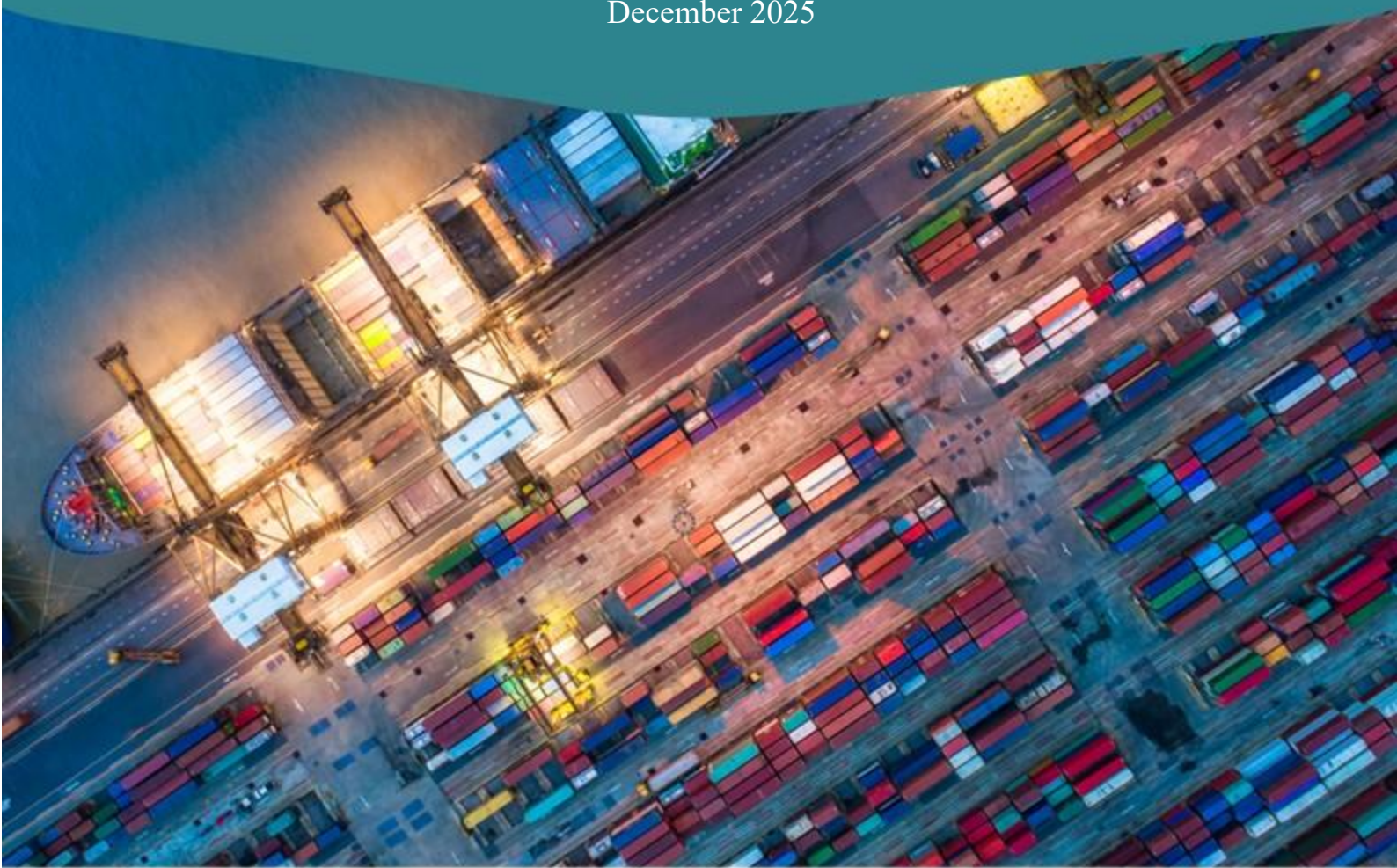


# Strengthening the UK's Forced Labour and Human Rights Legislative Framework

December 2025



## Acknowledgements

The role of the Independent Anti-Slavery Commissioner (IASC), its functions and powers were established in the landmark Modern Slavery Act 2015. This charges the Commissioner with encouraging good practice sharing amongst all those with a role to play in tackling every aspect of modern slavery and human trafficking in the UK. Eleanor Lyons is the UK's Independent Anti-Slavery Commissioner.

The role is independent of government, allowing the IASC to scrutinise and report on the effectiveness of policies and actions taken to prevent exploitation, support and protect victims, and bring perpetrators to justice. The IASC also supports the carrying out of research to improve our understanding of modern slavery and how it can best be tackled.

This report would not have been possible without the contributions of the many businesses, Small and Medium Sized Enterprises (SMEs), trade unions and survivors, who generously shared their insights and experience to help shape this proposal. The IASC extends heartfelt thanks to all the contributors for their time, expertise and commitment.

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Omnia Strategy LLP is a London based international law firm founded by Cherie Blair CBE KC. Its legal expertise spans complex cross border dispute resolution, including investor state arbitration, commercial arbitration, litigation, mediation, enforcement and recovery. Omnia Strategy LLP also has a dedicated Business and Human Rights practice that advises multinational companies on integrating respect for human rights throughout their operations and supply chains. This work includes human rights due diligence, risk assessments, policy development, stakeholder engagement, grievance mechanisms, and compliance with international standards such as the United Nations Guiding Principles on Business and Human Rights.

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Unseen is a UK charity dedicated to ending modern slavery and supporting survivors. The organisation runs the Modern Slavery and Exploitation Helpline, a confidential service available for anyone who needs advice or wishes to report concerns. Unseen also partners with businesses to help them identify and address exploitation within their operations and supply chains. Through training, consultancy and data insights, the charity equips organisations to prevent harm and create safer working environments.



Forward Global is an international advisory and technology firm specialising in managing digital, economic, and information risks. Its mission is to help executives, businesses, and institutions anticipate, prepare for, and respond to critical challenges, enabling better decision-making and stronger strategic positioning.

**Important Notice:** This report discusses issues of exploitation, including forced labour and human trafficking. Some readers may find this content distressing. If you have been affected by these issues or are concerned about someone, confidential advice and support is available at:

Unseen Modern Slavery & Exploitation Helpline

 08000 121 700

 <https://www.modernslaveryhelpline.org>

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## Foreword by ‘BT’ a Survivor of Modern Slavery

*These opening remarks were written by ‘BT’, an Unseen Survivor Consultant*

The exploitation of human beings is both morally indefensible and ultimately destructive to any society that permits it to exist. The human capacity for exploitation and oppression is complex, studied by philosophers and scholars for centuries, but also from my very own experience of exploitation, it arises from and points to the same root causes: self-interest, greed, the desire for power over another, and cognitive biases that make harming others easier to rationalise. Left unchecked, these tendencies are amplified.

There was a period of my life that was plagued with constant pain, darkness and betrayal. As a business owner and asset manager, I was offered what seemed to be a wonderful opportunity by the head of a large organisation. An opportunity arriving right after surviving a devastating natural disaster and losing it all. The state of desolation, left vulnerable, and being offered a safe space, leaving me overly trusting, as I searched for hope, but instead found abuse, forced labour and exploitation that carried on for an extended period. But I wasn’t exploited because of my vulnerabilities; we are all inherently vulnerable in some way, but some of us fall prey to those with an eye and ability to exploit those vulnerabilities. This is the story of many others who have slipped through the cracks as I have. I speak for anyone who, like me, has survived the dark valleys and had their dignity stripped away at the hands of an organisation with poor oversight, meaningless compliance, shallow due diligence and weak enforcement having not only failed to prevent harm, but allowed it to flourish. I also speak for those who, after surviving, were met not with protection or justice, but with systemic failures that enabled inadequate, even harmful, remedies, ultimately leaving victims and communities further traumatised.

A strong Mandatory Human Rights Due Diligence (MHRDD) legislative framework would have created the visibility, expectations, and accountability that were missing in my case. It would have triggered questions no one was trained or legally compelled to ask. It would have applied oversight to relationships, transactions, and environments where harm was able to hide. It would have created points of intervention long before the situation escalated, and it would have ensured that when harm did occur, remedies were survivor-led, timely, effective, and not themselves sources of further trauma.

For the UK, MHRDD is not simply another regulatory requirement. It is a safeguard against the quiet, incremental pathways that lead people into exploitation. It recognises that without enforceable systems, even well-intentioned institutions can unintentionally enable harm or fail to provide meaningful remedy when that harm is exposed. When the law draws clear lines, exploitation has fewer places to hide. When those lines are backed by accountability, oversight, consequence, and guaranteed pathways to appropriate remedy, we move from reacting to harm to preventing it, and from inadequate responses to just and restorative ones.

## Foreword by Eleanor Lyons, the Independent Anti-Slavery Commissioner



Across supply chains, factory floors, and shipping lanes, one truth is becoming impossible to ignore, human rights abuses are not distant tragedies. They are woven into the global economy and too often into the clothes we buy, the food on our shelves, and the services we rely on.

Labour exploitation is blighting our global value chains, with over 27 million adults and children worldwide trapped in forced labour. As ‘BT’ a survivor so eloquently outlined above exploitation has a horrendous impact on lives.

That is why as Independent Anti-Slavery Commissioner I have spent the last year looking at what change is needed to better protect workers, provide clarity for businesses looking to end forced labour in their value chains and do the right thing, and enable economic growth free from exploitation.

From engagement with SMEs, FTSE100, civil society, trade unions and survivors a solution has become clear – the UK needs new legislation to tackle forced labour. A law that would introduce a liability for failing to prevent serious human rights harms where an organisation has not taken reasonable measures to prevent these harms.

In partnership with Omnia Strategy LLP and Unseen, we have worked to produce ‘Model Legislative Drafting’ for the Government to adopt in the next King’s Speech. It proposes a clear, consistent UK-wide approach. It will give the Government powers to ban products tainted with forced labour from the UK and restrict imports from high-risk regions.

This is needed now. Whilst the UK was world-leading a decade ago with the landmark Modern Slavery Act 2015 in tackling transparency in supply chains, we have not kept pace with global change. In the last few years, our international partners have acted. From America to the EU, our partners have introduced laws to stop goods made with forced labour entering their markets. They were right to do so.

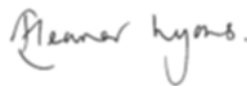
Goods tainted by forced labour undercut businesses who do the right thing. The UK imports approximately £20 billion worth of goods each year that are at risk of being produced through forced labour. As other countries’ laws come into effect this figure will increase as the UK becomes a dumping ground for the goods which were blocked by others. It will leave British businesses exposed, undercut by rivals cutting corners on human rights, with disastrous effect.

British businesses are already navigating the complex patchwork of disjointed laws in the UK that set competing standards for tackling forced labour in different sectors. These laws create confusion across the public and private sector, NHS and energy market. The inconsistency is bad for growth, fails to protect good businesses and allows bad actors to flourish.

That is why we need change in the UK. We need new legislation to align with international partners, protect businesses and promote economic growth. We need a level playing field to ensure growth is driven by innovation, not exploitation. We need to ensure that the UK does not fall any further behind.

The public want this change. They want certainty, as consumers, that they can trust that they are not buying something that is made through the use of child or forced labour. Polling carried out for this proposal shows that 92% of the British public think it is important to protect UK businesses from being undercut by imports produced using forced or child labour. The public want the Government to act. 79% of the public want new laws to stop goods made with forced labour entering our market.

Now is the moment for the Government to deliver and introduce the new legislation included in this proposal. The voices of those with lived experience must be included in this process, their expertise is vital in preventing and ending exploitation. There is an opportunity to stand firm against exploitation, promote economic growth, and show leadership. This legislation is needed. It will enable economic growth, support business, and prevent us becoming a market for the world's unwanted goods.



**Eleanor Lyons**  
**Independent Anti-Slavery Commissioner**

## Executive Summary

### Introduction and context

- **This proposal outlines why now is the moment that the UK needs new forced labour and human rights legislation.** Value chains are the lifeblood of our global economy, but UK businesses are being undermined by forced labour in these global systems, denying human dignity and perpetuating exploitation, flooding markets with ethically questionable goods and eroding economic resilience. The proposal would help to ensure the UK market does not rest on forced labour and other human rights abuses at home and abroad.
- **The IASC worked with businesses, international partners, trade unions and partners during the development of this proposal.** The IASC wrote to FTSE 100, spoke to trade bodies and trade unions, met with international partners in the EU, Australia, Canada, and the United States who already have or are developing similar legislation in this space, and gained insights from parliamentarians in the development of this proposal. The IASC also conducted public polling, held individual interviews with businesses to gain their insights and engaged with the group of Unseen survivor consultants. Through this engagement groups shared why new forced labour and human rights legislation is needed in the UK and what form they should take.
- **The IASC worked in partnership with Omnia Strategy LLP and Unseen on ‘Model Legislative Drafting’ which provides a blueprint to what new forced labour and human rights legislation should look like in the UK which the Government could adopt in the next King’s Speech.** In drafting this legislation, roundtables were held with businesses who shared their insights from operating in the UK and internationally. Businesses from across the FTSE 100, retail, financial services, consumer goods, and many more attended these roundtables. Alongside this a survey was shared with businesses for them to share their views on the Model Legislative Drafting.
- **This new Model Legislative Drafting should be adopted by the Government to protect victims from being exploited.** Forced labour and modern slavery are systemic crises and large-scale economic crimes with detrimental impact on human life. Over 27 million people globally are estimated to be living in conditions of forced labour, with abuse occurring both in the UK and across global value chains. This is why, globally, expectations on businesses’ role in tackling this crime are moving beyond voluntary reporting frameworks to enforceable standards.
- **Exploitation not only harms victims but also imposes significant financial costs on the British economy and responsible businesses.** Modern slavery costs the UK an estimated £60 billion each year - around 2 per cent of GDP. The average cost to each region is £92.8 million (England), £67.8 million (Wales), £65 million (Scotland), and £62.3 million (Northern Ireland).<sup>1</sup> The UK currently imports approximately £20 billion worth of goods

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<sup>1</sup> Unseen. 2025. *Why Mandatory Human Rights Due Diligence Is Economic Growth Policy, Not Regulatory Burden*. Available at: [Link](#)



each year that are at risk of being produced through forced labour.<sup>2</sup> Once the EU's import ban comes into effect in 2027, the UK risks becoming a further dumping ground for goods tainted with forced labour, which would undercut responsible British businesses.

- **The UK currently has a fragmented legislative environment which creates complexity for businesses.** In domestic legislation there are various precedents for tackling forced labour in different sectors. In the health sector, the Health and Care Act 2022, and in the energy sector, the Great British Energy Act 2025, for example, resulted in different legal requirements for how forced labour should be tackled in supply chains. There should be a universal precedent across all parts of the public and private sector to tackle forced labour and human rights abuses. That is why one clear new piece of forced labour and human rights legislation is needed.

## The consensus for change

- **New forced labour and human rights legislation is needed to align the UK with international partners and stop the country becoming a dumping for goods tainted by forced labour.** The Modern Slavery Act 2015 was world-leading at the time in its measures to introduce transparency in supply chains and put the topic of tackling labour exploitation into board rooms. However, since then the UK has fallen behind our international partners. The EU, America and Canada have all developed due diligence legislation. With other countries like Australia, New Zealand and South Korea considering new measures too. If the UK does not act now to introduce its own legislation it risks becoming an outlet for products tied to forced labour.
- **Survivors are clear that the UK needs a system that truly protects them, prevents exploitation, and holds perpetrators to account.** The IASC held a consultation session with survivor consultants. Survivors want mandatory and enforceable human rights due diligence that stops harm before it occurs, backed by a whole-of-government approach. They are calling for victim centred remediation that prioritises safety, autonomy, dignity and access to support, guided by professional trauma expertise and survivor participation in governance and legislative design.
- **Academic research has found that the UK regulatory frameworks are not working to protect exploited workers and to encourage transparency in supply chains.** The IASC conducted a literature review to explore the effectiveness of Mandatory Human Rights Due Diligence (MHRDD) (legislation that imposes mandatory measures to encourage businesses to undertake human rights due diligence) in preventing modern slavery and exploitation in supply chains. Voluntary frameworks are ineffective. The UK needs to adopt robust MHRDD to lead globally in corporate accountability and protecting workers.
- **Businesses support new MHRDD legislation in the UK to provide consistency, clarity and a level playing field.** Through interviews, surveys, and roundtables with FTSE100 and SMEs they shared their views on MHRDD. Interviews with companies reveal strong

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<sup>2</sup> Walk Free (n.d.) Modern slavery in United Kingdom. Available at: [Link](#)

support for new UK legislation that aligns with international standards. Multinationals already comply with international frameworks and warn that divergence creates duplication and inefficiency.

- **The UK public want goods they buy to be made free from child and forced labour.** Polling reveals strong public concern about forced and child labour in global value chains, with 61% of UK adults believing it is common with particular worries about clothing (73%) and children's products (57%). Nine in ten fear they may have unknowingly purchased such goods, and almost all would be concerned to find exploitative items in their homes. The public expect decisive action: 80% want retailers to be legally required to remove products linked to forced labour, and the same proportion support tougher government rules. Trust in voluntary business action is low as only 9% fully trust companies to act without oversight, while most believe profit takes priority over worker protection. There is overwhelming backing for enforcement, including proof of supply chain checks (81%), fines for non-compliance (76%), and loss of public contracts (74%). Finally, 84% call for international cooperation and 83% want UK standards to match or exceed global norms.

### The change that is needed

- **This proposal includes Model Legislative Drafting for the Government to take forward in the next King's Speech.** The IASC, Omnia Strategy LLP and Unseen have produced this draft legislation drawing on the engagement and expertise shared by stakeholders demonstrating how legislation could be introduced in the UK.
- **Now is a critical moment in the UK for the Government to adopt the Model Legislative Drafting.** With the Government's commitment to reviewing forced labour regulation there is a critical opportunity to deliver smarter, clearer, and more effective regulation that works for business, enables growth, reducing costs through harmonisation and encourages responsible business practice.

## Methodology and Timeline

To ensure a robust, evidence-based foundation for the proposed UK MHRDD legislation, the methodology adopted a holistic, multi-layered approach that integrated diverse perspectives and sources of insight. Stakeholder and rightsholder engagement, qualitative and quantitative research, and comparative legal analysis were combined to strategically align corporate, academic, civil society, and policy viewpoints. Consultation was conducted with FTSE 100 leaders and key industry bodies and representatives, alongside in-depth interviews across multiple sectors, and a targeted business survey to capture both breadth and depth of corporate readiness and implementation challenges.

### 1. Lived experience

A consultation session was designed to integrate lived experience perspectives through engagement with Unseen's group of survivor consultants. A total of 10 survivors attended the session. The meeting was facilitated by Unseen, with representatives from the IASC and Omnia Strategy LLP in attendance. The session followed a structured agenda to ensure safety, confidentiality, and meaningful engagement. Ground rules were established at the outset to create a trauma-informed environment, and external parties were required to follow Unseen's guidance on survivor engagement.

Survivors were asked to reflect on weaknesses in current legislative approaches and business practices, the real impact of forced labour, the potential value and risks of MHRDD, and how people with lived experience should be meaningfully involved in shaping and reviewing these systems.

Lived experience consultants contributed openly and thoughtfully throughout. Their insights brought essential real-world grounding to the development of MHRDD, ensuring that policy and business expectations are shaped not only by technical expertise but by the voices of those most affected. Their involvement strengthens the credibility, relevance, and moral urgency of this work.

Importantly, this methodology also includes a future commitment to ongoing engagement with survivors of exploitation to shape and refine its progress and implementation. Ongoing insight from lived experience will be indispensable in shaping and delivering legislative change that is grounded, effective, and responsive to the realities of exploitation.

### 2. Literature analysis

The IASC conducted a literature review adopting a comparative and thematic approach, guided by a set of research questions exploring the effectiveness, scope, enforcement, and integration of MHRDD laws. It focused on jurisdictions with enacted or proposed MHRDD legislation, including France, Germany, Norway, the Netherlands, Switzerland, and the European Union, as well as emerging developments in Australia, Canada, and the United States. Sources include peer-reviewed academic literature (2015–2025), legislation, policy documents, and white papers.

### **3. Qualitative interviews**

The IASC wrote to all FTSE 100 companies in May 2025. Qualitative interviews were then conducted with senior representatives from a sample of 25% of FTSE 100 companies across diverse sectors (retail, manufacturing, financial services, utilities, consumer goods) to explore corporate perspectives on MHRDD. Themes were identified through inductive coding of transcripts, examining organisational readiness, implementation challenges, technology use, investor influence, and global regulatory alignment. Illustrative quotes were included to reflect authentic participant views.

### **4. Business roundtables**

A series of high-level roundtables were co-hosted with the IASC, Omnia Strategy LLP and Unseen, convening senior leaders from the corporate, business, and financial sectors to shape the legislative drafting process into an implementable proposal.

### **5. Survey**

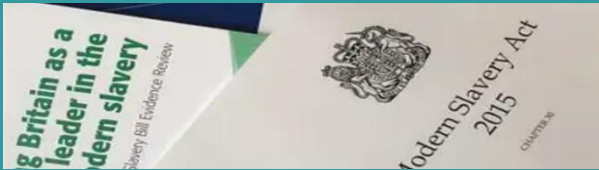
The IASC, Omnia Strategy LLP and Unseen conducted a business survey consultation to gather views and attitudes on MHRDD legislation. The survey gathered responses from 74 businesses spanning multiple sectors, including construction, transport, and professional services.

### **6. Polling**

A specialist polling team at Strand Partners conducted an online survey between 25-27 November 2025 with a nationally representative sample of 3,006 adults across the UK. The sample was balanced across key demographics including age, gender, and region in line with the most recent ONS data. The questionnaire consisted of 25 substantive questions, in addition to demographic and screener questions, designed to generate insights into public awareness, attitudes, and behaviours related to forced and child labour. Strand Partners is a member of the British Polling Council, and all fieldwork was conducted in line with BPC guidelines and ESOMAR standards. The full survey questions are available in Annex 5: Polling survey questions.

# Timeline

This timeline includes key events that have informed and progressed the development of this report.



**JANUARY – MARCH 2025** In January, the IASC gives evidence to the Business and Trade Select Committee Inquiry: Make Work Pay: Employment Rights Bill. The Committee recommends: *“The UK Government must look to align with global legislation, prioritising the introduction of mandatory Human Rights due diligence, to avoid duplicated efforts for UK businesses”* - Make Work Pay: Employment Rights Bill Report, 3 March

**APRIL – JULY 2025:** In April, the IASC gives evidence to the Joint Committee on Human Rights Inquiry Session: Forced Labour in UK Supply Chains. The Committee recommends: *“New legislation is needed to ensure that the UK’s market is protected from goods tainted by forced labour.”* - Joint Committee on Human Rights: Forced Labour in UK Supply Chains Report, 26 July

**JUNE 2025:** Roundtable discussions with the **All-Party Parliamentary Group** on Modern Slavery and Human Trafficking to gather their perspectives on the future direction of UK legislation and the key steps required to achieve meaningful and effective reform.

**SEPTEMBER 2025:** The IASC presents key findings and leads discussions on private sector engagement at the joint meeting of **OSCE and Council of Europe Special Rapporteurs**, learning from expertise and international efforts to strengthen labour rights and responsible business conduct.

**SEPTEMBER – OCTOBER 2025:** A structured programme of high-level roundtables (co-hosted with Omnia Strategy LLP and Unseen) with leaders from the **corporate and financial sectors** to inform and influence the legislative drafting of the proposal.

**NOVEMBER 2025:** The IASC participates in the United Nations Forum on Business and Human Rights to present and discuss the proposal with **international partners, global business networks, and leading experts** in responsible supply chain governance.

**OCTOBER 2024:** The Modern Slavery Act 2015 Committee recommends: *“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.”* – The Modern Slavery Act 2015: becoming world-leading again, Modern Slavery Act 2015 Committee, House of Lords, 16 October

**MARCH 2025:** The IASC gives oral evidence to the Home Affairs Select Committee Non-inquiry Session: Modern Slavery Act: ten-year review: *“We are reflecting back on the last 10 years and what has changed to tackle modern slavery.....Beyond today, it is really important that mandatory human rights due diligence is implemented in new legislation.* 25 March

**MAY 2025:** The IASC writes to all **FTSE 100** businesses to invite senior leaders to contribute to a proposal for new UK forced labour and human rights legislation.

**JULY – OCTOBER 2025:** A series of workshops, meetings, and roundtable discussions with **business associations, trade and industry groups, and cross sector coalitions**. These engagements were designed to gather in depth insights on the practical, legal, and operational considerations required for an effective and implementable due diligence standard. This process enabled the identification of common challenges, areas of consensus, and opportunities for alignment with international best practice.

**NOVEMBER 2025:** The IASC, Omnia Strategy LLP and Unseen issue a survey consultation with business. Responses received from range of business sizes and multiple sectors, including construction, transport, and professional services.

