate change in the UK and devolved administrations.*

The EU Corporate Sustainability Reporting Directive from a reporting standpoint is the clearest example of current combined social and ecological legislation, having recently entered into force and EU nations having to transpose the Directive's contents into national laws in 2024. This similarly applies to the EU Corporate Sustainability Due Diligence Directive (CSDDD). From the perspective of the UK – which does not appear to be travelling in the direction due diligence policy structures – the EU framework has the potential to provide a blueprint to strengthen and expand potential reporting requirements following assessments on the efficacy of its implementation. These learnings can be taken from the lower turnover levels, the expansion of monitoring to company supply chains, and consideration of modern slavery risks and risks including other social, human rights and environmental factors. Calls have been made in the UK CSO sector to implement a combined legislation response, and so there is the potential for a shift in policy thinking in the future (CJC 2020). Key for the UK is monitoring of the effectiveness of these directives for the development and implementation of similar UK focused responses. Further engagement can also be taken from the pre-existing French (Duty of Vigilance Law) and German (Due Diligence in the Supply Chain Act) legislation to build an evidence base for the improvement and strengthening of UK-based intersectional responses. The UK can also learn from the implementation and review of the Australian Modern Slavery Act which has more stringent requirements and responses to business and supply chain compliance. These have been considered lacking in the UK version of the legislation; both have undergone review, but more targeted penalties have been considered in Australia than the UK (Australian Government 2023; UK Government 2019). There have been ongoing calls and proposed bills to improve the UK Modern Slavery Act that have stalled in parliament (Modern Slavery (Amendment) Bill, Modern Slavery (Transparency in Supply Chains) Bill) that may help to close this gap in the legislation, whilst still only addressing one aspect of the modern slavery-climate change nexus. Other policy in the UK may also help to close the gap with the Australian MSA, which also addresses procurement procedures through the recently passed Procurement Act 2023 (UK Government 2023a).

There are also additional sector specific learnings that could be applied to the UK. For example, the UK's recent amendments to the Financial Services and Markets Act 2023 provides an opening for human rights and environmental due diligence and transparency requirements to be integrated. Both the environment – including climate change – and social, community and human rights issues are included as sustainability issues to be considered in disclosure and regulation (UK Government 2023b). Similar learnings can be made from the Brazilian BCB Resolution that placed annual ESG disclosure requirements on financial institutions within Brazil (BCB 2021).

## Focus on Fisheries: Learnings from the Thai Fishing Sector

Fisheries within Thailand have undergone scrutiny because of reported labour abuses and overfishing. This had drawn significant responses from key import markets such as the EU who issued a 'yellow card' to the sector related to Illegal, Unregulated and Unreported (IUU) fishing (European Commission 2015), and the United States who had placed Thailand on the Tier 2 Watchlist for human trafficking governance and compliance (U.S. Department of State 2021) following fluctuations in ratings over the past decade. Drawing from previous work by International Justice Mission (IJM) to combat forced labour in the fishing industry in the region, an assessment of the work via an environmental lens has been undertaken.

Labour deficits resulting from Typhoon Gay in 1989 were noted by the IOM (2011) to be linked to a spike in labour trafficking from neighbouring countries. This spike in labour abuses was still manifesting almost 30 years later when Thai, Burmese and Cambodian fishers were surveyed across the sector. Around 38% of fishers had been subjected to trafficking, and 76% of were estimated to have accrued levels of debt prior to beginning work (Issara and IJM 2017). In another study NORC and IJM (2022) identified a series of migrant workers were also trapped in a situation of exploitation through fear of reprisal; approximately 30% of migrant workers in the fishing industry experienced abusive or coercive employment practices. Work undertaken by the Thai Government has indicated improvements in worker experience across the sector (ILO 2020).

As a result of evaluating evidence of labour abuses, which have the potential to be rooted in the long-term outcomes of climate change, further acute labour shortages were noted as workers did not want to engage with the sector due to (?) its exploitative practices (IJM and RCG 2022). Further, the effects of continued environmental degradation through overfishing practices within the Thai fishing sector were identified as being a driver of exploitation, as the transition to fishing activities further offshore, for longer durations, in deeper waters, are offset by recruitment and trafficking of fishers within the industry (Issara and IJM 2017; Yea and Stringer 2021).

The situation in Thailand's fisheries can be framed through the recurrent, non-linear, and multi-directional patterns of the modern slavery-climate change nexus outlined in Decker Sparks et al. (2021) based on evidence gathered and assessed through an environmental lens. Firstly, the literature notes that labourers subjected to modern slavery are compelled to participate in environmental criminal activities. For the Thai fishing industry, fishers have been identified that have been exploited on distant water vessels engaged in overfishing activities. Secondly, environmental degradation and unsustainable extraction creates a *pull* factor into modern slavery as the sector creates demand for cheap labour. In the Thai fisheries, overfishing using technology harmful to the marine ecosystem has led to trawlers having to venture into deeper waters away from depleted coastlines, the costs of which are offset by recruiting and trafficking vulnerable fishers through deceptive practises (Issara and IJM 2017). Finally, climate change drives modern slavery itself. Here, climate change drives extreme weather events and acts as noted by Bharadwaj et al. (2022) as a "stress multiplier" compounding the effects of existing vulnerabilities because of climate change (Brown et al. 2021). For fishers in Thailand, this is reflected in the Typhoon noted earlier (IOM 2011) as an avenue for shifting livelihood patterns and responses to extreme climate variables through exploitative working practices.

Work has been undertaken and progress has been made in the Thai fisheries sector, with the EU removing its yellow card in 2019 (European Commission 2019), and Kadfak and Linke (2021) arguing that the bi-lateral dialogue engaged in between EU-Thailand was in part fuelled by the need to engage with market concerns, as well as considering sustainability issues domestically. Further, the governance work that has been undertaken in the country on labour rights has meant that Thailand now sits within Tier 2 of the TIP report (U.S. Department of State 2022, 2023) having been upgraded. Both positive changes on the environmental and labour rights sides of the sector demonstrate improvements can be made. Yet as the review of IJM research shows, improvements in the industry should be ongoing, sustained, and monitored through the lens of the modern slavery-climate change nexus.

