

The Modern Slavery Act 2015: Becoming World-Leading Again

December 2024



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Presented to Parliament by the Secretary of State for the Home Department by Command of His Majesty

December 2024



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# Introduction

Modern slavery is a complex and varied problem requiring a suitably nuanced approach that places the experiences of survivors and expertise of those working with them at its heart. Tackling this horrendous crime requires a holistic approach that is effective and sustainable.

Next year will mark the 10-year anniversary since the Modern Slavery Act 2015 was passed – it was a truly momentous milestone at the time and resulted in significant improvements in the UK's response. Both at home and internationally, the Act and the legislation introduced were seen as groundbreaking, with the UK viewed as a leading, credible voice in driving forward much needed change. This is where the UK should be again, at the forefront of driving for change and leading by example.

It is vital that this Government starts acting now to address some of the immediate problems that exist while also considering much needed longer-term changes. The reform needed will not be easy, straightforward or quick to achieve and a truly collaborative cross-government and civil society approach, including survivor voices, is critical to enable effective change. Government, along with its partners, must set its sights high and work ferociously together in pursuit of better outcomes.

This holistic victim-centred approach will be achieved through a renewed commitment to joint working between Government, law enforcement and criminal justice system partners and civil society. Long-term reform of the modern slavery approach will focus on driving up prosecutions and convictions and ensuring tailored and holistic support is available for victims, providing them with access to the help they need to rebuild their lives.

The Government has already announced measures on issues linked to the long-term reform of the modern slavery system, including its Manifesto commitment to introduce a standalone offence of child criminal exploitation and the creation of the Fair Work Agency (FWA) through the recently introduced Employment Rights Bill.

The Government has also pledged to eradicate the backlog of decisions on modern slavery cases referred to the National Referral Mechanism (NRM) by hiring 200 additional Home Office staff to process cases. Thousands of vulnerable people should consequently receive faster decisions on their cases so that they can move forward with their lives, avoiding the prolonged uncertainty and mental health suffering that these long delays cause.

The Government would like to thank the Committee members for their work reviewing the Modern Slavery Act and thank all those who provided oral evidence or submitted written evidence to the Committee, in particular those who gave personal testimony of their experiences.

The Government has considered all of the Committee's recommendations. Many recommendations have been accepted and many will be fully considered as the Government develops its policies. These recommendations will be valuable in steering the Government as it brings forward a reformed modern slavery system that puts victims first and rebuilds the UK's international standing in the global fight against modern slavery.

As noted in this response, several of the recommendations concern policy made under the previous Government. In some cases the policy has been rescinded or significantly altered. For example, this Government has made clear that the migration partnership with Rwanda will end.

Please note that recommendations, and their context, have at times been grouped together in this document in order to provide a consolidated response. The order of the recommendations as set out in this Government response therefore may not follow the order of the recommendations as made in the Lords' report.

# **Response to Recommendations**

### **Impact of Immigration Legislation**

#### The Committee states:

We have not received evidence of widespread abuse of the modern slavery system. Case studies may be emotive, and we do not underestimate or devalue their power, but they are not a panacea for data covering a whole population. It is important that comprehensive data is used when making changes as significant as those to recent immigration legislation, since otherwise the actions of a minority may have a disproportionate effect on all victims. (Paragraph 38)

We have received evidence from authoritative sources, including well-regarded academics and the Independent Anti-Slavery Commissioner, expressing concern about changes in rhetoric from the previous Government about the relationship between immigration and modern slavery. Although the two areas can interact, they are different strands of a complex picture, and neglecting this fact can have negative impacts on victims in vulnerable situations. The current Government's announcement that it will not continue the Rwanda scheme may offer an opportunity to take a new direction by clearly separating immigration and modern slavery. (Paragraph 39)

#### The Committee finds:

- 1. The Government should develop a sound evidence base to inform policy in this complex area. Data should be sought as to whether and, if so, in what respects and by whom the modern slavery system is being abused. That data should be kept up to date, and it should be published. Allegations of significant abuse of the system should never be made unless they can be backed up with hard data. (Paragraph 40)
- 2. It should be recognised that there is a very real difference between migrants who come here willingly, and those who come because they are being trafficked as victims of modern slavery. This should lie at the heart of Government policy and of any future legislation about illegal migration. The adverse impact that immigration legislation may have on the identification and protection of victims needs to be carefully assessed and monitored. (Paragraph 41)

#### The Government response:

The Government recognises the need for evidence – including data – in the development, delivery and review of its policies. The Government continues to explore the evidence base and data landscape to ensure it can achieve its goals, including on ambitions to

halve violence against women and girls within a decade and in its review of recent immigration legislation.

The Government is clear on the distinction between migrants and those who are trafficked as victims of modern slavery. The Government has ensured that the portfolio for modern slavery is wholly under the Minister for Safeguarding and Violence Against Women and Girls, rather than the Immigration Minister, in recognition of priorities in this space. This rehousing of the modern slavery portfolio emphasises the victim-centred approach this Government will take on modern slavery, underlined by the Minister's commitment to making sure survivors' voices are at the heart of the Government's work. The Government will pursue and tackle any abuse of the system to ensure it is working effectively for victims. We will ensure our interventions are based on robust evidence.

#### The Committee states:

The public order disqualification has sometimes resulted in difficulties for victims such as in giving evidence from overseas without legal support. The update to the statutory guidance in January 2024 improved this by ensuring better engagement with frontline organisations. However, it does not go far enough in addressing the modern slavery risk faced by victims. The requirement for objective evidence to make a reasonable grounds decision has deprived many of support they would previously have been entitled to and has further increased delays in the system even when decisions are positive. The requirement for individuals to provide evidence "before a specified date" is likely to exclude many from the support they need. It does not adequately consider the impact of trauma on modern slavery victims and the time it takes to recover from this. (Paragraph 50)

#### The Committee finds:

- 3. The Government should consider amending the guidance in section 14.276 of its modern slavery guidance so that it improves the protection that is given to victims from removal. It should be extended to whether there is "any risk" that the individual will be re-trafficked in or from the UK, rather than whether there is "a real and immediate risk" of this happening." (Paragraph 51)
- 4. The Government should remove the requirement for objective evidence for a reasonable grounds decision within the National Referral Mechanism. (Paragraph 52)
- 5. The Government should remove the requirement for evidence to be provided "before a specified date," as per section 58(2) of the Nationality and Borders Act. The Government's statutory guidance acknowledges that victims often need time before they feel comfortable speaking to the authorities. (Paragraph 53)

#### The Government response:

The levels of protections for potential victims of modern slavery that are subject to removal will depend on whether or not the potential victim is detained. Safety and safeguarding of detained individuals are supported by a range of operational policy frameworks. Immigration Enforcement and Law Enforcement authorities also have responsibilities and protocols in place to mitigate any real and immediate risks.