**NOVEMBER 2025:** The IASC co-hosts, with the Rt. Hon. Karen Bradley MP, a roundtable discussion with **Parliamentarians and senior business figures** to gather detailed feedback and refine the proposal into a fully implementable legislative framework.



## 1.Introduction and Context

This proposal outlines the case for change and why new forced labour and human rights legislation is needed in the UK now. To produce this proposal the IASC has worked with businesses, international partners, trade unions, parliamentarians, survivor consultants, and civil society organisations to hear why they think change is needed to protect exploited workers and stop goods tainted with forced labour entering the UK. Alongside these conversations, the IASC has conducted polling, a literature review, held business roundtables, and conducted interview analysis.

The IASC has worked with Omnia Strategy LLP and Unseen to feed in these findings and develop ‘Model Legislative Drafting’ which outlines what new forced labour and human rights legislation could look like in the UK. In the development of this proposal a wide range of businesses and the finance sector were consulted individually, at roundtables, and had the chance to feed into a survey. This ensured the voices were captured from FTSE 100 businesses to SMEs.

Throughout the course of this work the need for new legislation has become clear. This proposal outlines the scale of modern slavery in the UK, the economic cost of this crime, and the current fragmentation that exists within the enforcement environment.

The proposal outlines why the UK needs to align with international partners, why businesses want change, why the public support this, and that survivors of labour exploitation do too.

The Government wants to make the UK the best place in the world to do business. Value chains are the lifeblood of our global economy, yet UK businesses are being undermined by forced labour in these global systems, denying human dignity and perpetuating exploitation, flooding markets with ethically questionable goods and eroding economic resilience. The UK market should not rest on forced labour and other human rights abuses at home and abroad.

In the UK, a fragmented web of overlapping laws related to forced labour - from the Modern Slavery Act 2015 to sector-specific procurement rules - create confusion, duplication, and unnecessary costs for businesses, while failing to provide consistent protection for workers or prevent modern slavery and other human rights abuses.

Meanwhile, internationally, major economies are moving ahead with comprehensive streamlined regulatory frameworks that set clear expectations for global business practices - rooted in MHRDD and restrictions on goods linked to forced labour. Businesses are aligning their operations to these frameworks, all the while having to abide by different piecemeal regulation in the UK at additional cost.

If the UK does not streamline its domestic legislation and align its regulatory framework with that of major global economies, British business risks facing a competitive disadvantage, with the UK’s wider reputation as a trusted trading partner at risk. Importantly, without decisive action, the UK will fail to uphold its moral responsibility to protect people from forced labour and human rights abuses both domestically and in global value chains.

## The UK was world-leading in tackling forced labour but has fallen behind.

Voluntary measures have not gone far enough to tackle forced labour new legislation is needed.

The Modern Slavery Act 2015 is the key legal framework for setting the parameters for businesses' approach to addressing forced labour in their supply chains. Companies which exceed £36 million a year in global turnover are required to produce Modern Slavery Statements every year. This legislation was world-leading at the time and made companies look at exploitation within their supply chains. This legislation brought the conversation into board rooms and made businesses look at how they can prevent forced labour in their supply chains. A decade on from this legislation and it is acknowledged that it no longer goes far enough - something this report outlines in more detail below.

The UK supports the UN Guiding Principles on Business and Human Rights (UN Guiding Principles), which were endorsed by the UN's Human Rights Council in 2011.<sup>3</sup> The UN Guiding Principles provide guidance for states and companies on preventing, addressing, and remedying human rights impacts which occur as part of a business's own operations and within the value chain. The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct outline how businesses can make positive contributions to environmental, economic, and social progress and reduce adverse effects of their operations and business relationships.<sup>4</sup> These UN Guiding Principles and OECD Guidelines are welcome and understood by businesses. Ultimately however, they are voluntary and unenforceable in the UK.

Free Trade Agreements (FTAs) are another mechanism which should outline the UK's commitment to tackling forced labour. Some of the FTAs that the UK currently have do include provisions on forced labour and human rights, however, there is no systematic and universal approach in how the UK does this. The UK should have a systemic approach, as used by our international partners, such as the EU, to embedding forced labour and human rights measures into its FTAs and this should be monitored and enforced by the Government.

Across all these measures it is now acknowledged that they do not create consistency or go far enough. In October 2024, the Modern Slavery Act 2015 House of Lords Committee warned that the UK was falling behind internationally.<sup>5</sup> In the last year alone, multiple Select Committees have recommended that the Government implement MHRDD. This includes the Business and Trade Select Committee and the Joint Committee on Human Rights which the IASC gave oral evidence to for their Inquiry into Forced Labour in UK Supply Chains.

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<sup>3</sup> United Nations Human Rights Office of the High Commissioner (OHCHR). *Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework* Available at: [Link](#)

<sup>4</sup> Organisation for Economic Co-operation and Development (OECD). 2023. *Guidelines for Multinational Enterprises on Responsible Business Conduct*. Available at: [Link](#)

<sup>5</sup> House of Lords (2024) *The Modern Slavery Act 2015: becoming world-leading again*. (HL Paper 8). London: House of Lords. Available: [Link](#)

In February 2025 the Business and Trade Select Committee recommended ‘The UK Government must look to align with global legislation, prioritising the introduction of MHRDD, to avoid duplicated efforts for UK businesses’ in their ‘Make Work Pay: Employment Rights Bill’ Inquiry Report.<sup>6</sup> In its July 2025 report, the Joint Committee on Human Rights made strong calls for the UK to adopt MHRDD including imposing civil liability for companies that fail to prevent forced labour and human rights abuses.<sup>7</sup> The Committee proposed that companies be required by law to map and mitigate forced labour risks in their supply chains, under a statutory duty backed by effective regulatory enforcement, penalties, and support mechanisms. The Committee warned that without stronger measures the UK risks becoming a dumping ground for goods tainted with forced labour. The Committee found that goods linked to forced labour are entering UK markets due to weak enforcement and the absence of MHRDD.

It recommended that the UK Government legislate within one year to: prohibit the import and sale of goods tainted with forced labour, aligning with international standards; introduce MHRDD obligations across supply chains; and establish civil liability provisions for companies failing to prevent forced labour. The Committee emphasised that import bans should not stand alone but form part of a comprehensive package that includes proactive due diligence, stakeholder engagement, and access to remedy. It warned that without these measures, the UK risks reputational damage and falling behind global norms. The Government’s response cited the Responsible Business Conduct Review (RBC Review), launched in the Trade Strategy in June 2025.<sup>8</sup> This established the Office for Responsible Business Conduct to lead work on due diligence policy. The Government also emphasised a calibrated, proportionate approach - particularly for SMEs - while considering import bans, regulatory design, and remedy mechanisms.

This Government has established a Single Enforcement Body. The Fair Work Agency will be important for stopping the spectrum of labour market abuses.<sup>9</sup> The Gangmasters and Labour Abuse Authority will be critical in this Agency for protecting victims of modern slavery. Whilst the focus on reform domestically is welcome, it is also critical to address international labour standards and associated systemic human rights challenges. This is recognised by many Trade Unions who acknowledge that current legislation does not go far enough and are calling for new MHRDD law.<sup>10</sup> These proposals emphasise that global value chains often externalise costs, such as poor working conditions, forced labour, and ecological harm, onto vulnerable communities. Mandatory due diligence, therefore, is presented as a mechanism to ensure all businesses operate responsibly.<sup>11</sup>

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<sup>6</sup> Business and Trade Select Committee (2025) *Make Work Pay: Employment Rights Bill inquiry*. Available at: [Link](#)

<sup>7</sup> Joint Committee on Human Rights (2025) *Report on Mandatory Human Rights Due Diligence*. Available at: [Link](#)

<sup>8</sup> Department for Business and Trade (2025) *UK Trade Strategy: Responsible Business Conduct Review*. Available at: [Link](#)

<sup>9</sup> Independent Anti-Slavery Commissioner (2025) *Strategic plan 2024 to 2026*. Available at: [Link](#)

<sup>10</sup> UNISON (2025) *UNISON joins forces with Friends of the Earth on due diligence law*. Available at: [Link](#)

<sup>11</sup> Trades Union Congress (2025) *Proposal for new mandatory human and labour rights and environmental due diligence legislation* [online]. London: TUC. Available at: [Link](#)

The Devolved Governments have demonstrated strong alignment with this agenda. Northern Ireland's Modern Slavery and Human Trafficking Strategy 2024-2027<sup>12</sup> prioritises transparency in supply chains and embeds human rights in its Public Procurement Policy, while Scotland's Vision for Trade and updated Trafficking and Exploitation Strategy 2025<sup>13/14</sup> emphasise due diligence and leadership on human rights. Wales reinforces these commitments through its Modern Slavery Statement and Code of Practice on Ethical Employment<sup>15</sup>, actively reviewing measures to strengthen accountability and exploring MHRDD. Collectively, these actions highlight a shared commitment across the UK to eradicate forced labour and promote ethical, transparent value chains.

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<sup>12</sup> Department of Justice 2024, *Modern Slavery and Human Trafficking Strategy 2024 to 2027*. Available at: [Link](#)

<sup>13</sup> Scottish Government 2021, *Scotland's Vision for Trade*. Available at: [Link](#)

<sup>14</sup> Scottish Government 2025, *Scotland's Trafficking and Exploitation Strategy 2025*. Available at: [Link](#)

<sup>15</sup> Welsh Government 2025, *Code of Practice: Ethical Employment in Supply Chains*. Available at: [Link](#)

## Why action is needed now

The UK needs new forced labour and human rights legislation to encourage growth, stop British businesses being undercut, align with international partners, protect exploited workers, and simplify a complex regulatory regime.

**Modern slavery and human trafficking have devastating impacts on victims. It represents a growing national challenge, requiring stronger protections and enforceable standards to prevent exploitation.**

Forced labour and modern slavery are systemic crises and large-scale economic crimes with detrimental impact on human life. Nearly 50 million people globally are estimated to be living in conditions of modern slavery, and over 27 million in forced labour, with abuse occurring both in the UK and across global supply chains.<sup>16</sup> Globally, expectations on businesses' role in tackling this crime are moving beyond voluntary reporting frameworks to enforceable standards.

In the UK, labour exploitation is consistently the most reported form of modern slavery, accounting for the largest share of cases for over a decade. In 2024, 19,125 potential victims of modern slavery were referred to the Home Office, the highest number since records began, with labour exploitation identified as the most common type of abuse. Of these, 6,153 National Referral Mechanism<sup>17</sup> (NRM) referrals were specifically for labour exploitation, representing 32% of all referrals and marking the highest recorded number for this category since the NRM began.<sup>18</sup> However these numbers represent only reported cases, the true scale of exploitation is likely to be significantly higher due to widespread underreporting. Labour exploitation occurs in communities across the country – affecting every part of the UK.

**The economic cost of exploitation. Exploitation has a financial cost – impacting the British economy and businesses. Growth is threatened by structural drag on the UK economy.**

New MHRDD legislation is essential for the UK's economic growth. Growth is threatened by structural drag on the UK economy. Modern slavery costs the UK an estimated £60 billion each year - around 2 per cent of GDP. This is not simply a moral or social issue; it is fundamentally an economic one. The average cost to each region is £92.8 million (England), £67.8 million (Wales), £65 million (Scotland), and £62.3 million (Northern Ireland).<sup>19</sup>

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<sup>16</sup> International Labour Organization (2022) *50 million people worldwide in modern slavery*. Available at: [Link](#)

<sup>17</sup> The National Referral Mechanism (NRM) is a framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support. Home Office (2025) *National referral mechanism guidance: adult (England and Wales)*. Available at: [Link](#)

<sup>18</sup> Home Office (2025) *National Referral Mechanism statistics*. Available at: [Link](#)

<sup>19</sup> Unseen. 2025. *Why Mandatory Human Rights Due Diligence Is Economic Growth Policy, Not Regulatory Burden*. Available at: [Link](#)



The UK currently imports approximately £20 billion worth of goods each year that are at risk of being produced through forced labour.<sup>20</sup> Once the EU's import ban comes into effect in 2027, the UK risks becoming a dumping ground for goods tainted with forced labour, which would undercut responsible British businesses. There needs to be protection in place to create a level playing field. This would also complement campaigns by parliamentarians such as the 'Buy British' campaign which aims to tackle long-recognised issues with UK Government procurement systems and support local businesses.<sup>21</sup>

MHRDD is a pro-growth legislative structural reform, essential for a resilient, credible, and competitive UK economy. Analysis from the ILO indicates that globally, the investment required to implement targeted forced labour interventions amounts to roughly 0.14% of GDP, while the economic returns from ending forced labour would generate a demand-driven GDP increase of 0.41%, nearly a 3:1 return on investment.<sup>22</sup> A five-year study carried out by UN Development Programme (UNDP) with 235 major firms across high-risk sectors found no financial penalty for improving human rights performance. In fact, the data points to operational and strategic benefits. UNDP's modelling demonstrates that every 10-percentage point increase in Corporate Human Rights Benchmark score correlates with a 1% increase in Return on Assets (ROA). One company improved its Corporate Human Rights Benchmark (CHRB) score by +18.4 percentage points and saw ROA rise by +1.67%.<sup>23</sup> This unfair competition is unsustainable for UK businesses – not only is forced labour bad for growth in the UK economy, but it also leaves British businesses at risk of being undercut by goods made by forced labour.

**Clarity is needed in the UK with a fragmented legal and regulatory landscape. Businesses need a level playing field and clear, consistent rules to compete effectively.**

New legislation is needed as the current UK regulatory landscape is confusing and costly – not only for businesses trying to comply, but for the rightsholders it is meant to protect, and for the taxpayer with the resourcing of multiple non-aligned regulatory workstreams. There is no single coherent framework connecting business and human rights with procurement and due diligence. Clarity is needed, without a coherent framework, further piecemeal amendments and sector-specific rules will continue to emerge, adding complexity and cost for both Government and business.

The Modern Slavery Act 2015 provides the most comprehensive framework; however, it does not create certainty for businesses about what is expected of them. The Act relies on quasi-voluntary disclosure rather than enforceable obligations, allowing companies can technically comply without taking meaningful action. There are no effective penalties in the Act for failing to publish a Modern Slavery Statement or for publishing inadequate information. This lack of consequence leaves proactive businesses at a disadvantage compared to those that do nothing.

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<sup>20</sup> Walk Free (n.d.) Modern slavery in United Kingdom. Available at: [Link](#)

<sup>21</sup> Hansard, Public Procurement (British Goods and Services) Bill, 15 March 2024, [link](#).

<sup>22</sup> ILO (2024) *Acting against forced labour: An assessment of investment requirements and economic benefits*. Geneva: International Labour Office. Available at: [Link](#)

<sup>23</sup> United Nations Development Programme (2025) *Human Rights vs. Competitiveness: A False Dilemma?*. Available at: [Link](#)

Additionally, the Act's narrow focus on transparency in reporting on supply chains may encourage businesses to concentrate primarily on procurement related risks, rather than on their most salient human rights risks or the areas where they have the greatest leverage across their broader value chain. Recent legislation in other jurisdictions increasingly requires both upstream and downstream due diligence. Furthermore, the UK's reliance on a separate reporting track under the Modern Slavery Act 2015 - rather than aligning with mandatory due diligence regimes emerging across Europe - creates administrative burdens for companies operating internationally and adds to the fragmentation of the regulatory landscape.

In the absence of an overarching and effective regulatory framework to tackle modern slavery, the UK has been hit by scandals, both within its own supply chains and, in its inability to respond to allegations of forced labour. In June 2024, the Court of Appeal ruled that the UK National Crime Agency (NCA) acted unlawfully when it refused to investigate allegations that cotton imported from China's Xinjiang region was produced using forced Uyghur labour. In addition to this, in recent years, legislative amendments have been made in reaction to serious allegations and scandals. Notably, NHS rubber supply chains, and high risks in Solar Industry. Three new pieces of domestic legislation have been introduced in the last three years alone creating confusion and administrative burdens for business and government alike. Below is an outline of domestic legislation which creates a piecemeal response to tackle forced labour.

- **Proceeds of Crime Act (2002):** Allows for the recovery of criminal assets. Under s.1 of Modern Slavery Act 2015 it is an offence to hold someone in slavery or servitude or for them to perform forced labour. The proceeds or property produced from doing this may amount to 'criminal property' in Part 7 of POCA.
- **Procurement Act (2023):** This legislation aimed to simplify public procurement. It introduced some requirements for suppliers to manage modern slavery risks in their supply chains and potential exclude bidders from public procurement.
- **Health & Care Act (2022) and NHS Regulations (2024):** Introduced the UK's first sector-specific human rights due diligence regime, requiring all NHS procurement bodies to assess and mitigate modern slavery risks across the full commercial lifecycle, with mandatory contract clauses and risk-based supplier oversight.
- **Great British Energy Act (2025):** Establishes a legal duty for the publicly owned energy company to exclude suppliers linked to forced labour, appoint a senior ethical supply chain lead, and embed anti-slavery commitments in its strategic priorities-setting a precedent for ethical procurement across the renewables sector. The Government introduced this change after amendments from parliamentarians for greater protections of human rights.<sup>24</sup>

Different domestic legislation creates confusion and complexity for both Government and the private sector. That is why this proposal outlines Model Legislative Drafting that sets a clear solution for Government to adopt.

<sup>24</sup> Hansard, Sarah Champion's amendment, Clause 3, Great British Energy Act 2025, [link](#).  
Hansard, Lord Alton of Liverpool's amendment, After Clause 7, Great British Energy Act 2025. [Link](#).

## 2. Consensus for change

### Lived experience consultation

Survivors want protection, accountability, and a system that does not punish those it is meant to support

A consultation session was designed to integrate lived experience perspectives through engagement with Unseen's group of survivor consultants. Survivors were asked to reflect on weaknesses in current legislative approaches and business practices, the real impact of forced labour, the potential value and risks of mandatory human rights due diligence, and how people with lived experience should be meaningfully involved in shaping and reviewing these systems.

Lived experience consultants contributed openly and thoughtfully throughout. Their insights brought essential real-world grounding to the development of MHRDD, ensuring that policy and business expectations are shaped not only by technical expertise but by the voices of those most affected. Their involvement strengthens the credibility, relevance, and moral urgency of this work.

#### **The real-world consequences of failing rights-holders**

Survivors emphasised that human rights abuses are not abstract risks, but their lived realities with lasting legal, financial, psychological, and social consequences. Participants described current systems as compounding harm rather than preventing it, recounting being punished, doubted, or disbelieved by authorities. Several survivors also indicated that there is a lack of clear channels for support. They emphasised that their experience of current systems has led to continued marginalisation, with immigration rules, income thresholds, and loss of legal aid being identified as sources of ongoing harm.

The group underscored the need for strong MHRDD measures to address these issues, with one participant emphasising that *“a weak system does not merely fail to protect victims, it actively enables exploitation”*.

## The development and implementation of MHRDD

### Embedding survivor engagement into Governance

Participants indicated that survivors and NGOs must be involved in every stage of policy design and implementation, from development to oversight. Participants emphasised the importance of businesses engaging on an ongoing basis, not through ad hoc projects, but by embedding lived experience into decision-making and governance at all levels. Survivors highlighted that their expertise provides unique insights into how exploitation occurs in practice, including coercion, recruitment, and supply chain dynamics, which cannot be captured through research alone.

*Survivors will know what happens on the field, how they how they are moved, how they are coerced. I think it's very, very important that [engagement with lived experience] is made a mandatory thing [that is] protected with enforcement, because I think it's easy to just make the assumption that something is happening in a particular way to carry out exploitation or forced labour, but to actually have the facts is a whole different story. And so, I think that's actually imperative... engagement with NGOs, the relevant NGOs who have this lived experience within their capacity.” - BT*

Survivors also called for specialised lived experience roles within governance, such as a human rights non-executive director, to ensure meaningful representation. These roles should have real authority, including participation in key committees, full voting rights, legal protection, investigative powers and responsibilities linked to corporate liability. Another participant stressed that survivor engagement must not be confined to board-level oversight but embedded throughout governance and operations, including supporting the design and implementation of recruitment processes, contract standards, training, and worker-related policies.

### Embedding MHRDD into recruitment, employment, and value chains

*“You can agree with me, anyone who has been exploited, there's an element of trust which you know has been broken and you can't just trust this company saying well, because we are over £36,000,000, we're just going to, you know, publish a statement and trust us that, you know, there is no nothing within the supply chain.” - AZ*

Survivors highlighted the gap between high-level corporate commitments and the realities experienced by workers. One participant stressed that modern slavery statements should not exist “for fancy websites,” but must be reflected in employment contracts, offer letters and onboarding materials. Accordingly, MHRDD should be fully integrated into worker-facing documents and processes.

It was suggested that human rights-related documents, including worker contracts, should clearly highlight workers’ rights and processes for raising grievances, and should be made available in workers’ native languages to ensure accessibility and understanding. As noted in

the above subsection, survivors emphasised that embedding lived experience into governance frameworks helps ensure that these documents are practical, clear, and genuinely supportive of workers, rather than formal or symbolic.

Participants identified recruitment practices as a significant area of risk. Survivors called for prohibiting employers from retaining passports or personal documents, along with the introduction of independent inspections and welfare checks. Survivors noted the need for improved awareness campaigns so that rights holders understand their rights and know how to seek help.

*“When workers receive an offer letter or contracts, especially those recruited internationally, must be told who to contact for help if things go wrong”. - AA*

### **Effective due diligence isn't about risk mitigation, but prevention**

*“In this exploitation system, let us reduce our talk about exploitation. What is bringing the exploitation?... the system is aiding in the exploitation... The real problem is not addressed.” - AZ*

Survivors emphasised that human rights due diligence must tackle the root causes of exploitation, not just respond after harm occurs. They highlighted how exploitation is enabled by weak systems, poor oversight, and a lack of accountability. Preventative MHRDD should address the root causes of exploitation, and policies and procedures must be designed to stop harm before it happens. This includes ensuring that workers are informed of their rights, have clear and accessible ways to raise concerns, and are protected from systemic vulnerabilities. This preventative approach aligns with the Failure to Prevent legislative models: requiring organisations to take proactive, practical steps that stop abuse at its source. In other words, prevention isn't optional; it is the fundamental objective.

### **Effective remediation**

*“Business should take action when they find Modern Slavery by protecting the worker, making sure they get safety and support, not punishment. Report the situation and work with authorities and charities to help the victim. Fix the root problem in the supply chain instead of simply cutting off the supplier” -JE*

Survivors highlighted major gaps in remediation, particularly being excluded from decisions about their own remedy and often not receiving support while these decisions are being made. Due to the trauma, fear and acute instability often experienced immediately after escaping exploitation, survivors often cannot accurately assess their long-term needs. Many face urgent vulnerabilities, such as loss of income, insecure housing or immigration uncertainty that creates pressure to accept inadequate or harmful remediation offers to simply survive.

Survivors reinforced the importance of informed consent, noting that victims are often not made aware of the remedies available and that consent is not consistently sought before decisions are made. They stressed the need to fully understand the options available, what each



entail, and any potential adverse impacts before making choices. Trauma can impair cognitive capacity, meaning that decisions made in the immediate aftermath may not reflect the survivor's long-term interests or well-being.

It was emphasised that the remedy should be proportionate to the severity of the harm caused, and that determining the seriousness of harm should involve qualified trauma and mental-health professionals.

### **Ongoing Communication and Participation**

Survivors stressed that remediation must include clear, continuous communication and that they must be fully informed and able to participate meaningfully in all decisions that affect them. They underscored the need to have the ability to revisit remediation agreements if trauma or pressure at the time prevented informed consent.

One participant expressed that, through their experience, engagement of victims throughout the recovery process is limited, stating *"we always been for them just to tick the box"*.

Survivors highlighted that there is no one-size-fits-all approach to remedy. Timelines and services that work for some may not suit others. Satisfaction with remediation must be continuously assessed, ensuring that vital support, such as psychological care, is not withdrawn before a survivor feels ready.

Without continued support, survivors may be formally free from exploitation but practically constrained, unable to fully recover or exercise autonomy.

### **Independent Advocacy and Survivor Expertise**

To ensure that remediation is genuinely effective, NGOs with experience in supporting survivors or independent survivor advocates should be mandatorily involved in remediation processes. Their role is essential in safeguarding survivors' rights, identifying long-term needs, preventing coercion or desperation-driven decisions, and ensuring that the outcome restores and does not bring further harm to the survivor.

Remediation can provide a pathway for survivors to help prevent future harm, if they wish to do so. Engaging survivors' lived experience allows businesses and systems to learn from real-world insights, ensuring policies and practices are grounded in actual experiences rather than assumptions. As one participant explained:

*"When we talk about remediation and you have a survivor who is now in some sort of recovery system or some sort of move on system. How do you now draw from their expertise from what they've just come out of without re-exploiting them? I do think there's enormous power and being able to learn from people with live experience on what what's actually happening on the ground so that what's being enforced is not based on assumption but reality" - BT*

## Enforcement of MHRDD

### Need for enforcement, oversight, and independent accountability

*“Because if it's not enforced, it is like there is there is no law at all” - JE*

Survivors emphasised that any legislation designed to hold businesses accountable must be backed by strong, independent enforcement mechanisms. Without such enforcement, transparency and reporting become meaningless, and companies may treat compliance as optional rather than obligatory.

