



Covid-19 and potential implications on human trafficking and other forms of modern slavery internationally

Briefing: April 2020

Introduction

COVID-19 is a global pandemic affecting every country in the world. Similarly, modern slavery is a global threat that affects every country in the world. This briefing aims to highlight some of the global concerns and increased potential threats around modern slavery posed by COVID-19 and identify recommendations.

Please note: The information and recommendations contained in this document are as per the global situation as of April 22, 2020. However, as the COVID-19 situation is constantly evolving, responses are likely to require adaptation over time.

Summary

This briefing will cover the following themes:

1. Increased threat and vulnerability of individuals and communities including access to state and non- state support structures/safeguarding mechanisms.
2. Potential impact on the modus operandi of exploiters.
3. Potential impact on the rule of law and law enforcement activities.
4. Potential risks for businesses.

It should be noted that modern slavery is a complex issue and often these issues are interlinked and affect each other.

Increased Threat and Vulnerability of Individuals and Communities

including Access to Social Welfare and Care Support Structures and Systems (State and Non-State)

Overarching Vulnerabilities Tend to be More Acute in a Crisis

Traffickers will target vulnerable individuals/communities for recruitment. Victims may have pre-existing vulnerabilities such as poor economic/employment opportunities; poverty; lack of education; learning difficulties and disabilities; mental health, which may include pre-existing trauma; bereavement; language, drug or alcohol addiction; homelessness/precarious living conditions; religious repression/lack of religious freedom; marginalisation of a community; and irregular immigration status, as well as possibly fleeing conflict or being classed as stateless. Women and children can be particularly vulnerable. These vulnerabilities become more acute in the face of a crisis. The pool of individuals that experience these vulnerabilities is likely to increase during a crisis, and the COVID-19 pandemic is no exception to this. In addition, these varying vulnerabilities make people more vulnerable to contracting the virus, which then affects wider family members, thereby further increasing their vulnerability (e.g. the impact on a family if the breadwinner or primary caregiver contracts the virus).

State Social Care, Education including Safeguarding Mechanisms

Some countries have formalised adult and child social care systems, including education systems. Some countries have fractured and less formalised adult and child social care systems, while others have no formalised system with non-governmental organisations primarily filling this gap. This all contributes to risks for vulnerable adults and children who, as a result, are not able to report and access support and safeguarding mechanisms quickly. Furthermore, where systems do exist, a challenge is posed by the diversion of existing resources to address the crisis, including the ongoing social care of those who have survived the virus. ECPAT UK have noted the potential psychological impact on victims with no or limited access to services including isolation¹.

In addition, educational establishments often provide more than education. For example, schools often support with safeguarding, protection and nutrition, including subsidised meals. Families who are economically overstretched and ordinarily depend on these services may not be able to cope with the impact of various lockdown measures and school closures, placing children at risk of being abandoned, sold, or groomed.

Impact of COVID-19 on the Global Economy

The International Labour Organisation's (ILO's) preliminary assessments indicate that in the wake of COVID-19, there will be a rise in unemployment and underemployment.² Many of the world's poorest lack the economic ability to sustain themselves through a pandemic. Preliminary ILO estimates indicate 'a rise in global unemployment of between 5.3 million ("low" scenario) and 24.7 million ("high" scenario) from a base of 188 million in 2019.'³ Added to this is those who may be dependent on particular workers wages which could multiply this figure. Thematically, responses to economic crises can increase self-employment as a fallback option for survivors or as a means to maintain their income.⁴ However, given the restrictions on movement and sale of goods this safety net may not be available. In addition, the ILO has estimated that there will be (under the 'mid' and 'high' scenarios) between 20.1 million and 35.0 million more people in working poverty than before the pre- COVID-19 estimate for 2020.⁵ With an increase to unemployment comes an increase in the risk of exploitation for those who are desperate to meet their basic need. This creates an even more fertile recruitment ground for exploiters.