One of the more interesting international examples for strengthening UK legislation on modern slavery and climate change policy can be taken from the US Lacey Act. The legislation is focused on wildlife trafficking but contains unique enforcement language that could be inserted into current UK legislation such as the Modern Slavery Act 2015 as a proposed amendment. The language includes the implementation of "any foreign law" being applied in the context of the wider act. For example, if the language were to be integrated into the UK MSA, and cases were found to be qualifying of international legislation within a criminal case (e.g., the EU CSDDD) then the UK could use the EU legislation to prosecute the case. UK legislators can enhance the language of the Lacey Act by explicitly qualifying that "any foreign law" is inclusive of any human rights or forced labour foreign law (such as those noted on the Antislavery in Domestic Legislation database), in addition to any environmental, conservation or sustainability law.

Beyond the development or update of new legislative systems, a similar approach to the Canadian Order in Council which established the Canadian Ombudsperson for Responsible Enterprise (CORE) is a route that could draw together work completed by the Independent

Anti-Slavery Commissioners Office, and that of the Climate Change Committee, through a combined mandate. In this case, the Ombud office would hold corporations to account based on their conduct in relation to already implemented UK laws on modern slavery and climate change but with a focus on corporate compliance and supporting more cross-departmental cohesion.

Finally, import bans have been used most widely in the US, through the application of withhold and release orders (WROs) as part of a broad swath of legislation across North America that focused on the prevention of importing goods linked to forced labour. In the US, additional legislation associated with the import of goods linked to Uyghur forced labour risks from China (Uyghur Forced Labor Prevention Act) has been enacted. Similar policies related to Uyghur forced labour have been proposed before in the UK (Import of Products of Forced Labour from Xinjiang (Prohibition) Bill), however, they have not been developed or implemented. Similar import bans have been proposed in the EU (Aarup 2021) but have been superseded by alternative policies such as corporate sustainability due diligence.

# 5. Governance Actor Interviews/Focus-Groups

To gather further insight into the current UK and devolved administration landscape we interviewed several key governance actors across the UK Government, and the Devolved Administrations of Scotland, Northern Ireland and Wales, spanning modern slavery and climate change policy communities. Data were gathered from 20 governance actors through semi-structured interviews, focus-groups and written responses. Participants were recruited through existing networks, purposive and snowball sampling. The interview questions are included in **Annex C**.

This section summarises the key findings from this aspect of the research and presents main themes , reflecting on the critical barriers and opportunities for addressing modern slavery and climate change in an intersectional way

## 5.1 Present Understandings

### Knowledge-to-Action

Understandably, the interviews found that while governance actors were familiar with their own area of expertise, they were limited in their understanding of the sector they did not work in (modern slavery/climate change). Disclaimers such as "I'll start with a caveat there", "this is only an area that our team is kind of more recently exploring", "that's not an area which I'm so directly knowledgeable about" (UK policymakers 003, 007)[3] were common throughout all interviews. However, those who were working around the topic of modern slavery tended to have a greater understanding of climate change than those working around climate change had of modern slavery. General knowledge was present on climate change amongst modern slavery policymakers, with knowledge gaps focussed more on specific policy strategies and associated actions "we don't have a lot of explicit connectivity with climate change within that strategy" (DA policymaker 011). Presently, every department over a certain size is required to publish a *modern slavery statement*, which includes as a requirement, reference to team training and knowledge building. There are missing statements across government departments that should have them, which has affected public sector actors' ability to enforce private sector compliance (Interview L2610). There is also a longer history of aiming to increase awareness by actors in modern slavery policy, so to have certain actors working in other policy areas uninformed was concerning. It is also noteworthy, that the project struggled to gain input from some teams due to such little knowledge, which meant some were hesitant to engage in a recorded interview.[4] This was particularly prominent in the climate change policy community, with many declining to participate based on their lack of insight into modern slavery and its connection to climate change, beyond migration. In part, this was attributed to preferential treatment of climate mitigation and delivering net zero, meaning the "exploration of impacts on modern slavery is not formed" (DA policymaker 008).

[3] We recognise the importance of differentiating between the four nations but ultimately the requirement to protect anonymity of the participants due to the size of administrations and departments who engaged with us. The same applied to government departments at the national level, hence the use of DA and UK policymaker respectively.
[4] Recording the interviews was not a barrier to engaging with participants, more it was the perceived lack of knowledge toward modern slavery and climate change, despite being asked to speak to their own expertise that was a larger issue.

This disparity in knowledge was addressed by UK policymaker 001 noting "[t]hey'll be many more environmental/climate experts than there will be human rights experts". A potential reason for this was raised by another UK policymaker (003) stating that "we need them [climate change policy makers] to work with us, but they don't necessarily need us" based on the current separation of climate change response structures in the UK. This knowledge gap also seemed to stem from a pressure on climate change actors to focus on emission reductions, which limited the ability to explore compounding factors or unintended consequences of mitigation policies. This was briefly summarised by one DA policymaker (008): "I'll try and make the links but realise that this is research so I won't cheerily make any links that don't exist and as I said, really the start our agenda is driven by a, you know, laser focus on emissions reduction. So, in terms of stakeholders, if you're not, y'know, if you don't have policy levers that we can pull as a government to reduce emissions, there is that limited capacity [to engage]". More generally, these knowledge gaps appear to reflect the "lack of capacity at the moment anyway to do this sort of research [analysis around climate change links to migration and vulnerabilities] and analysis ourselves" within government (UK policymaker 004).

There was a sense of recognition that this knowledge gap within actors needed addressing and a strong organisational will to generate a shift in thought to incorporate a modern slavery/climate change lens. One DA policymaker (014) focussed on climate change said "you've thought maybe that human slavery was [...] certainly outside climate change. So, it's interesting to get that thought process in to give, y'know, modern slavery a bit of a, a bit of a think about [...] y'know to make sure we assess it within our policies". Similar sentiments were reflected across the interviews/focus-groups with one DA policymaker (011) referencing that despite the limited knowledge there was "an opportunity for us to think about how we increase that connective tissue and reflect it going forward". The importance of assessing these linkages through the Climate Change Risk Assessment (CCRA) was also emphasised, as this provides the evidence base for the national adaptation programmes in England and the devolved administrations; "that adaptation programme has to be in direct response to the climate change risk assessment, the CCRA … if it isn't in the evidence base then it would be very, very difficult to get it into the policy landscape" (DA policymaker 008). The closest link to modern slavery in the current CCRA3 is ID3, which assesses the risks and opportunities to the UK from climate related, international human mobility (HM Government, 2022). Action in this area has been classified as a 'watching brief', meaning that the evidence should be kept under review and risk levels and adaptation activities monitored. However, this provides a partial and limited view on the potential linkages between climate change and modern slavery; therefore, there is considerable scope for expanding this assessment and a need to address identified evidence gaps (as outlined in **Table 3**).