Participants expressed the need for a dedicated oversight *“agency or a body that looks into slavery”* to monitor whether companies are implementing human rights due diligence effectively. Effective enforcement should include:

- Properly resourced inspectors capable of conducting meaningful ground-level checks
- Independent benchmarking of company statements, similar to the CCLA model, to ensure transparency and drive action
- Awareness campaigns and targeted training for enforcement agencies

It was also noted that reporting should include enforcement outcomes, not just the number of victims or incidents that occurred.

One survivor emphasised that such an enforcement body must be informed by lived experience and work closely with NGOs supporting rightsholders:

*“I believe recruiting people that do not have a background [informed by lived experience] would not solve it. I believe charities that work with victims ... and those with those with lived experience of slavery - they will be best fit...Working closely, codesigning or involvement of charities like Unseen and many others, it's not just recruiting a body [of] individuals that know about it theoretically, but also practically.”*

Survivors expressed that without enforcement, transparency becomes meaningless. This combination of oversight, inspection and accountability was seen as essential to ensure that corporate commitments are translated into real protections for workers.

### Evidence, thresholds, and communication failures

Survivors raised concerns about how evidence is collected, processed, and acted upon. Several reported that their cases were dismissed because proper evidence was never gathered by investigators or relevant businesses. They highlighted unclear thresholds for action, including when a concern should trigger an investigation, protective measures, or escalation to law enforcement, as well as unclear thresholds for prosecution. Survivors also described inconsistent or absent communication from authorities, all of which makes it harder for harm to be recognised and addressed.

Survivors emphasised that the evidential burden should not fall on them. Instead, they noted that the absence of mandated, systematic evidence-gathering by companies and authorities leaves victims without the documentation needed to be identified or to seek justice, particularly when harm is caused by a one-off contractor or supplier who is no longer present.

Participants suggested that responsibility should lie with companies to maintain traceability, preserve records, and ensure accountability across their value chains. Businesses should also be required to hold and protect evidence in ways that support survivors seeking justice while safeguarding their rights.

## Conclusions

### **A whole-of-government approach is essential**

Survivors emphasised that MHRDD legislation will only be effective if supported by coherent policies across all government departments. All participants expressed a concern that the Home Office, labour enforcement bodies, and welfare systems may undermine anti-exploitation efforts through siloed approaches, and victims entering the NRM continue to face immigration barriers and punitive restrictions. Prevention, remediation, and enforcement must be aligned across government.

### **International cooperation is essential**

International cooperation emerged as a key theme. The UK's legal framework was described as weaker than that in Canada, the US, and Australia. Participants recommended aligning UK laws with global best practice and using trade leverage to address forced labour in smaller economies. Import controls were suggested as a potential tool, but survivors emphasised that remediation and protection for workers must remain central.

### **What survivors want**

The consultation made one thing unmistakably clear: survivors want a system that protects them, prevents exploitation, and holds exploiters accountable. They call for MHRDD that is not optional or symbolic, but mandatory, enforceable, and designed to stop harm before it occurs.

The survivors engaged in this consultation support UK MHRDD that:

- Is mandatory, enforceable, and prevention-focused
- Prioritises victims' safety, autonomy and dignity
- Ensures victim-centric remediation, including individualised remedies and professional harm assessments
- Embeds independent oversight and inspection power through an independent enforcement body, which monitors compliance and holds companies accountable

- Mandates survivor involvement in governance and legislative design, with real decision-making power
- Ensures anti-exploitation commitments appear in contracts and recruitment processes.
- Provides clear worker-level access to support and reporting channels
- Develops a whole-of-government blueprint that integrates victim protection across immigration, labour, and justice systems to avoid re-victimisation
- Uses professional trauma expertise as a part of assessing harm and remediation
- Aligns UK laws with international best practice and uses trade leverage to reduce forced labour

Survivors' words cut to the heart of the issue: a weak system does not merely fail to protect; it actively enables exploitation.

*"Businesses must be required to do proper due diligence, face penalties for non-compliance, and close loopholes. Weak enforcement risks could be more exploitation, even under current laws." - SA*

This consultation demonstrated the urgent need for an MHRDD that is practical, enforceable, and transformative, not just for compliance, but to fundamentally shift the dynamics that allow exploitation to persist.

## International alignment

New forced labour and human rights legislation is needed to align the UK with international partners and prevent the country becoming a destination for goods tainted by forced labour

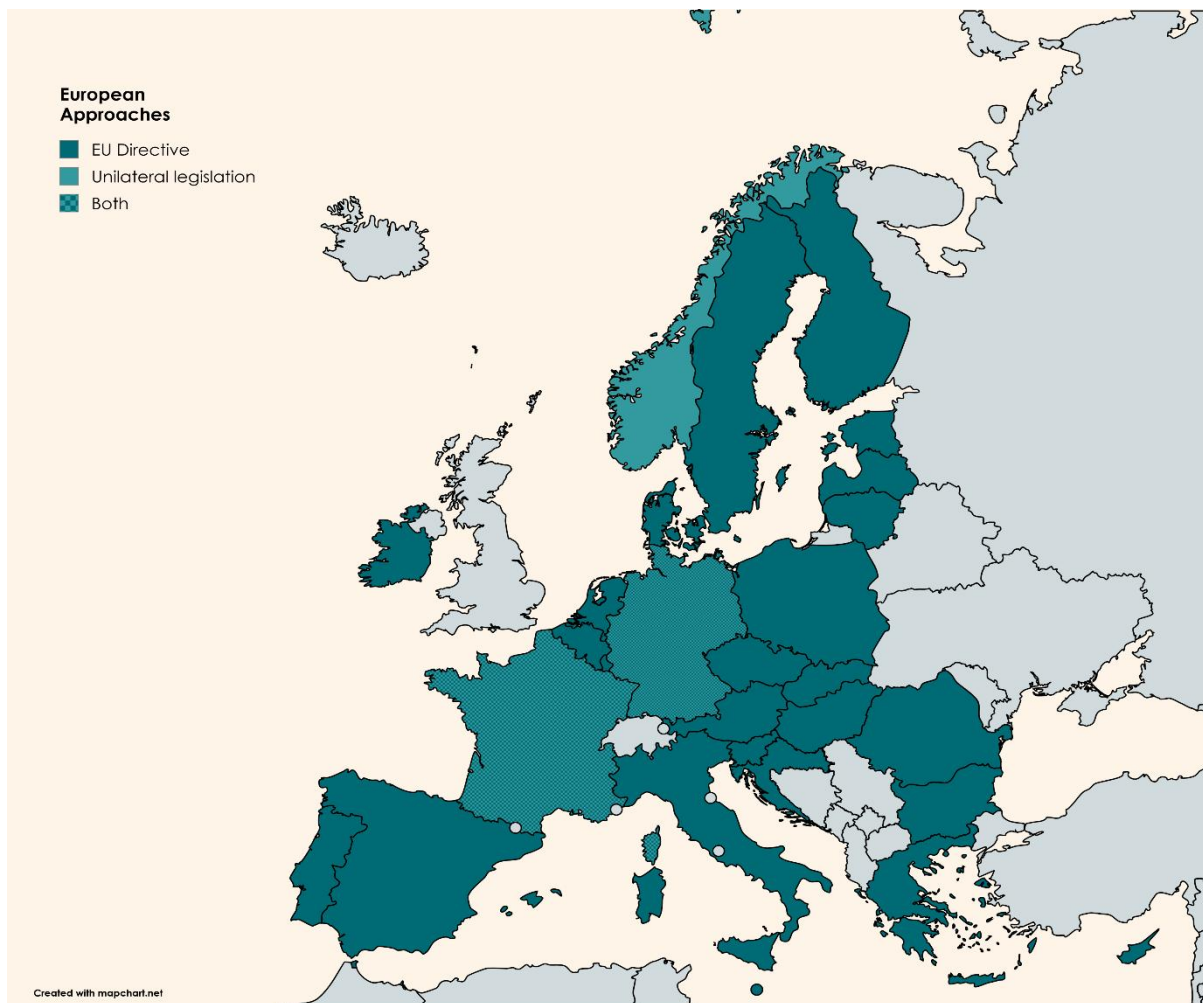
During the development of this proposal the IASC engaged with international partners who have adopted MHRDD to learn from them about what has worked in addressing forced labour in supply chains. The IASC also met with international partners who are considering adopting new legislation, and who are looking to work with the UK in this space. The learnings and reflections from the meetings have been fed into Model Legislative Drafting. UK legislation on forced labour and human rights abuses would help to harmonise operating environments for businesses.

It became clear in these meetings, that whilst the UK was world leading ten years ago when the Modern Slavery Act 2015 was passed, other countries have continued to develop new legislation to tackle forced labour, and the UK has fallen behind. Across Europe and other advanced economies, the regulatory landscape has shifted decisively towards MHRDD and import controls targeting goods made with forced labour. These measures provide businesses with clear expectations, something that was lacking under voluntary frameworks, which fail to adequately reward businesses trying to act responsibly. This reflects a global consensus that voluntary frameworks have failed to prevent exploitation and that clearer enforceable standards are essential for meaningful corporate accountability and provide businesses with the certainty and clarity they need.





## In Europe



**France: Duty of Vigilance Law (2017):** Requires large companies to publish and implement vigilance plans covering human rights and environmental risks across their operations and supply chains. Includes civil liability for harm caused by failure to comply.

**Germany: Supply Chain Due Diligence Act (2023):** Applies to companies with 1,000+ employees. Mandates risk analysis, preventive measures, and grievance mechanisms, enforced by BAFA with fines up to €8 million or 2% of global turnover.

**Norway: Transparency Act (2022):** Covers a broad range of enterprises and grants the public a right to request information on corporate due diligence. Emphasises stakeholder engagement and OECD alignment.

**Netherlands: Child Labour Due Diligence Act (2019):** Requires all companies selling goods or services to Dutch consumers to identify and address risks of child labour in their supply chains, submit a public due-diligence statement, and implement corrective measures. Enforced through administrative fines and potential criminal sanctions for repeated non-compliance.

**EU: Forced Labour Regulation (2024):** Prohibits products made with forced labour from entering or leaving the EU market, complementing due diligence obligations.

**EU: Corporate Sustainability Due Diligence Directive (CSDDD):** Legally in force since July 2024, with phased implementation from 2027. Applies extraterritorially to non-EU companies operating in the EU. Introduces civil liability and administrative penalties.

## Worldwide

**Canada: Canada: Fighting Against Forced Labour and Child Labour in Supply Chains Act (2024):** Imposes reporting obligations on companies regarding forced and child labour in supply chains, requiring public disclosure and board-level accountability. Stops short of mandating proactive due diligence or civil liability.

**United States: Uyghur Forced Labor Prevention Act (2021):** Establishes a rebuttable presumption that goods from Xinjiang are made with forced labour, effectively banning imports unless companies provide clear evidence of compliance.

**United States: Tariff Act of 1930 (Section 307):** Prohibits the importation of goods mined, produced, or manufactured wholly or in part by forced labour. Enforcement has intensified in recent years, particularly for goods linked to Xinjiang.

**Brazil: Draft Bill No. 572 (2022):** Proposes mandatory human rights and environmental due diligence across global value chains, including reporting every six months, stakeholder engagement, and civil liability. Enforcement measures include fines, suspension of operations, and loss of public incentives. Currently, Brazil relies on constitutional and labour laws, with no comprehensive due diligence requirement.

**Thailand: Draft Human Rights and Environmental Due Diligence Bill (2025):** Proposes mandatory due diligence for large companies and some foreign entities, covering human rights and environmental risks. Includes civil penalties and aims to align with OECD and UN Guiding Principles standards.

**South Korea: Act on the Protection of Human Rights and the Environment for Sustainable Business Management 2025):** Reintroduced bill would require large companies (500+ employees or revenue over KRW 200 billion) to identify, prevent, and address human rights and environmental risks across supply chains. Applies to domestic and foreign firms operating in Korea, signalling Asia's first mandatory due diligence law.

**New Zealand: Proposed Modern Slavery Bill (2025):** Would require entities with revenue over NZD 50 million to report on modern slavery risks and actions, with penalties for non-compliance and an independent commissioner. Stops short of mandating full due diligence, though future reforms may add this.

**Australia: Modern Slavery Act (2018):** Requires large companies to report on modern slavery risks but does not mandate due diligence or penalties. A 2023 review recommended reforms, including mandatory due diligence and civil penalties.

### International Approaches

- In force
- Under development

Over the last decade, international partners have legislated to prevent goods tainted with forced labour and human rights abuses entering their markets and to mandate due diligence. This matters for businesses operating across multiple jurisdictions because the UK – once a pioneer with the Modern Slavery Act 2015 – is now becoming an outlier. While other jurisdictions have moved to mandatory due diligence, the UK still relies on fragmented, largely voluntary measures. This creates critical risks, including:

- **Economic risk:** Without alignment, the UK could become a dumping ground for goods tainted by forced labour, as the EU and US strengthen import controls. Businesses warn that this would undercut responsible UK firms and damage competitiveness.
- **Regulatory risk:** Companies operating internationally face a patchwork of obligations. Divergence between UK and EU standards increases compliance costs and complexity, leading to inefficiencies and legal uncertainty.
- **Reputational risk and investor assurance:** UK firms may be perceived as lagging on human rights, undermining trust with investors, consumers, and global partners.

As one FTSE 100 interviewee warned the IASC: *“If it can’t go into the EU and it can’t go into the US, then here’s where it’s going to go.”* This sentiment highlights the urgency of harmonisation to avoid the UK becoming a haven for unethical trade. Now is the moment that the UK needs to introduce new forced labour and human rights regulation to align with international partners and prevent becoming a market flooded with goods manufactured using forced labour.

## Import Controls

Import controls are trade enforcement measures designed to ban and prevent goods produced with forced labour from entering national markets. They support MHRDD as another line of defence. Import controls include bans that require businesses looking to import goods to be confident that their supply chains are free from forced labour. These bans aim to close governance gaps where voluntary frameworks fall short, creating strong incentives for companies to trace and certify their supply chains. Unlike disclosure-based regimes, import bans carry immediate commercial consequences, making them a powerful tool for addressing systemic exploitation. They can also include measures to prohibit the export of goods made with forced labour, and the sale of such goods within the UK market, including those produced domestically.

### United States

The United States has one of the most robust enforcement regimes for import bans. Two key instruments underpin this approach: Uyghur Forced Labor Prevention Act (2021) and Section 307 of the Tariff Act of 1930. These laws prohibit the importation of goods made with forced labour and impose due diligence-like obligations on importers, including supply chain mapping and certification. A distinctive feature of the U.S. model is the rebuttable presumption under the Uyghur Forced Labor Prevention Act, which assumes that all goods originating from the Xinjiang region are produced with forced labour unless the importer can

provide clear and convincing evidence to the contrary. This shifts the burden of proof onto companies and creates strong compliance incentives.

Enforcement is led by U.S. Customs and Border Protection (CBP), which has authority to detain and seize goods suspected of being produced with forced labour. CBP uses risk analysis, intelligence gathering, and supply chain audits to identify high-risk shipments. Its ability to block goods at the border makes this one of the most powerful enforcement mechanisms globally, demonstrating how trade policy can be leveraged to uphold human rights standards.

### Canada

Canada's approach combines reporting obligations with an import ban under the Customs Tariff (tariff item 9897.00.00) and the Fighting Against Forced Labour and Child Labour in Supply Chains Act (2024). The law prohibits the importation of goods "mined, manufactured or produced wholly or in part by forced labour" and requires companies to report on risks of forced and child labour in their supply chains.<sup>25</sup>

Enforcement is carried out by the Canada Border Services Agency (CBSA), which administers the Customs Tariff ban. CBSA relies on intelligence from Employment and Social Development Canada (ESDC) and other sources to identify high-risk goods and regions. When goods are suspected of being produced with forced labour, CBSA officers can detain shipments and prohibit entry under tariff item 9897.00.00.<sup>26</sup> Importers may appeal by providing evidence that no forced labour was involved. The Canadian Government has announced plans to strengthen enforcement by introducing clearer rules, increasing funding for CBSA, and considering a rebuttable presumption similar to the U.S. model.<sup>27</sup>

## Conclusions

The proposed Model Legislative Drafting in this report would allow the UK to align with international partners and prevent the UK from becoming a destination country for goods made through the use of forced labour that have been rejected by other countries who have tightened their standards. By combining import controls with proactive due diligence obligations, the UK can create a robust framework that drives meaningful change, aligns with international best practice, and reinforces its commitment to ethical trade.

<sup>25</sup> Government of Canada (2024) Fighting Against Forced Labour and Child Labour in Supply Chains Act and Customs Tariff import ban. Available at: [Link](#)

<sup>26</sup> Canada Border Services Agency (2025) Memorandum D9-1-6: Goods manufactured or produced by prison or forced labour. Available at: [Link](#)

<sup>27</sup> Government of Canada (2024) Statement by Minister Ng on forced labour measures in 2024 Fall Economic Statement. Available at: [Link](#)

## Academic reporting and analysis

### Academic research has found that the UK regulatory frameworks are not working to protect exploited workers or to encourage transparency in supply chains

A literature review was carried out to explore the effectiveness of MHRDD legislation in preventing modern slavery and exploitation within global supply chains. The review responds to growing evidence that voluntary measures, such as the UK Modern Slavery Act 2015, have failed to deliver meaningful corporate accountability (Haynes, 2016; LeBaron & Rühmkorf, 2017). While the Act was initially considered pioneering, its reliance on transparency rather than enforceable obligations has resulted in limited impact on corporate behaviour.

The review adopted a comparative approach, drawing on academic research, international legal frameworks, and policy analysis from jurisdictions with enacted or proposed MHRDD laws, including France, Germany, Norway, and the European Union. It also considered developments in Canada, Australia, and the United States, as well as public opinion data and stakeholder perspectives. By synthesising this evidence, the review aimed to identify best practices and implementation challenges, providing a foundation for UK legislation that is effective, enforceable, and aligned with international standards (McCorquodale & Nolan, 2022; Deva, 2023).

A summary of the literature review is presented below:

#### **Limitations of voluntary frameworks**

Whilst world leading at the time in introducing transparency in supply chain provisions, since then our international partners have introduced new legislation in this space. Subsequently, the UK Modern Slavery Act 2015 has been widely criticised for its lack of enforceability and reliance on voluntary reporting. Companies are required to publish annual statements on steps taken to address modern slavery, but there are no penalties for non-compliance and no duty to prevent harm (Haynes, 2016).

Academic critiques argue that this transparency-based model legitimises existing corporate social responsibility initiatives without imposing substantive obligations (LeBaron & Rühmkorf, 2017). As a result, compliance has often been superficial, with many companies failing to identify risks or implement meaningful changes.

Evidence from Australia reinforces these concerns. Its Modern Slavery Act (2018) mirrors the UK model and has similarly been criticised for weak enforcement and inconsistent reporting (McGaughey et al., 2023). These findings demonstrate the limitations of voluntary frameworks and highlight the need for binding obligations to ensure corporate accountability.



## **Effectiveness of mandatory legislation**

International evidence demonstrates that mandatory due diligence laws significantly improve corporate behaviour when combined with enforcement mechanisms. France's Duty of Vigilance Law (2017) requires large companies to implement vigilance plans covering human rights and environmental risks, with civil liability provisions enabling affected parties to seek redress (Savourey & Brabant, 2021). Germany's Supply Chain Act (2023) mandates structured due diligence processes and empowers regulators to impose fines and exclude companies from public procurement (Krajewski et al., 2021). Norway's Transparency Act (2022) emphasises stakeholder engagement and public access to information, enhancing transparency and accountability.

These models contrast sharply with disclosure-based regimes in the UK and Australia, which lack penalties and rely on reputational pressure. Comparative analysis suggests that laws with enforceable obligations, civil liability, and regulatory oversight are more effective in preventing harm and promoting corporate accountability (McCorquodale & Nolan, 2022).

## **Public support for reform**

Public opinion in the UK strongly favours legislative action to address human rights abuses in supply chains. Surveys conducted by YouGov and civil society organisations consistently report that over 80% of respondents support new laws requiring companies to take proactive steps to prevent exploitation (Friends of the Earth, 2024; Corporate Justice Coalition, 2022). This sustained public backing reflects growing societal awareness of ethical supply chains and provides a strong democratic mandate for reform. This is echoed in unique polling the IASC has carried out for this research.

Academic literature confirms that public pressure and reputational risk are key drivers of corporate compliance, particularly when reinforced by legal obligations (Bright, 2021; McCorquodale & Nolan, 2022). The combination of public support and international best practice creates a compelling case for the UK to adopt comprehensive MHRDD legislation.

## **Risks of cosmetic compliance**

A recurring theme in the literature is the risk of "cosmetic compliance," where companies meet formal requirements without substantive change. Landau (2019) warns that due diligence can become a tick-box exercise when laws focus on process rather than outcomes. This risk is particularly acute in sectors such as fashion, where social audits are often used as proxies for compliance. Academic experts advocate for meta-regulation that embeds accountability, transparency, and stakeholder participation, ensuring that due diligence translates into real improvements for rights-holders (Landau, 2019; Deva, 2023).



## Access to remedy

Access to remedy remains one of the weakest aspects of existing frameworks. While France's Duty of Vigilance Law allows civil liability claims, other jurisdictions rely on administrative fines or reputational incentives, which do little for victims (Savourey & Brabant, 2021). Corporate grievance mechanisms often lack transparency and effectiveness, functioning more as risk management tools than genuine accountability mechanisms. Harrison et al. (2024) recommend mandatory reporting on grievance outcomes and stronger judicial remedies to ensure that rights-holders can seek redress.

## Conclusions

The literature demonstrates that voluntary frameworks have failed to prevent modern slavery and exploitation, while mandatory due diligence laws offer a more effective model when designed with enforceable obligations, civil liability, and regulatory oversight. International evidence highlights the importance of comprehensive supply chain coverage, stakeholder engagement, and mechanisms to prevent cosmetic compliance. For the UK, adopting robust MHRDD legislation represents an opportunity to lead globally in corporate accountability and human rights protection (McCorquodale & Nolan, 2022; Deva, 2023).

Future UK legislation should prioritise human rights, embed strong enforcement mechanisms, and institutionalise survivor participation. By learning from international best practice and addressing identified gaps, the UK can craft a world-leading framework that delivers meaningful protections for rights-holders and ensures corporate accountability. The need for new forced labour and human rights legislation in the UK that enforce standards, protect workers, align with international partners is strongly supported by the work of academics.

## **Business, industry and investors**

### **Businesses want consistency, clarity, and a level playing field**

Business engagement has been central to this proposal, informed by a comprehensive research process that combined quantitative and qualitative methods. A written survey was distributed to businesses of varying size and across multiple sectors to capture broad perspectives on human rights due diligence and future legislative needs. Alongside this, in-depth interviews were conducted by the office of the IASC with senior representatives from FTSE100 companies, covering diverse industries such as retail, manufacturing, financial services, utilities, and consumer goods. This provided rich insights into corporate readiness, implementation challenges, and expectations for regulatory alignment, ensuring that the proposal reflects both the breadth and depth of business experience.

### **Quantitative analysis of business survey responses**

A written survey gathered responses from 74 businesses spanning multiple sectors, including construction, transport, and professional services. There were a wide range of respondents, with a majority of SMEs across various sectors, covering more than 300,000 employees and collectively generating revenues in excess of £54 billion.

The survey explored attitudes and business practices on human rights due diligence, current UK legislation, and future policy proposals. Findings highlight strong support for greater consistency, clarity, and alignment with international standards, alongside a clear desire for practical guidance and a level playing field for all businesses.

The full survey questionnaire is available in Annex 2 of this report.

### **Businesses recognise their human rights responsibilities across the value chain**

Survey findings show that 80% of respondents believe their human rights responsibilities apply across the entire value chain, not just upstream suppliers or downstream actors such as distributors, logistics providers, and retailers. This demonstrates strong awareness and commitment among businesses to address risks comprehensively. The proposed legislative framework in this report reflects this expectation and supports businesses in meeting these responsibilities consistently.

### **Broad consensus in support of new UK legislation**

The majority (76%) of businesses surveyed, including many SMEs, support the introduction of legislation that:

- Creates a legal duty to prevent human rights harms;
- Establishes restrictions on forced labour products; and
- Strengthens human rights disclosure and reporting.

This level of support demonstrates that a wide range of businesses are ready for change and want a clear, enforceable framework that levels the playing field.

### **The majority of businesses already undertake human rights due diligence**

84% of respondents reported that they already conduct some form of human rights due diligence. It is clear that new UK legislation would harmonise existing practices rather than impose unnecessary burdens. The model UK legislation proposed in this report would help deter companies that undercut standards and prevent a “race to the bottom,” ensuring fair competition.