Public Health and Lack of Access to Free National Health Services

The ILO reports that “Nearly 40% of the world’s population has no health insurance or access to national health services. Some 800 million people spend at least 10% of their household budget on health care each year, and 100 million people fall into poverty because of medical expenses.”⁶ Poverty is a major driver that leaves people vulnerable to exploitation and, in this current crisis, it is possible that people will be recruited by exploiters and/or enticed into debt bondage in order to pay for vital healthcare for loved ones who contract the virus. Significantly, in some countries, organised criminals have already infiltrated healthcare systems prior to the pandemic. A study in 2018⁷ found that, on average, 19% of patients in the European Union reported paying bribes for preferential health treatment – with the percentage as high as 41% in Slovakia and 38% in Slovenia.

In addition, those trapped in slavery may not have any access to medical assistance and could be in cramped conditions, for example in a brothel or a forced labour situation where they share a property with many people. This significantly increases the risks of the virus spreading. This coupled with a lack of access to medical care could result in serious illness or even fatality.

Lack of Access to Social Security Systems including Unemployment Benefit and Access to Food

Many workers internationally, including some workers within developed countries such as the UK, may lack access to a social security system. In fact, the ILO states that 55% of the world’s population (about four billion people) do not benefit from any form of social protection.⁸ In addition, in its report on the World Social Protection System 2017-2019, the ILO estimates that only 29% of the global population are covered by comprehensive systems that include a full range of benefits such as child and family benefits, unemployment benefits, and pensions.⁹ The ILO notes that Africa and Asia are particularly underdeveloped in relation to social security structures.¹⁰ Therefore, countries in these areas are at particularly high risk, and any existing system (however limited or fractured) is likely to be overwhelmed.

The lack of a welfare safety net invariably increases the public health risk because workers in key industries have no choice but to continue working even if they have symptoms of COVID-19, as there is no incentive to report symptoms, which places the wider workforce at risk. These risks are likely to be higher in industries where unsafe employment practices already exist. In addition, workers who lose their jobs owing to the crisis have no safety net to fall back on, which may force them into bonded debt and/or exploitative work to provide for their basic needs. This could also include selling children to traffickers out of desperation.

There could also be impacts on access to food supplies, particularly in vulnerable communities. Even prior to the pandemic, the World Food Programme issued a report in March 2020 detailing 18 countries that were identified as ‘hot spot’ countries (i.e. due to conflict, political instability and or climate induced disasters) were at risk of plunging into further crises which pose serious threats to food security and livelihoods.¹¹ This includes two countries in which Hope for Justice operates: Ethiopia and Zimbabwe. In addition, there are several at-risk countries neighbouring our operational locations: Democratic Republic of Congo, Myanmar, and South Sudan. Such risks are likely to become more acute during the pandemic.

Access to NGO Services

Financial Impact on NGOs

Globally, Non-Governmental Organisations (NGOs) often provide a vital role in filling the gaps in non-existent and/or fractured social welfare and care systems. As the global crisis impacts on the global economy, many NGOs may lose funding and be forced to shut services and/or have a significantly reduced income, thus reducing their financial (as well as physical) capacity to assist the most vulnerable. For instance, UNHCR are seeking \$255,000,000 for refugees alone to mitigate the impact of COVID-19.¹²

Programmatic Impact on NGOs

NGOs may be actively sought by the state to provide services to vulnerable individuals and communities or provide services to fill the gaps where there is no state provision. Hope for Justice is no exception to this. Many of the most vulnerable will not easily be able to access services that may identify and mitigate risks to exploitation or re-exploitation, e.g. services identifying victims, outreach services, independent advocacy, self-help groups, homelessness services, educational services, lighthouses, etc. In addition, due to the restrictions and lockdowns in place in various countries, the ability of organisations to work with agencies and communities to identify potential victims is significantly reduced, leaving victims with little means to escape their situation. NGOs working with vulnerable communities also face the added risk of infection and reduction in staffing levels as staff with symptoms self-isolate. In addition, there are extra cost implications for providing resources to both staff and beneficiaries to mitigate risks of infection and spread of the virus.

Additionally, victims identified in another country may not be able to be repatriated at this time, leaving them in unsafe situations. An example of this is that there are reports that trafficked child brides are stuck in China after fleeing their situation due to the suspension of rescue operations during the COVID-19 pandemic.¹³ Invariably, this leaves them at significant risk of being re-trafficked.

