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Citation:

SANDS, Matthew (2019). UDHR and modern slavery: exploring the challenges of fulfilling the universal promise to end slavery in all its forms. The Political Quarterly. [Article]

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UDHR and Modern Slavery

Exploring the Challenges of Fulfilling the Universal Promise to End Slavery in all its Forms

Abstract

This article reflects on the prohibition of slavery set out in Article 4 of the 1948 Universal Declaration of Human Rights, and analyses efforts undertaken in the years since to fulfil this commitment. It first addresses the evolution in the prohibition from historic forms of slavery to contemporary forms of slavery and human trafficking. Second, the article examines the Modern Slavery Act 2015 and the National Referral Mechanism to appreciate the UK's efforts to implement various international commitments to prohibit slavery, noting that the current focus towards criminalisation and the meagre support offered as victim protection does not constitute a sufficiently comprehensive strategy towards effective prohibition. Third, areas for reform are identified that could reorient government strategy toward more effective victim protection and support, starting with better identification of victims. And finally, the article argues in favour of actions that seek to prevent modern slavery crimes and abuse, including with a more robust regulatory framework that engages private sector actors to recognise the risks of slavery and exclude forced labour from supply chains.

Keywords

Article 4, UDHR, trafficking, slavery, MSA, NRM, national referral mechanism, prevention

The UDHR and contemporary forms of slavery

When the architects of the Universal Declaration of Human Rights ("UDHR") came together to consider the text, they would have been keenly aware of the millions of men, women and children enslaved in some of the most brutal examples of forced labour, sexual servitude and other forms of exploitation during the Second World War. These events would have served as a haunting backdrop for the adoption of Article 4:

No one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms.

Of course, the UDHR was not the first international effort to prohibit slavery. A number of attempts to ensure the right to freedom from slavery had been made some years earlier. The 1815 Declaration Relative to the Universal Abolition of the Slave Trade is understood as the first international instrument to condemn the practice. The 1926 Slavery Convention then examined the right in more detail and provided the first definition for slavery.

Despite the fact that slavery was already prohibited in international law prior to 1948, it is the UDHR provision that is used as a primary source of moral, political and legal authority for the prohibition against slavery. It is cited as evidence of the shared commitment of all States to prohibit slavery and the slave trade in all its forms.

The UDHR itself conveyed no *legal* authority, being agreed as 'a declaration of basic principles of human rights and freedoms, to be stamped with the approval of the General Assembly by formal vote of its members, and to serve as a common standard of achievement for all peoples of all nations.'ⁱ Yet despite lacking legal status, the prohibition has since been reinforced through multiple legally binding international treaties.ⁱⁱ It has also been adopted at the national level through near identical constitutional prohibitions. Consequently, the prohibition of slavery is now beyond doubt one of the most important norms of international law, from which no derogation is permissible,ⁱⁱⁱ and applicable to the whole international community of States, whether it has been expressly recognised or not.^{iv}

Contemporary relevance of the UDHR

In the seventy years since the international order became oriented to fulfil the shared commitments in the UDHR, the eradication of slavery plainly has not been achieved. Today, it is estimated that some 40 million people continue to live as victims of modern slavery.^v In the UK, an estimate in 2013 suggested that there may be close to 13,000 potential victims of modern slavery, though the Home Office admit that this figure represents an estimate and the actual number is likely to be much higher.^{vi} Whatever the true scale of abuse, it is becoming increasingly common.^{vii} Trading slaves has even been recorded in public spaces with little attempt to hide from authorities.^{viii}

Clearly, much more than general principles of prohibition are needed in order to translate the UDHR promise into law and practice.

'Modern' slavery

The 1926 Slavery Convention provided that 'Slavery is the status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised.' Since 1926, however, various contemporary forms of slavery have emerged that have caused some necessary shift in the way that slavery is understood. For instance, since the adoption of the UDHR, the UN General Assembly has become increasingly concerned with the traffic of women and girls for

sexual exploitation, and has condemned a wider range of acts broadly analogous to slavery, including 'the illicit and clandestine movement of persons across national and international borders' with 'the end goal of forcing women and children into sexually and economically oppressive and exploitative situations' for profit.^{ix}

The connection between slavery and human trafficking recognised by the General Assembly above is now explicitly recognised in the Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children that supplements the 2000 Convention against Transnational Organized Crime (the 'Palermo Protocol'). In its definition of trafficking, it incorporates slavery and related crimes as forms of prohibited human exploitation.