In terms of what was understood regarding linkages, UK, Scottish, and Welsh policymakers mentioned migration as the main intersection between modern slavery and climate change, with climate change as a driver for migration generating populations vulnerable to modern slavery (Interviews HIJK1608, CDEF0408). A UK policymaker (004) stated "I'm under the impression that climate change is sort of an amplifier of all drivers of migration and going forward will be an increasingly important factor on kind of influencing flows of people" which reflected the core sentiments raised across many of the interviews. One UK policymaker (003) raised that they were "beginning to understand that and see other areas, for instance, I didn't know that the sectors that modern slavery often occurs in are quite often sectors which are deeply linked to climate change". An alternative perspective to this came, from a UK policymaker (005) who stated "I think there is also an element where climate change and the transition to green energy also acts the driver. So, we found that a lot in critical mineral value

chains where you will see kind of gendered exploitation in regard to, you know, women and girls being more involved in the processing, men and boys more involved in the extraction and excavation and then kind of mixed roles within the transport sector". This was one of the few occasions in the interviews where gender was mentioned as an influencing characteristic. Northern Irish policymakers also tended to focus first on the impact climate change mitigation strategies could have on vulnerable populations, before considering migration factors (Interviews NO0811, M0711, L2610). The differences in perspectives on the intersections appeared to stem from the clear inclusion of social justice factors in the NI Climate Change Act 2022, organisational structures around financial economic and social impact assessments as well as a cultural value on considering social impacts of climate change mitigation actions. One DA policymaker (014) summarised it as "some [actions/assessments] are required under law and then some we do because it's the right thing to do". Regardless of these positive intentions, there is a worrisome lack of knowledge across the UK and devolved administrations that seems to relate to policy silos.

## 5.2 Policy silos

**Governance**, **Knowledge-to-Action**

Our research points to a separation between departments that are working in related areas, particularly in UK, Scottish, and Welsh departments. One cause for this disconnect appears to be the mandated areas of responsibility. To refer to the comment by DA policymaker (008) noted previously. This also reflects a sense of lack of resources for collaborative action which was raised in other interviews (A1907, CDEF0408, HIJK1608, G0908). Another UK policymaker (006) spoke to disconnect stating that "it can be very legalistic because there's an accountability element […] so when you get cross cutting issues, unfortunately there is kind of a bit of an organisational difficulty". In addition, a DA policymaker (011) focussed more on modern slavery stated that "one reflection I would say is we don't have a lot of explicit connectivity with climate change within [our] strategy." , reflecting the challenge that constrained mandates can have, especially if not designed to be adaptive to future needs. The other reason appears to be the way in which the two issues are framed at different spatial scales; indeed, one DA policymaker (008) described how "the fact that the adaptation agenda tends to focus domestically and the human trafficking and modern slavery agenda tends to focus internationally; so there's those two kind of disconnects".

However, even within departments organised around the same issue there appears to be a disconnect. For instance, in England, the Department for Energy Security and Net Zero (DESNZ) is responsible for climate mitigation, while the Department for Environment, Food and Rural Affairs (DEFRA) is responsible for climate adaptation. A DA policymaker (008) explained that "the climate legislation and the climate adaptation team which [are] two actually quite rather [sic] distinct teams unfortunately". One UK policymaker (003) spoke to the challenge that when collaborative action is sought "you kind of have ended going through random chains of all sorts of different people trying to find someone to speak to". This sentiment was reflected across interviews with UK policymakers (Interviews A1907, B03038, CDEF0408), stemming from the organisational structure of the civil service and the movement of people between roles; whilst this is not a structure they saw changing anytime soon, many described how this often leads to an "exodus of expertise" (UK policymaker 004). In other areas, it has led to imbalanced expertise – particularly within the business space, as previously identified by former UK policymaker (001).

Northern Ireland's organisations are significantly more connected, with strategy meetings occurring monthly with every government department and frequent meetings occurring with public/private sector organisations, civil society and other organised groups to provide bi-directional knowledge sharing (Interviews L2610, M0711, NO0811). However, this increased capacity for cross-departmental communication has not yet been reflected in integrated efforts to address climate change and modern slavery agendas.

Some opportunities for tackling silos are arising out of independent activities. These appear to be primarily led by anti-slavery actors pushing to engage with climate change actors rather than the other way round, with any action taken by climate change actors generally focussed on supply chains and the impact of green technologies (Interviews A1907, CDEF0408, HIJK1608, G0908). However, other opportunities to tackle the policy silos seemed to arise through actors' engagement with the project itself, with actors either seeing the focus groups as an opportunity to catalyse cross-departmental communications and activities (interview HIJK1608) or leaving the interviews with clear statements of intent to collaborate and communicate with others (Interview G0908, CDEF0408, NO0811).

One example would be that climate-language is also being integrated into activities where it was not previously mentioned. Much of this appears to centre around issues of climate-induced migration and increased risks of modern slavery (as mentioned by UK policymakers 003 and 004). The two issues are combined through the concept of 'Just Transitions'. For example, a DA policymaker (007) reflected on "workers' rights and social sustainability" and noted "the impact that [climate change factors] has on people who become more vulnerable to forms of exploitation". Furthermore, when reviewing current strategies, another DA policymaker (010) suggested that "[t]here may be areas that we've identified that are maybe more pressing now than were [sic] eight years ago, perhaps climate change being one of them". However, there are still mixed responses in some quarters. For example, it was noted by one respondent that the Modern Slavery Innovation Fund (MSIF) was "increasing their work on that [climate change] in terms of their programming side [sic] on the legislation and policy side there [the Home Office] so far we haven't seen much appetite to engage on this" (UK policymaker 003). One DA policymaker 007 also called for more international aligned thinking at the multi-lateral level, suggesting a more formal integration of modern slavery in the climate agenda, and outlining "that modern slavery is included as a kind of theme within COP28".

