

Integrating policies addressing modern slavery and climate change

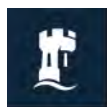
Research Summary

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Research by:



University of
Nottingham
Rights Lab



TRANSPARENTEM



This is a summary of the report: *Integrating policies addressing modern slavery and climate change: Making the case for combined and equitable governance action in the UK context*, based on research conducted by the Rights Lab and School of Geography (University of Nottingham) in partnership with Transparentem and International Justice Mission (IJM) UK. The project was funded through an open call for proposals by the Modern Slavery and Human Rights Policy and Evidence Centre (Modern Slavery PEC), which in turn is funded and supported by the UK Arts and Humanities Research Council (AHRC). The full report can be accessed on the Modern Slavery PEC website at modernslaverypec.org/resources/integrating-policies-modern-slavery-climate-change.

The Modern Slavery PEC has actively supported the production of this Research Summary. However, the views expressed in this summary and the full report are those of the authors and not necessarily of the Modern Slavery PEC.

Findings

1. Policymakers working on modern slavery and climate change **work in isolation (policy silos)** from each other, meaning that ensuing policies aren't integrated. There is a disconnect of scale of the two issues mean that activities to combine addressing modern slavery and climate change are further ahead in the anti-slavery sector than the climate change space.
2. **The research found perceived and real barriers to integrating policies on modern slavery and climate change**, linked to resource and capacity strain. The research community should work to support policymakers to strengthen the evidence on benefits of climate change and modern slavery policy integration and provide tangible guidance and recommendations for the development of new integration streams, such as combining Directorate scopes, development of joint-legislation, and networking between policy experts in both areas.
3. **Domestic and international legislative development**, utilising current policies and legislation as a baseline to develop combined policies in addressing modern slavery and climate change. For example, the inclusion of decent work within Scotland and Northern Ireland's climate change policies demonstrate that integrated legislation can be made.
4. The **methods we have deployed in this study** have enabled mainstreaming and connections to be actively made between previously isolated departments through the interviews conducted, and the linking of climate change and modern slavery as interconnected issues. Promoting these connections can work as a catalyst for more integrated cross-departmental collaboration.

Background

Modern slavery and climate change are interconnected. For example, 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 disproportionately affect certain groups, notably women and girls.

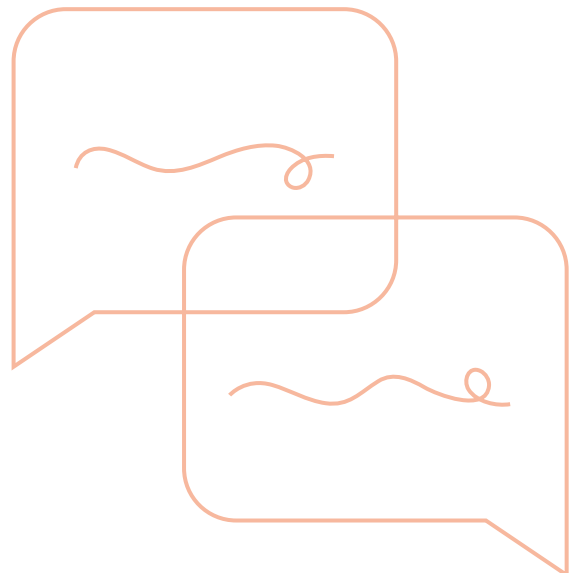
However, climate change action may also be a driving factor. For instance, planned relocations of communities as part of adaptive, risk management approaches can also create or exacerbate vulnerabilities to modern slavery, particularly if rights and livelihood opportunities are limited in receiving locations. Likewise, the 'race to net zero' could prompt new businesses to engage in modern slavery and human rights abuses through more socially considered investment and more conscious efforts to engage in environmental, social and corporate governance (ESG) mechanisms, 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.

This summary 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).