Wider Impact on Families and Communities Creating Increased Vulnerabilities

Particular Vulnerabilities for Children

A guidance note by the Alliance for Child Protection in Humanitarian Action entitled 'Protection of Children During Infectious Disease Outbreaks' notes a number of vulnerabilities specific to children, summarised in table format below. Hope for Justice has amended or added to the table (see below), specifically with the issue of exploitation and the COVID-19 pandemic in mind.¹⁴ However, it should be noted that there are many children who do not have a specific identified primary caregiver (for example many children living on the streets) and, therefore, health safeguards and wider safeguarding issues will be more acute. Equally, many of the issues would also apply to vulnerable adults, especially women:

Table One: Vulnerabilities for Children

Child protection issue	Risk presented by the disease	Risks presented by prevention and control measures e.g. "lockdowns" and increased vulnerabilities to exploitation
Separation of children from caregivers	<ul style="list-style-type: none">• Death or disability of caregiver.• Children sent away by parents to stay with other family members in non-affected areas.	<ul style="list-style-type: none">• Isolation of caregiver and/or child, including increased lack of supervision of child.• Community level quarantine imposed whilst family members are apart leading to children becoming separated.• Abandonment of children who may have symptoms.

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<p>Sexual violence including sex trafficking</p>	<ul style="list-style-type: none"> • Death or illness of a caregiver reduces family protection. • Increased tensions in lockdown and increased risks of domestic violence, which may include sexual violence. • Death or illness of caregiver who may shield child from familiar violence or abuse 	<ul style="list-style-type: none"> • General increased lack of supervision of children. • School closures reducing access to sexual and reproductive health information and wider child safeguarding. • Closure of child protection clubs and community-based self-help groups that work to prevent and mitigate risks. • Limited access to helpline services. • Reliance on outsiders to transport goods and services into a community (this may include traffickers). • Increased obstacles to reporting incidents, including through peers and communities.
<p>Physical violence</p>	<ul style="list-style-type: none"> • Loss of household income due to death or illness of caregiver. • Death or illness of caregiver who may shield child from familiar violence or abuse. • Increased tensions in lockdown and increased risks of domestic violence. • Fear of transmission, the need to care for sick family members or parental inability to cope with the children's psychological distress. 	<ul style="list-style-type: none"> • Lockdowns can lead to increased tensions between caregivers and children in the household, resulting in increased parental frustration and corporal punishment. • Increased obstacles to reporting incidents of physical violence.
<p>Child labour</p>	<ul style="list-style-type: none"> • Loss of household income due to illness or death of caregiver. 	<ul style="list-style-type: none"> • Loss of household income due to quarantine measures coupled with closure of educational institutions can lead to children being forced to work for family or potentially recruited/sold into child labour, including sexual exploitation.
<p>Social exclusion</p>	<ul style="list-style-type: none"> • Social stigmatisation/exclusion of individuals suspected to be infected. This could include a caregiver or the child themselves. 	<ul style="list-style-type: none"> • Social stigmatisation of individuals who have been in quarantine or treatment. • Social stigmatisation of 'at risk groups' through educational materials. • Disruption of birth registration processes due to "lockdowns." • Discrimination against certain groups. • Increased risk of homelessness due to financial impact or because the individual is seen as a transmission risk, e.g. health workers.
<p>Neglect and abandonment</p>	<ul style="list-style-type: none"> • Death or illness of a caregiver. • Abandonment due to fear of transmission. • Caregiver leaves family home to migrate and search for work to support family. • Abandonment due to socio-economic issues caused by the crisis and caregiver can no longer support child. • Limited interaction with other children. 	<ul style="list-style-type: none"> • Closure or remote access of wider child safeguarding support mechanisms, e.g. social care and educational establishments and community-based child protection mechanisms. • Isolation or quarantining of caregivers away from their children.

Increased Attempts at Migration of Vulnerable People from Rural to Urban Settings or Vice Versa

In addition, as the crisis impacts on the economy, rural communities are likely to be adversely affected, which may force greater migration of both adults and children to cities and urban areas to look for work, or enlist the services of traffickers and people smugglers to migrate using illegal routes to other countries. Given many countries are under lockdown, this may lead to increasingly precarious routes being taken to avoid detection. In addition, migration internally or externally can leave people open to exploitation and unable to escape, as they do not know how to access resources or facilities in unfamiliar areas. Children are particularly vulnerable in these situations.

