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Assessing the Impact of Modern Slavery Legislation and Increased Awareness in Parliament through the CPA UK

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Executive Summary

Background

This report presents findings from a Fellowship with the Parliamentary Office for Science and Technology based on research to explore the impact of the work of the Commonwealth Parliamentary Association (CPA) UK Modern Slavery Project. The CPA UK modern slavery project ran from 2016 to 2020 and was funded by the UK Government to provide practical advice and support to parliaments in the development of their anti-trafficking and anti-slavery work.

Methodology

The research entailed three phases, as follows - (i) documentary review of the formal and informal outputs of the CPA Modern Slavery Project; (ii) semi-structured interviews with 29 participants across 10 countries with parliamentarians, parliamentary officials, policy advisors, academics and participants from key NGOs working in the modern slavery and human trafficking sector, including survivor advocates.

Findings

Analysis of the data identified three main themes in addition to challenges and recommendations for future work.

Networking and Collaboration

Workshops allowed people to make connections with people in other jurisdictions or different sectors, to share ideas and learn from the work of others. For example, ' I think the engagement has been really, really fruitful because the parliamentarians that we got and the conversation that we had, because we had actually prepared, then had, you know, a conversation, we ended up having meetings with them and there were really specific things that we were asking for in terms of policy. Most of those things were addressed, like, within a period of one year as a result of the conversations that we'd had' (NGO 17, Kenya).

Policy Development

Participants in the Project gained knowledge, understanding and skills which they were able to contribute to development of policy and legislation. For example ' it was good to ask them their experiences, what sort of laws they had in place around modern slavery offences in their countries, what they were doing with respect to transparency in supply chains...and over time, I and others in our committee were able to build up...a list of things that we should be included as recommendations' (Parliamentarian 14, Australia).

Awareness Raising and Expanding Knowledge

Learning was collaborative the fell into three themes of general understanding, increased knowledge in relation to trafficking in sport and orphanage trafficking.

Executive Summary

Challenges

Throughout the documentary reviews and the interviews, challenges were identified including the role of champions and how to sustain work with changing personnel; competing national or local priorities for policy agenda; understanding the local context and the difficulty and importance of maintenance and follow-up work.

Future Work

Following the impact of the pandemic, many participants discussed the need to re-focus attention on trafficking, slavery and forced labour. Areas where participants would like to see future engagement concentrated were identified as corporate engagement; engagement in the Caribbean which acknowledges the diversity of the area, public awareness and legislative workshops; access to and sharing of data; increased involvement of criminal justice and border staff and a continued need to understand the problem in relation to cultural and country-specific contexts.

1. Background

This report presents findings from a Fellowship with the Parliamentary Office for Science and Technology based on research to explore the impact of the work of the Commonwealth Parliamentary Association (CPA) UK Modern Slavery Project. The research was funded by the University of Manchester Impact Acceleration Award. The work took place between April 2020 and April 2022, having been extended for 12 months because of the COVID 19 pandemic. The scope of the Fellowship was also widening to include forward-looking work.

The CPA UK modern slavery project ran from 2016 to 2020 and was funded by the UK Government to provide practical advice and support to parliaments in the development of their anti-trafficking and anti-slavery work. Phase One of the project (2016-2018) focused on capacity building for the development, drafting, and enactment of legislation to tackle modern slavery, human trafficking and forced labour.

In 2018, the Home Office approved funding for Phase Two which built on the work and relationships established during Phase One and developed additional work in the Asia-Pacific region, particularly with Australia. In March 2020, an e-handbook was launched which provides guidance for parliamentarians and parliamentary officials on effectively legislating against modern slavery and human trafficking.

The aims and objectives of the CPA UK Modern Slavery Project phases were as follows:

Phase One

- Developing groups of empowered and informed parliamentarians
- Delivering two capacity-building workshops
- Supporting stronger legislation through 'legislative change strategies'
- Providing mentoring and bilateral support

Phase Two

- Empowering parliamentarians in advocating against modern slavery, human trafficking, forced labour at both parliamentary and constituency levels
- Supporting the design and/or development of the drafting and/or amendment of modern slavery, human trafficking and forced labour legislation with partner parliaments for the creation of stronger legislation
- Strengthening parliamentarians' and officials' skills and knowledge on strong and effective parliamentary committees, resulting in better oversight and scrutiny of the implementation of modern slavery, human trafficking and forced labour legislation.