Further to the accepted rules of interpretation provided in the Vienna Convention on the Law of Treaties, international conventions that adopt the UDHR language have been interpreted in light of present day conditions to reflect current social norms and values (known as the 'living instrument' doctrine). In the case of *Rantsev*, for instance, the European Court of Human Rights agreed that positive obligations were owed by States to prevent human trafficking. The ruling also resolved some challenge over the relationship between human trafficking and slavery, finding that human trafficking fell within the scope of Article 4 of the ECHR, the prohibition of slavery, servitude, as well as forced or compulsory labour.^x

As a declaration, the UDHR cannot be interpreted as a 'living instrument'. Nevertheless, the interpretation of similarly-worded treaty provisions in a way that is consistent with an expanded understanding of contemporary forms of slavery is such that the UDHR provision is, in effect, given a meaning that responds to modern challenges through the corresponding evolution to customary international law.

The 1926 Slavery Convention definition has also been examined by the International Criminal Tribunal for the former Yugoslavia and by a group of international experts. Both sought to extend the definition to situations where the victim is not subjected to extreme rights of ownership, but where such physical or psychological control over a person effectively restricts or controls an individual's autonomy to remove a person's freedom of choice or their movement. Such construction detaches slavery from a historic understanding of "chattel slavery" to apply to contemporary contexts where humans are controlled as possessions, rather than legally owned, often through the destruction of a person's autonomy^{xi}

Consequently, the concept of modern slavery and slavery-like practices is now broad enough to cover a range of practices, including forced labour such as debt bondage and forced sex work, child sexual exploitation, forced marriage, and phenomena such as 'county lines' in which (typically) children are encouraged to smuggle drugs and move them across the country. All these practices restrict or control an individual's autonomy, to remove such freedom of choice or movement that the person is treated as a commodity to be used, abused and sometimes, discarded.

In the UK, the Home Office has recognised at least seventeen types of modern slavery, grouped into categories of labour exploitation, domestic servitude, sexual exploitation, and criminal exploitation.^{xii} The published typology demonstrates a wide range of offences, with the experience of victims often being very different from one form of exploitation to another, with many experiencing multiple forms of abuse.

With such variety of exploitative practices and experiences of victims, it is legitimate to ask whether the classification of all such offences under a single heading of modern slavery or human trafficking is appropriate. The views of practitioners vary significantly, with some asserting that the unifying feature is the exercise of powers attaching to the right of ownership, treating human beings as commodities to be bought and sold. Others assert that the removal of personal autonomy or freedom distinguishes slavery practices from lesser forms of exploitation.

One form of exploitation that is difficult to reconcile with the definition of slavery provided in the 1926 definition is forced marriage. The practice is still widely seen in the UK,^{xiii} and though political leaders including Prime Minister May have referred to forced marriage as a form of slavery, it has not been officially recognised as such. A consequence of the failure to recognise forced marriage as a form of modern slavery is that victims are not referred to the National Referral Mechanism (described in detail below), established to identify and offer support to victims of modern slavery, nor are forced marriage crimes prosecuted under the Modern Slavery Act 2015 that provides for more serious penalties and an opportunity for compensation.

A further consequence of the failure to recognise some other forms of exploitation, such as forced marriage, as a form of modern slavery is that they are not 'counted' as part of the data set that creates a picture of modern slavery across the UK. This in itself creates some inconsistency, as forced marriage is among the forms of exploitation included in global slavery estimates.^{xiv}

Other questions of classification include those posed by domestic violence in relationships that do not amount to marriage and child sexual exploitation, particularly in cases where the child is abused online.

The National Referral Mechanism and the Modern Slavery Act 2015

The National Referral Mechanism (NRM) was established in the UK in 2009 as 'a framework for identifying victims of human trafficking or modern slavery and ensuring they receive the appropriate support',^{xv} following the adoption of the Council of Europe's anti-Trafficking Convention in 2008. The NRM also collects data on the prevalence of modern slavery offences in the UK.

To be identified as a victim, adults must consent to be referred to the NRM by one of a number of front-line service providers. After a referral, the NRM determines whether there are reasonable grounds to believe the individual is a *potential* victim of human trafficking or modern slavery. In the event the reasonable grounds decision is

positive, the person is granted access to safe accommodation and given a 45-day period for reflection and recovery, during which no immigration action may be taken against them. In addition to accommodation and subsistence, providers of support typically include access to medical services, dental treatment, sexual health services, specialist counselling, resettlement support, signposting at post-service exit, support with applications for immigration and legal advice or for benefits, ESOL classes and preparation for work.