The Government is also clear that the decisions to detain, and subsequent decisions to maintain detention or release, must be well made with systematic safeguards and support for the vulnerable. There are a number of safeguards underpinning detention decisions, including: a Detention Gatekeeper who reviews the suitability of individuals for detention, with a clear focus on removability and vulnerability; and the Adults at Risk policy, which sets out that vulnerable people should be detained only when the immigration factors outweigh the risk of harm to the individual in any given case.

The policy for decision making in the NRM is designed to be compliant with the UK's international obligations and ensure that victims are being appropriately identified so that they can access the support they are eligible for. The Government keeps all policies under review and legislative plans for modern slavery will be announced in due course. As outlined below, the Government is also considering all options connected with ending the migration partnership with Rwanda, including for the Illegal Migration Act 2023.

#### The Committee states:

The modern slavery sections of the Illegal Migration Act are likely to have a damaging effect on the wellbeing of victims. Victims may become unwilling to engage with the authorities. This could remove the support they receive from frontline organisations, increase the likelihood that they are re-trafficked, and limit the evidence they can provide for prosecutions. (Paragraph 59)

We have heard arguments that if the Rwanda Act is brought into force it may afford traffickers greater control over victims, both before and after deportation to Rwanda. Individuals awaiting a reasonable grounds decision may be particularly vulnerable since they will not be treated as victims. (Paragraph 64)

#### The Committee finds:

- 6. The Government should remove the provision excluding from protection anyone who "is not a British citizen," as per section 29(4)(a) of the Illegal Migration Act, or "is liable to deportation," as per section 29(4)(b)(b) of the Illegal Migration Act. (Paragraph 60)
- 7. The modern slavery sections of the Illegal Migration Act should not be commenced because they could cause a reduction in the number of modern slavery prosecutions and because insufficient evidence has been received concerning the operation of the

measures in the Nationality and Borders Act on which the Illegal Migration Act relies. (Paragraph 61)

8. If the Rwanda Act comes into force, the Government should address in its report under section 6 a section devoted specifically to the Act's impact on victims, including the psychological effect on those fearing deportation and the risk of retrafficking, particularly for individuals transferred while awaiting a reasonable grounds decision. (Paragraph 65)

#### The Government response:

The Government has made clear the that the migration partnership with Rwanda will end. Any legislative plans resulting from this decision will be set out in due course.

#### The Committee states:

There is a risk that immigration law enforcement will be prioritised at the expense of ensuring the welfare of survivors and listening to their perspective on policy development. The aim should be to give them the support they need to recover from their experiences, and to avoid disincentivising them from entering the National Referral Mechanism. (Paragraph 69)

The Government should prioritise the safeguarding of victims over their immigration status and communicate changes in good time to victims and frontline organisations, including when there are delays in the National Referral Mechanism. (Paragraph 70)

#### The Committee finds:

9. The Government should provide rights to modern slavery victims including temporary immigration status, recourse to public funds, and access to work, providing a route to permanent settlement in the UK. (Paragraph 71)

#### The Government response:

The Government is clear on the distinction between migrants and those who are trafficked as victims of modern slavery. The welfare of victims and survivors is at the heart of this Government's approach. As such, the portfolio for modern slavery is now wholly under the Minister for Safeguarding and Violence Against Women and Girls rather than Ministers responsible for immigration.

The Government already provides a route for confirmed victims of modern slavery to seek temporary leave to remain. Many victims who are in the NRM also already have recourse

to public funds and the legal right to work owing to being British or due to having preexisting leave to remain for another reason, such as Settled Status through the EU Settlement Scheme.

Victims who have a positive Conclusive Grounds decision will be considered for Temporary Permission to Stay (TPS) if they are:

- assisting public authorities with an investigation or prosecution into their exploitation;
- seeking compensation against their exploiters and need to remain in the UK to do so; or
- if they require assistance with recovery from psychological or physical harm caused by their exploitation and that need for assistance cannot be met in a country to where the victim is either a national or citizen or to which the victim may be removed in accordance with an agreement between the UK and the relevant country or territory.

If a victim is granted a period of TPS – which is to be no longer than 30 months – a victim will have recourse to public funds, no prohibition on work and may also be able to enter higher education.

However, TPS is not a route to permanent settlement in the UK. Permanent settlement must be sought through another form of leave.

All victims who are supported by the Modern Slavery Victim Care Contract can access needs-based financial support to ensure that they can meet their essential living needs and access recovery-related services during their time in the NRM.

#### The Committee states:

Modern slavery policy must align with the UK's commitments under international law. The compliance of the previous government's immigration legislation with international law, including agreements on modern slavery and human trafficking to which the UK is a signatory, has been contested. (Paragraph 73)

#### The Committee finds:

10. The new Government should review its policy and procedures to ensure that primary legislation and statutory guidance are positively compliant with its international obligations under the Palermo Protocol and the European Convention on Action against Trafficking in Human Beings. (Paragraph 74)

#### The Government response:

The Government is committed to ensuring that all legislation is compliant with its international obligations including the Palermo Protocol and the European Convention on Action against Trafficking in Human Beings.

### **Care Sector**

#### The Committee states:

In order for regulatory and enforcement bodies such as the GLAA to tackle the changing picture of modern slavery, adequate resourcing is required. While it is important for taxpayer money to be used efficiently, decreasing the budget makes it difficult for the GLAA to meet the minimum International Labour Organisation standards. (Paragraph 87)

#### The Committee finds:

11. In advance of the formation of a Single Enforcement Body, the Government should increase resourcing of the Gangmasters and Labour Abuse Authority inspectorate to meet minimum International Labour Organisation standards and ensure joint working with the CQC. Consideration should be given to how efficiency can be improved, such as through shared communication by regulators and use of artificial intelligence. (Paragraph 88)

#### The Government response:

The Gangmasters and Labour Abuse Authority (GLAA) has strengthened its working relationship with the Care Quality Commission (CQC) over the last two years, particularly in response to the allegations of exploitation of overseas workers under the visa system in the care sector. The care sector has been a priority area within the GLAA's control strategy, with a significant increase in intelligence and investigations being referred to the organisation.