Civil service staff also noted in a group interview that, whilst they were watching to see the development of the new combined EU Directive on Corporate Sustainability Due Diligence (the CSDDD), it is not something that is currently being considered from a UK Government perspective; this latter point was also reflected by a DA policymaker 007. In fact, observing the implementation of other legislation implemented elsewhere to learn from the implementation practices and effectiveness for vulnerable workers, was noted on multiple occasions. For example, UK policymaker 003 commented in reference to the EU Directive that "as we see how that emerges and the impacts and if later down the line it becomes something we might consider that learning from the ways they've [the EU] kind of linked the two together might also help us to think about ways that we might want to link the two together". This was further complemented by a former UK policymaker (001) who in reference to the German Due Diligence in the Supply Chain Act posed the question of "whether mandating it [due diligence] ... whether that makes a difference to vulnerable workers". In their response a DA policymaker 007 identified that a mandatory human rights due diligence would be the ideal, however, they also noted that update of improvements to current legislation could also support workers. For example, the previously proposed improvements to the Modern Slavery Act 2015 would strengthen some of the transparency in supply chains issues and expand mandated reporting

into public bodies with non-compliance penalties added – like those included in the Australian version of the legislation. They noted that they "hope that, in the future of the UK, Government will move forwards with those measures", which could fill some of the gaps in legislation at present.

### Box 3: Section on Intersecting Governance Actors

During the interviews, stakeholders were asked which organisations they worked or liaised with on the topics of modern slavery and/or climate change. All organisations *named in stakeholder interviews* are represented in **Figure 7**. This is not to suggest complete representation. Typically, the UK Government, Scotland, Wales and Northern Ireland were represented as having diverse interactions within the administrative region; between administrative regions; and – to varying degrees – international institutions (such as the UN). Northern Ireland had significantly more developed communication between departments, though this did not seem to result in a higher level of understanding of modern slavery and climate change across organisations. There was noted intention to act on this moving forward. The political situation with Stormont appears to have had a negative effect on the ease of translating communicated aims into action.


*Figure 7: Key departments and organisations identified through the governance actor interviews identifying the key stakeholders who were regularly being engaged around topics of modern slavery and/or climate change. All are given equal weighting.*

## 5.3 Perceived and Real Barriers

**Governance**, **Capacity Building**, **Knowledge-to-Action**

There were several barriers identified by the governance actors who participated in the research. A key barrier to aligning the two agendas is the lack of expertise and knowledge

gaps. First, we encountered a reluctance from key stakeholders to engage (see 5.1). Second, there is an issue of resources and capacity constraints that have restricted more in-depth analyses of the issue, rather than a lack of interest in the issue. Indeed, the Climate Change Committee specified their interest in understanding the unintended consequences of UK net zero policies and supply chains on modern slavery. This was seemingly more of a barrier in England and Wales compared with Scotland and Northern Ireland who have already begun to show some engagement with the topic of labour rights through their devolved legislation on climate change (see **Section 3**). The issue of restrictions in mandates was also returned to in discussions.

On the knowledge of the intersections being limited – there was an expression of more research, like this project, being completed as policy makers were limited by lack of evidence and understanding and a "lack of capacity at the moment anyway to do this sort of research [analysis around climate change links to migration and vulnerabilities] and analysis ourselves" within government (UK policymaker 004). One DA policymaker (011) noted "It would be useful that if your work is able to tease out any clear connectivity between climate change and what is going because and what is happening in the trafficking exploitation space. Because the impacts of climate change will be global and will impact famines etcetera, etcetera and therefore there is likely to be a global knock on to the global level of traffic and exploitation and displacement of peoples". Another noted that they need research to "point us in some of those directions where those correlations exist then then that is a good baseline to initiate the policy design process" (DA policymaker 008). The need for evidence to drive action was also noted across all administrations (Interviews M0711, CDEF0408, G0908, HIJK1608).

Regarding resources, a DA policymaker (007) mentioned that "the challenge comes down to time and resources essentially. If we had much larger budgets or if I had more colleagues, so I could work with on these agendas, we would be able to act more effectively on each on you know all of the recommendations and ideas we receive". This sentiment was also reflected by a second DA policymaker (008). No policymaker implied any barriers (outside of resource) to engaging with partners, only detailing a sense of knowing who to engage with, especially in the context of the civil service. Another DA policymaker (010) noted that there were authorities who could "compel in public bodies to participate [...] and engage with us and that power has never been switched on [as] we've never really had an issue with a lack of willingness or a lack of engagement". One DA policymaker (013) noted "we have good connections with kind of other national human rights institutions across the globe kind of recently and then also internationally. I don't really think that there would be anyone that we unless I think if we're not working with them, we're kind of unaware of them". Across all interviews, there was an understanding that "the barriers [aren't] caused by a lack of willingness" only that, especially amongst UK departments, "they're just administratively much more separated from each other" and this created barriers for communication (DA policymaker 007, Interviews CDEF0408, G0908, HIJK1608, A1907).

Related to the point above about the barriers to communication, the operational management of the civil service and key organisations/departments can create further barriers to the effective alignment of modern slavery and climate change agendas. An interesting point mentioned by a former UK policymaker (001) was the impact that the current promotion system within the civil service – "I think they've [the civil service] got the balance wrong between the needs of the organisation and the needs of people's careers because they [the staff] just jump around and it's not good for stakeholder relationships, it's not good for building expertise". This was also reflected in the role of the IASC office, with the term length being too

short in order establish rapport with the right policy makers, and then begin to enact real change within the system through the office's work (former UK policymaker 001).

Internationally, the UK is facing an increasingly difficult challenge of a lowering reputation, largely due to historic and current responsibility for climate change and increasingly hostile political approaches to migration. This has created diplomatic challenges for supporting other state governments to increase their activities and obligations on climate change mitigation as well as increasing hesitancy around human rights language and discourse (Interview CDEF0408). This hesitation was primarily noted by UK policymakers with the devolved administrations of Scotland and Ireland having much more positive international relations on the topics (Interviews HIJK1608, NO0811, M0711).

Discussions around international obligations led, on several occasions, to the new Illegal Migration Act 2023. Several policymakers spoke out against the Act, especially Northern Ireland Policymakers who detailed it as a challenge to Article 2 of the Windsor Framework and a direct violation of the UK's international human rights obligations. Not only this, but due to the separation of certain powers, namely those on asylum (held by Westminster) and those on service provision (held by Northern Irelands Assembly) the Illegal Migration Act creates challenges "around making sure that we are compliant with our international obligations to provide support" (013). Another DA policymaker (012) stated that the impact of the Illegal Migration Act will be on "people trying to get into the NRM […] the concern it does give us is that it will mean that there'll be quite a cohort of people who will be basically left without [support]".