Methodology

This research applied a three-pronged methodological approach. First, an evidence review of the existing evidence of modern slavery and climate change was undertaken focusing on academic and grey literature. The evidence was reviewed to assess the current base of recommendations that are provided based on the findings of studies. These recommendations were grouped into four categories that were used as the basis for the formulation of the recommendations provided in this study. Second, we undertook a domestic and international legislative review. This included assessing the current intersections between modern slavery (and associated working conditions) within climate change legislative approaches. A comparison with international progress was explored to determine approaches in other jurisdictions that could be usefully applied in the UK national and devolved contexts. Finally, we completed a series of interviews with governance actors across the UK, focusing on those working in the anti-slavery and climate change spaces. This included connecting with governance actors based in the UK national government structure, as well as engaging in conversation with actors from all three devolved nations (Scotland, Wales, and Northern Ireland). We asked a series of questions that covered topics on the current efforts on intersection between modern slavery and climate change being made, the barriers to achieving collaborative action, and the efforts that would be required to be able to better address the two issues concurrently. All recommendations that were developed over the course of the research were subsequently reviewed by a series of governance actors and their feedback incorporated.



Findings

1. **We noted policy silos** around coordinated efforts to address modern slavery and climate change. Whilst people in the anti-slavery space are working toward considerations of climate change within their operations, there continues to be a separation for those working on climate change. One of the key issues is a disconnect of scale, suggesting that evidence-gathering activities should focus on UK domestic issues.

"[T]he 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"

Devolved Administration (DA) policymaker

2. **We identified perceived and real barriers** throughout the course of research. Much of this is linked to strains on resources and capacity that many governmental departments face. Part of this is being able to provide evidence and the benefits of supporting new streams of policy action. This will be vital when pushing toward combined policies, and potentially introduce new legislation addressing modern slavery and climate change at the same time in the UK system.

"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..." and this can "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 policymakers



3. Finally, **learnings from domestic and international activities** can strengthen coordination on modern slavery and climate change in the UK. Domestically, work around 'just transitions' and the inclusion of decent work within Scotland and Northern Ireland's climate change policies demonstrate that integrated legislation can be made. Learning from the domestic leadership in combined action, and supporting this with understanding of the good practice being drawn from the increasing amount of international legislation on import bans and due diligence is a point that the UK can learn from in order to begin leading again in tackling both climate change modern slavery.

"[they] think one of the big issues is that kind of you can do work to help one [modern slavery] and that effects might affect the other [climate change] and vice versa" and assessing these policy impacts is "a useful opportunity to look at how modern slavery and environmental sustainability align"

UK policymaker and DA policymaker

4. The research we have undertaken has **already had an impact** in the governance space. For example, by undertaking interviews on the topics of modern slavery policy experts and with climate change policymakers, we have provided the catalyst for more integrated cross-departmental collaboration. It is also important to recognise that this is a direct form of impact that can come from research; rather than legislative change being the priority. Demonstrating a change in thinking within the approaches of policymakers and providing them with clear and targeted recommendations from legislative change to actions within team activities are all useful.

"[W]hat kind of things would be good to work on right now?"

UK policymaker



Recommendations

Seventeen (17) overarching recommendations are identified according to four core themes identified by the research, related to **governance**, **knowledge-to-action**, **capacity building and finance**, and **support, lived experience and inclusion**. Further detail on the recommendations – including the intended actor and specific recommended actions – are included in the full research report.

For the UK Government and Devolved Administrations

- **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.
- **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.
- **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.
- **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 the UK's response to modern slavery and climate change.
- **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.
- **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.
- **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 who are displaced due to climate disruptions, conflict, and related socio-political instabilities.