If the decision is negative, the person is required to leave any accessed support within 48 hours. Following the 45-day reflection and recovery period, the NRM will make a conclusive decision on the balance of probability (“it is more likely than not”) whether the person is a victim of human trafficking or modern slavery.

Even in the event of a positive decision, support is only available for 45 days, after which the victim has 14 days to leave support. As with a negative reasonable grounds decision, those who receive a negative conclusive decision are required to leave support within 48 hours.^{xvi}

Like the NRM, the Modern Slavery Act 2015 (‘MSA’) also contributes to the implementation of obligations described in the Council of Europe 2005 Anti-trafficking Convention, as well as the 2011 EU anti-Trafficking Directive. Its adoption further responded to the jurisprudence of the European Court of Human Rights that requires a number of positive obligations to criminalise and investigate crimes of slavery, servitude, forced and compulsory labour.

While England and Wales adopted the MSA, the devolved governments in Northern Ireland and Scotland took the alternative route to adopt separate legislation, the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) and the Human Trafficking and Exploitation (Scotland) Act. All entered into force in 2015. The creation of three separate pieces of legislation in itself creates some problem of inequality, as definitions for key offences as well as the support and protection entitlements for adult victims are significantly different across the UK.^{xvii}

Specifically, the MSA provides a number of new powers and consolidates criminal offences related to slavery. New powers include those for the confiscation of assets of traffickers and increase sentencing powers; it introduces a duty to notify an authority when a victim is identified; establishes a guardianship programme for child victims (yet to be fully implemented); provides a limited defence for victims who find themselves compelled to commit crimes as a direct consequence of their trafficking; sets out requirements for overseas domestic workers to renew their visas through the NRM; puts in place civil orders to prevent trafficking and exploitation; establishes the Independent Anti-Slavery Commissioner; and provides that companies with an annual turnover in excess of an amount fixed by the Home Secretary publish information on their efforts to exclude forced labour from their supply chains.

Even though the MSA is not as extensive as some might have hoped,^{xviii} the legislation is clearly an improvement on what existed before and may be celebrated for bringing all statutory powers together in one place. This in itself makes the area of law and process easier to navigate for law enforcement and legal professionals. However, while the MSA fulfils the international law duty to make slavery a crime, the Group of Experts on Action against Trafficking in Human Beings (GRETA) that acts to monitor the UK's implementation of the Council of Europe's anti-Trafficking Convention has noted that the MSA makes only limited provision to protect victims.^{xix} It has also been noted that the MSA does not fulfil the procedural requirement to investigate and prosecute effectively. This failure is reflected in the low number of prosecutions that have been achieved under the Act, despite a growing number of victims being referred to the NRM. In 2016, 3,805 potential victims were referred to the NRM, a 17% increase on 2015.

The failure to prosecute offenders or provide for a more comprehensive strategy to tackle modern slavery led the National Audit Office (NAO) to produce a highly critical report in December 2017.^{xx} The NAO noted the failure of the government to establish an effective strategy that gave the Home Office effective oversight of the modern slavery system as a whole. Without a comprehensive understanding of victims and perpetrators, accountability and support for victims remains impossible. The report noted that without significant changes to strategy, the Government would not be able to significantly reduce the prevalence of modern slavery or show that it is achieving value for money.

A review of the MSA was announced in July 2018 with some areas of the Act explicitly identified as priorities for examination. The process is expected to report on the operation and the effectiveness of the Act. Significantly, it will also consider potential improvements. To date, two interim reports have been made available, and a final report of the findings is due to be published by the end of March 2019.

Next steps and potential reforms in policy and practice

Certainly, there is a huge agenda of necessary reform to reverse the growing practice of modern slavery, both in the UK and overseas. As two areas of priority, training for those tasked with the identification of victims and responding more effectively to protect and support victims must be undertaken in earnest, particularly as many national authorities continue to demonstrate that they have yet to fully understand or implement the MSA.

Effective victim identification

While some police services demonstrate good practice, with Greater Manchester Police showing evidence of achievement in the area, the identification of victims is inconsistent or ineffective. As a result of poor identification, victims who come into contact with authorities are not always recognised as such and may therefore remain in situations of exploitation. In addition, both the police and Crown Prosecution

Service have yet to understand the statutory defence for victims of trafficking in s.45 of the MSA, which provides that a person who is compelled to commit criminal acts as a result of their exploitation must not face punishment. In some cases, victims have been arrested and prosecuted, with police failing to recognise the vulnerability of victims in their operational decisions.