One DA policymaker (015) detailed the frustration that instability and suspension of governing mechanisms creates: "it's really challenging. We've [sic] got a really powerful climate change act that has really clear objectives and set targets and timelines. So that is driving progress across the civil service and particularly in our department. But the challenge then is that, you know, we don't have ministers to take decisions on new policies and we are we have an annual budget, you know, so you can't have that long term plan." Another DA policymaker (013) noted that the long periods without a government "can make things difficult and kind of tricky and make things a lot more kind of slow paced". Despite this, movement was still being made with civil servants and other policymakers pushing to keep developments moving forward "we've got the Executive Formations Act. [...] We are progressing everything that we can progress in the and we are engaging with political parties throughout" (DA policymaker 015). However, the frustration with the situation was expressed across several interviews, especially as policymakers viewed Northern Ireland as having strong positive legislation in place that, with Stormont sitting, could open doors to progressive action (Interviews L2610, M0711, NO0811).

Despite these barriers, across all the interviews there was a sense of willingness, hope, and energy for improving the situation and connecting climate change and modern slavery as two vital and related phenomenon threatening communities on a global, national and local level.

## 5.4 Just Transitions

**Governance**, **Capacity Building**, **Support, Lived Experience and Inclusion**

The concept of the Just Transition aligns with the overall programming approach of international government response to "do no harm" (UK policymaker 005 and DA policymaker 014) where assessments and understanding of potential unintended consequences in work are identified. This is a risk that was reported by UK policymaker 003 who expressed that "[they] think one of the big issues is that kind of you can do work to help one and that effects might affect the other and vice versa".

Concerns around the ability to move toward green technology in a socially and environmentally sustainable manner were raised. For UK policymaker 005 this was in reference to concerns around investment from businesses that could face "pressure on them to engage in bad practice" to compete on the global stage especially in the transition to more green energy. Such risks were also made specifically in reference to forced labour in Chinese supply chains linked to solar panels for the transition (by both UK policymaker 003, DA policymaker 007 and former UK policymaker 001).

The benefits of Just Transition programming were also identified. In one devolved administration, this was seen as "a useful opportunity to look at how modern slavery and environmental sustainability align" (DA policymaker 007). This was echoed in Scotland and Northern Ireland, with DA policymaker 008 sharing that the devolved administration's approach involved "setting out plans for ensuring that our policy delivers both on emissions reduction and policy delivery on climate adaptation are done in a way that is just and fair. So that's an equitable point with regards to social and economic impact of our climate change policies".

Whilst these conversations were noted at the devolved level, in the national government context (UK policymaker 004) it was noted that "more inter-departmental conversation[s]" may be needed, and this links to the role migration may play in the need to fill "green jobs" as part of the wider movement to a greener economy and energy transition. However, the current political rhetoric around both climate and migrants – and the overall pushback against environmental-social governance from some factions of society (as expressed by former UK policymaker 001) – may limit the current narrative and pathways for both investment in the green transition in this way, but also through the lack of safe migration pathways for those seeking stability from climate vulnerabilities that may be linked to modern slavery.

# 6. Recommendations

Here we provide a series of recommendations for policy makers across the UK modern slavery and climate change governance space. Recommendations are organised according to core themes, related to **governance**, **knowledge-to-action**, **capacity building and finance mechanisms**, and **support, lived experience and inclusion** based on the categories identified from the evidence review (**Section 2**). These recommendations should be considered in a cyclical and reflective manner where each section feeds into the wider improvement of addressing the modern slavery-climate change nexus within the policy space (**Figure 8**).


*Figure 8: Model for the implementation and review of recommendation learnings to strengthen the support mechanisms and governance related to modern slavery and climate change within the UK and devolved governance mechanisms.*

The recommendations provided below were formulated based on the research undertaken throughout this project, drawing on previous evidence, policies from across the UK (including devolved administrations) and from overseas, as well as primary data collected as part of this study through engagement with governance actors across the UK. They are structured with an overarching recommendation (such as G1), some contain multiple actions to achieve the overarching goal (shown with sub-headings e.g., G1a). These recommendations have been reviewed by a series of governance actors and have been assigned an urgency score (CCC) (**Table 4**). The urgency scoring adopts a similar approach to that used by the latest Climate

Change Risk Assessment (CCRA3) (HM Government, 2022), taking into account current levels of risks or opportunities, how this is currently being managed and the benefits of further action in the next five years.

***Table 2:*** *Urgency categories explained. Urgency scoring adopts a similar approach to that used by the Climate Change Committee in its independent assessment of UK climate risks and the latest Climate Change Risk Assessment (CCRA3) (HM Government, 2022).*

| Urgency score | Description |
|---|---|
| **More action needed** | This means that new stronger or different government action is required in the next five years over and above those already planned. This also includes actions that we have identified as offering relatively 'quick wins'. |
| **Further investigation** | This means more evidence is urgently needed to fill significant gaps or reduce the uncertainty in the current level of understanding to assess the need for additional action. |
| **Sustain current action** | This means that current or planned levels of activity are appropriate, but continued implementation of these policies or plans is needed to ensure that the risk or opportunity continues to be managed in the future. |
| **Watching Brief** | This means that the evidence in these areas should be kept under review, with continuous monitoring of risk levels and activities so that further action can be taken if necessary. |

## Recommendations: Governance

### Legislative Review, Comparative Governance Globally, Governance Actor Interviews/Focus-Groups

Governance recommendations cut across the core themes of implementing change through both operational activities and legislative changes.

| ID and brief | Recommendation | Action | Urgency score |
|---|---|---|---|
| **Governance** | | | |
| **G1**<br><br>**Strategic oversight** | **G1.** Greater strategic oversight is needed between the Home Office and FCDO as the leading departments addressing risks of Modern Slavery.<br>• At the international scale, and led by the FCDO, the linkages between modern slavery and climate change should be included as a strategic priority. There should be a single Minister who is the Directorate within the FCDO covering issues of migration, modern slavery, and humanitarian issues (including the | FCDO | More action needed |