### **Strong demand for alignment with international standards.**

Overall, 77% of respondents felt that more consistent regulation between UK and international markets on business and human rights would help reduce the compliance burden for their organisation. The legislative proposal in this report aligns with global norms such as the UNGPs and OECD Guidelines and is designed with interoperability in mind alongside EU instruments like the Corporate Sustainability Due Diligence Directive (CSDDD) and Forced Labour Regulation. This would position the UK as a credible partner in global efforts to tackle forced labour human rights abuses.

### **Businesses want clarity, consistency, and practical support**

Respondents called for clear legal duties, standardised reporting templates, proportionate requirements for SMEs, and practical guidance such as model policies and sector-specific examples. They also emphasised the need for simple digital reporting systems and effective enforcement mechanisms. These elements are central to embedding MHRDD legislation within a wider support ecosystem, including government guidance, industry collaboration, and technological innovation, all of which will help businesses to comply.

## Thematic analysis of qualitative interviews with FTSE 100 business leaders

### Interviews with businesses showed they support new forced labour regulations in the UK

Research was conducted to explore corporate perspectives on MHRDD through anonymised interviews with senior representatives from FTSE 100 companies across sectors including retail, manufacturing, financial services, utilities, and consumer goods. The study examined how organisations are preparing for potential legislation, the challenges they face currently in implementing HRDD, and the role of technology, investor influence, and global regulatory alignment. Themes were identified through inductive coding of interview transcripts, highlighting patterns in corporate readiness, supply chain complexity, SME capacity, enforcement expectations, and reputational considerations. Illustrative quotes are included to reflect authentic participant views.

Interviews with FTSE 100 companies reveal strong support for new UK legislation that aligns with international standards. Multinationals already comply with EU frameworks and warn that divergence creates duplication and inefficiency. Retailers and manufacturers stress that alignment is essential to maintain competitiveness and avoid reputational harm. Financial institutions highlight the risk of being targeted by campaigners and litigators if UK standards lag behind global norms. As one FTSE 100 interviewee explained: *“Where we get divergence... it causes so much complexity and cost and inefficiency to us as a business.”*

#### Corporate readiness

Most large organisations have already embedded HRDD into their operations, even though it is not mandatory. For many MHRDD is viewed as formalising existing practices rather than introducing radical change. Companies with global supply chains often have established processes for risk assessment and remediation, which positions them well for compliance.

However, readiness varies across sectors. While consumer-facing businesses tend to prioritise their own HRDD even when it is not mandatory, due to reputational risk, others adopt a compliance-driven approach. Some organisations emphasise that existing frameworks, such as modern slavery statements, provide a strong foundation for future HRDD implementation if it is made mandatory. As IASC heard from one Retail company: *“We completed a full gap analysis of our own HRDD management systems... and created a quite big action plan that we are going to implement over the next couple of years.”*

#### Supply chain complexity

Visibility beyond Tier 1 suppliers that companies deal with directly as suppliers of goods and services remains a major challenge. Traditional audits often fail to uncover hidden risks, and

fragmented supply chains reduce leverage over distant suppliers. Companies are adopting risk-based approaches to prioritise high-risk geographies and sectors.

Technology is increasingly used to improve traceability, but systemic issues such as subcontracting and informal labour persist. Collaboration across industries and regulatory support are seen as essential to address these structural challenges. As the IASC heard:

- *“Underage workers or unethical practices are often hidden during scheduled inspections... making unannounced audits in remote regions nearly impossible.”* (Global apparel company).
- *“We need regulation to support transparency and collaboration across the value chain.”* (UK-based consumer goods firm)

### **SME challenges**

Larger firms advocate for proportionate regulation and support mechanisms such as training and shared tools to ensure that small and medium-sized enterprises (SMEs) have the resources and expertise to meet any potential MHRDD requirements.

Participants stressed that without tailored guidance, SMEs may resort to superficial compliance or outsourcing due diligence, undermining the spirit of the legislation. Capacity-building initiatives are viewed as critical to ensure inclusivity. As the IASC heard:

- *“The majority of businesses in the United Kingdom are small to medium-sized enterprises... it can be a lot more difficult for them.”* (UK-based retailer)
- *“SMEs... will struggle to support due diligence or they'll outsource due diligence and it'll be a passing of a test rather than a supporting of human rights.”* (Global manufacturing firm)

### **Legislation & enforcement**

Companies broadly support the introduction of MHRDD but emphasise the need for practical, enforceable standards aligned with international frameworks. Current UK legislation, notably the Modern Slavery Act 2015, is perceived as lacking enforcement power, allowing minimal compliance.

Harmonisation with EU rules is seen as critical to avoid fragmentation and competitive disadvantages. Participants called for clarity on scope, liability, and reporting requirements to ensure meaningful impact. As the IASC heard:

- *“I could literally give you an A4 sheet of paper saying we don't do anything and we're compliant with the law [Modern Slavery Act 2015].”* (UK-based financial services organisation)
- *“We have to be really careful about how the legislation is going to be drafted... to make sure that it's really helping improvement.”* (Global energy company)

### **Environmental, social and governance (ESG) and investor influence**

Human rights considerations are increasingly integrated into ESG strategies, though investor pressure has waned in some markets. Companies link MHRDD to reputational risk and long-term resilience, even when short-term financial priorities dominate.

Participants noted that transparent disclosure remains a key expectation from investors, despite fluctuating emphasis on ESG. This dynamic demonstrates the need for consistent regulatory signals to sustain momentum. As the IASC heard:

- *“ESG was once a powerful lever for change... now it's often deprioritised in favour of short-term financial performance.”* (Global consumer goods company)
- *“Our investors are increasingly engaged in this agenda... they like to see us disclose quite fully.”* (UK-based retailer)

### **Technology & innovation**

Artificial Intelligence (AI) and digital platforms are transforming the voluntary HRDD that companies currently undertake, enabling deeper supply chain visibility and dynamic risk assessment. These tools help identify patterns and flag potential issues before they escalate.

However, technology cannot replace human oversight. Resolving flagged risks often requires negotiation, training, and relationship-building. Participants stressed that tech solutions must complement, not substitute, human judgment. As IASC heard:

- *“AI may flag a risk, but resolving it often requires negotiation, training, and relationship-building.”* (Global technology firm)
- *“Traceability is not simply listing suppliers but demonstrating a robust paper trail.”* (UK-based apparel company)

### **Reputational impact**

Reputation is a key motivator for current HRDD voluntary compliance. Interviewees reported that ethical lapses can be more damaging than legal penalties, influencing supplier selection and disclosure practices. Companies view having strong voluntary HRDD as a competitive advantage.



Participants highlighted that superficial compliance can undermine trust. Genuine commitment to human rights is increasingly seen as integral to brand value and stakeholder confidence. As IASC heard:

- *“Being a supplier to us is seen as a badge of honour.”* (Global retail company)
- *“Getting it wrong could cause huge reputational damage... how investors and other stakeholders see the business.”?* (Multi-national organisation)

## Conclusions

The findings from this engagement are clear: businesses want consistency, clarity, and a level playing field. They strongly support new UK legislation that aligns with international standards, reduces duplication, and provides practical guidance. Companies called for clear legal duties, proportionate requirements for SMEs, and robust enforcement mechanisms. Above all, businesses emphasised the need for harmonisation with global frameworks to avoid competitive disadvantages and ensure fair, responsible trade. This consensus demonstrates that UK businesses are ready for change and want legislation that is practical, enforceable, and designed to deliver meaningful improvements in human rights due diligence.

## Investor perspectives

### Investors want clarity, market stability, and actionable human rights data

Investor perspectives on MHRDD have been drawn from desktop research, public statements, coalition letters, published analyses and informal conversations with leading institutional investors, asset managers, pension funds, and industry bodies. These engagements and publications highlight how investors assess human rights risks, the financial materiality of those risks, the importance of consistent disclosure, and expectations and alignment with international standards and regulations. Insights were gathered across multiple asset classes, reflecting a broad and practical view of investor priorities and the impact of MHRDD on capital allocation, portfolio resilience, and long-term value creation. The message is clear: investors are calling for mandatory, proportionate, practicable and risk-based MHRDD legislation in the UK. In this context, “risk-based” means that companies are expected to focus their due diligence efforts on areas where the potential for human rights harm is greatest, prioritising resources and actions in line with the severity and likelihood of the risks identified (UNPRI, 2025)<sup>28</sup>. This approach provides clarity, standardisation, and a level playing field that supports responsible investment, protects long-term returns, and strengthens market stability.

### Financial materiality of human rights risks

Investors emphasise that human rights risks have direct operational, legal, reputational, and regulatory consequences that can materially affect financial returns. Poor human rights performance can result in litigation, loss of contracts, regulatory penalties, and restricted access to capital. Conversely, companies that effectively manage human rights risks demonstrate resilience and protect long-term value, providing investors with greater confidence in the stability of their investments.

MHRDD can help ensure companies proactively manage these risks and provide meaningful disclosures, so long as the mandatory bar is set high enough. As one institutional investor noted in consultation, *“if the mandatory framework has gaps, or disclosures are not meaningful... investors will still push for more voluntary disclosures, particularly for businesses that are deemed high-risk”*

### Clarity, comparability, and transparency

Investors need consistent, reliable, and accessible information to assess company performance on human rights and make informed investment decisions. Voluntary disclosure often produces inconsistent data, making it difficult to understand risk exposures, compare companies, and integrate human rights considerations into portfolio construction. MHRDD would standardise expectations, provide transparent reporting on policies, due diligence

<sup>28</sup> UNPRI. 2025. *The Risk Based Approach to Due Diligence: practical, proportionate and effective human rights and Environmental due diligence (HREDD) for investors and Investees* Available at: [Link](#)

processes, and grievance mechanisms, and enable benchmarking across firms and sectors, supporting more accurate valuations and better allocation of capital. Importantly, investors emphasise that this is not just a matter of disclosure but of ensuring that companies take tangible action to manage and minimise human rights risks and impacts. By systematically addressing these risks, MHRDD can help reduce system-level risks for asset owners and long-term investors. It also supports consistent data needs (UNPRI 2022)<sup>29</sup>, including information on business model risks, governance and leadership, due diligence procedures, and outcomes, thereby enabling better decision-making and stewardship over time.

## **Competitiveness and a level playing field**

Alignment with international frameworks, including the UN Guiding Principles on Business and Human Rights<sup>30</sup> and OECD Guidelines<sup>31</sup>, is crucial to maintain UK competitiveness. Weak or misaligned rules risk the UK becoming a “dumping ground” for poor practices, reducing investor confidence and deterring global capital. MHRDD legislation that sets standards in preventing and disclosing on human rights harms, strengthens accountability, supports sustainable business performance and ensures a level playing field for investors and companies alike.

## **Proportionate and enforceable legislation**

Investors emphasise that MHRDD laws should be proportionate, risk-based, and clear on responsibilities across the value chain, including both suppliers and downstream value chain partners. Meaningful enforcement is essential to ensure compliance and prevent regulatory gaps. Practical and sensible rules reduce bureaucratic burden while ensuring companies act on genuine human rights risks, enabling investors to rely on credible, comparable, and actionable data. Alignment with international standards can further support these objectives.

## **Systemic risk and long-term market stability**

MHRDD is seen as a critical tool for managing systemic social risks, such as inequality, political polarisation, and modern slavery. Investors argue that integrating human rights considerations into investment decisions underpins market stability and supports sustainable long-term fund performance. Coalitions such as ‘Find it, Fix it, Prevent it’<sup>32</sup>, which as of December 2024 comprised 70 investors managing more than \$18tn, demonstrate how coordinated investor engagement can drive improvements across portfolios.

<sup>29</sup> UNPRI. 2022. *Managing Human Rights Risks: What data do investors need?* Available at: [Link](#)

<sup>30</sup> United Nations Human Rights Office of the High Commissioner (OHCHR). *Guiding Principles on Business and Human Rights: Implementing the United Nations “Protect, Respect and Remedy” Framework* Available at: [Link](#)

<sup>31</sup> Organisation for Economic Co-operation and Development (OECD). 2023. *Guidelines for Multinational Enterprises on Responsible Business Conduct*. Available at: [Link](#)

<sup>32</sup> Find it, Fix it, Prevent it” is an investor-led collaborative initiative that focuses on identifying (find it), remediating (fix it) and preventing (prevent it) modern slavery risks within corporate value chains, utilising a coordinated engagement model supported by benchmarking, advocacy, and data enhancement. This collective engagement approach has demonstrated measurable improvements in ESG performance across portfolios.

Investors also participate in initiatives such as Advance, a PRI-led collaborative platform where institutional investors work together to protect and enhance risk-adjusted returns by advancing progress on human rights through engagement and stewardship. However, the effectiveness of these initiatives relies on companies providing reliable and comparable human rights information. MHRDD and human rights disclosure would help drive interoperability ensuring that investors have access to the standardised, actionable data needed to operate initiatives like Advance at scale, strengthening the impact of coordinated stewardship efforts. Globally, Advance has 266 signatories, representing \$USD35 trillion in AuM.

### Policy momentum and investor coalitions

Investor support for MHRDD in the UK is evidenced by coordinated advocacy and public statements over several years:

- Sept 2022<sup>33</sup>: 63 businesses, investors, and civil society organisations called for MHRDD legislation
- July 2023<sup>34</sup>: 50 businesses sign a statement calling for MHRDD legislation
- Feb 2024<sup>35</sup>: PRI, IIGCC, and IAHR issued a joint letter reaffirming support for the EU Corporate Sustainability Due Diligence Directive (CSDDD)
- Sept 2025<sup>36</sup>: Joint letter calling on EU policymakers to preserve the review clause in the CSDDD

### What investors need

The findings from this research and engagement are clear: investors need clarity, comparability, and a level playing field to effectively meet their sustainability goals and obligations to clients and beneficiaries. The investor demand for MHRDD isn't abstract or isolated - it is backed by organised, institutional coalitions and reflected in formal letters and public policy.

Consultation and ongoing engagement suggest strong support among UK investors for legislation that is mandatory, proportionate, aligned with international standards, reduces reporting ambiguity, and strengthens transparency across the value chain. Investors emphasise accessible, standardised disclosure on policies, due diligence processes, and grievance mechanisms, as well as meaningful enforcement to ensure compliance. Harmonised MHRDD

<sup>33</sup> Investors for Human Rights (2022) 'Businesses, investors and CSOs write to UK Prime Minister calling for human rights due diligence legislation' Available at [Link](#)

<sup>34</sup> Business & Human Rights Resource Centre (2022) 'UK business support for human rights due diligence legislation' Available at: [Link](#)

<sup>35</sup> Investors for Human Rights (2025) 'Joint letter reiterating support CSDDD' Available at: [Link](#)

<sup>36</sup> Facing Finance (2025) 'Joint letter calling on EU policymakers to preserve the review clause in the CSDDD' Available at [Link](#)

legislation protects capital, mitigates systemic risks, and enables better-informed investment decisions. This consensus demonstrates that UK investors are ready for change and want legislation that is practical, enforceable, and designed to integrate human rights considerations into mainstream investment practice.<sup>37</sup>

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<sup>37</sup> Please see Annex 3 for references outlining investor support.

## The Public

### The public want goods to be free from forced labour

Between 25–27 November 2025, the specialist polling team at Strand Partners, a policy and research advisory company, conducted an online survey of 3,006 adults across the UK to understand public attitudes toward forced and child labour in global supply chains. The polling aimed to assess the level of concern among consumers, their expectations of businesses and government, and their support for stronger measures to prevent exploitation. The findings reveal widespread unease about the possibility that everyday goods may be linked to exploitative practices, alongside strong public demand for greater accountability and tougher rules to protect workers and uphold ethical standards.

#### Public concern about forced and child labour

Public concern about forced and child labour is high. Across the UK, people are deeply uneasy about the idea that everyday goods sold in shops and online could be linked to exploitative supply chains overseas. Six in ten of the UK public (61%) believe this is a common occurrence, with particular suspicion directed at clothing and footwear (73%) and toys and children's products (57%). Many also believe that forced or child labour may be involved in the production of food and drink (49%), electronics (47%), and beauty or personal care products (43%).

This concern often feels close to home. Nine in ten (90%) worry they may have unknowingly purchased a product made using forced or child labour, and almost all of respondents (93%) would feel concerned if they discovered that an item in their home had been produced using exploitative practices. Nine in ten (91%) also think it is important to buy products that are not made using forced or child labour.

The public expect more to be done to prevent these items from reaching UK homes. Four in five (80%) believe UK retailers should be legally required to remove products linked to forced labour from their shelves, and 80% also believe the Government should introduce stronger rules requiring UK businesses to properly check for forced or child labour in their supply chains. The public call on both businesses and government to do more to ensure that the products people buy and rely on are free from forced and child labour.

#### Low public trust in business action and strong support for tougher rules

The UK public are sceptical that companies operating in the UK will take effective action against forced or child labour in their supply chains without stronger government rules to hold them accountable. While almost all respondents (92%) believe that companies are responsible for ensuring their supply chains are free from forced or child labour, fewer than one in ten (9%) fully trust them to do this effectively without government oversight.



There is little trust that businesses will act voluntarily. Seven in ten (70%) think companies will only do the bare minimum on forced or child labour unless they are required to act, and nearly three quarters (73%) believe most businesses are more concerned about profits than protecting workers from exploitation.

Tougher enforcement is therefore necessary to ensure adequate business transparency. More than eight in ten (81%) say businesses should be required to prove their claims about checking supply chains for forced or child labour, rather than simply stating that they do so. Three quarters (76%) think firms should face fines or penalties if they fail to prevent labour exploitation, and 74% say businesses should lose public contracts in the UK if they cannot show that their supply chains are free from forced or child labour.

There is also a clear commercial incentive for businesses to act. Nearly four in five respondents (78%) say they would be more likely to buy from a company that is open and transparent about its supply chains and how it prevents worker exploitation.

### **Strong public support for tougher government rules on imports and protection for British industry**

More than eight in ten (84%) say the Government needs to do more to stop products made with forced or child labour overseas from reaching UK markets, while nine in ten respondents (92%) believe it is important to protect UK businesses from this type of unfair competition. The UK public understand that this is a problem that requires international co-operation. More than eight in ten (84%) think the Government should work with other countries to introduce tougher international laws to prevent forced labour imports, and 83% believe the UK should match or exceed the standards set by other nations to ensure the strongest possible protections.

## **Conclusions**

The polling results send a clear message: the UK public are deeply concerned about forced and child labour and expect decisive action from both businesses and government. While most people believe companies have a responsibility to ensure their supply chains are free from exploitation, trust in voluntary business action is low. There is overwhelming support for stronger legal requirements, tougher enforcement, and international cooperation to prevent exploitative imports and protect British industry. These findings highlight a significant public mandate for change, one that prioritises transparency, accountability, and ethical trade practices.

### 3. The change that is needed

#### Model Legislative Drafting

This section includes the Model Legislative Drafting and accompanying Explanatory Commentary. With particular thanks to Omnia Strategy LLP for their expertise. The Drafting below have been drawn and shaped through wide-ranging engagement with businesses and has been developed and co-created with the IASC, Omnia Strategy LLP and Unseen, whose combined legal expertise, frontline experience and direct work with businesses were essential to its development.



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## Forced Labour and Human Rights Bill

### *Explanatory Commentary*

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1. This Explanatory Commentary provides explanations of key provisions set out in the Model Legislative Drafting (“**Bill**”).
2. Overall, the Bill would:
  - establish responsibility of commercial organisations and public undertakings for serious human rights harms and to provide for penalties and civil liability;
  - prohibit forced labour products from the United Kingdom market;
  - replace section 54 of the Modern Slavery Act 2015 with provision about reporting and disclosure in relation to human rights;
  - confer duties on Ministers to protect human rights;
  - confer functions on the Office for Responsible Business Conduct; and
  - make provision for review and reporting to Parliament.
3. We recognise that there are devolution implications to the Bill, with some areas of policy and implementation falling within the competence of the Scottish, Welsh and Northern Ireland devolved institutions. For clarity, the Bill is drafted as if all its provisions applied to the whole of the United Kingdom, with some provisions nevertheless acknowledging legal differences between the constituent nations (for example, in relation to criminal offences and procedure). The UK Government should continue engaging with the devolved institutions and politicians within them as part of the process of consultation and discussion on the Bill and its aims.

## **PART 1: RESPONSIBILITY FOR SERIOUS HUMAN RIGHTS HARM**

| No. | Title | Subsection | Commentary |
|-----|-------|------------|------------|
|-----|-------|------------|------------|

### ***Chapter 1: Responsibility for serious human rights harm***

This Chapter sets out the criteria under which a relevant organisation (defined below) is responsible for a human rights harm, and when it will not be responsible for harms where it can be shown that it had undertaken “*reasonable due diligence*”.

|          |   |     |   |
|----------|---|-----|---|
| <b>1</b> | <b>Responsibility for serious human rights harm</b> | (1) | <p>Subsection (1) provides that where:</p> <ul style="list-style-type: none"> <li>(i) a serious human rights harm occurs; and</li> <li>(ii) a relevant organisation is involved in the harm (i.e. causes, contributes, or is directly linked to, that harm);</li> </ul> <p>the relevant organisation is responsible for that harm, unless it can prove that it conducted “<i>reasonable due diligence</i>”.</p> <p>This follows the ‘failure to prevent’ model, drawing from the Bribery Act 2010 and the Economic Crime and Corporate Transparency Act 2023.</p> <p>Under UK statutory interpretation, a singular ‘harm’ can be interpreted as more than one ‘harms’. This applies across the Bill to all singular nouns used.</p> |
|          |   | (2) | Subsection (2) provides a defence to responsibility for serious human rights harm where the relevant organisation has undertaken reasonable due diligence.  |
|          |   | (3) | Subsection (3) provides that more than one relevant organisation may be responsible for a serious human rights harm.  |
|          |   | (4) | <p>Subsection (4) defines a number of key concepts and terms used in the Bill. The source(s) of each definition is broadly as follows:</p> <ul style="list-style-type: none"> <li>• The definition of “<i>human rights harm</i>” draws from guidance from the UN Human Rights</li> </ul>  |

| No. | Title                           | Subsection | Commentary  |
|-----|---------------------------------|------------|---|
|     |                                 |            | <p>Office and references the human rights listed in the Schedule to the Bill, which, in turn, is drawn from those international human rights instruments to which the UK is a party.</p> <ul style="list-style-type: none"> <li>The factors to be considered in determining whether a human rights harm is “<i>serious</i>” are aligned with the factors in determining severity under the UN Guiding Principles on Business and Human Rights (“<b>UN Guiding Principles</b>”).</li> <li>The definitions for “<i>business relationship</i>” and “<i>business partner</i>” are drawn from the EU Corporate Sustainability Due Diligence Directive (Article 3).</li> </ul> <p>“<i>Business partner</i>” may include a range of commercial relationships across the value chain, including suppliers, (sub)contractors, service providers, agents, brokers, consultants, joint ventures, subsidiaries, franchisees, clients and investees.</p> <p>Subsection (4)(c) ensures that serious human rights harms that occur outside the UK fall within scope of the Bill.</p> |
|     |                                 | (5)        | <p>Given the UK’s evolving international human rights commitments, subsection (5) gives the Secretary of State power to amend the Schedule listing the human rights provisions. Any amendments are subject to the affirmative Parliamentary procedure.</p>  |
| 2   | <b>Reasonable due diligence</b> | (1)        | <p>Subsection (1) sets out steps expected as part of “<i>reasonable due diligence</i>” in order to establish an exception to responsibility (where a relevant organisation would otherwise be responsible for a serious human rights harm).</p> <p>These standards are drawn from the OECD Guidelines for Multinational Enterprises and will be further elaborated in guidance to be provided alongside the Bill (see Clause 4).</p>  |

| No. | Title                 | Subsection | Commentary   |
|-----|-----------------------|------------|--|
|     |                       |            | By way of practical example (subject to guidance), a relevant organisation may meet its due diligence expectations under Subsection (1)(a) by ensuring effective governance of human rights matters, integrating salient human rights risks into its management systems, and providing ongoing human rights training to relevant stakeholders.   |
|     |                       | (2)        | <p>Subsection (2) sets out the proportionality factors to be considered when assessing whether a relevant organisation has carried out “<i>reasonable</i>” due diligence, including the organisation’s size and available resources, as well as any known risk factors. This generally follows the standards set out in the UN Guiding Principles.</p> <p>In assessing whether due diligence is “<i>reasonable</i>,” consideration must be given to whether the commercial organisation qualifies as a small or medium-sized enterprise (“<b>SME</b>”). The express reference to SMEs in this subsection is informed by private sector feedback.</p>   |
|     |                       | (3)        | If a relevant organisation cannot prove it took the specific due-diligence steps for the harm that occurred but can show it acted reasonably overall in managing the relevant risks, Subsection (3) means that it may nevertheless be treated as having taken those reasonable steps in relation to that harm.   |
| 3   | Relevant organisation | (1)-(6)    | <p>Subsections (1)-(6) set out the definition of “<i>relevant organisation</i>”, encompassing both “<i>commercial organisations</i>” and “<i>public undertakings</i>”, for the purpose of the Bill.</p> <ul style="list-style-type: none"> <li>• The definition of “<i>public undertaking</i>” is drawn from the Procurement Act 2023, meaning a person subject to public authority oversight, and operating on a commercial basis.</li> <li>• The definition of “<i>commercial organisation</i>” (subsection (2)) is drawn from the Modern Slavery Act 2015. This means that all of the requirements of the Bill (except the forced labour restriction, which applies to a “person”) apply the £36 million global turnover threshold. In</li> </ul> |



| No. | Title                | Subsection | Commentary   |
|-----|----------------------|------------|--|
|     |                      |            | <p>subsection (2), “<i>services</i>” includes financial services, such as investments and advisory services offered by investment managers to clients.</p> <p>In practice, it would be appropriate for the Financial Conduct Authority, in conjunction with HM Treasury, to review the appropriateness of the £36 million threshold for institutional investors, to inform the Secretary of State’s decision on whether and how to amend the threshold by regulations.</p>   |
| 4   | Support and guidance | (1)-(8)    | <p>Clause 4 requires the Secretary of State to assist relevant organisations in understanding and complying with their obligations under this Part, including by issuing guidance on:</p> <ul style="list-style-type: none"> <li>• The circumstances in which a relevant organisation is to be treated as causing, contributing to, or being directly linked with a serious human rights harm;</li> <li>• The threshold for a human rights harm to be serious;</li> <li>• What will constitute reasonable due diligence; and</li> <li>• What constitutes responsible disengagement and appropriate consultation with affected persons.</li> </ul> <p>This clause is informed by private sector feedback on what would be most useful in terms of support and guidance. The other subsections within this clause concern procedural requirements relating to such guidance.</p> |