Further consideration can also be given to a much larger number of non-State professionals that may inadvertently acquiesce to situations of abuse by failing to recognise persons as likely victims of modern slavery. For instance, there is already good practice among some banks to train their counter staff to recognise likely victims who come into branches to open accounts for laundering money or collecting criminal proceeds on behalf of traffickers, and report suspicious behaviour to a competent authority, but much more can be done to ensure more robust safeguards are put in place with private sector businesses.

The review of the MSA should also look carefully at the definitions used by professionals in the consideration of victims. It has been observed that terms including 'slavery', 'trafficking', 'smuggling', 'exploitation' and others are used without sufficient care and attention. Language in this area is critical, as ambiguity between terms and a lack of agreement on which forms of exploitation fall within the crimes creates confusion among practitioners and uncertainty among potential victims. Some of the uncertainty in this area is caused by inaccurate policy instructions. For instance, as noted above, there is a lack of policy instruction on whether front-line professionals have a duty to refer a (child) victim of forced marriage to the NRM. Yet without front line professionals referring potential victims to the NRM, the collection of data that informs government strategy and institutional responses will be incomplete.

Meaningful victim protection and support

Parosha Chandran, a leading barrister and adviser to the United Nations, has stated that a critical error in the adoption of the Modern Slavery Act was to focus on prosecution, rather than on effective victim protection and support.^{xxi} Professor Chandran and others recognise the essential role that prosecution serves, but that without a more comprehensive regime of protection for victims, meaningful justice will not be achieved.

The orientation of the MSA towards the punishment of offenders leads inevitably to the risk that victims themselves will be used as tools for law enforcement to progress prosecutions, rather than victims being recognised as holding inherent rights of their own, independent of any prosecution.

Victims' cases are often complex. They are often involved in multiple applications, for compensation, immigration relief, support for physical and psychological needs, as well as acting as a witness in criminal proceedings. It should also be recognised that victims of trauma suffer re-traumatisation if exposed to confrontational criminal proceedings. Indeed, it can also take years before a victim is ready to speak about their trauma or even recognise themselves as a victim.

Of course, victim protection and support begins with effective identification through the NRM. Victims that are positively recognised as such receive some limited protection and support. Civil society organisations and parliamentary committees have made a number of recommendations for improvements, but government reaction to date has been limited.

One frequent criticism of the NRM process is that a 'positive' decision (that identifies a victim as such) does not respond to the needs of victims, with the inevitable consequence that victims have little confidence to come forward and engage with authorities. Civil society organisations that support victims have lamented that there is not enough support for victims before, during and after the NRM process. For instance, there is currently only a very limited provision of resources for victim recovery, and the NAO reported that the Home Office has no assurance that victims are not exploited again, after they leave the NRM process.

The formal provision of victim support ends after 48 hours if a negative decision is taken by the NRM, and after 14 days if a positive decision is taken. The government has announced plans to extend this exit deadline, but has not set a timetable for doing so. This meagre level of support does not even meet the basic support needs of victims, such as the provision of advice and application to regularise their immigration status and finding suitable long-term accommodation. It therefore undermines the trust of victims and exposes them to the risk of destitution and further exploitation. The limited support available to victims does little to enable them to rebuild their lives after periods of modern slavery and exploitation.

Modern Slavery Prevention

The punishment focus of the MSA and the related protective regime of the NRM are both noted above. In order to better fulfil international duties to prevent trafficking,^{xxii} attention must also be directed to reducing the risk that persons will be exploited, by responding to structures creating vulnerability, tackling the demand for exploitation and addressing root causes overseas.^{xxiii}

Reducing vulnerability

Preventive duties are generally poorly defined in international law. However, the Council of Europe Anti-Trafficking Convention is helpful in offering some good practice examples such as social and economic initiatives aimed at persons

vulnerable to trafficking, using gender mainstreaming and human rights education, and training among employers in relevant sectors.

To its credit, the UK has undertaken high-profile awareness-raising initiatives, using Facebook and YouTube campaigns that have targeted persons most likely to be affected by modern slavery. However, despite a number of awareness-raising efforts, there does not appear to be available data to show how such measures have contributed to reducing the demand for services provided by victims on the part of the general public. Certainly, this is one area where further research could support greater attention towards prevention, by recognising 'what works' in raising awareness among vulnerable groups.