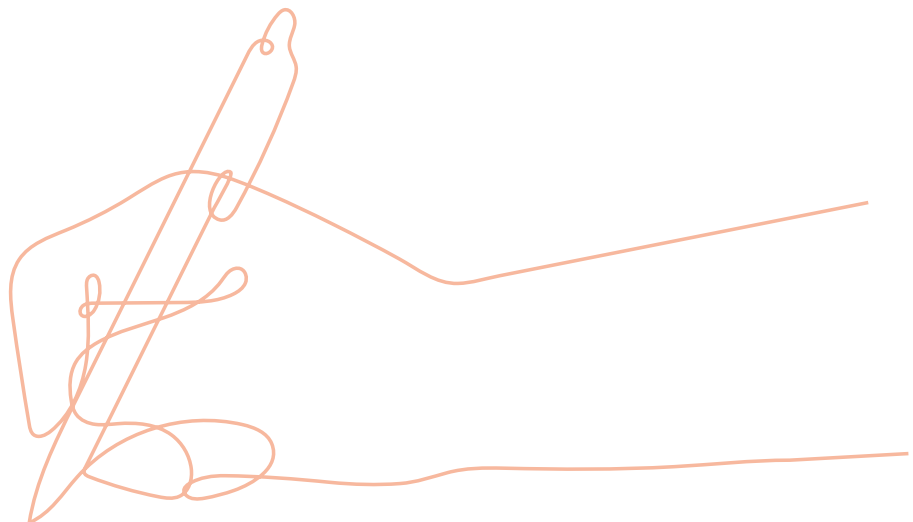
- **Sensitive language and reflexivity.** Sensitive language and reflexivity are required when interacting with international programming on both modern slavery and climate change from the UK. Acknowledgement of current and historical drivers of slavery and climate change are important for international cooperation.
- **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.
- **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.
- **Independent Anti-Slavery Commissioner (IASC).** 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.
- **Retraction through replacement (or revision) of the Illegal Migration Act.** We recommend that new legislation should be introduced that disapplies the provisions in the Illegal Migration Act, and if not, it should be revised to be appropriate to human rights standards and international obligations.

For researchers and funders

- **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.
- **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.

For businesses and investors

- **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.
- **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'.
- **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.



Areas for further research

Further research is required to explore the utility of the application of combined policy action based on modern slavery and climate change to ensure that the intersections between the issues are prioritised within governance systems. This includes an assessment of the efficacy of legislative actions in other geographies – which was beyond the scope of this study. Having reflected on the engagement with governance actors in this study, the need for evidence to present to Ministers and decision-makers is vital. Analysing learnings from the encouraging domestic achievements being made in Scotland and Northern Ireland is one such avenue. A second is following the implementation of international legislative changes around import bans and due diligence to assess their effectiveness and whether this is a pathway for combining climate change and anti-slavery action within the legislative arena.

To further develop evidence to support UK governance change requires a refocusing of research into climate change and modern slavery connections in the UK. This would remove some of the disconnect between addressing modern slavery in the context of climate change (which is often international) and how the UK addresses climate change (through nationally-focused targets and activities) by providing evidence that centres both issues across the four nations.

In order to fully understand the impact of this research, the progress of the Government departments – both national and devolved – that have been interested in this topic should be followed. This research has already led to the establishment of connections between disparate departments – bridging those silos – which is encouraging for the long-term viability of addressing modern slavery and climate change concurrently. The sustainability of this success should be monitored by researchers, with governance actors at the heart of driving connections and change from within the policy space.

Finally, the research that has been undertaken here displays a willingness for intersectional modern slavery action in the UK. Breaking down risks to modern slavery interlinked to climate change including migration, livelihood loss and increased vulnerabilities, and exposure to climatic conditions (amongst others) opens the conversation to more holistically integrate modern slavery risks in other areas of policy beyond climate change through a human rights approach across governance structures.

MODERN SLAVERY & HUMAN RIGHTS

POLICY & EVIDENCE CENTRE

Led by the Bingham Centre

The Modern Slavery and Human Rights Policy and Evidence Centre (Modern Slavery PEC) was created by the investment of public funding to enhance understanding of modern slavery and transform the effectiveness of law and policies designed to address it. The Centre funds and co-creates high quality research with a focus on policy impact, and brings together academics, policymakers, businesses, civil society, survivors and the public on a scale not seen before in the UK to collaborate on solving this global challenge.

The Centre is a consortium of six academic organisations led by the Bingham Centre for the Rule of Law and is funded by the Art and Humanities Research Council on behalf of UK Research and Innovation (UKRI).

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