The pandemic could also have the opposite impact. For example, in India the lockdown has forced many daily labourers within cities to return to their villages (often on foot) due to a lack of employment and basic food in the cities following lockdown.¹⁵ Also, many migrant workers are trapped in another country unable to return to their countries of origin including wider support networks. In essence, a lockdown to prevent the spread of the disease has caused a humanitarian crisis and significant risks of starvation to vulnerable populations.

In any case, poverty and unemployment are key drivers of increased vulnerability, which creates fertile ground for traffickers providing false promises of good work and a good life.



*Living conditions of modern slavery victims
helped by Hope for Justice*

Overall Risk of Re-Exploitation

Ultimately, diminished and overwhelmed state and non-state services will place victims at risk of not being identified and, even if identified, there are challenges in accessing front-line services, including longer-term support, repatriation and reintegration services. This places victims at a far more significant risk of not being able to escape their situation and, if identified, increases their risk to re-exploitation. This is, of course, in addition to their exposure to the health implications of COVID-19.

Potential Impact on the Modus Operandi of Exploiters: Crime Diversification

Whilst the current modus operandi of exploiters is likely to be severely disrupted during the pandemic, it is highly likely that serious organised crime groups and traffickers will diversify their tactics and look to identify new opportunities and markets at this time. This may include opportunities arising if state actors turn to criminal networks to achieve order, especially in areas where state capacity is weak. Collaboration between the state and criminal groups in times of crisis has a long history. For example, during World War II, the US government agreed to cooperate with the Mafia to counter union disruption in seaports.¹⁶

Act: Transportation, Recruitment and Potential Increase in Internal Trafficking

As the global crisis continues, increased border control and community lockdowns may restrict the ability of traffickers to move victims from country to country through legitimate means or normal routes of operation, e.g. via commercial airlines, bus routes etc. However, Hope for Justice has concerns that traffickers and human smugglers will simply diversify their tactics and exploit the fact that law enforcement efforts are currently largely diverted towards issues arising from the pandemic.

Traffickers may utilise the crisis to use increasingly precarious and dangerous routes to transport victims to other countries and raise the cost of facilitation of illegal movement, which in turn increases the potential debt bondage. The recent report¹⁷ of 64 migrants found dead in a sealed shipping container in Mozambique highlights the risk that increasingly hazardous transportation means will be used. Reports suggest that the migrants were Ethiopians who had paid to be transported to South Africa. Traffickers and smugglers are also likely to exploit large numbers of migrants who are currently stranded in a different country.

Recruitment tactics may also shift, perhaps increasing utilisation of mobile phones, social media and wider internet services, including grooming online. During lockdown, traffickers may have less physical mobility as face-to-face recruitment may arouse suspicions from authorities, especially where communities are in lockdown. In addition, there could be an increase in traffickers impersonating healthcare professionals or key workers to gain entry to vulnerable communities to reduce any suspicion. Europol are already seeing this kind of behaviour, reporting that criminals are gaining entry into the homes of vulnerable people under the guise that they are conducting COVID-19 tests but are actually committing theft.¹⁸

Means: Position of Vulnerability

The vulnerabilities detailed in (1) above, including school closures coupled with family destitution risks become a fertile ground for recruitment for all kinds of exploitation even in community quarantining/lockdowns.

Purpose: Innovation in Exploitation

Commercial Sexual Services and the Online Exploitation of Children including Cyber-Sex Trafficking

As lockdowns continue across countries and citizens have difficulty accessing commercial sexual services, exploiters may further innovate the use of online platforms, including the dark web. This may include increased cyber-sex trafficking. For instance, in South East Asia improved internet and increased access to mobile telephones has led to reports of an increase of live streaming of abuse prior to the pandemic.¹⁹ It is, therefore, highly likely that cyber-sex traffickers may utilise the COVID-19 pandemic to target vulnerable children, especially as many

are not in the safe environment of schools (the majority of which have been forced to shut during the crisis). It is also possible that abuse at home may increase where people try to make money to fill the gap created by the economic impact of COVID-19 through a variety of means such as cyber-sex trafficking. These safeguarding risks, including other wider risks, have been highlighted in a document produced by the Alliance for Child Protection in Humanitarian Action with guidance on safeguarding children during this crisis.²⁰ It also provides practical safeguarding recommendations.²¹