To support this joint effort, the GLAA has delivered training sessions to CQC colleagues on how to identify and address exploitation, which has resulted in an increase in intelligence sharing between the two bodies. Joint working and inspections have also been a key feature of this collaboration.

There are fiscal challenges across the whole of Government and the Home Office is operating within a very tight financial envelope. The Government will continue to engage with the GLAA to understand funding requirements and consider efficiencies, to help inform departmental allocations for 2025/26 and beyond.

Information sharing between agencies is crucial to the effective enforcement of employees' rights and this will be a core value of the FWA, within which the GLAA will be absorbed. The FWA is the Single Enforcement Body that Government is in the process of establishing, which will act as the principal body responsible for ensuring compliance with labour rights and standards across all sectors. The Employment Rights Bill, which was introduced on 10 October 2024, also provides for information sharing with other public bodies.

The Government is committed to ensuring the FWA has the resources it needs to do its job. Details around implementation will be provided in due course.

#### The Committee states:

There are insufficient safeguards on companies seeking to sponsor overseas workers in the care sector. Registration with the CQC is insufficient as it does not mean that companies are being actively inspected for issues such as labour exploitation. Although the CQC is making positive efforts to regulate the care sector with respect to modern slavery, it does not currently have the resources to do so as comprehensively as is required. (Paragraph 94)

#### The Committee finds:

12. The Government should require sponsors of workers under the Health and Care Visa scheme to have been inspected by the Care Quality Commission. Before registration, sponsoring organisations must have been in operation for a minimum period of time, must have been inspected, and the CQC should be provided with the resources that it needs to perform this task effectively. (Paragraph 95)

#### The Government response:

The Government keeps all immigration routes under regular review. The requirement for organisations wishing to recruit care workers or senior care workers to be registered with the CQC was part of a package of changes introduced by the previous government. While this Government has confirmed it will keep the changes which were introduced, it will continue to consider further changes which will strengthen the safeguards for care workers and senior care workers who come to the UK.

Regarding CQC inspections, under the current regulations it is a criminal offence to provide any regulated activity without being registered with CQC as per the Care Quality Commission (Registration) Regulations 2009. Any provider who is carrying out regulated activity without registration, even for a minimum period of time, will be at risk of enforcement action.

#### The Committee states:

While flexibility and sharing information between agencies is important, there are strong arguments that introducing some form of secure reporting pathways would protect exploited workers by allowing them to come forward about abuse without fear of repercussions. (Paragraph 101)

#### The Committee finds:

13. The Government should at the least establish and embed within legislation protocols for secure reporting pathways which limit labour market enforcement from sharing migration status with immigration enforcement. (Paragraph 102)

#### The Government response:

The FWA will make enforcement of fair work practices accessible to everyone. As part of the development of the FWA, the Government is currently considering protective measures that will encourage workers to report exploitation. This requires a careful and considered approach and will continue to be discussed alongside the passage of the Employment Rights Bill through Parliament.

#### The Committee states:

The current fragmentation of the UK's labour market enforcement system makes it difficult for the continuum of exploitation to be addressed before cases of modern slavery develop. The lack of an even approach across sectors makes it difficult to address the patterns of modern slavery when they arise, as shown by the recent increase in exploitation in the care sector. (Paragraph 109)

#### The Committee finds:

- 14. The Government should establish an arms-length Single Enforcement Body to ensure stronger compliance with relevant labour rights and standards. As a minimum, the Single Enforcement Body should act as a single point of contact for labour exploitation across all sectors. (Paragraph 110)
- 15. The Government should designate a lead, sponsoring department for the Single Enforcement Body where enforcement action crosses departmental boundaries. (Paragraph 111)

- 16. The Government should design the Single Enforcement Body from the perspective of workers and victims, ensuring a helpline acts as a single point of contact. (Paragraph 112)
- 17. The Government should ensure that the Single Enforcement Body has adequate capacity, resourcing, and powers to carry out inspections proactively, promote compliance and sanction non-compliance. It must be independent. (Paragraph 113)
- 18. The Single Enforcement Body's enforcement powers should be clearly defined, to avoid the risk of overlap and confusion with the existing regulatory and enforcement bodies and to provide a system of enforcement that can operate effectively across all the sectors of the labour market. (Paragraph 114)

#### The Government response:

The Government agrees that the UK's labour market enforcement system is fragmented and ineffective. This is bad for workers and bad for those businesses being undercut by the minority who freely break the rules. That is why the Government is already in the process of establishing a Single Enforcement Body known as the Fair Work Agency (FWA), which will act as the principal body responsible for ensuring compliance with labour rights and standards across all sectors. This new agency will streamline enforcement capabilities by integrating the three current enforcement bodies: GLAA, Employment Agency Standards (EAS) Inspectorate and HMRC's National Minimum Wage (NMW) team. The amalgamation of these three bodies will allow the FWA to have a clearly defined set of powers and operate within a structured framework, allowing the FWA to focus on its core mandate while working with other regulatory bodies where necessary.

The FWA will provide a single point of contact for reporting labour exploitation and related concerns, allowing for a more coordinated and comprehensive response to labour exploitation and abuse. Furthermore, the FWA is being designed with a worker-centric approach, ensuring there will be a focus on victims of labour exploitation. The FWA will be adequately resourced, with powers to proactively investigate and enforce compliance across a range of employment sectors.

The FWA will be an Executive Agency of the Department for Business and Trade (DBT) and will be a strong, recognisable single brand so individuals know where to go for help.

#### The Committee states:

The current approach to introducing new visa schemes such as the Health and Care visa leaves migrants on these schemes vulnerable to exploitation. (Paragraph 119)

#### The Committee finds:

19. The Government should provide rights to workers on visa schemes including the right to change employers, renew visas, and apply for transitional work permits. (Paragraph 120)

#### The Government response:

Workers from overseas may be restricted in the work they are permitted to do; within those restrictions, however, they have the same protections and rights under employment law as British and settled workers, and all employers are expected to comply with UK employment law including that which covers National Minimum Wage.

The Government's immigration employment routes typically enable workers to change employer, either directly through making a new visa application, or by requesting a move of employer through their licenced sponsor, where a visa is for an umbrella route (such as a Seasonal Worker on the Seasonal Workers Agricultural Scheme).

The Government's main immigration employment routes, for example the Skilled Worker route, do enable migrant workers to renew their visa. Some visa routes are, by design, only intended to support temporary periods of employment, and enabling renewals of such visas would not be consistent with their purpose.