Tackling demand

In addition to awareness-raising, a number of States have taken operational steps to help prevent the exploitation of victims through the regulation of affected industries. For instance, Malaysia and Bangladesh agreed memoranda of understanding to ensure regular and legal labour migration that reduces the risk of persons seeking to enter the labour force illegally; and Haiti monitored night clubs to prevent child sexual exploitation, using government and civil society representatives.^{xxiv}

The UN Special Rapporteur on trafficking has also stressed that labour sectors likely to be occupied by victims should be properly regulated so that these workers are granted more rights and freedoms, thus making them less likely to become exploited. Though the UK Gangmasters licencing regime does provide limited regulation of agricultural, horticultural and shellfish industries, scrutiny among other affected sectors remains absent. More attention should therefore be paid to regulating affected private sector businesses to ensure a greater reduction in modern slavery practices.

The inclusion of a provision in the MSA to promote supply chain transparency among companies is welcome. However, the current provision provides such a light touch that it is largely ineffective and it is one area of law that is in need of significant strengthening. For instance, the current provision does not sanction companies that fail to publish information. Until recently, there has been no guidance for the quality of information expected from companies, which has led to a response that is inevitably so general that it becomes worthless as a way to ensure transparency. In October 2018, the Home Office recognised some of these deficiencies and established a Modern Slavery Contact Database that seeks to share guidance and publish a list of companies that fail to produce a statement.^{xxv} It is too early to say what impact these plans will have.

To improve the current provision, consideration should also be given to ensuring that greater liability (criminal/civil) can be imposed on corporations that fail to protect their workers, and so that a greater number of companies take steps towards excluding the possibility of forced labour at every stage of their supply chains.

Addressing root-causes

Finally, it is now well understood that aggressive immigration policies that criminalise irregular migration and aim to deter claims of asylum, in particular, are counterproductive as they encourage people to engage the services of smugglers and traffickers to enter the country. With the introduction of increasingly hostile immigration practices, the UK has created an environment where potential victims are forced to seek out dangerous working environments and take risks that invariably lead to exploitation and abuse. To reduce the number of migrants using irregular routes and becoming vulnerable to abuse, regular migration routes must remain open and the government should cease its 'hostile environment' policy.

Conclusion

The universal commitment to prohibit slavery and the slave trade in all its forms has evolved. Modern slavery encompasses types of exploitation that exceed those anticipated by the architects of the UDHR. A number of treaty obligations binding on the UK describe the positive duties of States to prevent, as well as punish all contemporary forms of slavery, including human trafficking. The prohibition against slavery is also contained in domestic legislation, such as the MSA and Article 4 of the Human Rights Act 1998.

With the numbers of persons enslaved around the world growing, it is essential for the UK and other States to adopt comprehensive strategies to prevent modern forms of slavery. The focus of current efforts to reduce irregular migration and tackle crime does not easily adapt to identify and protect victims of modern slavery.

A number of key drivers have allowed modern slavery to subsist and grow despite the efforts of the international community to prohibit it. The criminalisation of irregular migrants and their exclusion from State services and protections has greatly facilitated the work of those who seek to exploit others, but that does not address other forms of exploitation. Further research is needed to more adequately understand cultural and societal factors that explain the persistence of domestic modern slavery practices.

There must also be greater clarity around definitions of terms used by front-line professionals that allows for more confident victim identification and permit the accurate collection of data that enables State authorities to respond to the current threats in an effective way.

Criminalisation is clearly a key part of the international commitment to prohibit modern slavery. It has an important normative function and empowers State agents with statutory provisions to deal with modern slavery offences. The establishment of the National County Lines Coordination Centre is one recent example of the increasing recognition that multiple agencies must cooperate to tackle these appalling abuses.

Nevertheless, to achieve effective prohibition, the reorientation of the MSA towards victim protection, and the adoption of complementary laws and policies in related areas (such as immigration, employment and sex work) to prevent abuse would achieve a more comprehensive strategy that better implements the universal commitment to prohibit slavery. By giving victims enforceable rights to immigration protection and meaningful redress, for instance, more will likely come forward to seek justice against their abuse.

One MSA reform that is set to be examined in the forthcoming review is private-sector supply chain transparency. Since the end of the Second World War, a number of companies have been required to account for their use of forced or slave labour. Companies today should be mindful of these lessons of history and accept a greater level of assistance and regulation to ensure that consumers can have confidence that their products and services do not rely on forced labour or other exploitative practices.