## ***Chapter 2: Civil liability of persons responsible for serious human rights harm***

The Bill sets out two types of liability that may be triggered where a relevant organisation is responsible for a serious human rights harm under the previous Chapter 1:

| No. | Title | Subsection | Commentary  |
|-----|-------|------------|---|
|     |       |            | <ul style="list-style-type: none"> <li>• <b>Civil liability</b>, through regulatory enforcement and/or civil claims brought under the Bill by victims or representatives before the court (Chapter 2); and</li> <li>• <b>Criminal liability</b> (Chapter 3) under which prosecutions may be brought.</li> </ul> |

*Civil penalties and requirements*

|   |   |         |  |
|---|---|---------|--|
| 5 | <b>Power to impose financial penalties and other requirements</b> | (1)     | Subsection (1) provides a range of civil enforcement measures that may be imposed by notice issued by the Office for Responsible Business Conduct (the “Office”) if it finds that a relevant organisation is responsible for a serious human rights harm and that no “ <i>reasonable due diligence</i> ” exception applies. This includes public censure, a penalty notice (of up to 5% of global turnover), compliance, compensation, costs and restoration notices, and exclusion from public procurement processes. |
|   |   | (2)     | Subsection (2) requires the Office to include reasons relating to notices under subsection (1).  |
|   |   | (3)     | Subsection (3) provides that, as an alternative to issuing a notice under subsection (1), the Office may accept undertakings from the organisation or another person.<br><br>These undertakings may include commitments (a) by the organisation to take steps to remedy the effects of the serious human rights harm; and (b) by another person, guaranteed by the organisation, to compensate.  |
|   |   | (4)     | Given that the enforcement measures will likely need to be specifically tailored to public undertakings (who, for example, may not have a ‘turnover’), Subsection (4) requires the Secretary of State to make regulations on the appropriate measures.   |
|   |   | (5)     | In order to provide clarity on the operation of penalties where a relevant organisation is responsible for a human rights harm, the Secretary of State is required to issue guidance.  |
| 6 | <b>Appeals</b>  | (1)-(4) | Subsections (1)-(4) allow for appeals where a relevant organisation is given a notice that it disputes, and the relevant high-level procedure. Details of this procedure will be set out in regulations made by the Secretary of State.  |

| No. | Title                                    | Subsection | Commentary  |
|-----|--|------------|---|
| 7   | <b>Ancillary and preventative orders</b> | (1)        | Subsection (1) allows the Office to apply to the court for orders as needed.  |
|     |  | (2)        | Subsection (2) provides that such an order may require the person against whom it is made to do, or refrain from doing, any act specified in the order. |
|     |  | (3)        | Subsection (3) provides for rules of court to make provision about applications and orders under this section, including appeals against orders.        |
|     |  | (4)        | Subsection (4) applies the same definition of “ <i>senior officer</i> ” as Clause 11 (which deals with senior officer criminal offences).               |

#### *Civil claims*

| No. | Title               | Subsection | Commentary  |
|-----|---------------------|------------|---|
| 8   | <b>Civil claims</b> | (1)-(3)    | <p>Clause 8 makes provision for civil claims to be brought by victims or their representatives (including the Office) against relevant organisations under the Bill.</p> <p>Subsection (3) requires a representative bringing a claim to have either (a) sufficient interest in the claim; or (b) the same interest in the claim as, and the consent of, the victim. These requirements do not apply to the Office.</p> |
|     |                     | (4)-(5)    | While existing rules of civil procedure already exclude ‘vexatious, scurrilous or obviously ill-founded’ claims, this subsection contains specific exclusions to this effect for the sake of clarity. This approach is informed by private sector feedback on this issue.   |
|     |                     | (6)        | Applies the standard civil time limit (six years) for victims to bring claims under the Bill.   |
|     |                     | (7)        | Subsection (7) allows for claimants to rely on findings made under the regulatory and criminal provisions of Chapters 2 and 3 to facilitate their claims. This follows the approach taken in the Health & Safety at Work etc. Act 1974, and the law allowing the use of evidence from criminal proceedings in civil proceedings.  |

| No. | Title             | Subsection | Commentary  |
|-----|-------------------|------------|---|
| 9   | Judicial remedies | (8)        | Subsection (8) seeks to reduce the cost deterrent on claimants bringing a claim.  |
|     |                   | (1)        | Subsection (1) reiterates the court's discretionary powers to grant appropriate remedies where a relevant organisation is liable.   |
|     |                   | (2)        | <p>Subsection (2) indicates that remedy may include exemplary damages or an account of profits, even where the restrictive rules usually applicable to these remedies would not otherwise be satisfied.</p> <p>This enables courts to go beyond the usual 'loss-responsive' approach to damages. It seeks to overcome the issue that damages for overseas harms, often based on local economic values, may be too low to meaningfully deter large multinational corporations.</p>                                     |
|     |                   | (3)        | <p>Subsection (3) sets out the mandatory factors the court must consider in deciding whether to award exemplary damages:</p> <ul style="list-style-type: none"> <li>• Whether the breach was deliberate under paragraph (a), discouraging relevant organisations from deliberately committing 'tactical' breaches; and</li> <li>• Paragraph (b) aims to ensure that the court will only take a punitive approach in circumstances where that has not already been achieved by means of civil penalties.</li> </ul>    |
|     |                   | (4)        | <p>Subsection (4) sets out the mandatory factors the court must consider in deciding whether to award an account of profits:</p> <ul style="list-style-type: none"> <li>• The extent to which the relevant organisation had profited from the serious human rights harm in question under paragraph (a); and</li> <li>• Whether damages are sufficient to deter the organisation from future conduct liable to render the relevant organisation responsible for serious human rights harm (paragraph (b)).</li> </ul> |

### Chapter 3: Criminal offences

| No. | Title | Subsection | Commentary |
|-----|-------|------------|------------|
|-----|-------|------------|------------|

Chapter 3 sets out two criminal offences:

- Criminal offences where a **relevant organisation** has responsibility for serious human rights harm, where that harm would also be a specific offence if it were to occur in the UK; and
- Criminal offence where a **senior officer** of a relevant organisation consented or connived in the commission of that offence.

Criminal liability is reserved for the most egregious cases of serious human rights harms.

|    |   |         |  |
|----|---|---------|--|
| 10 | <b>Relevant organisation criminal liability for serious human rights harm</b> | (1)     | Subsection (1) provides for corporate criminal liability for those responsible for serious human rights harms, where those harms would amount to criminal offences under UK law.   |
|    |   | (2)-(3) | In order to ensure that criminal liability is only triggered for the most egregious human rights harm, subsection (2) sets out a limited list of offences that meet the necessary threshold of seriousness.<br><br>An act or omission need only constitute a listed offence <i>as if</i> it had occurred within the UK (rather than have actually occurred in the UK). This removes the requirement for UK criminal jurisdiction to apply, recognising that many human rights harms are expected to take place outside the UK (where UK jurisdiction would not apply). |
| 11 | <b>Senior officer criminal liability for serious human rights harms</b>       | (1)     | Subsection (1) provides for a criminal offence for senior officers of organisations guilty under Clause 10. The language of “ <i>consent</i> ” and “ <i>connivance</i> ” is drawn directly from the Bribery Act 2010.  |
|    |   | (2)     | Subsection (2) draws the definition of senior officer from the Bribery Act 2010, with additional provisions for the appropriate persons in “ <i>public undertakings</i> ”.   |
| 12 | <b>Penalties</b>  | (1)-(3) | Clause 12, as well as providing for unlimited fines, gives the court convicting a director power to make a disqualification order.   |

|  |     |   |
|--|-----|---|
|  | (4) | Subsection (4) allows the Office, Secretary of State, or Crown Prosecution Service (and its Northern Ireland equivalent) to bring prosecutions. |
|--|-----|---|

## **PART 2: FORCED LABOUR RESTRICTION**

| No. | Title  | Subsection | Commentary  |
|-----|--|------------|---|
| 13  | <b>Prohibition of forced labour products</b> | (1)-(2)    | <p>Clause 13 sets a general ban on exporting, importing or making available on the UK market “<i>forced labour products</i>” (meaning products made with, or transported with, forced labour).</p> <p>Other than the inclusion of products transported with forced labour (referenced above) within the definition of “<i>forced labour products</i>”, Clause 13 is largely based on the EU Forced Labour Regulation. The restriction applies to all forced labour products, regardless of the value of the product or consignment in question (i.e. no <i>de minimis</i> threshold applies).</p> |
| 14  | <b>Interpretation of Part 2</b>              | (1)        | <p>Clause 14 provides for the key definitions for the forced labour restriction. These definitions are mostly taken from the EU Forced Labour Regulation.</p> <p>Transportation of, as well as making, products with forced labour has been added (not in EU Forced Labour Regulation) to address the high incidence of forced labour in transport and logistics industries.</p>  |
|     |  | (2)        | Subsection (2) extends the forced labour ban to products which are similar to and intermingled with forced labour products. It is adapted from existing legislation in order to avoid the evidential difficulties arising out of the intermingling of like products.  |
| 15  | <b>Presumption of forced labour</b>          | (1)-(5)    | Clause 15 empowers the Secretary of State to impose presumptive restrictions, following the US Uyghur Forced Labour Prevention Act, with some amendments following existing policy research.  |
| 16  | <b>Enforcement</b>                           | (1)        | The forced labour restriction is intended to apply to the products themselves rather than imposing any additional obligations on persons subject to the Bill. Penalties are,  |



| No. | Title | Subsection | Commentary  |
|-----|-------|------------|---|
|     |       |            | <p>however, applicable where a person breaches the forced labour restriction. Subsection (1) allows the Secretary of State to impose a penalty on those in violation of the forced labour restriction.</p> <p>Existing UK customs legislation already gives authorities powers to enforce customs controls, so we have not reduplicated these within this Part.</p>   |
|     |       | (2)        | <p>Subsection (2) sets a penalty for non-compliance with the forced labour restriction at twice the sale value of the relevant products or a penalty notice (up to 5% of a commercial organisation's annual turnover), whichever is highest.</p> <p>Given public undertakings may not have an annual turnover as defined under the Bill (or may otherwise need to be treated differently from commercial organisations), paragraph (c) requires the Secretary of State to make separate rules for circumstances of public undertakings' non-compliance.</p> |
|     |       | (3)        | <p>Subsection (3) requires the Secretary of State to make delegated legislation: (a) as necessary or appropriate for enforcement of the prohibitions; and (b) to establish a public forced labour database.</p>   |
|     |       | (4)        | <p>Subsection (4) sets out that regulations relating to enforcement of subsection (3)(a) must (a) allow for an appeal against monetary penalties; and (b) address the operation of subsection (1), including investigations of suspected contraventions.</p>  |
|     |       | (5)        | <p>Subsection (5) allows other enforcement bodies that may be relevant (such as Border Force or HMRC) to play a role in enforcement.</p>  |
|     |       | (6)        | <p>Subsection (6) sets out the requirements for the forced labour database (under subsection (3)(b)), including that it must be publicly accessible, regularly updated with forced labour risk information, allow anonymous submissions of suspected contraventions, and include details on findings, penalties, and appeal outcomes.</p>   |

| No. | Title | Subsection | Commentary  |
|-----|-------|------------|---|
|     |       | (7)        | Subsection (7) requires the Secretary of State to also publish guidance explaining good practice for avoiding forced labour products (including due diligence expectations), how evidence will be assessed when considering enforcement action, and what information should appear on the public database, including how anonymous reports will be handled. |

### **PART 3: DISCLOSURE AND REPORTING**

| No.                           | Title  | Subsection | Commentary   |
|-------------------------------|--|------------|--|
| <i>Human rights statement</i> |  |            |  |
| 17                            | <b>Human rights statement</b>                | (1)        | Subsection (1) requires a relevant organisation to publish an annual human rights statement.   |
|                               |  | (2)-(3)    | <p>The contents set out in subsection (2), paragraphs (a)-(d) follow a high-level and principles-based reporting approach.</p> <p>The drafting generally follows Section 54 of the Modern Slavery Act 2015 and existing UK companies reporting law.</p>                |
|                               |  | (4)        | Given the Bill creates new broader human rights due diligence disclosure obligations, the overlapping requirements under Section 54 of the Modern Slavery Act 2015 are no longer needed. Subsection (4) therefore repeals this section of the Modern Slavery Act 2015. |
| 18                            | <b>Publication of human rights statement</b> | (1)-(2)    | Clause 18 sets the specific requirements for an organisation to publish its human rights statement on its website or make it available for request (if it does not have a website). These requirements follow Section 54 of the Modern Slavery Act 2015.               |

*Human rights statement registry*

|    |                                  |         |   |
|----|----------------------------------|---------|---|
| 19 | Establishment of public registry | (1)     | Clause 19 requires the Secretary of State to, by regulations, establish a human rights statement registry. This effectively puts on a statutory footing the existing guidance around the modern slavery registry, and also ensures that statements extend to human rights (rather than only modern slavery statements). |
|    |                                  | (2)-(3) | Subsections (2) and (3) set out what regulations concerning the registry must ensure.   |
| 20 | Penalties for non-compliance     | (1)-(2) | Subsections (1) and (2) set penalties for non-compliance, with both a requirement to publish the human rights statement and the requirement to submit it to the registry. These include public censure, a fine of up to 5% of annual turnover (penalty notice), and requirement to pay the costs of investigation.      |

**PART 4: OFFICE FOR RESPONSIBLE BUSINESS CONDUCT**

| No. | Title                                   | Subsection | Commentary   |
|-----|---|------------|--|
| 21  | Office for Responsible Business Conduct | (1)        | Subsection (1) requires the Secretary of State, within six months of the Bill's commencement, to empower the Office for the purposes of enabling it to perform the functions conferred on it under this Bill.  |
|     |   | (2)        | Subsection (2) confirms that the duties must include (a) providing such support, guidance and advice (with reference to mandatory guidance required elsewhere in the Bill); and (b) taking appropriate steps to secure compliance.   |
|     |   | (3)        | Subsection (3) identifies key powers that the Office must be given, including the ability to investigate organisations, to do any other things necessary to issue financial penalties and other requirements (under Clause 5), and initiate or recommend the initiation of criminal proceedings (under Chapter 3). |

| No. | Title | Subsection | Commentary   |
|-----|-------|------------|--|
|     |       | (4)        | The Office is currently a subdivision of the UK Department of Business and Trade, and it may need additional constitutional and governance arrangements to ensure it can properly carry out its role under the Bill. Subsection (4) specifies that these regulations may include provision about such arrangements, including appointment of officers or other persons to act on behalf of the Office. |

## **PART 5: STATUTORY REVIEW AND REPORTING**

| No. | Title  | Subsection | Commentary   |
|-----|--|------------|--|
| 22  | <b>Review of operation of Act</b>                  | (1)-(2)    | Subsections (1)-(2) require the Secretary of State to review the Act every seven years with a view to updating and strengthening the regime.   |
|     |  | (3)        | Subsection (3) establishes a periodic accountability framework for the Secretary of State to report to Parliament.   |
| 23  | <b>Amendment to give effect to recommendations</b> | (1)        | Clause 23 allows the Secretary of State to implement recommendations made in the report under Clause 22.<br><br>Subsection (1) empowers the Secretary of State to amend subordinate legislation by regulations to give effect to such recommendations. |
|     |  | (2)        | Subsection (2) requires the Secretary of State, as soon as practicable, to update any guidance under the Act in line with recommendations.   |
|     |  | (3)        | Subsection (3) ensures that, before making regulations or changing guidance, there is an opportunity for representations to be made in response to the report, and that these are considered.  |

## **PART 6: MISCELLANEOUS AND GENERAL**

| <b>No.</b>                                     | <b>Title</b>                                    | <b>Subsection</b> | <b>Commentary</b>   |
|--|---|-------------------|---|
| <i>Further provision to give effect to Act</i> |   |                   |   |
| <b>24</b>                                      | <b>Ministerial duty to protect human rights</b> | (1)               | <p>Subsection (1) sets a general requirement for Ministers to ensure that all legislation is designed in accordance with its obligation to protect against businesses' human rights abuses. This reflects the UN Guiding Principles' articulation of State responsibility to 'protect', which, in turn, crystallises existing duties under international human rights law.</p> <p>The inclusion of this provision is also responsive to private sector roundtable feedback around the need for Government to avoid creating structural impediments to protecting human rights through counteracting policy.</p> |
|  |   | (2)               | Given the general nature of the duty in subsection (1), subsection (2) builds in a Parliamentary accountability mechanism.  |
| <b>25</b>                                      | <b>Financial services</b>                       | N/A               | Clause 25 requires the Financial Conduct Authority to exercise its rule-making and guidance-giving powers under the Financial Services and Markets Act 2000 to ensure the effective operation of the Bill in relation to persons within the FCA's regulatory authority – i.e. authorised firms and listed companies.  |
| <b>26</b>                                      | <b>Power to make consequential provision</b>    | (1)-(2)           | Clause 26 empowers the Secretary of State to (a) make consequential delegated legislation under the Bill; (b) make consequential changes to any other legislation, primary or secondary; and (c) implement temporary or carry-over rules to facilitate the transition from old to new legislation.  |

| No. | Title | Subsection | Commentary |
|-----|-------|------------|------------|
|-----|-------|------------|------------|

*Subordinate legislation*

|    |  |         |   |
|----|--|---------|---|
| 27 | Procedure etc. for subordinate legislation | (1)-(4) | Clause 27 sets out the process for making secondary legislation under the Act, including whether it should be made under the affirmative or negative procedure.   |
| 28 | Short title, commencement and extent       | (1)     | Subsection (1) gives the Act its formal short title, the “ <i>Forced Labour and Human Rights Act 2026</i> ”.  |
|    |  | (2)     | Subsection (2) provides for the Bill to come into force two years after enactment.  |
|    |  | (3)     | Subsection (3) specifies the territorial extent of the Bill. As drafted, it applies to the whole of the United Kingdom, but please see the introductory comments, above, about devolution implications. |

**SCHEDULE: LIST OF INTERNATIONAL HUMAN RIGHTS LAW PROVISIONS**

| Title  | Paragraphs | Commentary  |
|--|------------|---|
| List of international human rights instruments | 1-21       | The Schedule lists the relevant international human rights treaties and their provisions. Only treaties formally ratified by the UK and containing substantive, enforceable standards are included. Certain human rights instruments are excluded if they are non-binding, not ratified by the UK, or do not create obligations for non-State actors. |



# Forced Labour and Human Rights Bill

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#### SCHEDULE — LIST OF INTERNATIONAL HUMAN RIGHTS LAW PROVISIONS

A  
**B I L L**  
TO

Establish responsibility of commercial organisations and public undertakings for serious human rights harms and to provide for penalties and civil liability; to prohibit forced labour products from the United Kingdom market; to replace section 54 of the Modern Slavery Act 2015 with provisions about reporting and disclosure in relation to human rights; to confer duties on Ministers of the Crown to protect human rights; to confer functions on the Office for Responsible Business Conduct; to make provision for review and reporting to Parliament; and for connected purposes.

**B**E IT ENACTED by the King's most Excellent Majesty, by and with the advice and consent of the Lords Spiritual and Temporal, and Commons, in this present Parliament assembled, and by the authority of the same, as follows: —

**PART 1**

**CHAPTER 1**

**RESPONSIBILITY FOR SERIOUS HUMAN RIGHTS HARM**

**1      Responsibility for serious human rights harm**

- (1) Where a serious human rights harm occurs, a relevant organisation ("O") is responsible for that harm if —
  - (a) any activity of O causes or contributes to the occurrence of the serious human rights harm, or
  - (b) the occurrence of the serious human rights harm is directly linked to O's operations, products or services by O's business relationships.
- (2) But O is not responsible for a serious human rights harm if it is proved that O had undertaken reasonable due diligence to prevent the harm from occurring.

- (3) More than one relevant organisation may be responsible for a serious human rights harm.
- (4) For the purposes of this Part —
  - (a) “human rights harm” means an adverse impact that removes or reduces the ability of a natural person to enjoy a right listed in the Schedule;
  - (b) whether a human rights harm is “serious” is to be determined having regard to all the circumstances, including the scope, scale and remediability of the harm;
  - (c) it is irrelevant whether a serious human rights harm, or any act or omission of O or a business partner, occurs in the United Kingdom or elsewhere;
  - (d) “business relationship” means the relationship of O with a business partner;
  - (e) “business partner” means a person —
    - (i) with which O has a commercial agreement related to the operations, products or services of O or to which O provides operations, products or services (a “direct business partner”), or
    - (ii) which is not a direct business partner, but which performs business operations related to the operations, products or services of O.
- (5) The Secretary of State may by regulations modify the Schedule by adding, modifying or deleting an entry.

## **2 Reasonable due diligence**

- (1) In section 1(2), “reasonable due diligence” on the part of a relevant organisation (“O”) means taking such of the following steps, in such a manner, as is reasonable in all the circumstances —
  - (a) embedding human rights considerations into policies and management systems;
  - (b) identifying and assessing actual and potential human rights harms associated with O’s operations, products or services, including those arising from O’s business relationships;

- (c) ceasing, preventing and mitigating serious human rights harms;
  - (d) monitoring the implementation and effectiveness of O's due diligence activities;
  - (e) communicating how impacts are addressed;
  - (f) establishing, or participating in, an effective mechanism for the submission of notifications by persons where they have information or concerns regarding actual or potential human rights harms with respect to O's own operations, the operations of O's subsidiaries, and O's business relationships;
  - (g) providing for, or co-operating in, remediation when appropriate;
  - (h) conducting effective stakeholder engagement throughout the taking of the steps listed in paragraphs (a) to (g).
- (2) In subsection (1), "reasonable in the circumstances" means appropriate and proportionate in all the circumstances including —
- (a) the resources available to O and its business partners, the sector in which O and its business partners operate, the geographical and contextual factors associated with the place where the operations of O and its business partners take place, and the ownership and structure of O and its business partners;
  - (b) the likelihood of a serious human rights harm of the type in question occurring, and the seriousness of that harm if it were to occur, having regard to the matters mentioned in section 1(4)(b);
  - (c) whether or not O falls within the definition of small and medium-sized enterprises in section 123(1) of the Procurement Act 2023.
- (3) In relation to subsection (2)(b), where —
- (a) it is not proved that O has taken such of the steps mentioned in subsection (1), in such manner as is reasonable as regards harm of the type that has occurred, but
  - (b) it is proved that O has acted reasonably overall in relation to the risks associated with its activities and the activities of its business partners, including the risk of occurrence of other types of harm,
- O may nevertheless be treated as having taken such of those steps, in such manner as is reasonable as regards the harm that has occurred.

### **3 Relevant organisation**

- (1) In this Act, “relevant organisation” means –
  - (a) a commercial organisation, or
  - (b) a public undertaking within the meaning of section 2(2) of the Procurement Act 2023.
- (2) In subsection (1), “commercial organisation” means –
  - (a) a body corporate (wherever incorporated) which carries on a business, or part of a business, in any part of the United Kingdom, or
  - (b) a partnership (wherever formed) which carries on a business, or part of a business, in any part of the United Kingdom,which supplies goods or services and has a total turnover of £36 million or more.
- (3) In subsection (2), “partnership” means –
  - (a) a partnership within the Partnership Act 1890,
  - (b) a limited partnership registered under the Limited Partnerships Act 1907, or
  - (c) a firm, or an entity of a similar character, formed under the law of a country outside the United Kingdom,and “business” includes a trade or profession.
- (4) For the purposes of subsection (2), “total turnover” of an organisation is the sum of –
  - (a) the turnover of that organisation, and
  - (b) the turnover of any of its subsidiary undertakings.
- (5) In subsection (4), “turnover” means the amount derived from the provision of goods and services falling within the ordinary activities of the organisation or subsidiary undertaking, after deduction of –
  - (a) trade discounts,
  - (b) value added tax, and
  - (c) any other taxes based on the amount so derived.
- (6) The Secretary of State may by regulations amend the amount of turnover mentioned in subsection (2).