The most frequently accessed of the UK's sponsored employment routes is the Skilled Worker visa, which includes Heath and Care Workers. Skilled Workers, including workers on a Health and Care Visa, are able to move employers and renew visas but these require an application to be made. It is important that applications are considered to ensure workers are moving to an approved sponsor, moving to an eligible job and being paid the correct salary.

#### The Committee states:

It is important to empower workers with information in order to combat all forms of exploitation, including modern slavery. (Paragraph 122)

#### The Committee finds:

20. The Government should produce packs informing workers of their rights and communicate these directly to workers, for example via trade unions, who have offered to run workshops to do this. It should make it clear that employers have no right to take these packs away from workers. (Paragraph 123)

#### The Government response:

The GLAA, EAS Inspectorate and HMRC's NMW enforcement team collaborate to ensure that workers are aware of their rights. The GLAA, for instance, offers Workers' Rights Leaflets in multiple languages, outlining key employment protections such as fair pay, working hours, holiday entitlements and the right to a safe working environment.

In addition to these printed resources, these agencies also run webinars and workshops, often jointly, to further promote awareness of workers' rights. The creation of the FWA will enable closer collaboration and coordination in creating and distributing these resources.

#### The Committee states:

Exploitation in the care sector is made easier by the lack of TISC requirements on the majority of care providers, which leaves a large regulatory gap. (Paragraph 125)

#### The Committee finds:

21. The Labour Party manifesto committed to establishing a new Fair Pay Agreement for the adult social care sector. Through this Agreement, the Government should ensure that terms and conditions in social care are improved and that poor employment practices, such as requiring staff to pay for travel, uniforms and training which increase the risk of financial exploitation and under-payment of wages, are removed. (Paragraph 127)

#### The Government response:

The Government's Plan to Make Work Pay committed to establishing Fair Pay Agreements for the adult social care sector. Fair Pay Agreements will empower worker representatives, employers and others in partnership to negotiate fair pay and terms and conditions in a regulated and responsible manner. The Government is at an early stage of developing the Agreement and its scope will be determined following further engagement with the sector. The Employment Rights Bill includes provision for state enforcement of pay in new Fair Pay Agreements.

### **Enforcement of the Modern Slavery Act**

#### The Committee states:

Slavery and Trafficking Risk Orders and Slavery and Trafficking Prevention Orders are potentially powerful tools in tackling modern slavery which have been underused. There is sometimes insufficient awareness, understanding, training, and guidance relating to them.

There is a lack of data, both publicly and operationally, which hinders evaluation of effectiveness and proper implementation of legislation. The effectiveness of Orders would be improved if they could be applied in more circumstances and if there was more thorough monitoring of Orders which are already in place. Such improvements were referenced in the 2022 Queen's Speech but have not been implemented in legislation. Government activity in this area is welcome but is at an early stage. (Paragraph 137)

#### The Committee finds:

22. The Government should introduce legislation which facilitates wider use of Slavery and Trafficking Risk Orders and Slavery and Trafficking Prevention Orders, particularly enabling issue of STROs on acquittal, applications for Orders across the boundaries of different police forces, and electronic monitoring of the conditions and notification requirements. (Paragraph 138)

#### The Government response:

The Government's ambition is to ensure that law enforcement agencies have the right tools and use them to pursue perpetrators, prevent modern slavery and protect those at risk.

Slavery and Trafficking Risk Orders (STROs) and Slavery and Trafficking Prevention Orders (STPOs) can be made by courts on conviction or on application by the police, National Crime Agency, Immigration Officers, or the GLAA.

The Government continues to work with law enforcement and criminal justice partners to explore the use and effectiveness of STROs and STPOs. As part of this work, the Government continues to keep the legislation under review, to look for opportunities to strengthen the orders.

#### The Committee finds:

23. The Government should encourage more applications for Slavery and Trafficking Risk Orders and Slavery and Trafficking Prevention Orders, including by working with the Sentencing Council to ensure that they are considered in all cases. It should resume publication of the number of Orders which have been issued. (Paragraph 139)

#### The Government response:

The Government is working closely with law enforcement and criminal justice partners to encourage the use of STPOs and STROs and to consider how the impact these orders have on tackling modern slavery can be better measured. The data on the number of

breaches for STPOs and STROs is published by the Ministry of Justice in the quarterly criminal justice system outcomes statistics. The Government will consider if further data can be published.

The Sentencing Council provides guidance on ancillary orders for both magistrates' courts and the Crown Court, including guidance on STPOs, which sets out that in all cases, the court must consider the use of the slavery and trafficking orders. The Modern Slavery and Organised Immigration Crime Unit (MSOICU), which sits under the leadership of the National Police Chief Council (NPCC) Lead for Modern Slavery and Organised Immigration Crime based in Devon and Cornwall Police, also provides guidance for policing on STPO/ROs. The MSOICU guidance provides practical, operational advice to law enforcement officers and staff intending to apply for orders and managing the subjects of those orders within the community.

The MSOICU also has a specific objective in the Modern Slavery Criminal Justice Action Group (MSCJAG) to increase awareness and use of STROs and STPOs. The MSCJAG is a joint working group led by the CPS National Lead for Human Trafficking and the NPCC Lead for Modern Slavery and Organised Immigration Crime, which considers further action to increase modern slavery prosecutions, by bringing together criminal justice partners to discuss issues that have been raised during investigations and prosecutions with a view to removing any barriers.

#### The Committee states:

The non-punishment principle is an important protection for victims of modern slavery which is not invoked enough in practice. The defence is substantially limited by Schedule 4 of the Act, which disapplies it for offences which victims are often compelled to commit during their exploitation. Children are currently disadvantaged compared to other groups by section 45. (Paragraph 147)

#### The Committee finds:

24. The Government should collect and publish data on the usage of section 45 of the Modern Slavery Act, particularly the characteristics of defendants raising the defence (such as age, nationality and gender), the type of offence the statutory defence is raised for and the outcomes of the cases where the statutory defence is raised. (Paragraph 148)

#### The Government response:

The Government recognises the importance of the statutory defence under section 45 of the Modern Slavery Act to protect victims who have been compelled to commit the

relevant offence in the case of adults, or, for children, commits the relevant offence as a direct consequence of the person being, or having been, a victim of slavery or a victim of relevant exploitation. The Home Office acknowledges that there is an evidence gap on the use of section 45 and is committed to continuing to work with criminal justice partners to explore how data on the use of section 45 can be captured, to better understand its effectiveness.