2. Methodology

The research was developed using an iterative approach, where the themes from earlier stages in the research informed those in later stages. The research entailed three main stages, detailed below.

The research was approved by the University of Manchester Ethics Research Committee in July 2020 and was developed in collaboration with the CPA UK staff.

Stage One: Documentary Review

During this stage, formal and informal outputs of the CPA UK Modern Slavery Project were reviewed. The aim of this stage was to systematically identify the expressed aims and objectives of the modern slavery project, details of work undertaken by the CPA UK team and any outputs and outcomes stemming from the project.

These were used to inform the context against which the data gathered during stage two were analysed.

Stage Two: Semi-structured Interviews

Interviews were conducted with 29 participants across 10 countries with parliamentarians, parliamentary officials, policy advisors, academics and participants from key NGOs working in the modern slavery and human trafficking sector, including survivor advocates.

All participants had taken part to varying extents in the CPA UK modern slavery project and were purposively recruited in consultation with the CPA UK team.

Stage Two: Analysis and Reporting

During this stage, the data were analysed against the themes identified in the documentary review and key findings identified with ongoing discussion with the CPA UK modern slavery team.

Preliminary results of the research were presented to the CPA UK Executive Committee and to the wider CPA UK team in November 2021.

3. Findings

Analysis of the data identified three main themes relating to the impact of the CPA UK Modern Slavery Project.

3.1 NETWORKING AND COLLABORATION

Across all interviews, participants found value in the in-person workshops and events, which allowed people to meet and spend productive time together in both formal and informal settings and to make connections that they might not otherwise have had. The creation of these networks was a key objective of Phase One of the project and many of these relationships were still active at the time of the interview and were feeding into participants' ongoing anti-trafficking and anti-slavery work.

While participants still found value in online events that they had attended during COVID, some commented that the informal spaces where useful discussions develop are hard to replicate in an online environment.

"I found that the workshops are really helpful in terms of actually raising awareness, particularly if you find champions within those set of parliamentarians"

NGO 1, UK

'The networking and exchanging information and experiences about legislation allowed us to stand on each other's shoulders'

Parliamentarian 5, UK

'I was really struck by how the team made me feel included... I really appreciated the fact that, for example, we would have evaluation meetings after each day'

Parliamentary Official 3, UK

As a result of attending events during Phase One, one participant had created a new workstream focused on Commonwealth countries with contacts established through the project, taking the opportunity to leverage the networks established at the events.

One NGO recruited someone who they had met through a CPA UK event. Another NGO explained that they were able to access parliamentarians in ways that they would not otherwise have done:

3. Findings

'I think the engagement has been really, really fruitful because the parliamentarians that we got and the conversation that we had, because we had actually prepared, then had, you know, a conversation, we ended up having meetings with them and there were really specific things that we were asking for in terms of policy. Most of those things were addressed, like, within a period of one year as a result of the conversations that we'd had. So I think, yeah, it was really good'

NGO 17, Kenya

3.2 POLICY DEVELOPMENT

Gaining knowledge, understanding and practical skills to assist with the development of human trafficking, modern slavery and forced labour legislation was a key objective of the modern slavery project and one that was reflected by participants.

The main area where significant policy development was achieved was in relation to the Australian legislation, as outlined in the following two quotes. The ability to learn from the experiences of parliamentarians and civil society across the world provided knowledge and understanding to inform the development of Australian legislation, particularly regarding transparency provisions and orphanage trafficking.