Forced Labour including Criminal Activities

Labour

As lockdowns occur across the world and place many at risk of unemployment and destitution, traffickers may take advantage of people's economic vulnerability and offer loans to pay for basic necessities, which would result in bonded debt that could be realised in terms of labour provision at a later date when the crisis has subsided. In addition, normal regulatory checks as people open bank accounts are likely to be more limited as this may not be possible face-to-face, which might increase risks of traffickers opening bank accounts in a victim's name without normal checks which may mitigate these risks. Online fraud may be particularly lucrative given that many goods and services have now had to move to online platforms in many countries.

Online Fraud and Wider Criminal Activities

Furthermore, as lockdowns have forced many businesses to shut, it is likely that exploiters will adapt their operations quickly, for example by focusing on wider forms of exploitation such as online fraud activities (i.e. identity theft, credit card fraud, mobile phone and laptop fraud, bank loans and welfare benefit fraud, etc). In addition, criminal activities such as cannabis cultivation can be conducted in private homes or deserted business premises. For instance, a recent report by the Global Initiative Against Transnational Organized Crime noted that the season for cannabis cultivation in Albania is March and April and due to the crisis there was little the police could do to control this, which would invariably lead to higher amounts of cannabis entering the market.²² The UK National Crime Agency, Europol, and Interpol have all highlighted crime diversification during the COVID-19 pandemic, including the use of fraud and cyber-attacks.²³

In addition, victims could also be utilised to sell fake medical equipment, forced to pickpocket (particularly in supermarkets or wider establishments that are still open), or forced to beg. Those exploiting children through such activities as drug trafficking may be able to adapt their working practices and distribution models, i.e. delivery of goods by children on bikes in the UK under the veil that they are "exercising" or utilising wider delivery services. Equally, as many retail outlets are closed and deserted, including trading estates, they may be utilised by criminals to sell drugs.

Potential Impact on the Rule of Law and Law Enforcement Activities

New Power of the State

Globally, governments are enacting new legislation very swiftly providing for new powers to be able to tackle the pandemic. This creates a “health surveillance state” and changes the dynamic of the government’s relationship with its citizens, including data known about citizens.²⁴ New emergency powers are often being enacted without the appropriate checks, balances and accountability that would normally accompany such powers, e.g. the Coronavirus Act 2020 in the UK. This includes a lack of transparency on how these powers operate in practice and the circumstances under which these powers will be relinquished once the pandemic is over. Invariably, such powers will be open to abuse, including by state entities such as law enforcement agencies, especially in countries with significant levels of bribery and corruption. The impact, therefore, needs to be closely monitored and governments encouraged to be transparent in their approach to these powers.

Disruption of Criminal Activities

There are some potential positive impacts of the pandemic. Traffickers cannot operate in the same way, which disrupts their activities. For example, the ability of exploiters to recruit and transport victims internally or across borders may be significantly curtailed by the crisis as countries close their borders and communities enter lockdown. Businesses, including those recruiting forced labour victims and brothels, may be forced to shut in lockdown. However, serious organised criminals are likely to reorganise around these challenges and capitalise on the disruption and diversion of law enforcement resources. It is possible they have more resources than state actors. In addition, in many jurisdictions where traffickers operate, state actors can be corrupt and easily bribed. Traffickers can be more innovative as they do not face moral or regulatory restrictions.

Diversion of Resourcing to Police COVID-19 Country Lockdown

The diverse role of law enforcement is succinctly stated in a guidance document issued for law enforcement by Interpol: “...law enforcement services play a crucial role in contributing to the efforts to control the disease, promoting safer communities and fighting criminals who see the outbreak as an opportunity to increase or diversify their activities.”²⁵ Law enforcement’s role could involve a myriad tasks, including (but not limited to): immigration around maintenance of border crossings; management of contained areas e.g. shops/areas under lockdown; cordoning critical infrastructure such as hospitals; management of jail breaks; and public order management, for instance population unrest/rioting due to food restrictions and wider controls. In addition, law enforcement may be requested to assist in using investigative skills in contact tracing.