## **4 Support and guidance**



- (1) The Secretary of State must take reasonable steps (including issuing guidance under this section) to assist relevant organisations in understanding and complying with the provisions of this Part.
- (2) The Secretary of State must issue guidance about –
  - (a) the circumstances in which O is to be treated as causing, contributing to or being directly linked to a serious human rights harm for the purposes of section 1;
  - (b) the matters to be taken into account in determining whether a human rights harm is serious for the purposes of section 1;
  - (c) reasonable due diligence for the purposes of section 2;
  - (d) responsible disengagement from business relationships, including appropriate consultation with affected persons, in the event that a relevant organisation decides to suspend or terminate a business relationship in order to comply with this Act.
- (3) The Secretary of State must issue guidance under subsection (2), and under any other provision of this Act requiring the Secretary of State to issue guidance, within one year of the day on which this Act is passed.
- (4) The Secretary of State may issue guidance about other matters connected with the operation of this Act.
- (5) The Secretary of State must keep guidance issued under this section under review and may from time to time revise such guidance.
- (6) Guidance issued under this section is to be published in such a manner as the Secretary of State considers appropriate.
- (7) Subsections (5) and (6) also apply to guidance issued by the Secretary of State under any other provision of this Act.
- (8) Where guidance is issued under this Act, a person exercising functions in relation to a provision of this Act to which the guidance relates must have regard to the guidance.

## CHAPTER 2

### CIVIL LIABILITY OF PERSONS RESPONSIBLE FOR SERIOUS HUMAN RIGHTS HARM

#### *Civil penalties and requirements*

## **5 Power to impose financial penalties and other requirements**

- (1) Where the Office finds a commercial organisation responsible under section 1 for a serious human rights harm, the Office may, as it considers appropriate –
  - (a) issue a notice containing a public statement to that effect (a “censure notice”);
  - (b) issue a notice imposing on the organisation a financial penalty specified in the notice of an amount equivalent to up to 5% of the organisation’s global turnover (a “penalty notice”);
  - (c) issue a notice requiring the organisation to take specified steps within a specified time to ensure that the serious human rights harm does not continue or recur (a “compliance notice”);
  - (d) issue a notice requiring the organisation to take specified steps with a specified time to make restitution by re-establishing the situation before the serious human rights harm occurred, so far as this is possible (a “restoration notice”);
  - (e) issue a notice requiring the organisation to compensate, within a specified time, a specified person adversely affected by the serious human rights harm, by payment of a specified sum of money or by other specified means (which may include, without prejudice to the scope of paragraph (d), restoration of specified property to the person concerned) (a “compensation notice”);
  - (f) issue a notice excluding the organisation from participation in procedures for the award of supply, works, or service contracts by public authorities and public undertakings for a specific period of up to five years from the date of the notice (an “exclusion notice”);
  - (g) issue a notice requiring the organisation to pay a specified sum to cover the cost to the Office of investigating and adjudicating on the matter (a “costs notice”).
- (2) A notice under subsection (1) must include the Office’s reasons for –
  - (a) its finding that the organisation is responsible for a serious human rights harm,
  - (b) in the case of a penalty notice or a costs notice, the amount of the penalty or costs, and
  - (c) in the case of a compliance notice, a restoration notice, a compensation notice or an exclusion notice, the requirements

imposed by the notice (including the amount of any money payment required by a compensation notice).

- (3) In addition to, or instead of, issuing a notice under subsection (1), the Office may –
  - (a) accept an undertaking from the organisation to take steps to remedy the effects of the serious human rights harm;
  - (b) accept an undertaking by another person, guaranteed by the organisation, to compensate persons adversely affected by the serious human rights harm.
- (4) The Secretary of State must by regulations make provision corresponding to subsections (1) to (3) for cases where the Office finds a public undertaking responsible for a serious human rights harm.
- (5) The Secretary of State must issue guidance about the operation of this section, including guidance about the amount to be specified in a penalty notice issued to a commercial organisation or public undertaking.

## **6 Appeals**

- (1) A relevant organisation in relation to which any of the following notices is issued may appeal to the court or tribunal (“the court”) specified in regulations made by the Secretary of State –
  - (a) a notice under section 5(1);
  - (b) a corresponding notice under regulations made under section 5(4).
- (2) An appeal may be brought, in the manner and within the time specified in the regulations, on the ground that –
  - (a) the notice is based on an error of law or a material error of fact, or
  - (b) the Office erred in exercising discretion.
- (3) If the court considers that a ground specified in subsection (2) is established, it must allow the appeal and –
  - (a) set aside the notice,
  - (b) substitute another notice which the Office could have given, or
  - (c) remit the matter to the Office for reconsideration.
- (4) Otherwise, the court must dismiss the appeal.

## **7 Ancillary and preventative orders**

- (1) On an application by the Office, the High Court (in Scotland, the Court of Session) may make an order –
  - (a) against a relevant organisation, or any of its senior officers, for the purpose of giving effect to any requirement of a penalty notice, a compliance notice, a restoration notice, a compensation notice or a costs notice issued in relation to that organisation;
  - (b) against a relevant organisation, or any of its senior officers or business partners, for the purpose of preventing the occurrence of a serious human rights harm for which the Office considers, were it to occur, the organisation would be responsible.
- (2) An order under subsection (1) may require the person against whom it is made to do, or refrain from doing, any act specified in the order.
- (3) Rules of court may make provision about applications and orders under this section, including appeals against orders.
- (4) In this section, “senior officer” has the same meaning as in section 11.

### *Civil claims*

## **8 Civil claims**

- (1) A person mentioned in subsection (2) who claims that a relevant organisation is responsible for a serious human rights harm may bring civil proceedings against the organisation under this section.
- (2) A claim under this section may be brought by –
  - (a) a natural person (the “victim”) who claims to have been adversely affected by a serious human rights harm, or
  - (b) the Office, or another person, (a “representative”) acting on behalf of one or more victims.
- (3) A representative other than the Office must have –
  - (a) sufficient interest in the claim, or
  - (b) the same interest in the claim as, and the consent of, the victim.

- (4) A claim brought under this section must be dismissed if it appears to the court that the claim –
  - (a) is frivolous, vexatious or otherwise an abuse of process, or
  - (b) has no reasonable prospect of success.
- (5) Subsection (4) does not affect any other power of a court to dismiss a claim on similar grounds.
- (6) Section 2 of the Limitation Act 1980 (time limit for actions founded on tort) applies to proceedings brought under this section.
- (7) In proceedings under this section, a finding in a notice issued by the Office under section 5(1) or (4) that an organisation is responsible for a serious human rights harm may be relied on to the same extent as a conviction for an offence under Chapter 3.
- (8) A court may not make an award of costs against a person bringing proceedings under this section except to the extent that, having regard to all the circumstances including the conduct of that person in relation to the proceedings, it is just and reasonable to do so.

## **9 Judicial remedies**

- (1) Where, in proceedings under section 8, the court finds that a person has suffered a serious human rights harm for which the relevant organisation (“O”) is responsible, it may grant such relief or remedy, or make such order, within its powers as it considers just and appropriate in all the circumstances.
- (2) The relief awarded in subsection (1) may include exemplary damages or an account of profits, whether or not they are otherwise within the court’s powers.
- (3) In deciding whether to award exemplary damages, the court must consider –
  - (a) whether O deliberately caused or enabled the serious human rights harm to occur;
  - (b) whether a penalty or requirement imposed under section 5 is sufficient punishment for O’s conduct in all the circumstances.

- (4) In deciding whether to award an account of profits, the court must consider –
  - (a) the extent to which O has profited from the serious human rights harm;
  - (b) whether damages are sufficient to deter O from future conduct liable to render O responsible for a serious human rights harm.

## CHAPTER 3

### CRIMINAL OFFENCES

#### **10 Relevant organisation criminal liability for serious human rights harm**

- (1) Where a relevant organisation is responsible for a serious human rights harm, it is guilty of an offence if, had the act or omission concerned taken place in the United Kingdom, it would have amounted to –
  - (a) an offence under the law of England and Wales listed in subsection (2), or
  - (b) (where different) a corresponding offence under the law of Scotland or Northern Ireland.
- (2) The offences are –
  - (a) murder, kidnap or false imprisonment under common law;
  - (b) an offence under section 1 of the Sexual Offences Act 2003 (rape);
  - (c) an offence under section 1 or 2 of the Modern Slavery Act 2015 (slavery, servitude and forced or compulsory labour; human trafficking);
  - (d) an offence under section 1 of the Corporate Manslaughter and Corporate Homicide Act 2007;
  - (e) an offence under section 18, 23, 24, 28 or 29 of the Offences Against the Person Act 1861 (grievous bodily harm or wounding with intent; poison; explosions);
  - (f) an offence under sections 1(2) or 2 of the Criminal Damage Act 1971 (endangering life by damaging property);
  - (g) genocide, crimes against humanity or war crimes under Part 5 of the International Criminal Court Act 2001.
- (3) The Secretary of State may by regulations modify subsection (2) by adding, modifying or deleting an entry.



## **11 Senior officer criminal liability for serious human rights harm**

- (1) If a relevant organisation is guilty of an offence under section 10(1), a senior officer of the organisation is also guilty of the offence if, and only if, the serious human rights harm is proved to have been brought about with the consent or connivance (and whether by act or omission) of that senior officer.
- (2) In this section —
  - (a) “senior officer” means —
    - (i) in relation to a body corporate, a director, manager, secretary or other similar officer of the body corporate;
    - (ii) in relation to a partnership, a partner in the partnership;
    - (iii) in relation to a public undertaking, a person acting in a capacity specified in regulations made by the Secretary of State;
    - (iv) a person purporting to act in the capacity of a person mentioned in subparagraph (i), (ii), or (iii).
  - (b) “director”, in relation to a body corporate whose affairs are managed by its members, means a member of the body corporate.

## **12 Penalties**

- (1) A relevant organisation guilty of an offence under section 10 is liable on conviction on indictment to a fine.
- (2) A senior officer guilty of an offence under section 11 is liable on conviction on indictment to a fine.
- (3) Where a director is found guilty of an offence under section 11, the court may, in addition to dealing with the director in any other way, make a disqualification order under section 6 of the Company Directors Disqualification Act 1986, as if the director had been convicted of an offence as mentioned in that section.
- (4) In England and Wales and Northern Ireland, proceedings for an offence under this section may be instituted only —

- (a) in England and Wales, by the Office;
- (b) in England, by the Secretary of State;
- (c) by or with the consent of the Director of Public Prosecutions.

## PART 2

### FORCED LABOUR RESTRICTION

#### **13 Prohibition of forced labour products**

- (1) The following are prohibited –
  - (a) making available on the United Kingdom market,
  - (b) importing into the United Kingdom, or
  - (c) exporting from the United Kingdom,forced labour products.
- (2) The following are prohibited –
  - (a) making available on the United Kingdom market,
  - (b) importing into the United Kingdom, or
  - (c) exporting from the United Kingdomproducts which are similar to, and intermingled with, forced labour products.

#### **14 Interpretation of Part 2**

- (1) In this Part –
  - (a) “forced labour” means forced or compulsory labour as defined in Article 1 of International Labour Organization Convention No. 105, or Article 2 of International Labour Organization Convention No. 29, including forced child labour;
  - (b) “forced labour products” means any product made or transported with forced labour;
  - (c) “making available on the market” in the United Kingdom means any supply, in the course of trade, of a product for distribution, consumption or use in the United Kingdom, whether or not in return for payment, and includes the targeted distance sale of a product;
  - (d) “product” means any item that is capable of being the subject of commercial transactions;

- (e) “targeted distance sale” means the offer of a product for sale online, or through other means of distance sale, where the offer is targeted at end users in the United Kingdom.
- (2) For the purposes of this Part –
- (a) a product is made with forced labour if forced labour has been used in whole or in part at any stage of its extraction, harvest, production or manufacture, including in the working or processing related to a product at any stage of its supply chain;
  - (b) a product is transported with forced labour if forced labour has been used at any time during its transportation or storage at any stage of its extraction, harvest, production, manufacture or processing;
  - (c) section 5 of the Customs and Excise Management Act 1979 (time of importation, exportation, etc.) applies in the same way as it applies for the purposes of that Act.

## **15 Presumption of forced labour**

- (1) The Secretary of State may by regulations designate products of a specified description as products which are presumed to be forced labour products.
- (2) Products designated under subsection (1) are to be treated as forced labour products for the purposes of this Part unless it is shown that –
  - (a) they are not forced labour products, and
  - (b) any provision of regulations under section 16(3) requiring information to be provided to show that products are not forced labour products have been complied with.
- (3) In determining whether to designate products under subsection (1), the Secretary of State must have regard to the risk that products of that description have been made or transported with forced labour.
- (4) Products designated under subsection (1) may be specified by reference to –
  - (a) a product type;
  - (b) an industry;

- (c) a country, region or other place, or a description of facility, where any specified stage of extraction, harvest, production, manufacture or transport of a product takes place;
  - (d) a specified description of person involved in extraction, harvest, production, manufacture or transport of a product.
- (5) When assessing risk under subsection (3), the Secretary of State may take into account, among other things –
  - (a) the Database established under Article 31 of Regulation (EU) 2024/3015 (EU Forced Labour Regulation);
  - (b) the list of goods and their source countries maintained by the US Bureau of International Labor Affairs under the Trafficking Victims Protection Reauthorization Act of 2005;
  - (c) the extent to which products of that description have previously been the subject of a contravention of section 13.

## **16 Enforcement**

- (1) Where the Secretary of State finds that a person has contravened a prohibition in section 13, the Secretary of State may impose a monetary penalty on that person.
- (2) The amount of a monetary penalty under subsection (1) is to be the greater of –
  - (a) twice the amount that the Secretary of State considers to represent the sale value of the products in relation to which the contravention has been found,
  - (b) if the contravention is committed by a commercial organisation, an amount equivalent to up to 5% of the organisation's global turnover, or
  - (c) if the contravention is committed by a public undertaking, an amount calculated in accordance with regulations under subsection (3)(a).
- (3) The Secretary of State must, within six months beginning with the date on which this Act is passed –
  - (a) make such regulations as the Secretary of State considers necessary or appropriate for enforcement of the prohibitions in section 13, and

- (b) establish by regulations a forced labour database.
- (4) Regulations under subsection (3)(a) must include provision —
  - (a) conferring a right of appeal against a penalty under subsection (1), and
  - (b) other provision about the operation of subsection (1), including the investigation of suspected contraventions of section 13.
- (5) Regulations under subsection (3)(a) may provide for the Secretary of State to delegate the exercise of a specified function of the Secretary of State under this Part to a specified person.
- (6) The database under subsection (3)(b) must —
  - (a) be accessible to the public;
  - (b) be regularly updated and provide information about forced labour risks, according to geographic area, product type, and industry;
  - (c) provide a facility for members of the public anonymously to submit information on suspected contraventions of section 13;
  - (d) contain information about findings made and penalties imposed, and the outcome of appeals, under this section.
- (7) The Secretary of State must issue guidance about —
  - (a) good practice in avoiding the import, export and making available on the United Kingdom market of forced labour products, including the exercise of due diligence and measures for effective supply chain tracing and management;
  - (b) the Secretary of State's assessment of evidence in deciding whether to take enforcement action under this Part;
  - (c) the information to be published on the database under subsection (3)(b), including in circumstances where information submitted by a member of the public has not led to enforcement action under this Part.

## PART 3

### DISCLOSURE AND REPORTING

#### *Human rights statement*

## **17 Human rights statement**

- (1) A relevant organisation must prepare a human rights statement for each financial year of the organisation.
- (2) A human rights statement for a financial year must give a true and fair view of —
  - (a) what serious human rights harms occurred for which the relevant organisation may be responsible under section 1;
  - (b) if the relevant organisation determines that no such human rights harms occurred for which it is responsible, the reasons why the relevant organisation has so determined;
  - (c) a plan outlining the measures to be adopted in the next financial year to avoid becoming responsible under section 1;
  - (d) an assessment of the effectiveness of such actions taken in the financial year to which the statement relates.
- (3) A human rights statement —
  - (a) if the organisation is a body corporate other than a limited liability partnership, must be approved by the board of directors (or equivalent management body) and signed by a director (or equivalent);
  - (b) if the organisation is a limited liability partnership, must be approved by the members and signed by a designated member;
  - (c) if the organisation is a limited partnership registered under the Limited Partnerships Act 1907, must be signed by a general partner;
  - (d) if the organisation is any other kind of partnership, must be signed by a partner.
- (4) Section 54 of the Modern Slavery Act 2015 is repealed.

## **18 Publication of human rights statement**

- (1) If the relevant organisation has a website, it must within 30 days of the end of the organisation's financial year —
  - (a) publish the human rights statement on that website, and
  - (b) include a link to the human rights statement in a prominent place on that website's homepage.
- (2) If the relevant organisation does not have a website, it must provide a copy of the human rights statement to anyone who makes a written request for

one, and must do so before the end of the period of 30 days beginning with the day on which the request is received.

### *Human rights statement registry*

## **19 Establishment of public registry**

- (1) The Secretary of State must by regulations establish a public registry for the purpose of receiving, storing, and making available to the public, human rights statements prepared under section 17.
- (2) The regulations must ensure that the registry –
  - (a) enables the electronic submission and storage of human rights statements;
  - (b) is a free and publicly accessible online platform;
  - (c) includes a searchable database containing all uploaded human rights statements;
  - (d) retains all statements submitted to the registry for five years, or such longer period as the regulations may specify, from the date of submission.
- (3) The regulations must provide that –
  - (a) a relevant organisation must deliver a copy of its human rights statement to the registry and the Office within six weeks of signature;
  - (b) the copy so delivered must be in substantially the same form (subject to any differences permitted by the regulations) as the version published or provided under section 18.

## **20 Penalties for non-compliance**

- (1) Where the Office finds that a commercial organisation has failed to comply with a requirement of section 17 or 18 or of regulations under section 19, it may issue to the organisation a notice, as the Office considers appropriate –
  - (a) containing a statement to that effect (“a censure notice”);
  - (b) imposing on the organisation a financial penalty specified in the notice (a “penalty notice”);



- (c) requiring the organisation to pay a specified sum to cover the cost to the Office of investigating and adjudicating on the matter (a “costs notice”).
- (2) The Secretary of State must by regulations make provision —
  - (a) about the amount of a penalty specified in a penalty notice or a costs notice, and
  - (b) about the information to be provided in, and for a relevant organisation to appeal against, a censure notice, penalty notice or costs notice.

## PART 4

### OFFICE FOR RESPONSIBLE BUSINESS CONDUCT

#### **21 Office for Responsible Business Conduct**

- (1) The Secretary of State must, within six months of the commencement of this Act, by regulations confer powers and duties on the Office for Responsible Business Conduct (in this Act, “the Office”) for the purposes of enabling the Office to perform the functions conferred on it under this Act.
- (2) The duties must include —
  - (a) to provide such support, guidance and advice about the functions of the Office under sections 5, 8(2), 12(4) and 20, and any other matters connected with this Act, as the Office considers appropriate;
  - (b) to take such steps as the Office considers appropriate to secure compliance with the obligations of relevant organisations under this Act.
- (3) The powers must include —
  - (a) to carry out investigations;
  - (b) to do any other things necessary for the proper operation of sections 5, 8(2), 12(4) and 20;
  - (c) to bring, or recommend the bringing of, criminal proceedings under Chapter 3 of Part 1.
- (4) The regulations may include provision about the constitution of, and governance arrangements for, the Office in relation to its functions under

this Act, including provision for the appointment of officers or other persons to act on behalf of the Office.

## **PART 5**

### **STATUTORY REVIEW AND REPORTING**

#### **22 Review of operation of Act**

- (1) The Secretary of State must –
  - (a) within the period of seven years beginning with the date on which this Act is passed, and
  - (b) within the period of seven years beginning with the date of publication of the first and each subsequent report,prepare a report on the operation of this Act.
- (2) In preparing a report under subsection (1), the Secretary of State must in particular –
  - (a) consider what measures, if any, including any change in the law, or in any guidance issued under this Act, are desirable in order to strengthen the effectiveness of this Act, and
  - (b) make recommendations for any change in the law or guidance considered desirable under paragraph (a).
- (3) The Secretary of State must –
  - (a) publish the report prepared under subsection (1), and
  - (b) lay a copy before Parliament.

#### **23 Amendment to give effect to recommendations**

- (1) Where in a report under section 22 the Secretary of State recommends a change in any subordinate legislation, the Secretary of State may by regulations modify that subordinate legislation to give effect to the recommendation.
- (2) Where in a report under section 22 the Secretary of State recommends a change in any guidance issued under this Act, the Secretary of State must, subject to subsection (3), make the change as soon as practicable after publication of the report.

- (3) Before making, or (where required) consulting on or laying in draft, regulations under subsection (1), or making any change to guidance under subsection (2), the Secretary of State must –
  - (a) allow a reasonable opportunity for representations to be made in response to the publication and laying before Parliament of the report, and
  - (b) take into account any such representations received.

## PART 6

### MISCELLANEOUS AND GENERAL

#### *Further provision to give effect to Act*

#### **24 Ministerial duty to protect human rights**

- (1) Every Minister of the Crown must, in bringing forward any primary legislation and in making any subordinate legislation, have regard to –
  - (a) the United Kingdom's obligation and responsibilities to protect human rights under the United Nations Guiding Principles on Business and Human Rights and any other applicable international law, and
  - (b) the desirability of eliminating serious human rights harms and any other conduct prohibited by this Act.
- (2) The Secretary of State must –
  - (a) within the period of three years beginning with the date on which this Act comes into force, and
  - (b) within the period of three years beginning with the date of publication of the first and each subsequent report,lay before Parliament a report on the steps taken by Ministers of the Crown to give effect to their duty under subsection (1).

#### **25 Financial services**

Rules made, and guidance issued, by the Financial Conduct Authority under its powers in Parts 6 and 9A of the Financial Services and Markets Act 2000 must include provision about the operation of this Act in relation to –

- (a) authorised persons (within the meaning of section 31(2) of that Act), and
- (b) issuers of listed securities.

## **26 Power to make consequential provision**

- (1) The Secretary of State may by order make provision consequential on the coming into force of this Act.
- (2) An order under this section may, in particular –
  - (a) include incidental, supplementary and consequential provision;
  - (b) amend, repeal, revoke or otherwise modify any enactment;
  - (c) make transitory or transitional provision or savings.

### *Subordinate legislation*

## **27 Procedure etc. for subordinate legislation**

- (1) Regulations and orders under this Act are to be made by statutory instrument.
- (2) No instrument containing regulations under sections **1Error! Reference s** **ource not found.**, 6(1), 10(3) or 21(1) or an order under section 26(1) is to be made unless a draft of the instrument has been laid before Parliament and approved by resolution of both Houses.
- (3) An instrument containing regulations under any other provision of this Act (other than section 23(1)) must be laid before Parliament and is subject to annulment by resolution of either House.
- (4) An instrument containing regulations under section 23(1) is subject to the same Parliamentary procedure and consultation requirements, if any, as an instrument containing the subordinate legislation modified by the regulations.

### *Short title, commencement and extent*

## **28 Short title, commencement and extent**

- (1) This Act may be cited as the Forced Labour and Human Rights Act 2026.
- (2) This Act comes into force at the end of the period of two years beginning with the day on which it is passed.
- (3) This Act extends to England and Wales, Scotland and Northern Ire

## SCHEDULE

## Section 1

### LIST OF INTERNATIONAL HUMAN RIGHTS LAW PROVISIONS

The rights in section 1(4)(a) are those conferred by –

1. International Labour Organization Convention No. 29 on Forced Labour 1930, articles 1 and 2.
2. Protocol No. 29 to the International Labour Organization Convention No.29 on Forced Labour 1930, articles 1 to 3 and 5.
3. International Labour Organization Convention No. 87 on Freedom of Association and Protection of the Right to Organise 1948, articles 1 to 6 and 11.
4. International Labour Organization Convention No. 98 on the Right to Organise and Collective Bargaining 1949, articles 1 to 4.
5. Convention for the Protection of Human Rights and Fundamental Freedoms 1950 (as supplemented by Protocol No. 1 of 1952 and Protocol No. 13 of 2002 and as amended by Protocol No. 11 of 1998, Protocol No. 14 of 2010 and Protocol No. 15 of 2021), articles 2 to 14 and articles 1 to 3 of Protocol 1.
6. International Labour Organization Convention No. 100 on Equal Remuneration 1951, articles 1 to 4.
7. International Labour Organization Convention No. 105 on the Abolition of Forced Labour 1957, articles 1 and 2.
8. International Labour Organization Convention No. 111 on Discrimination (Employment and Occupation) 1958, articles 1 and 2.
9. International Convention on the Elimination of All Forms of Racial Discrimination 1965, articles 1 to 4.
10. International Covenant on Civil and Political Rights 1966, articles 1 to 3, 6 to 12, 16 to 24 and 26 to 27.
11. International Covenant on Economic, Social and Cultural Rights 1966, articles 1 to 3, 6 to 13 and 15.
12. International Labour Organization Convention No. 138 on Minimum Age 1973, articles 1 to 8.
13. Convention on the Elimination of All Forms of Discrimination Against Women 1979, articles 1 to 7 and 10 to 15.