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| | impact of climate change) in a singular response so that reporting can be targeted, and intersectional issues can be addressed simultaneously. | | |
| | **G1a.** The linkages between modern slavery and climate change should be included as a strategic priority in domestic policies. | Home Office | More action needed |
| **G2**<br><br>**Problem framing and recognition**. | **G2.** An overarching human rights lens should be a core goal of public policy and should be integrated as a focus across all departments and their mandates. For those dealing specifically with climate change adaptation, mitigation, and modern slavery, this is vital to shift human-climate risks beyond security issues into humanitarian and social responses. | UK Government, DAs, and departments | More action needed |
| | **G2a.** Strategic alignment is needed between the UK national government and the Devolved Administrations to establish a unified and cohesive approach. Promoting knowledge exchange and learning within/between the devolved administrations and UK Government is essential. | UK Government and DAs | More action needed |
| | **G2b.** The issue of modern slavery should be included in the *National Risk Register*, and intersectional risks (such as modern slavery and climate change) to ensure that modern slavery is recognised (and addressed) as a significant risk. | Cabinet Office | More action needed |
| **G3**<br><br>**Enhanced cross-departmental collaboration** | **G3.** Mechanisms are needed to overcome current siloed approaches throughout the UK government and devolved administrations. | UK Government and DAs | More action needed |
| | **G3a.** Establish and embed a cross-department sub-group within existing networks to encourage combined action on the intersection between international development, modern slavery, and climate risks (both domestically and internationally). | | |
| | **G3b.** Establish internal and cross-departmental 'brown-bag' sessions/workshops for networking and knowledge exchange for civil servants and policy makers | UK Government and DAs | More action needed |
| | **G3c.** Periodic meetings between UK policy makers and counterparts in devolved administrations to encourage collaboration and exchange of ideas between governments. Special consideration should be made of the | UK Government and DAs | More action needed |

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| | unique relationship between UK and Northern Ireland Departments. | | |
| | **G3d.** Establish a system of effective hand over in rolling employment patterns. This should include an appropriate period to sufficiently transfer knowledge, expertise, and networks. | Civil service | More action needed |
| **G4**<br><br>**Legislative change** | **G4a.** Consider developing an equivalent to the EU Corporate Sustainability Due Diligence Directive (CSDDD), focused on the UK and the import of goods and operation of companies linked to modern slavery and climate change.<br>• Alternatively, adopt the framework for a 'UK Business, Human Rights and Environment Act' (Anti-Slavery International 2022), to position the UK as a leader in combined responses to modern slavery and climate change.<br>• Researchers should undertake a cost-benefit analysis and implementation assessment of the CSDDD as it is implemented, as well as the recent German and French laws to determine the approach of implementing similar legislation in the UK. | UK Government, including Home Office, FCDO etc. | Further investigation |
| | **G4b.** Future new and updated climate legislation, should learn from the language of 'Just Transition' included in Scottish and Northern Irish environmental legislation. It should also clearly encompass working conditions and transparency in supply chains. | UK Government and Parliament | |
| | **G4c.** Proposed improvements to strengthen the UK Modern Slavery Act 2015 in relation to Section 54 (on business compliance) should be reintroduced and debated within parliament. | UK Government and Parliament | More action needed |
| | **G4d.** Following the lead of the UK Government, public bodies should begin to produce modern slavery statements (prior to enforcement) to place themselves in a leading position. Support should be provided to implement Modern Slavery Statements across all public bodies, especially Northern Ireland in consideration of the relevant status of Stormont. | UK Public Bodies | More action needed |
| **G5**<br><br>**Alignment** | **G5.** Inclusion of climate change as an issue of concern in relation to modern slavery as part of the Global Commission on Modern Slavery. Aligning with the commission's focus, crisis | Global Commission on | More action needed |

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| | contexts should explicitly include climate change as a compounding factor in modern slavery vulnerabilities. The commission should promote intersectional ways of addressing modern slavery and climate change through international commitments. | Modern Slavery | |
| **G6**<br><br>**Intergovernmental collaboration** through multi-lateral negotiations around modern slavery and climate change topics as interrelated issues. | **G6a.** The UK should revive its reputation as a multi-lateral governance actor and provide international leadership on these issues via:<br>• Engagement with human rights council resolutions and other human-rights focused multi-lateral agencies, as well as the COP UNFCCC annual sessions, as an opportunity for the UK to drive more understanding into the risks of modern slavery and climate change on vulnerable populations.<br>• Facilitation of working groups assessing working conditions (e.g., ILO, Special Rapporteurs) together with their climate counterparts (e.g., UNFCCC, Special Rapporteur) to facilitate active multi-lateral discussions | UK Government | More action needed |
| | **G6b.** The UK can, in part, remobilise its leading role in strengthening modern slavery considerations on the multi-lateral stage through its role as part of the new Global Commission on Modern Slavery. | FCDO | More action needed |
| | **G6c.** The role of the FCDO Modern Slavery Envoy should be used to platform evidence of the intersection between modern slavery and climate change at multi-lateral forums and within partner countries. | FCDO | More action needed |
| | **G6d.** If a proposal for a single enforcement body (SEB) is revived, it should include explicit reference to the intersections between climate change and modern slavery. Any proposal should explore how giving the SEB wider remit could incorporate environmental and social accountability frameworks. A SEB should include protections of migrant workers who have been exploited from immigration enforcement – training and awareness raising of the increasing likelihood of climate migrants as vulnerable populations for modern slavery should be incorporated into the institutional reforms. | DBT | More action needed |

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| | **G6e.** Newly negotiated and renegotiated bi-lateral trade agreements should include terms that promote working rights and environmental good practice. It should be promoted by the UK that in order to trade internationally high social and environmental standards must be met. | DBT; FCDO | More action needed |

## Recommendations: Knowledge to Action

### Evidence Review, Legislative Review, Governance Actor Interviews/Focus-Groups

Evidence gaps need to be filled to better inform decision-making. There is also a role for governance actors to play in ensuring diplomacy and acknowledgement of historical contexts to provide appropriate responses to support international partners through challenging intersectional issues.