These significant and varied roles during a health (and humanitarian) crisis will invariably have an impact on the resourcing of the day-to-day work of law enforcement agencies, including identifying potential victims and investigating cases involving slavery. In addition, social distancing measures mean that criminal justice systems may have limited resourcing to process cases. This will be especially acute in countries where law enforcement and judicial systems are already under-resourced and/or have a level of corruption, all of which impacts on the rule of law. Inevitably, serious organised crime groups will exploit the gap in the resourcing of normal law enforcement activities.

Public Health Restrictions on Law Enforcement Activities

Restrictions on normal policing activities, including face-to-face contact owing to public health risks, may curtail police ability to identify victims either as part of their normal frontline duties or in planned operations to identify

and rescue victims. For instance, policing in some countries could be restricted to emergency calls only or risk of loss of life incidents only. Furthermore, police service personnel are not immune to COVID-19 and many will not have protective equipment, which means they could end up having to self-isolate, significantly reducing law enforcement personnel. This will affect ongoing and new investigations, which are often labour intensive and require significant resourcing. In addition, as investigations often cross borders, there may be limited scope at present to process applications and obtain evidence from other jurisdictions. The current restrictions may also inhibit the ability of countries to extradite perpetrators.

Restrictions on Judicial Proceedings

Even if traffickers are identified and potentially arrested, due to lockdowns in many countries, courts are often running at minimal staffing and capacity. Whilst some hearings have moved online, this is not possible for all types of proceedings and there are many countries that still operate on paper-based legal systems where this kind of technology is not even available.

Potential Early Release of Convicted Exploiters

There is a considerable risk in prisons that COVID-19 will spread very quickly amongst inmates. Some countries have adopted measures where prisoners are released early. This could include perpetrators of modern slavery. In addition, there could be a tendency towards releasing people who have been arrested and charged on bail, rather than putting them on remand. Hope for Justice's experience is that there is a high risk of traffickers absconding in these circumstances.



Potential Increased Risks for Businesses

There also could be increased risks to certain businesses posed by traffickers. The pandemic has forced the shutdown of many businesses known for exploitation, e.g. car washes, nail bars, etc. However, other businesses are providing vital goods and services. For instance, the need for some services has increased demands in some sectors, e.g. food production, processing, deliveries, healthcare, which include many sectors that are already identified as vulnerable to labour exploitation in normal circumstances. The increased demand for workers in these sectors coupled with the relaxation around normal regulatory checks (e.g. immigration documentation) and restrictions on the activities of enforcement agencies creates a hotbed for exploitation. Furthermore, due to the need to recruit quickly in the key sectors, businesses could be at risk of being infiltrated by serious organised crime groups, including through employment agencies. The case of Operation Fort, which Hope for Justice worked closely on, is a good example of a case where a gang had infiltrated businesses.²⁶

In addition, often sectors with high-level risks around exploitation also have poor health and safety standards. During a pandemic, it is unlikely that workers will be provided with appropriate personal protective equipment and education to reduce risks of spreading the infection in the workplace, particularly where this information is required in more than one language.

Businesses are also likely to see increased risks arising in their global supply chains. Many of these supply chains are global and interrelated. For instance, a report by Thomson Reuters states that workers could go hungry as global fashion brands cancel or delay orders of garments due to the crisis.²⁷ There are also countries with high migrant worker populations, many of whom have been stranded in one country and unable to return to their native country. Businesses, when assessing risk, will need to consider the impact of an increasingly vulnerable population desperate for work, and suppliers who may also be in financial difficulty. It must ensure corners are not cut on human rights to keep costs down. This assessment and mitigation of risk is made more challenging because normal indicators may be blurred in a pandemic or crisis situation. For instance, a key indicator of forced labour is restriction of movement; however, suppliers may be actively restricting the movement of its labourers to prevent the spread of the virus.

Key Recommendations

Central to all the recommendations below are cross-sector and multi-disciplinary collaboration, coordination, and working in partnership. We must ensure that the most vulnerable are protected, safeguarded, and supported so that no one is left behind.