As part of this commitment, the Home Office is working closely with the police, and it has developed a new data collection request for police forces in England and Wales as part of the Home Office Annual Data Requirement (ADR) process.

The ADR was introduced in April 2023 on a voluntary basis, to seek data from forces that currently have the capability on the frequency and crime type where the statutory defence has been raised. The voluntary nature of the collection provides a provisional period to test the robustness of the data and time to work with forces to make any necessary refinements, including to force capability to enable collection of the data and the potential for capturing demographics. Publication of the data will be subject to the necessary data and quality assurance clearances.

#### The Committee finds:

25. The Government should review and consider removing the offences in Schedule 4 to extend the protection applied by the non-punishment principle, including to those who have committed modern slavery offences. (Paragraph 149)

#### The Government response:

Schedule 4 of the Modern Slavery Act 2015 sets out the offences to which the section 45 defence does not apply, which includes serious sexual, violent, terrorism and modern slavery offences. In cases where the section 45 defence does not apply or cannot be evidenced to the criminal standard, the CPS can still exercise its discretion and decide whether it is in the public interest to prosecute.

As the Government develops its priorities for reforming the modern slavery system, it will continue to keep the legislation under review to ensure it keeps pace with the evolving threat of modern slavery.

#### The Committee finds:

26. The Government should review the tests for section 45 made by criminal justice practitioners to improve the consistency of the application of section 45 for children. (Paragraph 150)

#### The Government response:

The Government recognises the particular vulnerabilities of children and that is why the test in section 45 is lower for children (those under 18 years) than it is for adults. Unlike for adults, the section 45 test for children does not require the child to demonstrate that they were compelled to commit the relevant offence. Rather, they need to demonstrate that the relevant offence was committed as a direct consequence of being, or having been, a victim of slavery or relevant exploitation, and a reasonable person in the same situation and having the person's relevant characteristics would commit the offence.

The CPS guidance sets out the factors that prosecutors should take into account when determining whether the section 45 defence is applicable in a case. This aims to bring consistency in the application of the defence. It requires prosecutors to give careful consideration to the applicability of the section 45 defence and whether there is sufficient evidence to disprove the defence beyond reasonable doubt. No charges should be brought if there is sufficient evidence to suggest the suspect is a victim of slavery and their offending was either compelled by (in the case of adults) or as a direct consequence of having been a victim of modern slavery (in the case of children).

#### The Committee states:

Gathering the evidence required for successful prosecution of modern slavery offences is known to be challenging but there are established methods of doing it. The victim navigator pilot has been very successful and it is disappointing that the previous government was seemingly not engaged with it given Minister Farris' lack of awareness of the scheme. Financial investigations have yielded excellent results but require resource to be effective. (Paragraph 158)

#### The Committee finds:

27. Victim navigators should be rolled out nationally. The objective must be that they are available in all cases. (Paragraph 159)

#### The Government response:

The Government recognises the importance of supporting victims to engage with the criminal justice system and the positive impact an independent support worker, working alongside law enforcement, can have on securing this engagement.

In 2022/23, the Government tested different initiatives delivered by Justice and Care, Hope for Justice and the Medaille Trust, to consider how to further support victims to engage with the criminal justice system. The Government is keen to build on this research, working in partnerships with NGOs and law enforcement, to identify how to best support victims to engage with the criminal justice system. The Minister for Safeguarding and Violence Against Women and Girls has met with the NGOs delivering the Victim Navigator Programme to understand the impact of the programme, and to explore ways to expand this, and other similar initiatives, to ensure victims have the support they need.

In addition, all adult victims supported by the Modern Slavery Victim Care Contract have a support worker who will provide them advice and support to access legal aid, legal advice and legal representation, and assistance during criminal proceedings, including Special Measures available under the Victim's Code should they wish to support the police in criminal investigations. Child victims supported by local authorities and Independent Child Trafficking Guardians receive similar support.

#### The Committee finds:

28. The Government should provide additional resourcing for financial investigations and ensure that priority is placed on them in law enforcement agencies. (Paragraph 160)

#### The Government response:

The Government recognises the importance of financial investigations in identifying and prosecuting modern slavery offenders. The Home Office recently met with law enforcement partners during Anti-Slavery Week to discuss the issues they are facing. The Government is committed to continue working with them to understand what more can be done to support investigations and increase prosecutions.

In recognition of the importance of financial investigations in modern slavery investigations, the MSOICU recruited a Financial Crime Specialist to support forces in financial investigative techniques. National workshops have been attended by over 40 officers engaged in the financial investigation field. Financial investigative guidance has also been produced and published to: assist Senior Investigation Officers in compiling operational financial strategies; broaden the knowledge of financial investigators on modern slavery offences; and increase criminal investigators' general understanding of financial investigative techniques.

The Financial Crime Specialist, in collaboration with a training specialist, is developing a bespoke modern slavery financial investigations training module. The training will be piloted in Wiltshire late this year and is expected to be rolled out nationally in 2025 following evaluation. Furthermore, through the Joint Money Laundering Intelligence Taskforce, the National Crime Agency is working in partnership with the banking sector to

harness the capability within banks to identify red flags in financial transactions and alert these to the authorities.

#### The Committee finds:

29. The Government should seek to improve its bilateral agreements with Vietnam and Albania, building on its successful arrangements with Romania. It should also seek to negotiate bilateral agreements with additional countries. (Paragraph 161)

#### The Government response:

The UK remains committed to working with international partners to jointly tackle modern slavery as a global issue. The UK has close relationships with the Albanian, Vietnamese, and Romanian Governments to address shared priorities on modern slavery. Partnerships with these countries cover initiatives to prevent modern slavery, improve law enforcement cooperation, and support effective reintegration of victims.

The UK will continue its close engagement with these countries and seek opportunities to deepen these partnerships. The Government regularly reviews emerging global trends in modern slavery to understand where UK engagement may help to tackle these issues.

#### The Committee finds:

30. The Government should amend the recent immigration legislation so that the ability to gather evidence is not limited (see Chapter 2). (Paragraph 162)

#### The Government response:

The Government has made clear the that the migration partnership with Rwanda will end. Any legislative plans resulting from this decision will be set out in due course.