'When I went to the UK, it was really good to meet with UK parliamentarians, also parliamentarians from around the world... it was good to ask them their experiences, what sort of laws they had in place around modern slavery offences in their countries, what they were doing with respect to transparency in supply chains... and over time, I and others in our committee were able to build up a list of things that we should be included as recommendations'

Parliamentarian 14, Australia

'Being able to 'ask them their experiences, what sort of laws they had in place... what they were doing with respect to TISC [Transparency in the Supply Chain] fed into the development of national legislation'

Parliamentarian 14, Australia

3. Findings

'It was through the CPA workshops that I began to see more clearly what needed to be done, the role Australia could play in it, and the unique role the Commonwealth plays in bringing nations together to fight this insidious transnational crime. It is the perfect forum for us all to work together with governments, businesses, and organisations in many nations. As an Australian Senator, I returned home and learnt more about this issue, raised public awareness, then lobbied my colleagues and worked with a range of NGOs to build a case for Australia to take action. As part of my advocacy, I had orphanage tourism and orphanage trafficking included for examination as part of the Parliamentary Inquiry into Establishing a Modern Slavery Act in Australia, an Inquiry I was so proud to sponsor and participate in

Parliamentarian 29, Australia

Parliamentarians from Bangladesh, Kenya, Nigeria, and Pakistan gained knowledge from workshops and collaboration with other participants that contributed to local and regional projects in their home countries as well as informing specific nuances of legislation.

'The trainings have armed me with skills and understanding that have helped my contribution to strengthening our domestic laws on modern slavery and child trafficking act'

Parliamentarian 11, Kenya

After engagement with the CPA UK modern slavery project, one Nigerian parliamentarian decided to focus on domestic servitude, forced labour, and child marriage in the south of Nigeria. He initiated an awareness-raising campaign to address the role of the 'traditional space' in facilitating trafficking and slavery, collaborating with local community leaders to develop trust with rural populations and translating materials into language appropriate for that area. Through this work, he has been able to work with parents to understand the challenges they face in financially providing for their families and having options to send children to school rather than sending them away to earn money.

Through involvement with the project, four parliamentarians were 'designated as parliamentary champions' in Nigeria. In this role...

'...we were able to widen the number of parliamentarians who are committed to this issue because to get this passed through the parliament, we needed to be able to ensure that at least not less than 50% of members get committed to that'

Parliamentarian 8, Nigeria

3. Findings

'I attended sessions, they gave us awareness on, about legislation and how to go about it. So that's where I learned. I came back, I went to our laws..., I noticed flaws, I drafted a new act. I brought a new act and today, it is finally passed'

Parliamentarian 9, Pakistan

'As a result of that training, the parliamentarians from Bangladesh were interested in getting additional support on legislation on the...on anti-trafficking federal law. And so I then continued engagement with them to figure out exactly what some of the issues were with the... current law, and then drafted some, some legislation to see how we could potentially close some of the gaps in that'

NGO 19, Bangladesh

3.3 AWARENESS RAISING AND EXPANDING KNOWLEDGE - CREATING NEW PERSPECTIVES

Throughout most interviews, participants talked about the increased awareness of trafficking, slavery, and forced labour that they had gained during project events. The learning was collaborative, a result of spending time together and discussing experiences as well stemming from the formal inputs of the project. The awareness fell into three themes of general understanding and increased knowledge, trafficking in sport and orphanage trafficking, the latter two some participants identified as areas they knew little or nothing about prior to the project workshops.

3.3.1 GENERAL AWARENESS RAISING AND UNDERSTANDING

Engaging with parliamentarians from other countries enabled participants to develop a...

'...clearer insight into what their understanding, what their perspectives are' and to 'incorporate that into my own...deliveries'

NGO 2, Kenya

'By virtue of, you know, going to the UK on a pretty regular basis and...interacting with prosecutors who prosecute trafficking in persons cases, I was able to bring that experience and knowledge to Bangladesh'

NGO 21, Bangladesh

3. Findings

'The trainings have armed me with skills and understanding that have helped my contribution to strengthening our domestic laws on modern slavery and child trafficking act. I have gained knowledge on drafting and implementing effective legislation against modern slavery. I have consequently educated our people and those around us on vital steps to ensure victims are not forgotten'

Parliamentarian 11, Kenya

Participation in the project events was equally valuable for UK parliamentarians and is particularly relevant in the context of understanding the wider context that facilitates slavery, trafficking and forced labour. Engaging with parliamentarians and representatives from other jurisdictions encouraged parliamentarians to reflect on the UK legislation and their role in furthering the domestic agenda.