14. International Labour Organization Convention No. 155 on Occupational Health and Safety 1981, articles 16 to 21.
15. Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment 1984, articles 1 and 2.
16. Convention on the Rights of the Child 1989, articles 1 to 6, 9 to 19 and 23 to 39.
17. International Labour Organization Convention No. 182 on Worst Forms of Child Labour 1999, articles 1 to 3 and 7.
18. Optional Protocol to the Convention on the Rights of the Child on the Involvement of Children in Armed Conflict 2000, articles 4 and 7.
19. Optional Protocol to the Convention on the Rights of the Child on the Sale of Children, Child Prostitution and Child Pornography 2000, articles 1 to 3.
20. Convention on the Rights of Persons with Disabilities 2006, articles 3 to 10 and 14 to 30.
21. International Labour Organization Convention No. 187 on Promotional Framework for Occupational Safety and Health 2006, articles 2 and 5.

## Conclusion

This proposal demonstrates that now is a decisive moment for the UK to introduce strong, coherent forced labour and human rights legislation. Extensive engagement has made clear that the current regulatory environment is fragmented, outdated, and insufficient to address the scale of modern slavery in global supply chains.

Whilst transparency in supply chains s.54 of the Modern Slavery Act 2015 was world-leading at the time, it is right that a decade later the Government looks anew at what needs to be done to address forced labour in our supply chains.

The evidence is unequivocal: forced labour is a systemic, global economic crime affecting nearly 27 million people and costing the UK an estimated £60 billion annually, while also undermining responsible businesses and exposing the country to significant economic and ethical risks. Behind the economic costs are human lives - victims of labour exploitation who deserve better, and survivors who advocate for change.

This change is already happening with international partners in the EU, North America, and the Asia-Pacific who are moving rapidly toward enforceable due diligence standards. Without comparable UK regulation, the country risks falling further behind and becoming a dumping ground for goods produced through exploitation - particularly once the EU's ban on forced labour goods takes effect in 2027. UK businesses will be undercut by goods which are produced through forced labour. Businesses themselves recognise this, strongly supporting consistent, clear, and internationally aligned standards that reduce duplication, enable growth, and level the playing field.

That is why we need forced labour and human rights legislation in the UK and why the IASC has outlined the case for change in this proposal. Academics, businesses, the public, and international partners all understand why the UK needs this new law imminently - and the Government should commit to introducing these measures in the next King's Speech.

To support this, this proposal includes Model Legislative Drafting which provides a ready-made blueprint for effective, practical reform. It reflects the expertise of Omnia Strategy LLP and the insights of FTSE 100 companies, SMEs, and sector experts, and demonstrates that robust regulation is both feasible and necessary. There is a critical opportunity to introduce legislation that protects workers, strengthens UK competitiveness, and ensures that the products entering our market are free from forced labour.

In short, the consensus is strong, and the imperative is clear: the UK must act now. Adopting new legislation in the next King's Speech will reaffirm the UK's leadership, safeguard the integrity of its markets, and take meaningful steps to end exploitation in global supply chains.



## **Next steps and recommendations**

To progress this legislative change the Government should:

- Adopt the proposed Model Legislative Drafting through an inclusive, consultative process involving survivors with lived experience, rights holders, businesses, trade unions, investors, civil society, and enforcement bodies. Their insights are essential to designing measures that are practical, survivor-centred, and enforceable.
- Apply the Model Legislative Drafting to both public and private value chains, ensuring that government procurement sets the standard for ethical sourcing and does not perpetuate exploitation.
- Commission further research on worker remediation mechanisms, including how companies can provide meaningful redress to victims of forced labour and human rights abuses and prevent recurrence.
- Develop guidance and capacity-building initiatives for SMEs and public bodies to implement due diligence effectively, reducing compliance burdens while maintaining robust standards.

By taking these steps, the UK Government can adopt legislation that is not only strong and coherent but also survivor-informed, globally aligned, and capable of driving systemic change across all sectors.

## A Broad Coalition

The IASC acknowledges the significant work undertaken across the anti-slavery, labour-rights and human-rights sectors highlighting the limitations of voluntary measures and advocating the need for strengthened protections against forced labour in supply chains. These include:

- **Investor Alliance for Human Rights (IAHR):** August 2022 – 39 investors representing £4.5 trillion AUM signed a statement supporting MHRDD as essential for risk management and sustainability.
- **Corporate Justice Coalition (CJC):** September 2022 – 167 businesses and investors, including ASOS, Primark, Tesco, and Aviva Inve, urged the UK Government to introduce a Business, Human Rights and Environment Act via a Private Members Bill on MHRDD. In January 2025 – CJC published *A Business, Human Rights and Environment Act: The Clear Case for a New Law*, calling for legislation to protect families, workers, and the planet from human rights abuses and environmental harm caused by UK companies, banks, and the public sector.
- **Joint Statement by UK Businesses and Investors (BHRRC):** July 2023 – 50 major UK businesses and investors, including John Lewis Partnership and Co-op, called for legislation mandating due diligence.
- **Good Business Matters Pledge: 2023 (updated August 2025):** Coordinated by Good Business Matters, this campaign calls for UK law mandating human rights and environmental due diligence. Signed by 69 decision-makers and 167 businesses, it shows broad cross-sector support for stronger corporate accountability and ethical supply chains.
- **Businesses & Investors Joint Statement (BHREA):** April 2024 – Over 150 businesses and investors signed a joint statement calling for a UK Business, Human Rights and Environment Act.
- **British Institute of International and Comparative Law (BIICL):** October 2024 – Published a report on the impacts of human rights due diligence laws on internal corporate practice, *Towards New Human Rights and Environment Due Diligence Laws: Reflections on Changes in Corporate Practice*.
- **Peace Brigades International UK (PBI UK):** November 2024 – Called for new legislation in its report, *The Case for Change: Why Human Rights Defenders Need a UK Law on Mandatory Due Diligence*.
- **Trade Union Congress (TUC):** January 2025 – Set out its Proposal for New Mandatory Human and Labour Rights and Environmental Due Diligence Legislation.
- **Coalition Against Forced Labour in Trade Submission:** February 2025 – UK-based civil society coalition urged the Joint Committee on Human Rights to adopt import bans and mandatory due diligence, reinforcing the case for legislative reform.
- **Anti-Slavery International (ASI): July 2025** – Called for new UK legislation and a human-centred approach to tackle forced labour in supply chains.
- **ETI, BRC, CJC and TUC Joint Letter following JCHR Report:** July 2025 – Coordinated by ETI, this statement responded to the Joint Committee on Human Rights report on Forced Labour in UK Supply Chains. Co-signed by BRC, CJC, and

TUC, it backed recommendations for MHRDD, import bans on goods linked to forced labour, and civil liability for non-compliance, urging swift Government action.

- **Ethical Trading Initiative (ETI):** September 2025 – Outlined in its policy brief, ETI Position on Mandatory Human Rights and Environmental Due Diligence Regulation, why mandatory Human Rights and Environmental Due Diligence regulation is needed in the UK.

The Commissioner recognises the expertise and evidence these organisations bring and notes the clear and growing body of sector-led analysis supporting legislative reform. Taken together this work demonstrates the breadth of support for stronger legislation and highlights the urgent need for Government action.

## Supporters



*"Asda supports the call for the introduction of Mandatory Human Rights Due Diligence in the UK, and welcomes the opportunity to engage with businesses, stakeholders and the government on this topic."*

- Duncan Warner, Senior Human Rights Manager, Asda
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*"Tony's Chocolonely has consistently called for mandatory human rights and environmental due diligence legislation. We welcome proposals to update the UK's modern slavery framework and the UK's environment act, as we believe it is important to ensure that what is agreed is effective, enforceable and drives real change. This would support the work being undertaken by responsible businesses to identify, prevent and remediate issues in their supply chains. We want to see a level playing field, a robust process and legislation that keeps pace with global developments."*

- Belinda Borck, Global Public Policy Coordinator, Tony's Chocolonely
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*"The UK was the first country to implement regulation against modern slavery with the Modern Slavery Act 2015. It has a critical role to play in carrying forward this work by creating due diligence rules that ensure respect for human rights is fundamental to business activity."*

- Dr Márcia Balisciano, Global Head of Corporate Responsibility, RELX
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*"Retailers have long been calling on Government to implement well-considered legislation that will strengthen standards for British businesses and their supply chains. Mandatory human rights and environmental due diligence will improve the protection of workers and the environment and keep the UK in step with global requirements. We are proud to join wider industry in our call to action."*

- Andrew Opie, Director of Food and Sustainability, the British Retail Consortium



*“The Consumer Goods Forum works with its member companies as they put Human Rights Due Diligence in place across their operations and supply chains. Forced labour remains a persistent risk across many sectors, and our members are taking practical steps to protect people and strengthen how they source and produce. This effort supports a more resilient consumer goods industry — one that can cope with fast-changing economic, legal and sustainability demands and meet rising expectations from shoppers and stakeholders.*

*But businesses cannot solve this challenge on their own. Lasting progress needs clear and consistent rules, backed by strong implementation. This gives companies the confidence to act, creates a fairer market, and improves how risks are identified and addressed. We welcome partners who support efforts to strengthen human rights due diligence, as effective policy is vital to tackle forced labour at scale.”*

- Maria Isabel Cubides, Senior Manager, The Consumer Goods Forum



*“ETI and our company, NGO and trade union members are united in our strong support for mandatory human rights and environmental due diligence (mHREDD). We have consulted extensively across our tripartite membership, and there is clear consensus that robust, mandatory standards are essential to drive the progress that society wants. Voluntary action alone won’t deliver change on the scale that’s needed. mHREDD will create a level playing field and help drive the sustainable, resilient growth the economy needs.”*

- Giles Bolton, Executive Director, Ethical Trade Initiative



*"The tech sector operates globally and wants to see harmonised and effective due diligence laws so supply chains can be more transparent and businesses can better understand human rights risks. The UK has fallen behind on this agenda from a position of leadership so new legislation is needed".*

- Julian David, CEO, techUK



*“At CCLA Investment Management we are deeply committed to the long-term value of businesses and the development of a sustainable, healthy and resilient economy in the UK. We believe that human rights risks are financially material to both businesses and investors and that support for human rights creates long term business competitiveness and value creation. We see the value of a UK human rights due diligence framework that incentivizes meaningful risk management while providing legal clarity. We believe this should align with international standards, including the UN Guiding Principles on Business and Human Rights and OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. For UK businesses already navigating these frameworks in international markets, domestic interoperability simplifies rather than complicates compliance.”*

- Dr Martin Buttle, Better Work Lead, CCLA Investment Management Ltd



*"Human rights due diligence is crucial for investors and corporates. Due diligence regulations, well aligned with international standards, help establish a level playing field for responsible corporate and investor practice, reducing the negative human rights and environmental impacts of economic activities. Far from being a burden on business, risk-based due diligence can support competitiveness by helping investors identify human rights risks in their portfolios and access the necessary information for effective stewardship with investees."*

- David Cerrato, Senior Policy Specialist, Human Rights and Social Issues, Principles of Responsible Investment



*“As a corporate transparency platform, TISCReport sees first-hand that voluntary reporting alone is not enough to prevent forced labour in global supply chains. We strongly support the Independent Anti-Slavery Commissioner’s call for clear, mandatory human rights due diligence duties, underpinned by robust transparency and worker voice. To be truly effective, these reforms must be matched by a stronger open corporate data infrastructure in the United Kingdom, so that information about supply chains, ownership and governance is accessible, connected and*

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*not limited to financial data alone. Only then can responsible businesses, civil society and regulators properly identify risk, protect victims of exploitation, and ensure the United Kingdom does not become a dumping ground for goods made with abuse.”*

- Jaya Chakrabarti MBE, CEO, Semantrica Ltd (TISCreport)

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SLAVE-FREE  
ALLIANCE

Working Towards a  
Slave-free Supply Chain

*“Slave-Free Alliance strongly supports the introduction of mandatory human rights due diligence legislation in the UK. Voluntary measures are no longer enough; expectations must become enforceable standards. Such legislation will ensure businesses take proactive steps to prevent and address human rights risks across their operations and global supply chains, tackling the scale and persistence of abuses that continue to devastate lives. This is about creating a level playing field and strengthening corporate accountability and transparency. While other countries and regions move forward with robust frameworks, the UK is falling behind. Above all, we cannot allow global trade to be built on the exploitation of people.*

*Slave-Free Alliance represents over 100 member businesses, including 17 FTSE 100s, and there is clear support among our members for this legislation. Mandatory due diligence will promote meaningful stakeholder engagement, improve access to remedy, and drive systemic change. We believe this is a vital step towards a future where human rights are respected and upheld in every supply chain.”*

- Rachel Hartley, Consultancy Director, Slave-Free Alliance



## Annex 1 – References

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## Annex 2 – Model Legislative Drafting Overview and FAQs

### Creating Clarity, Certainty and Consistency in UK Forced Labour and Human Rights Regulation

#### A Legislative Proposal for UK Government: Overview

##### A. WHO?

1. This proposal has been prepared by **Unseen** (a leading NGO dedicated to combating the injustice of people being exploited for others' gain; [www.unseenuk.org](http://www.unseenuk.org)) and the UK **Independent Anti-Slavery Commissioner** (a role created in the Modern Slavery Act 2015 with a mission to advance best practice in the UK's response to modern slavery, with a remit to advise the Government on policy and legislative reform; [www.antislaverycommissioner.co.uk](http://www.antislaverycommissioner.co.uk)), with pro bono support from **Omnia Strategy LLP** ([www.omniastategy.com](http://www.omniastategy.com)) and **Forward Global UK** ([www.forwardglobal.com](http://www.forwardglobal.com)).
2. The proposal is informed by consultation with private sector businesses from corporate and financial sectors and has benefited from input from civil society and survivors of exploitation.

##### B. WHY?

3. Forced labour and modern slavery is a **systemic drag on the UK economy** demanding a more robust, harmonised and enforceable legal framework and greater attention from business.
4. The Government is committed to aligning any new regulation with its mission to kick start **economic growth**.
5. **Inaction on forced labour is anti-growth and harms UK businesses.** Forced labour currently costs the UK **£60 billion a year**, the equivalent of **2% of the entire UK economy**. Eradicating forced labour and integrating affected individuals into the formal economy **could boost growth**.
6. Estimates also suggest that the UK imports around **£20 billion** of goods that are at risk of having been made with forced labour. With the EU ban coming into force in 2027, the UK must avoid being a dumping ground for goods tainted by forced labour.
7. The **Government has recognised the limitations of its existing regulatory framework for responsible business conduct** and is mapping out new regulatory options. It is reviewing how best to strengthen penalties for non-compliance and create

a proportionate enforcement regime, including the introduction of human rights due diligence and import controls to align with international partners.

8. Regulation and reporting requirements need to be **streamlined domestically and aligned to international standards**. Currently, the European Union is finalising revisions to sustainability due diligence and reporting legislation, alongside its Forced Labour Regulation, whereas the UK has no equivalent law. Just within the UK, the regulatory framework is fragmented across the public sector, with inconsistent requirements across departments and bodies, such as the NHS and Great British Energy. The UK has the opportunity to leverage advances in regulatory design and corporate best practices.
9. Businesses are increasingly supporting – and driving – critical efforts to fight forced labour and protect human rights in their organisations and across their value chains, including through helping to shape updates to the UK’s regulatory framework and ensure a level playing field.

#### **C. WHAT?**

10. New UK legislation establishing civil (and, in exceptional circumstances, criminal) responsibility for failing to prevent serious human rights harms. A broad statutory defence ensuring that organisations that have undertaken reasonable human rights due diligence are not liable, with detailed, sector-specific guidance on what constitutes reasonable human rights due diligence.
11. A prohibition on products made with forced labour being placed or made available on – or exported from – the UK market. Empowering the Government to impose presumptive restrictions on certain goods, where there is a high risk of them being tainted by forced labour.
12. Strengthening human rights disclosure through new, proportionate reporting obligations.

#### **D. HOW?**

13. **In-scope organisations:**
  - **Large businesses** – UK-based and overseas organisations carrying on business / part of a business in the UK with a worldwide turnover of at least £36 million (the Modern Slavery Act 2015 threshold).
  - **Public sector** – public sector bodies in respect of their commercial activities.
14. **Source of human rights standards:** Core international human rights treaties and standards – e.g. International Labour Organization Conventions and International Covenant on Civil and Political Rights.

15. **Responsibility for involvement in serious human rights harms:** Adopts a well-established categorisation of ways in which organisations can find themselves **involved** in **serious human rights harms** as the basis for liability. This would provide clarity amidst complex contexts and value chains, with further understanding to be supported by official guidance and capacity-raising initiatives. Please see **FAQs below** for further detail.
16. **Statutory defence of reasonable human rights due diligence:**
  - **No liability** where an organisation is involved in a serious human rights harm **if** it had undertaken reasonable human rights due diligence, such as to identify, prevent and mitigate such harms.
  - This model is intended to provide clarity and certainty around expectations for **appropriate** and **proportionate** human rights due diligence, based on established international standards and existing corporate practice.
  - Due diligence should be **risk-based** – i.e. sensitive to businesses' circumstances, including their size (including SME status), resources available, sector, geographical and contextual factors, ownership and structure, and likelihood and severity of a harm.
17. **Forced labour restrictions:**
  - General ban on goods tainted by forced labour from being made available on the market or exported from, the UK, informed by the new EU Forced Labour Regulation.
  - Empowers the Government to establish restrictions on particular products, with clear criteria for the exercise of these powers to avoid political misuse.
18. **Reporting and transparency:**
  - Expands and clarifies the corporate reporting requirements established by section 54 of the Modern Slavery Act 2015, requiring disclosure of identified human rights harms, with appropriate safeguards to protect sensitive rights-holders and commercial information.
  - Establishes equivalent regular reporting requirements for public sector organisations with commercial activities.
  - Mandates and standardises topics for disclosures and establishes a central Government registry for reporting.
19. **Support, enforcement and liability:**
  - Introduces civil (access to courts) and regulatory (enforcement action) liability, and criminal liability for especially flagrant breaches, including for senior

managers. Victims and their representatives would be able to bring legal claims against those responsible.

- Requires guidance and ongoing support from the Government to enable organisations to understand and comply with their obligations.

**Frequently Asked Questions**

*The proposal envisages that official guidance would have to be issued alongside new legislation to clarify expectations and how concepts in the law would be interpreted and applied. These FAQs address topics of particular interest arising from our engagement with a broad range of stakeholders.*

**What is a serious human rights harm?** A serious human rights harm occurs when a person's or people's basic rights are badly affected. Our proposal lists specific rights, drawn from the UK's human rights commitments. Whether a harm is "serious" depends on the facts, such as the gravity, the number of victims affected, and the extent to which it can be remedied. Some examples of serious human rights harm include: forced labour, wage discrimination, gender-based violence or harassment, and arbitrary arrest and detention.

**What does it mean to be involved in a serious human rights harm?** An organisation is involved in a human rights harm where it is connected to that harm in one of the following ways:

| Participation                      | Description   | Example   |
|------------------------------------|---|---|
| <b>It causes the harm.</b>         | Where an organisation's activities (its actions or omissions) on their own give rise to the harm.   | <p>A business exposes its factory workers to hazardous working conditions without adequate safety equipment.</p> <p>A business is the sole or main source of pollution in a community's drinking water supply due to chemical effluents from production processes.</p>    |
| <b>It contributes to the harm.</b> | Where a business, through its own activities, gives rise to harm, either directly alongside other entities, or through some outside entity. | <p>A business changes product requirements for suppliers at the eleventh hour without adjusting production deadlines and prices, thus pushing suppliers to breach labour standards in order to deliver.</p> <p>Performing construction and maintenance on a detention</p> |

|   |   |  |
|---|---|--|
|   |   | camp where inmates were allegedly subject to inhumane treatment.   |
| <b>It is directly linked to the harm.</b> | Where a business has not caused or contributed to a harm, but there is nevertheless a relationship between that harm and the organisation's products, services or operations through another entity (i.e. business relationship). | <p>A bank provides finance to a client and the client, in the context of using this finance, causes the eviction of local communities.</p> <p>A business sources cobalt mined using child labour which is then used in its products.</p> |

**What is human rights due diligence?** Human rights due diligence is an ongoing process to address actual and potential impacts on a person or people's rights, whether inside or outside the organisation. It comprises steps including:

- **Embedding human rights considerations into policies and management systems** – developing, adopting and communicating policies that set out commitments to human rights and plans for carrying out due diligence, embedding these commitments into oversight and management systems to form regular business processes, and incorporating these expectations into relationships with business partners.

*Example:* A multinational company may draft a human rights policy identifying an individual on its board as responsible for due diligence, with high-level management reporting.

- **Identifying and assessing actual and potential serious human rights harms** – for larger organisations, scoping areas of operations and business relationships for human rights risks, based on sectoral, geographic, product and organisation-specific risk factors (including known or anticipated risks). Undertaking iterative and increasingly detailed assessments of prioritised operations, suppliers and other business relationships to identify actual or potential harms and the extent of participation, with the most likely and severe harms prioritised.

*Example:* An investor may rely on market-research services and other external resources (civil society reports, media etc.) to scope for risks; whereas a retailer may map the structure of its supply chain and identify general areas of risk based on specific geographic, sectoral, product or business factors.



- **Ceasing, preventing and mitigating serious human rights harms** – stopping any activities that cause or contribute to harm, and developing adequate plans to prevent or mitigate potential harms. Based on risk prioritisation, taking steps to prevent or mitigate harms directly linked to operations, products or services through business relationships (e.g. exercising the organisations leverage to reduce the harm, or disengaging altogether, if necessary).

*Example:* Manufacturing company may provide training to workers on policies and protocols, such as safe handling of machinery, chemicals, and raise awareness on how to identify risk.

- **Monitoring the implementation of due diligence** – track the implementation and effectiveness of due diligence, and use the lessons learned to improve future effectiveness.

*Example:* Garment producer monitors supplier progress, worker feedback, and responses to child labour cases at site level, annually reviewing data and reports across high-risk suppliers or regions to assess overall progress.

- **Communicating how harms are addressed** – communicate externally relevant information on due diligence policies, processes, activities conducted to identify and address harms, including the findings and outcomes of those activities.

*Example:* Multinational company communicates to its stakeholders through a consolidated human rights impact report (either regulatory or voluntary).

- **Remedying harm** – when an organisation has caused or contributed to harm, it should take steps to counteract or make good the harm or cooperate in doing so, working with legitimate grievance mechanisms.

*Example:* Construction company establishes a worker hotline to enable workers to raise concerns about issues affecting their rights, such as health and safety. Where a breach is found, the organisation investigates, apologises, pays compensation and makes updates to policies and procedures.

**Are any of these due diligence expectations new?** No. Human rights due diligence builds on processes that organisations have long used to identify and address different types of risk. It is already in development and widely utilised across the private sector and in public bodies. There is a huge amount of good practice, although this is patchy and we need to level the playing field. There is a wealth of publicly available, authoritative sources that the Government should draw from in developing guidance – most notably the UN Guiding Principles on Business and Human Rights and OECD Guidelines for Multinational Enterprises and industry-specific initiatives, which many businesses already implement.

**What does it mean for reasonable due diligence to be “appropriate and proportionate”?** Reasonable due diligence should take into account factors such as the organisation’s size,

resources, sector, and context. It should be based on how likely the harm is to occur and how serious it would be if it did (see above). When the likelihood and seriousness of harm is high, due diligence should be more extensive. An SME, for instance, with limited leverage and resources may consider establishing robust prequalification processes whereby only suppliers that meet high human rights thresholds are engaged. A large multinational with numerous suppliers and business relationships across a range of higher-risk contexts, may draw from in-country offices with allocated and trained personnel responsible for overseeing due diligence on the ground.

*Example:* An apparel company importing clothes made with cotton originating from Xinjiang may consider that the high likelihood of severe harm warrants increased due diligence, given the widespread record of forced labour and other abuses in the region. Businesses operating in conflict-affected areas should undertake heightened human rights due diligence.

**Must the human rights due diligence undertaken relate to the harm that actually occurs?**

An organisation would be able to rely on its human rights due diligence to avoid liability for being responsible for a serious human rights harm in two circumstances:

- where it had undertaken reasonable due diligence that covered the risk of the particular type of harm that subsequently occurred; and,
- where it had not undertaken due diligence covering that particular risk but this omission, and the organisation's human rights due diligence overall, was reasonable in the circumstances.