| ID and brief | Recommendation | Action | Urgency score |
|---|---|---|---|
| **Knowledge-to-action** | | | |
| **K1 Addressing evidence gaps** | **K1.** There is a pressing need to improve the evidence base, understanding and communication of the cascading risks associated with modern slavery and climate change, both in the UK and beyond.<br>• More evidence is needed on the direct and indirect pathways through which modern slavery and climate change intersect, internationally and domestically, to directly inform government department strategies;<br>• The linkages between climate change and modern slavery should be considered within the next climate change risk assessment (CCRA4) to help inform national adaptation planning.<br>• Based on improved evidence, national adaptation plans/programmes (England, Scotland, Wales, and N. Ireland) should explicitly address the linkages to modern slavery and climate change. | Research communities; Climate Change Committee; UK Government and DAs | Further investigation |
| **K2 Establishing safe pathways** | **K2.** The Home Office and the FCDO should work together to establish safe pathways for response to climate and intersecting crises along migration pathways, from source to destination. This is particularly pertinent for those moving due to climate disruptions, conflict, and related socio-political instabilities. | Home Office FCDO | More action needed |

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| **K3**<br><br>**Sensitivity language** | **K3.** Sensitivity language and reflexivity is required when interacting with international programming on both modern slavery and climate change from the UK (most relevant to the FCDO).<br>• Acknowledgments in some contexts of the disparities in contributions to trans-Atlantic slavery and climate change by developed countries (including the UK) need to be noted, and factored into negotiations, programming and public-facing outputs following guidance from those with in-country experiences.<br>• Working on sensitivity language around typologies of modern slavery that align with the UK strategy on modern slavery, but also acknowledge the requirements for programming overseas should be adaptive and responsive to changing international activities. | FCDO Home Office (MSIF) | Sustain current action |

## Recommendations: Capacity Building and Finance Mechanisms

### Evidence Review, Legislative Review, Comparative Governance Globally, Governance Actor Interviews/Focus-Groups

Capacity in this case refers to both the ability to bolster evidence, action, and governance change. Most are applicable to the public sector; however, the role of the private sector and private finance is also vital.

| ID and brief | Recommendation | Action | Urgency score |
|---|---|---|---|
| **Capacity building and finance** | | | |
| **C1**<br>**Adaptation finance** | **C1.** There is an urgent need to bolster adaptation finance through ODA via the FCDO, and domestic funding for projects through relevant departments/bodies (e.g., DEFRA, the CCC, the GLAA, the Environment Agency) via the Treasury to support vulnerable communities and build resilience.<br>• More widely, the UK should be stepping up its support to climate finance and ensuring that the New Collective Quantified Goal (to be agreed by 2024 via UNFCCC COP negotiations) meets the needs of those countries most vulnerable to climate change, in addition | UK Government | More action needed |

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|---|---|---|---|
| | to supporting the operationalisation of new Loss and Damages Fund.<br>• The UK Government should follow the Scottish lead and establish a climate justice fund that targets support for communities (both domestically and overseas) that have been affected by the climate crisis. A portion of this fund should be allocated to those experiencing dual risks such as modern slavery and climate change. | | |
| **C2 Research funding** | **C2.** Funding for research around modern slavery and climate change intersections in the UK is needed to address evidence gaps.<br>• UKRI should work toward developing new funding streams, as well as the potential to support research led by organisations outside of the UK (working with UK institutions).<br>• Continued funding is required to support UK focused policy centres (such as the Modern Slavery and Human Rights Policy and Evidence Centre).<br>• Ongoing commitments from the Global Commission on Modern Slavery to build the evidence base through the funding of research should be promoted. | UKRI and other funding councils; Global Commission on Modern Slavery; Modern Slavery PEC | More action needed |
| **C3 Informed green investment** | **C3.** Green investment mechanisms require regulations that must consider the social factors of ESG compliance.<br>• **Hedge funds and investment firms** (mainly in the private sector space) must align investment choices with a human right lens, following guidance from groups working on modern slavery and working rights issues in supply chains and implementing improvements, or divesting from high-risk supply chains.<br>• Guidance for businesses on risks (for operations and investments) should be promoted by industry bodies (such as the BSI) and multi-lateral organisations (e.g., the ILO), using frameworks including the British Standard on Modern Slavery (BSI 2022).<br>• Investment in private monitoring and reporting to comply with ESG frameworks should strive to equal weighting between the | Private investment; Business; Industry Bodies | More action needed |

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| | environment (“E”) and the social (“S”) rather than addressing social risks in a standalone manner. | | |
| **C4 Technological Development** | **C4.** Technological development and applications for climate mitigation (e.g., energy supplies) must limit trade-offs and ensure decent working conditions to avoid unintended consequences for local communities in terms of labour exploitation.<br>• Private investment strategies should take account of existing and emerging evidence of modern slavery in supply chains and efforts should be made to mitigate risks through due diligence mechanisms.<br>• Public investment, for all levels of government, should implement strategies to limit modern slavery risks through their procurement and investment in climate mitigation. This should follow guidance from research and human rights organisations. | Crown Commercial Services; Private Investment | More action needed |

## Recommendations: Support, Lived Experience and Inclusion

### Evidence Review, Legislative Review, Governance Actor Interviews/Focus-Groups

Lived-experience is vital to addressing intersectional challenges of modern slavery and should be at the centre of all governance activity. Working with and alongside lived-experience survivors is important as lack of policymaker understanding of the links between modern slavery and climate change and modern slavery can be addressed by working with those who carry these experiences.

| ID and brief | Recommendation | Action | Urgency score |
|---|---|---|---|
| **Support, lived experience and inclusion** | | | |
| **S1 Lived experience inclusion** | **S1.** Lived experience and survivor voices should be meaningfully included at all stages of policy making, including where modern slavery and climate change policy may intersect. Dialogue and participatory governance mechanisms are key.<br>• Engagement with those with lived experience and survivors should be trauma-informed and mutually beneficial. Survivor Alliance provides several survivor engagement resources that can be consulted to ensure any activities are non-exploitative and safe. | UK Government; DAs | More action needed |