The value of visiting other countries taught parliamentarians about the reality of trafficking and slavery and about 'hurdles to enforcement' (Parliamentarian 5, UK).

'We picked up information about how they were dealing with it, which we then were looking to transpose back in the UK context'

Parliamentarian 7, UK

3.3.2 ORPHANAGE TRAFFICKING

Several participants discussed the impact that learning about orphanage trafficking had on their work, highlighting the role of the CPA UK project in creating awareness of this activity and impetus to focus work in this area.

'I never had an understanding in my wildest imagination that child, children's institutions would be used as a hub for trafficking. Now, we've seen situations where people from these institutions, we call them orphanages in Nigeria. These orphanage homes, you keep children in, in perpetual poverty or impoverished states for the purpose of attracting benefits '

Parliamentarian 6, Nigeria

One participant reflected that she had 'learnt a lot...through being in the CPA workshops and just about priorities in different countries' which led to focused work on orphanage trafficking due to the relationship they had made at the CPA UK workshop.

3. Findings

'They're probably one of the only platforms and organisations that has, and it really helped lift that issue and give it some authority, which it needed cos it, it was kind of a silent crisis. Like, you know, thousands and thousands of kids involved in that and not much is known about it at all. So having those sort of platforms, like the CPA's, is really, really important'

NGO 10, UK

3.3.3 TRAFFICKING IN SPORT

Similarly, several participants gained knowledge and understanding about trafficking in sport, most notably in athletics and football which led to their engagement with local communities to understand how misconceptions and misinformation about pathways into sport can lead to victimisation of individuals who leave their countries of origin to take part in sport but are subsequently left, undocumented and with no funds to travel home.

'After attending the trainings by the CPA, I got the urge to organise a regional sporting event in my area, which attracted over 100 soccer clubs, under the theme stop football trafficking'

Parliamentarian 11, Kenya

'I found this engagement with the parliamentarians very, very useful and, I think I would say, even impactful' as the NGO was involved in an organised sporting event that was spurred by participation in the CPA workshop 'we were also, you know, requested by an MP... to help her draft what was to be, you know, something that she could present on the floor of parliament'

NGO 13, UK/Africa/Caribbean

One UK parliamentarian explained how the workshops and visits to other jurisdictions had given her invaluable experience that she was able to utilise when working with corporations to talk about modern slavery in their supply chains –

'I can say to brands, "I've seen this, I've spoken to these people," and for me, that – you know, that is really sort of part of my core really, you know, to have that passion and commitment which says, "I can't, I can't tolerate this. I cannot live with this, so what are you going to do about it? Because you shouldn't be able to live with it either." So it's just about having, having had that, that experience'

Parliamentarian 18, UK

4. Challenges

The documentary reviews indicated some key challenges or areas for development with the project work, summarised below.

- A lack of resources available for anti-trafficking and anti-slavery work can mean that there are significant differences between plans at the policy level and practical implementation. The ability to identify these local and regional contexts can assist parliamentarians in understanding and highlighting areas for change.
- Sensitivities in relation to language and terminology can impact to varying degrees. The association between modern slavery and the transatlantic slave trade created difficulties for some participants (also reflected in academic literature). 'During the first six months, international parliamentarians highlighted that 'modern slavery' is not commonly understood and can even be deemed as offensive. As a result, CPA UK adopted the UN's phrase of 'modern slavery, human trafficking, forced labour' (Phase One Project completion report final, p.9).
- Phase One highlighted that some countries requested 'support to strengthen implementation, rather than amending legislation' (Phase One Project completion report final, p.9) which was incorporated into phase 2. Several participants discussed legislative development, outlined in section 3.2 above. Participants also mentioned issues with implementation, based on local features of communities and discrepancies between national legislature and local practice, which impacted implementation, see section * below.

The interviews reflected these challenges and provided further detail about local contexts and how these impact anti-trafficking and anti-slavery resources and capacity. Several participants discussed their perspective on the language, acknowledging the difficulties with terminology and historic associations alongside a pragmatic acknowledgment of using terminology with which all participants are familiar and comfortable.