#### The Committee states:

Good practice and strategic priority towards modern slavery exist in parts of the UK but not in others. Information is not always provided to the organisations which most need them, including across government departments. It is important to balance necessary data sharing with safeguards for data protection. There has been a lack of strategic emphasis on prosecution and prevention from the previous government, partly due to fact that the modern slavery strategy has not been updated since 2014. (Paragraph 169)

#### The Committee finds:

- 31. The Government should improve information and data sharing mechanisms across multiple agencies, including between the police and the NHS, through establishment of a modern slavery data warehouse. In doing so it should consider safeguards and the circumstances where data sharing is appropriate. (Paragraph 170)
- 32. The Government should prioritise prosecution in its modern slavery strategy with a focus on treating victims as exploited individuals, not immigration offenders. The modern slavery strategy should also give greater attention to prevention, such as through strengthening powers against indirect enablers of modern slavery and targeting organised criminal gangs. (Paragraph 171)

#### The Government response:

The Government regularly shares disaggregated NRM data on the UK Data Service (UKDS) for practitioners and researchers to analyse. The Government also regularly reviews what information is beneficial to publish, both through the bulletin and the UKDS.

One of the Government's priorities is to increase the prosecution of modern slavery offenders. The Government met with law enforcement agencies, criminal justice partners and Non-Government Organisations during Anti-Slavery Week to discuss prosecution challenges and is committed to working in partnership to develop an action plan to address these challenges.

### **Supply Chains**

#### The Committee states:

Modern slavery statements by companies are inconsistent and the lack of mandated requirements for content makes it difficult for companies to be held accountable for their transparency, even with the voluntary public registry. (Paragraph 187)

The inconsistent quality and content of modern slavery statements obfuscates the transparency section 54 was intended to provide. This might be the result of insufficient guidance or engagement with companies, as well as a result of the lack of mandated topics for statements to cover. (Paragraph 188)

#### The Committee finds:

- 33. The Government should make publication of statements on its modern slavery registry mandatory, setting out the required topics for each statement to cover. This should include a description of how the organisation has assessed the effectiveness of its actions. (Paragraph 189)
- 34. The Government should create a summary dashboard with information including numbers of statements in total, by sector, and from organisations in scope, and examples of good and bad reporting by companies. This dashboard should be published online. (Paragraph 191)

#### The Government response:

The modern slavery statement registry is a powerful tool for transparency, bringing together modern slavery statements into one place on GOV.UK. The registry now hosts more than 16,200 modern slavery statements and over the last year there has been an average of 22,500 public searches for the registry every month.

In April 2024, the Home Office announced a number of improvements to the modern slavery statement registry to increase the number of statements being uploaded voluntarily and support organisations to publish robust statements.

The Home Office is planning to build on these changes and introduce further improvements. Although individuals can download summary data on all modern slavery statements uploaded to the registry, the Home Office is currently developing a public facing data dashboard that will provide more data to the public. The Home Office is consulting with a wide range of stakeholders to ensure that the dashboard provides data that helps consumers and organisations better interrogate modern slavery transparency data.

#### The Committee finds:

35. The Government should increase awareness amongst all companies about supply chains and publish standardised and accessible guidance for compliance with section 54. (Paragraph 190)

#### The Government response:

The Home Office is currently working with a wide group of stakeholders from business, academia and civil society to update the Section 54 statutory guidance. This will further support businesses to produce high quality statements, which are underpinned by effective measures to prevent and effectively respond to instances of modern slavery in supply chains.

The Government regularly engages with trade bodies and companies of all sizes, including those who are not in scope of the legislation, to increase awareness of modern slavery and good practice measures to reduce the risk of exploitation in operations and supply chains.

#### The Committee states:

There are many options for enforcing the supply chain requirements of the Modern Slavery Act, but the current approach of no enforcement is not one of them. We believe that the most important aspect to consider when deciding an enforcement approach is proportionality. (Paragraph 198)

#### The Committee finds:

36. The Government should introduce proportionate sanctions for organisations that do not comply with supply chain requirements. (Paragraph 199)

#### The Government response:

If an organisation fails to comply with the transparency requirement, the Home Secretary can seek an injunction to require compliance. This power has not been used to date due to the cost to the taxpayer of seeking injunctions and the difficulties assessing compliance within the current legislative framework.

The Government is reviewing how it can strengthen penalties for non-compliance and create a proportionate enforcement regime. However, this will require legislative change and will need to be considered against a wider review of how best the Government can use legislative and non-legislative measures to tackle forced labour and increase transparency in global supply chains. The Government will set out next steps more broadly in due course.

#### The Committee states:

The cross-departmental reality of modern slavery can obfuscate approaches to enforcement, particularly in the case of supply chains where the Department for Business and Trade has a particular responsibility. Efficient working between departments is essential to addressing modern slavery, and while departments have described how they work together, it would be beneficial to set out formally the role of each department in combatting modern slavery. (Paragraph 202)

#### The Committee finds:

37. The Government should clarify responsibility for enforcement in its modern slavery strategy, including making it clear how this is divided between departments and ensuring that departments are properly resourced to discharge this responsibility efficiently and effectively. (Paragraph 203)

#### The Government response:

Government departments work together closely to enhance the Government's approach to tackling modern slavery in supply chains. The principal departments involved in this work are the Home Office, the DBT, the Foreign, Commonwealth and Development Office (FCDO) and Cabinet Office.

The Home Office is responsible for the Modern Slavery Act 2015, including the 'Transparency in Supply Chains' provision, the associated statutory guidance and management of the modern slavery statement registry, which brings modern slavery statements together on a single platform.

The DBT leads on wider business regulation and trade measures, including non-financial reporting, free trade agreements and export controls. The DBT also has responsibility for keeping under review possible measures to tackle modern slavery such as import controls and/or mandatory due diligence, with support from the Home Office and the FCDO.

The FWA will be an Executive Agency of the DBT and will provide a single point of contact for reporting labour exploitation and related concerns, allowing for a more coordinated and comprehensive response to labour exploitation and abuse.

The FCDO is responsible for the UK's international approach to eradicating all forms of modern slavery in line with achieving SDG 8.7. The FCDO works with multilateral partners to forge a united global response to eradicating modern slavery and works bilaterally to deliver a range of regional and country development programmes to reduce modern slavery overseas.

The FCDO is responsible for engaging internationally to promote adherence to the UN Guiding Principles on Business and Human Rights (UNGPs). In line with the UNGPs, the FCDO also works to support coherence across Government policy and legislation, particularly where it may impact global supply chains.

The Cabinet Office is responsible for procurement legislation, including the new Procurement Act which will come into force in February 2025, and for setting procurement policy for central government departments. The Act will strengthen the exclusion regime in relation to modern slavery, to prevent exploitative companies from securing government contracts.