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| | • All policy making and support provision (across multiple areas) should follow the guidance provided by the UK BME Anti-Slavery Network (BASNET).<br>• For research and research funders working on topics including modern slavery and the links to climate change, BASNET and partners provide specific equality, diversity and inclusion (EDI) guidance (Such et al. 2023) that should be incorporated into research activities. | | |
| **S2**<br><br>**Community Investment** | **S2.** Greater **financial investment in community-led** climate change and modern slavery organisations is needed to lead in the development of programming to support the needs of the populations they work with and are a part of. | UK Government; DAs | More action needed |
| **S3**<br><br>**Independent Anti-Slavery Commissioner** | **S3.** The Independent Anti-Slavery Commissioner (IASC) has an essential role to play in monitoring the national response to modern slavery to support improvements in survivor care and stakeholder engagement. Continuity planning is essential.<br>• The office should report on the progress of modern slavery and climate change integration across government departments.<br>• The role of the IASC should be filled prior to the end of the current IASC term (with a succession plan formalised) and enable a period of transition to ensure connections with the commissioner's office are maintained.<br>• The role of the IASC should be extended from three to five years. This would ensure relationships are developed across government departments, devolved administrations, and with key Civil Society Organisations and survivors, to support deeper levels of engagement and meaningful action across a broader scope of topics, including climate change risks.<br>• Developments to survivor care should consider<br>o care while transitioning out of shelters;<br>o systems that are tailored to/able to provide nuanced care for different forms of exploitation and consequential gender-based needs (including trans and non-binary survivors). | Home Office | More action needed |

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| **S4**<br><br>**Illegal Migration Act** | **S4.** This projects main recommendation is that the Illegal Migration Act should be removed from the UK legislative landscape. Until that can be achieved there are several *interim* recommendations.<br>Above all recommendations listed below is an urgent need for the Illegal Migration Act to be dissolved. | UK Government (Home Office) | More action needed |
| | **S4a.** At the earliest opportunity for the legislative replacement or revision of the Illegal Migration Act:<br>• Governance actors should enact a more considered approach to the legislation considering advice provided by those engaged in anti-trafficking, anti-slavery spaces.<br>• A more thorough integration of international obligations to protect victims of modern slavery must be incorporated. | | |
| | **S4b.** Guidance must be produced for how governance actors should prioritise their international obligations and how service providers should protect their service users from unjust criminalisation.<br>• This project recommends this is led by civil society actors in collaboration with government to maintain a human rights, trauma-informed and survivor-focused lens on guidance.<br>• Specific guidance for translating the Illegal Migration Act in action while maintaining a respect for Article 2 of the Windsor Framework and international obligations regarding service provision should be generated for actors in Northern Ireland | | |
| | **S4c.** When engaging in financial, economic and social assessments of proposed policies stemming from the Illegal Migration Act, policymakers should make close and careful reference to the UK's international obligations, especially those of the Palermo Protocol, with references to Article 2(b), Article 7, Article 8. | | |

# 7. Discussion and Conclusions

Whilst efforts are being made in the UK to address climate change and modern slavery, they are ultimately siloed. However, there are some positive actions being undertaken, suggesting that intersectional action on the modern slavery-climate change nexus may soon be possible. There is a clear willingness across those working in the space of modern slavery governance to engage and begin incorporating the risks of climate change within their responses. Furthermore, we have observed the beginnings of those in the climate change space also being open to new collaborations and considering joint action. It was clear that there are some areas of the UK that are more open to knowledge sharing and combined action than others – namely Northern Ireland and Scotland – thus we encourage other DAs and the UK to be looking to apply some of those key learnings to their own practice.

Moreover, this study has observed the potential need for institutional-cultural shifts, particularly within the civil service, to better enable an intersectional approach. However, governmental organisations shared that they do not feel that they have the resources or capacity to begin to feasibly change the structural issues that reside within the current system. One of the barriers that we have contended with throughout the project has been the turnover of staff within national and devolved departments, which highlights the nature of the problem and shows the difficulties of gaining access to key expertise and sustaining connections. One way in which this could be improved (although would require a substantial restructuring of the civil service), is through the retention of subject-matter and policy expertise within a specific area. Although this is unlikely to happen in the near future, it is a longer-term goal that could be achieved through more devolved powers, or a change in Government policy.

A further institutional cultural change that requires attention, is the seeming lack of human rights being central to the operations of government. Whilst a principle of ‘do no harm’ is in place, the current lack of action is harmful for communities affected by modern slavery and climate change. Human rights must be a core goal that is embedded into all government programming and operations moving forwards. Applying a human rights lens, centres the rights of the population against exploitation and to the vulnerabilities that may be exacerbated by climate change. Taking a human rights approach in the broadest terms will also strengthen the ‘do no harm’ approach to policy but in a formally mandated manner that cuts across national and devolved decisions.

The governance space needs to be adaptive and resilient when responding to intersecting risks. While the inertia of governance systems is something that is widely known, those wishing to engage in this space should be mindful of windows of opportunity that can be used to mobilise change for the better. Moreover, any recommendations and policy interventions for effecting change should be meaningfully designed and coproduced with key policymakers.

Finally, and perhaps most importantly, there needs to be recognition that whilst climate change appears to be a more imminent or pressing threat on the global scale, the actions that can be undertaken to address modern slavery can go some way to addressing some of the effects climate change will have both on vulnerable communities and more widely. Considering recent government announcements that suggest a dismantling of climate ambition at the UK national level, we strongly urge UK Government to reaffirm its commitment to meaningful and transformative climate action. Fundamentally, in order to fully address climate change modern slavery must cease, and vice versa (**Figure 1**). It is important that those with expertise in modern slavery engage with those in the climate change space as growing gaps greatly increase vulnerabilities to modern slavery, not just overseas but at home; accelerated climate

action is essential for curtailing these risks. Simultaneously, addressing modern slavery cannot be ignored until climate change issues have been resolved. The two agendas must be achieved in tandem.

To conclude, this research has demonstrated that whilst there are prevailing governance gaps in the ways that modern slavery and climate change intersect, there is hope and encouraging signs that governance actors are willing to consider and address the two issues simultaneously. Challenges to embedding such change within legislation may persist, and institutional cultural barriers surrounding the nature of departmental interactions may lead to some resistance. However, there is a clear willingness from governance actors within the UK Government, and the Devolved Administrations in Scotland, Wales and Northern Ireland to begin linking the two agendas. Researchers and funders should be encouraged that the evidence generated around the modern slavery-climate change nexus is of value to governance actors and that they are keen to use such evidence to inform decision-making through strategic priority areas, programming activities, and development of policy – all of which can be achieved without the longer-term goal of changing legislation. The findings of this study have begun to demonstrate and filter into new connections between governance actors around this topic, and evaluating the importance of understanding modern slavery and climate change intersections across the UK can only help to strengthen the national response to both climate change and modern slavery over time.

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