4.1 RESOURCES AND BARRIERS TO ANTI-TRAFFICKING AND ANTI-SLAVERY WORK

4.1.1 THE ROLE OF CHAMPIONS

During Phase One of the project, it was identified that elections, resultant changes to personnel and the priority afforded to modern slavery can pose a risk to momentum for ongoing work. Whilst the role of champions is important to advance human trafficking and modern slavery on policy agendas, and to maintain momentum for action, depending on an individual is risky.

4. Challenges

To mitigate this, participants viewed as important project outcomes that embed action in the policy agenda.

4.1.2 COMPETING PRIORITIES

Some parliamentarians both within and outside the UK discussed the problem of maintaining interest or prioritising modern slavery and human trafficking when there are competing national priorities and the importance of balancing these locally with the needs of their constituency or region.

In encouraging constituents to engage with these issues, one participant explained the importance of identifying the 'wider social cost' and the specific impact that this might have on an area (Parliamentarian 7, UK).

4.2 LOCAL AND CULTURAL SPECIFICITY

The balance between providing support with national policy and legislative development and identifying local or regional issues was identified in the Phase One report, as above, and by several participants.

The project was not intended to support the implementation of legislation although, as above in relation to the development of local and regional events, it did have an impact at the level of implementation and practical application. In discussing the balance between legislative development and implementation, many participants reflected on the local and cultural contexts within which they work, and the impact of this on anti-trafficking and anti-slavery work.

Whether or not a representative of a jurisdiction needed support regarding policy development or implementation varied depending on the stage of legislative development. For example, a Nigerian parliamentarian explained 'we have the legislations and they are well documented but how best can we implement the legislations to bring this issue to fruition' (Parliamentarian 6, Nigeria).

The regional and local contexts are key here and vary depending on local law enforcement practices, the local economies and markets and the presence or absence of NGOs with an ability to engage with parliamentarians and policy makers. To mitigate this, Nigerian participants highlighted the need to identify and collaborate with local community organisations, local police and to consider how national legislative frameworks operate in these areas.

4. Challenges

Further issues of implementation were highlighted by several participants who identified that although national legal frameworks existed, there were discrepancies between national laws and how these laws are actioned locally depending on local corruption, local practice, the need for training at local levels and how the problem varies regionally, across jurisdictions.

However, other participants appreciated the wider focus, explaining that it is very difficult to focus on implementation as the experiences are too specific and too broad. There can be a temptation for legislative models to be adopted or transferred to other jurisdictions but 'there is no particular reason why the same answer should apply to everyone' (Parliamentary Official 4, UK).

Alongside acknowledgment of a more general, national approach, other participants highlighted the need for approaches that recognised the cultural context within which exploitation can occur and other inequalities in some jurisdictions, which can compound exploitation. The importance of cultural specificity was also identified by the CPA UK throughout the project (Phase One and Phase Two reports).

Some participants identified that having very focused workshops on understanding the intersections of legislation that impact trafficking, slavery, and forced labour would be useful, for example, around violence against women and girls, gender equality, and forced marriage. As an example, one participant discussed the role of the first-born girl in Kenya and how this might lead to exploitation in order to highlight the importance of a parliamentarian being able to locate any legislative discussions within a local context.

'One of the greatest challenges around raising awareness is about working through those traditional social and cultural norms'

...the firstborn girl, you know, the pressures that are put on her, the expectations of her in terms of being able to get employment, to be able to provide for her siblings, to pay their school fees, to build a house for mum, and then suddenly this opportunity arises that she can go to another country, she can work in a hotel, she's gonna - you know - either cook or she's gonna, even be sort of a housemaid or something and how that feels for her, how that feels for the family and how that feels for the community. And, sensitively, people will see that as a blessing from God. You know, their faith is really what sort of protects them and defines their perspectives on things...

They can relate to it. They can almost walk through that - It's called a Harambee, which is a fundraiser. So, you know, even the community would have a ...

Continued

4. Challenges

Harambee so that they could pay for her passport and all of these things, and then be able to say that, and how many of the family would go to the airport and see her off? And then this what happens.