#### The Committee states:

While recent developments in public procurement are positive, a passive approach is insufficient. Companies should be encouraged to be transparent and address modern slavery where it is found, rather than fear debarment if they discover it. Government should lead by example and meet the same standards of responsibility to reduce modern slavery in its supply chains that should be required of private companies. (Paragraph 210)

While there are a wide number of options for what thresholds should be applied to supply chain legislation, we believe that these thresholds should be consistent across sectors, including the public sector. (Paragraph 233)

Exploitation in the care sector is made easier by the lack of TISC requirements on the majority of care providers, which leaves a large regulatory gap. (Paragraph 125)

#### The Committee finds:

- 38. The Government should improve the implementation of its guidelines so that its supply chains compliance is proactive rather than passive. It should be able to demonstrate this through tangible action to reduce modern slavery. (Paragraph 211)
- 39. Section 54 of the Modern Slavery Act should be extended to all bodies in the public sector with an annual budget equivalent to that of the commercial organisations to which it applies. (Paragraph 215)
- 40. Any measures introduced for the private sector should apply equally to the public sector. Consideration should be given as to how to implement this principle in detail, such as the appropriate threshold to use for the public sector (see paragraph 215). (Paragraph 234)
- 41. The current Government should honour the former Government's commitment to extend the statutory obligation of section 54 of the Modern Slavery Act to public bodies and ensure that they fulfil their duty of care by investigating their supply chains for evidence of exploitation. (Paragraph 126)

#### The Government response:

Government is harnessing the public sector's spending power to ensure exploitative businesses do not take a share of the £400 billion that the public sector spends on goods and services each year. Public bodies should be taking a risk-based approach to modern slavery due diligence as set out in the Government's Procurement Policy Note 02/23 and associated guidance.

The Procurement Act has strengthened the rules around excluding suppliers linked to modern slavery. For instance, the Act expands the mandatory exclusion grounds which apply if the supplier or a connected person has been convicted of certain offences under

Modern Slavery legislation. Suppliers can be investigated for debarment on modern slavery grounds and be placed on a central debarment list of suppliers who must or may be excluded across the whole of the public sector.

The Act also provides for a Procurement Review Unit (PRU) to be established; the PRU will ensure there is greater consistency and efficiency of supplier exclusions across the public sector, informed by the central debarment list and published investigation reports. The PRU will own and maintain the debarment list and will carry out debarment investigations.

To support proactive delivery of government policy and guidance, the Government has developed the Modern Slavery Assessment Tool which supports public bodies in assessing and managing modern slavery risks with their suppliers. As of September 2024, over 8,600 assessments have been completed. Government has also launched modern slavery e-learning for public sector procurement officials, which over 5,600 public sector officials have completed.

Public sector organisations can voluntarily publish modern slavery statements. The Government is reviewing the scope and nature of the Section 54 legislation and will need to consider this against a wider review of how best government can use legislative and non-legislative measures to tackle forced labour and increase transparency in global supply chains. Government will set out next steps more broadly in due course.

#### The Committee states:

The contents of the proposed Modern Slavery Bill outlined in the Queen's Speech in 2022 would constitute a positive improvement on the current picture of supply chain provisions for modern slavery, although they could go further. (Paragraph 218)

#### The Committee finds:

42. The previous Government drafted legislation on supply chain reporting. This draft legislation should be strengthened by the current government, and must, as a minimum, require relevant companies and public sector organisations to report and set out meaningful, reasonable steps to both identify risks and tackle modern slavery in their supply chains. Those failing to do so should face proportionate sanctions and, in the interests of transparency, a central register of such statements should be published by government. (Paragraph 219)

#### The Government response:

The Government is committed to improving its response to modern slavery. It has already taken action on key legislation, including setting up the FWA through the Employment

Rights Bill, and has made a Manifesto commitment to introduce a new offence of the criminal exploitation of children. The Government is reviewing how best it can use legislative and non-legislative measures to tackle forced labour and increase transparency in global supply chains. The Government will set out next steps more broadly in due course.

#### The Committee states:

The developments internationally on due diligence indicate that the UK has fallen behind. As many UK companies operate internationally, they will find themselves obligated to meet the due diligence requirements of other nations. (Paragraph 230)

#### The Committee finds:

- 43. The Government should make UK due diligence law compatible with the standards of the international landscape to make compliance easier for companies. (Paragraph 231)
- 44. The Government should introduce legislation requiring companies meeting the threshold to undertake modern slavery due diligence in their supply chains and to take reasonable steps to address problems. We recommend that they consult businesses on potential changes, looking closely at the issues we have raised and giving due consideration to small and medium sized companies' ability to meet any new requirements. (Paragraph 227)

#### The Government response:

The UK supports voluntary due diligence approaches taken by UK businesses to respect human rights and the environment across their operations and supply relationships, in line with the UN Guiding Principles on Business and Human Rights (UNGPs) and the Organisation for Economic Co-operation and Development's Guidelines on Multinational Enterprises.

As a signatory to the Guidelines, the Government operates an independent UK National Contact Point (NCP), which engages UK businesses to increase awareness and understanding of these principles and standards for responsible business conduct. Where businesses' operations or supply chains are not in line with the Guidelines, a complaint can be made to the UK NCP, which administers a non-judicial complaints mechanism to mediate an agreement between the parties.

The FCDO is carrying out a National Baseline Assessment (NBA) on the implementation of the UNGPs. An NBA will contribute to the evidence base to inform the UK's approach to tackling business-related human rights abuses, including in global supply chains.

The Government will assess the best ways to prevent environmental harms, modern slavery and human and labour rights abuses in both private and public sector supply chains, including effective due diligence rules. The DBT regularly engages with stakeholders in business and civil society on these issues, as do other government departments, and Government will consult thoroughly with interested stakeholders as it considers any further action.

#### The Committee states:

While import laws could assist in preventing goods made with forced labour from entering the UK, country-specific bans have significant foreign policy implications. However, without any consideration of import laws, the UK risks becoming a dumping ground for tainted products. (Paragraph 238)

#### The Committee finds:

45. The Government should consider introducing import laws which ban goods being brought into the UK if they are produced by certain companies known to use forced labour. These import laws should not be targeted at particular countries. (Paragraph 239)

#### The Government Response:

The Government will continue to assess and monitor the effectiveness of the UK's existing measures, alongside the impacts of new policy tools that are emerging to ensure it can best tackle forced labour in supply chains. The Government will continue to work with businesses and international partners to understand the impact of trade measures to combat forced labour.