Anti-Slavery Funding

- Funding for international anti-slavery work must continue, and funds that have already been allocated for the support of trafficked people should not be diverted during, or in the aftermath of, the pandemic. This will only serve to create secondary problems such as crime and disorder. Existing funding should also have flexibility to build in awareness, resourcing, and support to vulnerable individuals and communities (including trafficking survivors) to mitigate risks of the spread of the virus, as well as mitigate anti-slavery risks. There is a nexus between the two.
- Survivors should be considered within the vulnerable category in country plans and emergency responses.
- An anti-slavery response should be incorporated into COVID-19 national and international aid commitments.
- There needs to be continuity in development assistance and enhanced aid, particularly for countries with particularly large populations of vulnerable groups.

Data Collection

- Governments, including law enforcement agencies, need to work with business, civil and civic society organisations to collect data on short, medium, and long-term impact to inform effective planning. This includes cooperation and collaboration to understand what data is required and a methodology so that data can be collected, collated, and analysed quickly. The Global Slavery Index may be able to assist with this, as could wider academic institutions such as the University of Nottingham Rights Lab.

Identify and Innovate Work with Vulnerable Communities to Prevent Exploitation and Mitigate the Health Risks, Identify Potential Victims and Continue Pathways for Safeguarding and Support

- All persons, including undocumented migrants and non-registered migrant workers, should have the possibility to regularise their status and be able to secure access to health services and welfare and social assistance, including education around the virus and basic assistance to protect themselves, e.g. washing facilities and clean water. This would mitigate the risk of exploitation and the spread of the virus.
- Risks faced by trafficked people, vulnerable adults and children need to be carefully analysed, contextualised, and incorporated into local, national, regional, and international COVID-19 policy, risk management and planning. Particular attention should be given to specific health and safeguarding risks around victim identification, safeguarding and support of at-risk populations and identified trafficked victims. This needs to examine short, medium, and long-term risks and impact.
- Develop or incorporate a combined public health and anti-slavery response into existing clusters/networks/partnerships. The networks could be utilised to identify trends (including changes to the modus operandi of traffickers) and share best practices, responses, and referral pathways during the crisis. Such clusters may need to be run remotely, e.g. WhatsApp, Zoom, Skype, etc. A multi-disciplinary and sectoral response

ensures that there are early and holistic responses to the needs of communities and victims, which would lead to better outcomes.

- Develop and/or review multi-disciplinary planning around the health and anti-slavery risks within networks to work towards putting in plans, procedures, and best practices to mitigate health and trafficking risks. These may need to be local and country specific.
- Healthcare professionals need to build capacity into anti-slavery organisations around health best practices into programmatic work with vulnerable communities. This will encourage good health education, best practices, and mitigate risks for beneficiaries, communities, and staff.
- Anti-slavery organisations need to build capacity via training and education into healthcare professions around the specific vulnerabilities to exploitation, child, and adult protection, as well as how and where to report concerns. This moves towards a public health approach.
- Developing or adapting standard operating procedures and protocols across all stakeholders to prevent/reduce family separation and other forms of child protection risks by all frontline workers, including health workers.
- Child and vulnerable adult protection and slavery risks/concerns need to be incorporated into health sector assessments and monitoring tools. This includes referral pathways and intelligence pathways where trends and risks are identified whilst conducting health programmes. This includes processes for children who are separated from a caregiver or where a caregiver has contracted the virus and is unable to care for a child or vulnerable adult.
- Health care screening, assessments and monitoring tools need to be incorporated into referral pathways, as well as initial and ongoing casework support for beneficiaries. This includes utilising trained medical staff within programmes and educating wider staff on screening, assessments, and monitoring tools.
- Adaptation of existing programmes to include education for individuals and communities around COVID-19, how to prevent the spread of the virus and incorporate community-friendly health and anti-trafficking messages specific to the crisis. This includes upskilling wider frontline services, e.g. police. Given that this upskilling would need to be done remotely, the use of radio, social media and wider internet could be utilised for health and counter trafficking messaging – this means identifying those with relevant equipment in the community. In addition, this may involve coordination between healthcare education programmes and anti-slavery programmes to ensure messages are appropriate and clear.
- Introduce community responsive risks to prevent exploitation, e.g. targeted interventions such as provision of food/food vouchers for necessities, access to report learning for children, strengthening women’s groups to be able to adapt and continue, e.g. self-help groups.
- Develop contingency plans to address remote programmatic working and coordination between multiple agencies, including mapping current referral pathways into programmes and services, which are still functioning (albeit in a reduced or remote capacity).
- Assess and ensure that children and families in self-isolation/quarantine or in health facilities have adequate basic needs, including access to washing facilities, food, and healthcare.
- Increase distributions of provisions and equipment (e.g. clean water, sanitizer, etc.) that may mitigate risks to specific areas where there may be trafficked persons, e.g. brothels, factories, farms.