So I find that being able to do that is an effective way of really raising awareness amongst parliamentarians.’ (NGO, 2, Kenya).

NGO 2, Kenya

Considering structural inequalities can also help to provide context. A Pakistani participant felt that anti-trafficking and anti-slavery work also needs to be contextualised within an understanding of women’s ‘economic empowerment’ to address gender inequalities that can lead to women being exploited, particularly in home working situations (Parliamentarian 9, Pakistan).

NGOs were viewed as important in providing information that official authorities may not be as aware and many participants reflected that the involvement of NGOs and survivor advocates was a very positive and beneficial part of the CPA UK project. However, this can pose difficult decisions for NGOs, as one participant reflected:

‘NGOs need to consider whether they are ‘part of the system or advocating against it and it’s a bit of a tricky balance’

NGO 1, UK

Thus, providing space for these discussions was viewed as valuable from both NGO and official perspectives.

The context within which the NGO is working is also important and depends on the extent to which there is parliamentary interest initially:

‘If the committee isn’t already interested, having a meeting about [modern slavery] can be interesting but it’s not necessarily going to lead to anything...unless appetite is already there and so in that context, there is a need to manage expectations around what can be achieved in parliament and what can be achieved in a select committee’

Parliamentary Official 3, UK

4. Challenges

The changes likely to be made following workshops are 'small, incremental gains that are actually going to be possible rather than everyone immediately putting modern slavery to the top of their agenda' (ibid.) and thus, managing expectations of all parties is important.

4.3 FOLLOW UP AND CONTINUED ENGAGEMENT TO MAINTAIN ACTION

As a bounded and time-limited project, many participants recognised that ongoing support and maintenance are challenging, particularly in places where resources are minimal and there are many competing policy agenda items.

Legislative change is a lengthy process and participants felt that longer-term support and engagement would be beneficial - 'more time sustained over a longer period' (Parliamentarian 5, UK) - whilst recognising the financial and practical constraints.

'But I think one of the issues that we're missing in many of these developing countries is just the continued, consistent engagement, right? But obviously programmes, you know, like, like this, you know, have a lifespan, and so it's hard to, to stay engaged, even after the conclusion of the programme, just because there's no funding, right, for it. So I think it's, it's one of the things that I would've liked to have seen, you know, even after our programmes come to an end, but there's not really any way to do that unless you're able to get additional funding to keep it going'

NGO 19, Bangladesh

'...in talking to some of the MPs, there was definitely - I got the feeling they were inspired to do more. Whether that actually led to action, I don't know, because it's not the sort of thing you get feedback on'

Parliamentary Official 4, UK

To some extent it has been possible to capture the actions that led from engagement with the project in the current research. However, it remains difficult to disentangle outcomes of one project from another alongside the difficulty for participants of recalling events from up to four years prior.

5. Future Work and Recommendations

Participants were asked about the opportunities for future engagement with the CPA UK and how the CPA UK could support them in their future work. Many made more general recommendations, detailed below in section 5.3 and specific themes for future work were focused around corporate engagement and work in the Caribbean.

Many participants reflected on the impact of the pandemic and the importance of rebuilding their work and a national focus on trafficking and slavery after these issues had garnered less attention during the last two years.

All expressed the willingness to work with the CPA UK again and saw value in the collaboration. Many participants struggled to identify ways in which their engagement with the CPA UK could be improved and identified the following general strengths of the project:

- The convening power of the CPA UK created greater collaboration between parliamentarians and civil actors which led to the identification of actionable tasks.
- Events were very well organised and inclusive. All participants felt very valued in relation to their involvement in the project.
- Participants felt that issues had been handled with sensitivity and that the CPA UK had created safe spaces within which they could share their experiences and learn from others.
- There was a good balance between formal workshops and inputs and informal spaces to reflect and to build relationships with others.
- Events promoted equality between participants, regardless of background which was identified by many of the participants as very positive in facilitative of open and useful discussions.