In 2015, the Modern Slavery Act was a significant political achievement that galvanised support towards the punishment of the worst forms of abuse committed against some of the most vulnerable people. The forthcoming review of the MSA represents a significant opportunity to build on this foundation to more comprehensively respond to the challenge of modern slavery in England and Wales today.

ⁱ Eleanor Roosevelt, 10 December 1948, speaking in front of the United Nations General Assembly prior to the vote to approve the Universal Declaration of Human Rights.

ⁱⁱ ICCPR Art. 8, African Charter on Human and Peoples' Rights Art.5, American Convention on Human Rights Art.6, Arab Charter on Human Rights Art.10, Association of Southeast Asian Nations Human Rights Declaration Art. 13, European Convention on Human Rights Art.4. See also, in addition to the 1926 Slavery Convention, a number of treaties that aim exclusively towards the effective prohibition of slavery and human trafficking, including the 2000 International Labour Organization Convention Concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour; the 2000 Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, the 2005 Council of Europe Convention on Action against Trafficking in Human Beings, and EU Directive 2011/36/EU of the European Parliament and of the Council of 5 April 2011 on preventing and combatting trafficking in human beings and protecting its victims, and replacing Council Framework Decision 2002/629/JHA.

ⁱⁱⁱ M. Cherif Bassiouni, "Enslavement as an International Crime", New York University Journal of International Law and Politics, vol. 23, 1991, at p.445; Yearbook of the International Law Commission 1963, vol. II, United Nations sales publication No. 63.V.2, pp. 198-199; UN Human Rights Committee, General Comment No. 24, HRI/GEN/1/Rev.5, at para. 8; See also ICTY, *Prosecutor v. Kunarac*, IT-96-23-T & IT-96-23/1-T, Judgment, 22 February 2001, paras.515-543.

^{iv} ICJ, *Barcelona Traction, Light and Power Co, Ltd. (Belgium v. Spain)*, 5 February 1971, I.C.J. Reports, 1970, at p.32.

^v International Labour Office (ILO), *Global estimates of modern slavery: Forced labour and forced marriage*, Geneva, 2017.

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- ^{viii} Maley, J., 'Slave auctions' targeted in crackdown on airport crime, *The Guardian*, 5 June 2006.
- ^{ix} General Assembly Resolution 49/166, Traffic in women and girls, A/RES/49/166, 23 December 1994.
- ^x ECHR, *Rantsev v. Cyprus and Russia*, App No. 25965/04, 7 January 2010 (2010) 51 E.H.R.R. 1, at 275. See also, ECHR, *Selmouni v. France*, 25803/94, in relation to art.3, at para.101.
- ^{xi} See ICTY, *Prosecutor v. Kunarac*, IT-96-23-T & IT-96-23/1-T, Judgment, 22 February 2001, para.542, and the Bellagio-Harvard Guidelines on the Legal Parameters of Slavery, adopted 3 March 2012, by the Members of the Research Network on the Legal Parameters of Slavery.
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- ^{xviii} Gary Craig, 'The UK's Modern Slavery Legislation: An Early Assessment of Progress', *Social Inclusion*, 2017, Vol 5, Issue 2, Pages 16-27, at 19
- ^{xix} Committee of the Parties to the Council of Europe Convention on Action against Trafficking in Human Beings, Recommendation CP(2016)12 on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by the United Kingdom, adopted at the 19th meeting of the Committee of the Parties on 4 November 2016
- ^{xx} NAO, *Reducing modern slavery*, 15 December 2017, at <https://www.nao.org.uk/report/reducing-modern-slavery/>.
- ^{xxi} Parosha Chandran, Inaugural Lecture - Modern Slavery and the Role of Law: stories from the Frontline, King's College London, 14 November 2018.
- ^{xxii} See article 5, 2005 Council of Europe Convention on Action against Trafficking in Human Beings; article 18, of EU Directive 2011/36/EU.
- ^{xxiii} Anti-Trafficking Monitoring Group, *Before the Harm is Done* (September 2018).
- ^{xxiv} Obokata, T., 'Implementing International Law on Human Trafficking: State Practice of United Kingdom and Ireland', *State Practice and International Law Journal*, vol.2, no.2 (2015) 85-103, at 91.
- ^{xxv} Home Office, Contacts database for guidance on modern slavery reporting, 15 October 2018, at <https://www.gov.uk/government/publications/contacts-database-for-guidance-on-modern-slavery-reporting/contacts-database-for-guidance-on-modern-slavery-reporting>.