Innovation and Adaption of Frontline Programmes and Law Enforcement Efforts to Address Emerging Threats and Changing Modus Operandi of Exploiters, including Government Transparency

- There needs to be close monitoring of second order impact, including crime diversification and identifying vulnerable populations and vulnerabilities in existing criminal justice systems.
- Active monitoring and pre-empting of criminal involvement through law enforcement, business, civil and civic society initiatives.
- Active monitoring and transparency in the state's use of extra legislative/policy powers specifically to address the pandemic.
- Innovate ways to identify and report emerging threats, trends, and trafficking concerns where people are working remotely, e.g. through WhatsApp type groups, social media platforms, online reports, helplines, etc., allowing for intelligence sharing protocols and education to counter threats. This could also include use of drone technology and innovation around charting changing environmental landscapes and migration patterns from space.
- Support and promote frontline work with those working with vulnerable communities and groups, including children and young people to maintain outreach to reduce the risk of them falling prey to traffickers.
- Partnership with media, e-commerce, educationalists, and NGOs to target vulnerable groups, including children promoting awareness and safeguarding on key internet platforms.
- Ensure law enforcement personnel have appropriate training and equipment to mitigate risks whilst performing their duties. In addition, judiciary need to have equipment and training, including video-link technology to continue judicial processes through the crisis.
- Ensure law enforcement personnel are adequately resourced to continue to address the serious organised crime threat. This means ensuring that wider frontline agencies are (where safe to do so) reporting emerging threats and trends that they are seeing. This may also mean upskilling existing law enforcement personnel to address some of the increased/emerging threats, such as increased online fraud, cybersex-trafficking, online abuse, and infiltration of healthcare, including counterfeit healthcare goods. This includes the role of civil society in countering these threats through education.

Recommendations for Business

- Businesses could utilise innovative technology to support global anti-slavery and public health initiatives. This could also include adapting its manufacturing to meet demands for such things as personal protective equipment.
- Businesses should continue to take advantage of online resourcing and training to ensure that they are equipped to tackle the issue of modern slavery, as risks around exploitation are likely to increase during and in the aftermath of the pandemic.
- Businesses will need to be aware of the extra risks which may arise in the current pandemic and work to review their due diligence processes, focusing their efforts on compliance and audits in supply chains where there are high product demands, increasingly vulnerable populations and financial pressures on suppliers to cut corners on human rights issues. This may include establishing teams to address the short, medium and long-term impact.
- The COVID-19 crisis affords businesses with a useful opportunity to work collaboratively with their suppliers

to problem solve, improve health and safety, including around mitigating the risks of spreading the virus. This could ensure translation of health and safety risks into relevant languages (including on reducing the spread of COVID-19) and promoting reporting pathways for concerns over health, safety, and exploitation.

- Businesses may need to innovate in order to continue their operations. This may include personal protective equipment, flexible working, and better hygiene procedures to mitigate the risks of spreading the virus.
- If there is a legislative requirement, or businesses have issued a modern slavery statement, they should include within the statement information on what extra responses they have taken considering COVID-19.

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| slavefreealliance.org

| info@slavefreealliance.org

| +44 (0)300 008 0044

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Slave-Free Alliance Ltd is a registered company (no. 11258651) and is a part of Hope for Justice, which is a charity registered in England and Wales (no. 1126097) and in Scotland (no. SC045769).

Hope for Justice is an international charity that is fighting modern slavery and helping its victims by preventing exploitation, rescuing victims, restoring lives and reforming society.

Headquartered in Manchester, UK and working across five continents, Hope for Justice's pioneering anti-trafficking model is scalable, replicable and sustainable.

For technical enquiries relating to this report, contact:

phillipa.roberts@hopeforjustice.org

For media enquiries, contact:

press@hopeforjustice.org

Hope for Justice

P.O. BOX 5527

Manchester

M61 0QU

United Kingdom

T: 0300 008 8000

W: hopeforjustice.org