**Why a “failure to prevent” model?** The UK parliamentary Joint Committee on Human Rights Legislation proposed a new duty on businesses to prevent human rights abuses back in 2017, and repeated this recommendation in July 2025. The failure to prevent model is familiar; it is at the heart of the well-known UK Bribery Act and subsequent financial crime legislation. This model offers a UK contribution to a complex global problem, which must therefore complement other international efforts. It is designed to interoperate with the many policy advances in the EU and elsewhere to maximise impact, while avoiding duplication of compliance and reporting efforts.

## Annex 3 – Survey Questions

### BACKGROUND INFORMATION

1. **What is your name?** Required to answer. Single line text.
2. **What is your job title?** Required to answer. Single line text.
3. **What is the name of your organisation?** Required to answer. Single line text.
4. **What is your business email address?** Required to answer. Single line text.
5. **What sector does your organisation operate in?** Required to answer. Multiple choice.  
(Tick one or more box)

- (a) Agriculture, Forestry and Fishing
- (b) Mining and Quarrying
- (c) Manufacturing
- (d) Electricity, Gas, Steam and Air Conditioning Supply
- (e) Water Supply; Sewerage, Waste, and Remediation
- (f) Construction
- (g) Wholesale and Retail Trade; Repair of Motor Vehicles
- (h) Transport and Storage
- (i) Accommodation and Food Service Activities
- (j) Information and Communication
- (k) Financial and Insurance Activities
- (l) Real Estate Activities
- (m) Professional, Scientific and Technical Activities
- (n) Administrative and Support Service Activities
- (o) Public Administration and Defence; Compulsory Social Security
- (p) Education
- (q) Human Health and Social Work Activities
- (r) Arts, Entertainment and Recreation
- (s) Other Service Activities
- (t) Activities of Households as Employers; Undifferentiated Production Activities of Households
- (u) Activities of Extraterritorial Organisations and Bodies

6. **Is your business currently within scope of the modern slavery and human trafficking statement requirement under the Modern Slavery Act 2015?** Required to answer. Single choice.

(Note that the existing threshold under the Modern Slavery Act 2015 requires the following:

*A 'body corporate' or a partnership, wherever incorporated or formed:*

- *Carries on a business, or part of a business, in the UK;*
- *Supplies goods or services; and*
- *Has an annual turnover of £36 million or more.)*

Yes  
No  
Unsure

**7. How would you classify the size of your organisation based on the UK government definitions?** Required to answer. Single choice.

*(Please select the category that best fits your organisation based on the **most recent financial year**. A company qualifies if it meets **at least two out of the three criteria**)*

**Micro:**

- Turnover: Below **£1 million**
- Balance sheet total: Below **£500,000**
- Average number of employees: Below **10**

**Small:**

- Turnover: Below **£15 million**
- Balance sheet total: Below **£7.5 million**
- Average number of employees: Below **50**

**Medium-sized:**

- Turnover: Below **£54 million**
- Balance sheet total: Below **£27 million**
- Average number of employees: Below **250**

**Large:**

- Turnover: **£54 million** or more
- Balance sheet total: **£27 million** or more
- Average number of employees: **250** or more

*(Tick one box)*

Micro  
Small  
Medium-sized  
Large  
Not Sure

### 3. INTERNATIONAL ALIGNMENT

**8. Does your organisation support aligning any UK requirements covering business and human rights\* with those of the EU or any other international legal standards in this area?** Required to answer. Single choice.

*\*Human rights legislation would include enshrining businesses responsibilities to respect various rights beyond rights associated with modern slavery and human trafficking. These rights include: right to life; prohibition of torture and cruel, inhuman or degrading treatment; right to privacy family, home and correspondence; rights of a child, freedom of thought, conscience and religion; freedom of association and assembly; right to access to housing; right to food, clothing, water and sanitation in the workplace; rights against discrimination; and indigenous rights.*

Yes

Yes, in some respects

No

Unsure

**9.Does your organisation generally support aligning the UK rules on products made with forced labour with those of the EU Forced Labour Regulation?** Required to answer. Single choice.

Yes

Yes, in some respects

No

Unsure

**10.Does your organisation support aligning the UK rules on products made with forced labour with those of the U.S. Uyghur Forced Labour Prevention Act?** Required to answer. Single choice.

Yes

Yes, in some respects

No

Unsure

**11.Would more consistent regulation between UK and international markets on business and human rights help reduce the compliance burden for your organisation?** Required to answer.

Single choice.

Yes

No

Unsure

## **CURRENT DUE DILIGENCE PROCESSES**

**12.Does your organisation currently undertake any form of human rights due diligence?** Required to answer. Single choice.

Yes

No

Unsure

**13. What level of confidence do you have that your organisation's current human rights due diligence is effective?** Required to answer. Single choice.

Very confident  
Somewhat confident  
Neutral  
Somewhat lacking in confidence  
Little/no confidence

**14. Has your organisation explicitly and publicly committed to implementing the UN Guiding Principles and/or the OECD Guidelines for Multinational Enterprises?** Required to answer.

Single choice.

Yes  
No  
Unsure

**15. Please share any further comments you have on the topics discussed in this section.** Single line text.

#### **CURRENT UK LEGISLATION**

**16. On a scale of 1-10, how clear are your organisation's current legal obligations regarding forced labour and human rights in the UK?** Required to answer. Rating.  
(Scale: 1 = Not at all clear, 10 = Very clear)

**17. On a scale of 1-10, how effective do you think the framework under the Modern Slavery Act 2015 is in shaping businesses practices around forced labour due diligence and prevention?** Required to answer. Rating.  
(Scale: 1 = Not at all, 10 = Very effective)

**18. Does your organisation believe that the current reporting system under the Modern Slavery Act 2015 is fit for purpose?** Required to answer. Single choice.

Yes  
No  
Unsure

**19. On a scale of 1-10, how successful has the Modern Slavery Act 2015 been in setting a level playing field for businesses?** Required to answer. Rating.  
(Scale: 1 = Not at all, 10 = Very effective)

**20. Please share any further comments you have on the topics discussed in this section.** Multi Line Text.

#### **BUSINESS AND HUMAN RIGHTS LEGISLATION**

**21. Beyond modern slavery and human trafficking, is there a need for new UK legislation on business' human rights obligations?** Required to answer. Single choice.

Yes  
No  
Unsure

**22. Please share any further comments you have on the topics discussed in this section.**  
Multi Line Text.

## 7. SPECIFIC ELEMENTS OF LEGISLATIVE PROPOSAL

**23. Does your organisation support the introduction of a legal duty on businesses to prevent serious human rights harms to which the organisation is connected, with a defence of reasonable human rights due diligence?** Required to answer. Single choice.

Yes  
No  
Unsure

**24. To what extent would it be helpful if such a duty increased clarity and legal certainty for your organisation?** Required to answer. Single choice.

Yes  
No

**25. If so, does your organisation support establishing corporate criminal liability for failing to prevent a gross violation of human rights (e.g. slavery or inhuman or degrading treatment) that a business directly causes?** Required to answer. Single choice.

Yes  
No  
Unsure

**26. Does your organisation support establishing corporate criminal liability for senior managers who – in extreme cases, such as gross negligence and wilful misconduct – fail to prevent a gross violation of human rights, with fines or disqualification for those found guilty?** Required to answer. Single choice.

Yes  
No  
Unsure

**27. Does your organisation support:**

**(a) Establishing new legal routes by which victims may bring statutory claims against a business that fails to prevent human rights abuses, in addition to existing**

mechanisms?

**(b) Empowering authorities to take enforcement action when a business fails to prevent human rights abuses, with the potential for compensation orders to be made as part of such enforcement actions, in addition to existing mechanisms?** Required to answer. Multiple choice.  
(Tick one or more box)

- (a) Statutory claims
- (b) Regulatory enforcement
- No
- Unsure

**28. Does your organisation support placing entity-based, geographic, or product-specific customs restrictions where there is a high risk of imported products being made with forced labour?** Required to answer. Single choice.

*In a similar manner to the U.S. Uyghur Forced Labour Prevention Act, the UK Government would set presumptive restrictions on certain products entering into the domestic market, based on relevant objective assessment(s) of forced labour risks. In order to successfully import such products, businesses would then need to provide evidence that those products were not made with forced labour.*

- Yes
- Yes, in some respects
- No
- Unsure

**29. Does your organisation support more robust and standardised reporting obligations on human rights?** Required to answer. Single choice.

- Yes
- No
- Unsure

**30. Does your organisation support UK legislation that requires annual reporting on the following:** Required to answer. Multiple choice.  
(Tick one or more box)

- (v) All identified adverse human rights impacts from the previous financial year
- (w) Where no adverse impacts are identified, the basis for the organisation's confidence that no human rights harms occurred during the reporting period
- (x) Forward-looking reporting requirements – including a plan outlining the procedures to be adopted in the forthcoming financial year, along with an assessment of the effectiveness of actions taken in the previous financial year

**31. Under what reporting frameworks covering business and human rights does your organisation currently make disclosures?** Required to answer. Multiple choice.



*(Tick one or more box)*

UN Guiding Principles Reporting Framework  
Corporate Sustainability Reporting Directive (European Sustainability Reporting Standards)  
Global Reporting Initiative (GRI) Standards  
UK Modern Slavery Act reporting (Section 54)  
Not sure

**32. Are there any existing frameworks that your organisation would like to see future UK reporting requirements align with?** Required to answer. Single choice.

UN Guiding Principles Reporting Framework  
Corporate Sustainability Reporting Directive (European Sustainability Reporting Standards)  
Global Reporting Initiative (GRI) Standards  
Other (please specify) (Free text)  
Not sure

**33. Does your organisation believe that businesses' human rights responsibilities apply across the entire value chain rather than only upstream or downstream?** Required to answer. Single choice.

Yes  
No  
Unsure

**34. What elements would a new regime covering business and human rights most need to include in order to help your business to comply?** Single line text.

**35. Please share any further comments you have on the topics discussed in this section.** Multi Line Text.

## **SUPPORT & MISCELLANEOUS**

**36. In principle, would you be prepared to endorse a policy proposal and draft legislation that: (i) introduces a duty to prevent human rights harms, (ii) establishes restrictions on forced labour products, and (iii) strengthens human rights disclosure and reporting.** Required to answer. Single choice.

Yes  
No  
Unsure

**37. Other than your responses already given, are there any further comments that you have?** Single line text.

## Annex 4 – Investors

| Title  | Link  | Publisher / Source                 | Date |
|--|---|------------------------------------|------|
| <b>Charles Russell Speechlys: Why Investors Focus on Human Rights</b>                | <a href="https://www.charlesrussellspeechlys.com/en/insights/expert-insights/corporate/2025/why-investors-are-increasingly-focused-on-human-rights-what-companies-need-to-know/">https://www.charlesrussellspeechlys.com/en/insights/expert-insights/corporate/2025/why-investors-are-increasingly-focused-on-human-rights-what-companies-need-to-know/</a>   | Charles Russell Speechlys          | 2025 |
| <b>Council of the EU Press Release: Sustainability Reporting &amp; Due Diligence</b> | <a href="https://www.consilium.europa.eu/en/press/press-releases/2025/06/23/simplification-council-agrees-position-on-sustainability-reporting-and-due-diligence-requirements-to-boost-eu-competitiveness/pdf">https://www.consilium.europa.eu/en/press/press-releases/2025/06/23/simplification-council-agrees-position-on-sustainability-reporting-and-due-diligence-requirements-to-boost-eu-competitiveness/pdf</a> | Council of the EU                  | 2025 |
| <b>CCLA: Companies Meeting Minimum Anti-Slavery Standards</b>                        | <a href="https://future.portfolio-adviser.com/ccla-three-quarters-of-companies-meeting-bare-minimum-in-anti-slavery-standards/">https://future.portfolio-adviser.com/ccla-three-quarters-of-companies-meeting-bare-minimum-in-anti-slavery-standards/</a>   | Future Portfolio Adviser / CCLA    | 2025 |
| <b>IFM Investors: Addressing Modern Slavery in Investment Portfolios</b>             | <a href="https://www.ifminvestors.com/en-gb/news--insights/thought-leadership/addressing-modern-slavery-in-investment-portfolios/">https://www.ifminvestors.com/en-gb/news--insights/thought-leadership/addressing-modern-slavery-in-investment-portfolios/</a>   | IFM Investors                      | 2025 |
| <b>Investor Statement Supporting HRDD Legislation</b>                                | <a href="https://investorsforhumanrights.org/investor-statement-calling-business-human-rights-and-environment-act">https://investorsforhumanrights.org/investor-statement-calling-business-human-rights-and-environment-act</a>   | Investor Alliance for Human Rights | 2022 |
| <b>The Investor Case for Mandatory Human Rights Due Diligence</b>                    | <a href="https://investorsforhumanrights.org/sites/default/files/attachments/2020-04/The%20Investor%20Case%20for%20mHRDD%20-%20FINAL.pdf">https://investorsforhumanrights.org/sites/default/files/attachments/2020-04/The%20Investor%20Case%20for%20mHRDD%20-%20FINAL.pdf</a>   | Investor Alliance for Human Rights | 2020 |
| <b>Manulife IM: Human Rights Investing and Due Diligence</b>                         | <a href="https://www.manulifeim.com/institutional/global/en/viewpoints/sustainability/human-rights-investing-due-diligence">https://www.manulifeim.com/institutional/global/en/viewpoints/sustainability/human-rights-investing-due-diligence</a>   | Manulife Investment Management     | 2025 |
| <b>Inclusive Platform on Due Diligence Policy Co-operation</b>                       | <a href="https://www.oecd.org/en/topics/sub-issues/due-diligence-guidance-for-">https://www.oecd.org/en/topics/sub-issues/due-diligence-guidance-for-</a>   | OECD                               |      |

|  |   |               |               |
|--|---|---------------|---------------|
|  | <a href="#">responsible-business-conduct/inclusive-platform-on-due-diligence-policy-co-operation.html</a>   |               |               |
| <b>Wealth managers must help tackle modern slavery</b>   | <a href="https://www.pwmnet.com/content/cd94e931-61cd-5db3-bffb-b0cfbc98789c">https://www.pwmnet.com/content/cd94e931-61cd-5db3-bffb-b0cfbc98789c</a>   | PWMNet        | 2025          |
| <b>House of Lords Select Committee Publications</b>  | <a href="https://committees.parliament.uk/publications/49011/documents/257592/default/">https://committees.parliament.uk/publications/49011/documents/257592/default/</a>   | UK Parliament | 2024/<br>2025 |
| <b>Advance: A stewardship initiative for human rights and social issues</b>  | <a href="https://public.unpri.org/investment-tools/stewardship/advance">https://public.unpri.org/investment-tools/stewardship/advance</a>   | UNPRI         | 2025          |
| <b>The Risk Based Approach to Due Diligence: practical, proportionate and effective human rights and Environmental due diligence (HREDD) for investors and Investees</b> | <a href="https://public.unpri.org/download?ac=23786">https://public.unpri.org/download?ac=23786</a>   | UNPRI         | 2025          |
| <b>Managing Human Rights Risks: What data do investors need?</b>   | <a href="https://unpri--mainbox.sandbox.my.salesforce.com/sfc/p/#O5000000XiyFB/a/O50000002Pwaj/cCsM89GIaC.6_NyNN1ww.l8IaIDOalZlA6y31LAifOU">https://unpri--mainbox.sandbox.my.salesforce.com/sfc/p/#O5000000XiyFB/a/O50000002Pwaj/cCsM89GIaC.6_NyNN1ww.l8IaIDOalZlA6y31LAifOU</a> | UNPRI         | 2022          |
| <b>PRI Blog: Managing Human Rights Risks via Data Providers</b>  | <a href="https://public.unpri.org/pri-blog/how-can-investors-work-with-data-providers-to-manage-human-rights-risks/13546.article">https://public.unpri.org/pri-blog/how-can-investors-work-with-data-providers-to-manage-human-rights-risks/13546.article</a>                     | UNPRI (Blog)  | 2025          |
| <b>Unseen UK: Mandatory HRDD as Economic Policy</b>  | <a href="https://www.unseenuk.org/why-mandatory-human-rights-due-diligence-is-economic-growth-policy-not-regulatory-burden/">https://www.unseenuk.org/why-mandatory-human-rights-due-diligence-is-economic-growth-policy-not-regulatory-burden/</a>                               | Unseen UK     | 2025          |

## Annex 5 – Polling survey questions

### Strand Partners

All research was conducted in-house by Strand’s specialist polling team. Strand is a member of the British Polling Council and abides by its rules. The research team is trained by the Market Research Society and operates under its guidance. All polling data tables are of publishable quality.

**A1. Before this survey, had you heard of the term “forced labour”?**

- Yes
- No
- Don’t know

**A2. Which of the below do you think is the correct definition of forced labour, if any?**

- Work someone is made to do against their will because of coercion, threats, deception, or exploitation
- Work that is extremely demanding or done in harsh conditions, even if freely chosen
- Any job with very low pay
- Work taken because of family pressure or expectations
- Unpaid roles such as internships, volunteering, or helping relatives
- Temporary or insecure jobs with limited rights (e.g., zero-hours contracts)
- None of the above
- Don’t know

**A3. Before this survey, had you heard of the term “child labour”?**

- Yes
- No
- Don’t know

**A4. Which of the below do you think is the correct definition of child labour, if any?**

- Work done by children that is harmful, exploitative, or prevents them from getting an education, rest, or a safe childhood
- Any paid work done by someone under 18

- Part-time jobs taken by teenagers (e.g., in shops or cafés)
- Helping family members with chores or family businesses
- Work that is tiring or physically demanding for children but allowed by their parents
- Unpaid activities such as volunteering or school programmes
- None of the above
- Don't know

**B1. How common do you think it is for items sold in UK shops or online to be produced, in part or in full, using forced / child labour or exploitation overseas?**

- Very common
- Somewhat common
- Neither common nor rare
- Somewhat rare
- Very rare
- Don't know

**B2. Some products sold in the UK may be linked to forced labour in other countries, where adults or children are exploited or cannot leave their work freely. To what extent do you think it is common for the following types of products sold in the UK to be produced using forced / child labour overseas?**

- Food and drinks (e.g., fruit, vegetables, coffee, seafood)
- Clothes and footwear
- Mobile phones and electronics
- Furniture and homeware (e.g., wood, textiles)
- Beauty and personal care products
- Toys and children's products
- Construction materials (e.g., bricks, stone)
- Household cleaning products
- Car parts and automotive components

**B3. Some products sold in the UK may be linked to forced labour in other countries, where adults or children are exploited or cannot leave their work freely. To what extent would you be likely or not to buy each of the following types of products if it**

**was sold in the UK and you knew it had probably been produced using forced / child labour overseas?**

- Food and drinks (e.g., fruit, vegetables, coffee, seafood)
- Clothes and footwear
- Mobile phones and electronics
- Furniture and homeware (e.g., wood, textiles)
- Beauty and personal care products
- Toys and children's products
- Construction materials (e.g., bricks, stone)
- Household cleaning products
- Car parts and automotive components

**B4. Some products sold in the UK may be linked to forced labour in other countries, where adults or children are exploited or cannot leave their work freely. To what extent are you concerned that you might have unknowingly bought one of these products without knowing that it was produced using forced / child labour overseas?**

- Very concerned
- Somewhat concerned
- Slightly concerned
- Not concerned at all
- Don't know

**B5. How concerned would you be personally if you found out that a product that you have in your home had been made using forced / child labour?**

- Very concerned
- Somewhat concerned
- Slightly concerned
- Not concerned at all
- Don't know

**B6. To what extent is it important to you that products you buy are not made using forced / child labour?**

Crucial

Very important

Somewhat important

Not very important

Not important at all

Don't know

**B7. To what extent do you agree or disagree with each of the following statements?**

- The UK Government needs to do more to ensure products made involving forced / child labour in other countries do not enter the UK
- The NHS must never use any tools or technologies that are produced in other countries using forced / child labour
- UK shops and retailers should be legally required to remove products linked to forced labour from their shelves
- Businesses should have to publish proof of how they check their supply chains for forced labour
- The UK should ban imports from companies that have been linked to forced labour

**C1. Sometimes forced / child labour abuse or exploitation is found in a company's supply chain, even if it happens overseas or through a supplier. When this happens, how much responsibility do you think the company has for it?**

- A great deal of responsibility
- Some responsibility
- A little responsibility
- No responsibility at all
- Don't know

**C2. To what extent do you trust UK businesses to monitor forced / child labour effectively on a voluntary basis, without clear rules or oversight?**

- I completely trust them
- I mostly trust them
- I somewhat trust them
- I slightly trust them
- I don't trust them at all
- Don't know

**C3. To what extent do you think it is important for UK businesses to check their supply chains for forced labour and exploitation (i.e., exploitation that takes place in the factories or suppliers that UK businesses buy from, including overseas)?**

- Crucial
- Very important
- Somewhat important
- Not very important
- Not important at all
- Don't know

**C4. To what extent do you agree or disagree with each of the following statements?**

- Businesses will only do the bare minimum on forced / child labour unless they are forced to act
- Most businesses care more about their profits than protecting workers from exploitation
- I would be more likely to buy from a business that is more open and transparent about its supply chains and how it prevents exploitation of workers
- The Government should introduce stronger rules to force UK businesses to properly check for forced / child labour in their supply chains
- I would be more favourable to the Government if it introduced stronger rules to force UK businesses to properly check for forced / child labour in their supply chains
- I would be more likely to vote for the Government if it introduced stronger rules to force UK businesses to properly check for forced / child labour in their supply chains
- Businesses should face fines or severe punishment if they fail to prevent labour exploitation in their supply chains
- Businesses should lose public contracts in the UK if they cannot show they have no forced / child labour in their supply chains
- Businesses should be required to prove their claims about checking their supply chains for forced / child labour, rather than just saying they do it

**D1. To what extent do you agree or disagree with each of the following statements?**

- The UK Government should introduce new laws to stop British businesses being undercut by cheaper goods from other countries that may have been made using forced / child labour



- The UK Government should allow cheaper imports even if some may be linked to forced or child labour
- I would be more favourable to the Government if it introduced new laws to stop British businesses being undercut by cheaper goods from other countries that may have been made using forced / child labour
- I would be more likely to vote for the Government if it introduced new laws to more effectively block imports of goods into the UK produced using forced / child labour

**D2. To what extent is it important to you that UK businesses are protected from unfair competition from goods produced overseas using forced or child labour?**

- Crucial
- Very important
- Somewhat important
- Not very important
- Not at all important
- Don't know

**D3. To what extent would you be any more or less likely to vote for the Government if it introduced laws that more effectively blocked imports of food or manufactured products linked to forced or child labour overseas?**

- **Much more likely**
- **Somewhat more likely**
- **No difference**
- **Somewhat less likely**
- **Much less likely**

**D4. To what extent do you agree or disagree with each of the following statements?**

- The UK should work with other countries to introduce stronger laws preventing imports of goods made using forced or child labour
- The UK should follow the stricter standards used by other countries to ensure the UK has the strongest possible barriers against imports made with forced or child labour

- The UK should not follow the stricter rules used by other countries, even if this means less strong barriers against imports made with forced or child labour

## Glossary of acronyms

|              |  |
|--------------|--|
| <b>BAFA</b>  | Federal Office for Economic Affairs and Export Control (Germany). Enforces the German Supply Chain Due Diligence Act.  |
| <b>CSDDD</b> | Corporate Sustainability Due Diligence Directive (EU).   |
| <b>FTAs</b>  | Free Trade Agreements. International trade agreements: some include provisions on forced labour.   |
| <b>ILO</b>   | International Labour Organization. UN agency setting global labour standards.  |
| <b>IASC</b>  | Independent Anti-Slavery Commissioner. Role established under the Modern Slavery Act 2015 to promote good practice in preventing modern slavery.   |
| <b>MHRDD</b> | Legislation that imposes mandatory measures to encourage businesses to undertake MHRDD.  |
| <b>MSA</b>   | Modern Slavery Act 2015. UK legislation introducing measures to combat modern slavery, including Section 54 on Transparency in Supply Chains.  |
| <b>NRM</b>   | National Referral Mechanism. UK framework for identifying and supporting potential victims of modern slavery.  |
| <b>OECD</b>  | Organisation for Economic Co-operation and Development. Issues Guidelines for Multinational Enterprises on responsible business conduct  |
| <b>POCA</b>  | Proceeds of Crime Act 2002. Enables recovery of criminal assets, including proceeds from forced labour offences.   |
| <b>TISC</b>  | Transparency in Supply Chains. Provision under Section 54 of the Modern Slavery Act 2015 requiring businesses to disclose steps taken to prevent modern slavery and human trafficking.   |
| <b>UNGPs</b> | UN Guiding Principles on Business and Human Rights. A global framework that sets out: the State duty to protect human rights (Pillar 1), the corporate responsibility to respect human rights (Pillar 2), and the need for access to effective remedy for business related human rights abuses (Pillar 3). |
| <b>UFLPA</b> | Uyghur Forced Labor Prevention Act (US). Establishes a rebuttable presumption that goods from Xinjiang are made with forced labour.  |