#### The Committee finds:

46. The Government should include the issue of modern slavery and forced labour in its trade negotiations. (Paragraph 241)

#### The Government Response:

The UK has negotiated chapters on labour in Free Trade Agreements with Australia and New Zealand which include specific commitments on forced labour and modern slavery. There are also provisions on labour, including forced labour, in the Comprehensive and Progressive Agreement for Trans-Pacific Partnership. Additionally, the UK has labour

provisions as part of trade and sustainable development chapters in a range of its continuity agreements.

The UK will continue to work internationally to strengthen workers' rights and enhance labour standards globally. The Government will protect its labour standards in new trade agreements.

The UK is also monitoring implementation of its labour provisions, having held its first labour sub-committee with New Zealand, Committee on Cooperation with Australia and Trade and Sustainable Development sub-committees with partners such as with Vietnam and the Andean countries, to discuss labour issues and ensure implementation of commitments.

### Independent Anti-Slavery Commissioner

#### The Committee states:

It is disappointing that the role of Independent Anti-Slavery Commissioner remained vacant for 18 months without clear explanation. There are possible shortcomings with the independence afforded by the appointment process, particularly the fact that it has previously been conducted by the Home Secretary, as well as restrictions on budgeting and reporting. (Paragraph 248)

#### The Committee finds:

- 47. The Government should require its future candidates for the IASC post to undertake a pre-appointment hearing with the Home Affairs Committee so that there is independent scrutiny of the appointment process. (Paragraph 249)
- 48. The IASC post role and person specification should continue to require a track record of strategic leadership, a clear vision for the role, and the ability to engage people from across a range of backgrounds and viewpoints. The post-holder should be able to establish a strong public and media profile for modern slavery. (Paragraph 250)

#### The Government response:

The process to add roles to the pre-appointment scrutiny list is centrally owned and is set out in the <u>Cabinet Office Guidance: pre-appointment scrutiny by House of Commons</u> <u>select committees</u>. The Home Office periodically reviews all its public appointments and as commissioned by Cabinet Office, and continues to keep all public appointments under review. Eleanor Lyons was appointed as the Anti-Slavery Commissioner (IASC) in December 2023. The IASC appointment is regulated by the Commissioner for Public Appointments and the process was conducted in accordance with the Governance Code on Public Appointments.

All public appointees are independent of both the Department and His Majesty's Government. All appointments are made on merit, following open and fair competition.

#### The Committee states:

It is disappointing that the IASC has experienced practical difficulties in performing her role. These have partly been due to the delay in reappointment and it is reassuring that they are being addressed. The role requires a significant amount of resource to be performed effectively, not only for staff but also for advice from those with lived experience and the commissioning of independent research for example concerning new developments, international comparators, and prevention. (Paragraph 255)

#### The Committee finds:

49. The Government should ensure that the IASC's budget is sufficient for the Commissioner's responsibilities, in particular given changes in the modern slavery landscape and the need for prevention. The Commissioner should be able to continually monitor international good practice on modern slavery. (Paragraph 256)

#### The Government response:

The Commissioner's total budget provided by the Home Office for 2024/25 was £597,000. This is £52,000 more than the Home Office budget for the previous Commissioner between 2021/22. It comprises £497,000 Resource Departmental Expenditure Limit and £100,000 Capital Departmental Expenditure Limit.

The Government is aware the previous Commissioner also received funding from the devolved administrations, which is separate to the budget provided by the Home Office.

There are fiscal challenges across the whole of Government and the Home Office is operating within a very tight financial envelope. The Government will continue to engage with the Commissioner and her office to understand funding requirements to help inform departmental allocations for 2025/26 and beyond. Funding is allocated through agreement between the Home Office and the Commissioner and this enables the Commissioner to distribute that funding as they wish, with Home Office support.

#### The Committee states:

The IASC office's engagement with government has generally been positive, although there is a lack of awareness of modern slavery in some departments. There has historically been a limited relationship with business, partly due to this not being clearly articulated. The Department for Business and Trade has been reluctant to take a proactive role in tackling modern slavery despite the importance of its responsibilities concerning forced labour and supply chains. (Paragraph 261)

#### The Committee finds:

50. In order to effectively discharge its responsibility for the prevention of modern slavery, the Department for Business and Trade should clarify its relationship with the IASC and define this in the government's modern slavery strategy. (Paragraph 262)

#### The Government response:

Along with other government departments, the DBT is committed to working with the IASC to drive forward work to combat modern slavery in global supply chains. This includes meeting with the IASC to discuss the DBT's ongoing work to hold businesses to account in the modern slavery space.

Government plans for long term reform of the modern slavery system and will decide how best to communicate these plans, which will involve the allocation of resources and the division of responsibilities on modern slavery across Government departments, in due course.

#### **Other Issues**

#### The Committee states:

The length of our inquiry into the Modern Slavery Act was always likely to be restricted due to the electoral cycle. We express our regret that, within the time available for our inquiry, we have not been able to address all issues relating to the Modern Slavery Act. We hope these other issues will be taken forward by others for further review. We do not diminish their importance. (Paragraph 263)

#### Conclusions drawn by the Committee regarding these other issues:

- 51. We have heard evidence to suggest that the Government should consider how to improve the operation of the National Referral Mechanism for groups who are currently disadvantaged by it. These include UK nationals, victims of sexual exploitation, children, women, vulnerable adults, those with no recourse to public funds, and those without legal immigration status. (Paragraph 286)
- 52. The Government should improve the National Referral Mechanism guidance and ensure it is adhered to, including by its own agencies. It should draw on the latest operational experience and clarify how to make good quality referrals so that victims are not disadvantaged by being handled by particular First Responder Organisations. (Paragraph 287)
- 53. The Government should ensure that First Responder Organisations have adequate capacity. Aside from providing additional resourcing to existing organisations, it should do this by increasing the number of FROs and ensuring that non-informing FROs meet their obligations. (Paragraph 288)
- 54. We have found throughout our inquiry that combatting modern slavery is a difficult but urgent challenge, which is constantly changing. Having listened to victims and survivors, our recommendations are designed to achieve a step change towards that end. The new government now has an opportunity to make the UK, once again, a world-leader in the fight against modern slavery and to make a profound difference to many lives. (Paragraph 290)

#### The Government response:

The Government thanks the Committee for its considered report and recommendations. The Committee's conclusions will be taken into consideration as part of the Government's strategic approach to carry out more significant and sustained reform.

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