5.1 CORPORATE ENGAGEMENT

Many of the participants discussed provisions intended to create a level of corporate accountability for exploitation in supply chains, whether in relation to the section 54 Transparency in the Supply Chain provisions or measures in other jurisdictions.

Discussing experiences of other countries was valuable for understanding both the similarities and differences in creating these provisions and the relationships between the state, NGOs and business, discussed above in 3.2.

5. Future Work and Recommendations

Many countries are in the initial stages of creating responses that encourage corporate accountability and hence this was identified by several participants as a potential area for future work, with increased involvement of business and trade unions who 'are the ones who have their eyes in the workplace' (Parliamentarian 5, UK).

Several non-UK participants identified the importance of considering international labour agreements and how business interacts with those allied to the practices of recruitment agencies who facilitate exploitative work, and the role of governments in addressing these labour laws.

5.2 ENGAGEMENT IN THE CARIBBEAN

Three of the interviews specifically focused on future work engaging with the Caribbean and one included aspects of work in which the participant had been involved in the Caribbean, building on existing relationships between the CPA UK and individuals from the area and an identified need to address problems with the existing legislation.

This was reflected in all four of these interviews with suggestions for future work in the area as follows:

- The diversity of anti-trafficking approaches within the Caribbean was identified as both a barrier (in terms of differences in knowledge, awareness and political will to address the problem) and an opportunity (in terms of learning from countries with good practice in the region).
- Engagement with NGOs: Participants recognised diversity in the quality of relationships between government and NGOs. In some countries there are tensions related to governments listening to and considering the views of NGOs and countries where opportunities for NGOs to engage with government can be very limited. Because of the lack of trust and the fear of being identified, this prevents much engagement of survivor voices in policymaking. To address this, one participant suggested building trust through a workshop to facilitate cross-sectional discussion or engagement and opportunities to learn from some of the islands that have positive working relationships between government and NGOs.
- All participants identified that any of the countries in the region lack the capacity for training.
- Increasing public awareness.
- Legislative workshops that can identify and address problems with existing legislation.
- Gathering and sharing data on trafficking across the region.

5. Future Work and Recommendations

5.3 RECOMMENDATIONS

- Specific feedback on action points that is tied to a particular department which has responsibility for following up on that action point.
- Improved access to and sharing of data and intelligence.
- Increased involvement of police, criminal justice and borders and sharing practice in relation to specialist anti-slavery and anti-trafficking work by these sectors and organisations.
- To understand the processes of investigation and prosecution and what needs to be done in legislation to support victims effectively and not lead to their criminalisation.
- The continued need to understand the problem in relation to the cultural and country-specific contexts.

6. Concluding Comments

Across research generally and specifically in relation to interventions aiming to tackle criminal activity, measuring impact and the ability to attribute direct impact to one programme of work is difficult. This was identified by several participants. Several participants were aware of multiple strands of ongoing work across the anti-slavery and anti-trafficking sector both by civil society and NGOs and whilst this was viewed as positive generally, there was also a risk of overlap and a lack of awareness of the overall picture as well as it being difficult to identify whether one project or a culmination of all projects are responsible for impact.

Workshops had a useful role in this regard to allow organisations to share what they are working on to collaborate, build on and coordinate responses and crucially, to avoid replication. To mitigate against this, one participant suggested greater knowledge sharing between the CPA UK about the modern slavery project, across different parliamentary workstreams to achieve greater integration.

This research aimed to assess the impact of the CPA UK Modern Slavery Project. In revisiting participants and discussing their work in this area before, during and since their involvement in the CPA UK project, this research has provided valuable insights on some of the challenges and opportunities in cross-jurisdictional work in trafficking, slavery and forced labour as well as some of the longer-term outcomes of participation.

In the context of a multi-faceted problem such as this the project has encountered the question of balancing a broader focus on national and international policy frameworks on one hand with cultural and local contexts on the other. Both approaches have had an impact stemming from the CPA UK workshops from national legislative development that have engendered legal change to local initiatives that have changed community perspectives.

Both have importance within this field, to achieve change from the top-down and the bottom-up simultaneously. Reviewing the recommendations for future work and areas with potential for change, participants share the view that these parallel approaches have the capacity for most impact.

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