

I am writing on behalf of the Forced Labour Monitoring Group, which is a consortium of 44 organisations working on issues of labour exploitation in general and forced labour in particular. The FLMG includes quasi-governmental organisations, NGOs, campaigning groups, academics, think tanks and single issue groups. Further information is available on our website at www.flmg.org.

Thank you for your invitation to submit evidence to the Committee regarding the human rights implications of the Modern Slavery Bill.

Much of the evidence we would have wanted to submit has already been submitted to you by the Joseph Rowntree Foundation and we wish to endorse their comments, sent to you today. This evidence draws, inter alia, on research conducted by members of the FLMG, including major projects funded by the Joseph Rowntree Foundation and which are referenced in their submission. We would like to underline several points:

1. Forced labour is a serious and growing issue within the UK as well as beyond it: the human rights implications of this are therefore relevant both within the UK and outside and the UK government cannot leave it simply to international organisations such as the ILO and the UNCHR to monitor and respond to it. The UK government has a serious responsibility in this area and this must be reflected in the Modern Slavery Bill.
2. There is a clear need, supported by many businesses, for the issue of the regulation of supply chains to be addressed, and not left to voluntary codes. Companies have to take responsibility for the occurrence of forced labour within supply chains, either within this country or outside it. The horsemeat scandal in this country and the Rana Plaza disaster in Bangladesh each point to issues regarding the lack of accountability within supply chains and the use by companies based in this country of exploited labour outside it.
3. The research by Dwyer et al. ,also referenced in the JRF submission, points out the link between the vulnerability of workers in this country and their immigration status. This link should not exist and it is critical that governments seek to break it. Many workers are driven into forced labour because of the punitive immigration regime in this country.
4. The regulation of companies by the Gangmasters' Licencing Authority has been a modest success to date, modest in the sense that it has done its work effectively within a very limited remit and resources. The government has moved the GLA to the Home Office but this is not adequate. The GLA's remit needs to be extended to cover the whole of the labour market and therefore needs both significantly increased resources, but the ability to work across all industrial sectors. Government instructions to the GLA currently are effectively to focus only on the most serious cases, which seems bizarre. Either forced labour is a crime or it is not: as it is a crime, the GLA should be able to pursue all relevant cases and not just high profile or test cases.
5. Thinking about the human rights implications of forced labour needs to be extended to victims from other countries as well as workers of British origin. Most of the workers we interviewed in our research (Geddes et al 2013, Scott et al 2012) were migrant workers with a legal right to be in this country but who were exploited to a very significant degree. Barriers have been erected to them being able to protect themselves, not least the increase in fees to access employment tribunals which make it even more difficult for them to take advantage of their rights.
6. It is important to recognise that forced labour is not a phenomenon isolated from the more general issue of the exploitation of workers, exploitation which is increasing across the piece. Essentially, forced labour is simply the most extreme example of this kind of exploitation and therefore issues of human rights for those in forced labour, are issues which also face most workers.
7. Finally, the Bill as it stands, makes provision for an Anti-Slavery Commissioner which the government asserts will be 'independent'. However the nature of this independence is not spelled out. Our view is that independence has to mean that the role is statutorily based but that the

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Commissioner has a legal standing separate from government with the ability to report to Parliament (as for example with Children's Commissioners) and not subject to restrictive scrutiny or control by the Home Secretary. If, as is the case with the present government, there is a political predilection towards weakening the human rights framework of this country, it would be disastrous if an Anti-Slavery Commissioner were not free to comment independently on issues clearly to do with human rights.

I hope this is of help and we look forward to hearing the results of the JCHR's investigations.