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## UK Joint Committee on Human Rights Publishes Report on Forced Labour—Making Recommendations for New Legislation

*The Committee, through its six-month inquiry—which included taking evidence from business and industry groups—considered the UK’s current legal and voluntary framework in relation to forced labour in international supply chains, and recommends new legislation, including mandatory human rights due diligence and import bans.*

On 24 July 2025, the Joint Committee on Human Rights (**Committee**) published a report exploring forced labour in international supply chains of goods which enter into or are sold on the UK market (**Report**).<sup>[1]</sup> The Committee, through its six-month inquiry—which included taking evidence from business and industry groups—considered the UK’s current legal and voluntary framework in relation to forced labour in international supply chains. The Report compares the UK’s regulatory approach to forced labour with some of its main trading partners, including the European Union (**EU**) and the United States (**US**), as well as its policy position on the inclusion of human rights-related language in free trade agreements (**FTAs**)—a number of which have recently been concluded or are currently being negotiated.

The Committee concluded by finding “[t]he evidence we heard demonstrates that goods produced by forced labour are being sold in the UK”.<sup>[2]</sup> It observed that certain sectors are particularly high risk—including the green energy sector. In light of the Committee’s findings, the Report makes recommendations for the UK Government, including the introduction of mandatory

human rights due diligence (**mHRDD**) and import bans, to be actioned within one year of the Report's publication. This would (in the Committee's view) "*level the playing field and be welcomed by many responsible businesses*".<sup>[3]</sup>

According to the Report, new legislation should establish:

- that it is unlawful to import or sell goods linked to forced labour in the UK;
- new mHRDD obligations for businesses;
- a right for those who have suffered forced labour to bring a claim for civil liability against those responsible;
- the regulatory arrangements for imported goods, sale of goods, and ensuring business compliance with the new due diligence duties; and
- how such regulations will be enforced and how those responsible for enforcement will be resourced.<sup>[4]</sup>

Whether the Government will follow such recommendations remains to be seen, and a Government response is expected later this month. Policymakers will no doubt have in mind the evolving landscape in Europe, where the European Corporate Sustainability Due Diligence Directive (**CSDDD**) (amongst other ESG regulations) is under increasing scrutiny as part of a proposed Omnibus package (previously reported on [here](#)).

We address some of the key findings of the Report in more detail below.

### **Forced Labour in Supply Chains**

"Forced labour" is defined by the International Labour Organisation (**ILO**) as "*all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily*".<sup>[5]</sup> The ILO categorises forced labour as a form of modern slavery. The Report notes that, as of 2021, there were approximately 27.6 million people subject to forced labour globally, and that this number is increasing.

### **International Law on Forced Labour**

The Report observes that the UK has ratified a number of international treaties with relevance to forced labour, the most important of which are: (i) the European Convention on Human Rights (**ECHR**) (Article 4 prohibits "*slavery and forced labour*"); (ii) the International Covenant on Civil and Political Rights (ICCPR) (Article 8 prohibits slavery and servitude); and (iii) the ILO Conventions. As noted by the Committee, these international agreements create legal obligations for the UK as a matter of international law, although these usually only extend to the UK's territorial jurisdiction. With the exception of the ECHR, there are no courts which can be used by individuals to directly enforce their rights under these treaties, either internationally or in the UK.

The Report further notes that, even in the case of the ECHR, its applicability to forced labour in the UK's supply chains is limited in the context of international supply chains—Article 4 has been relevant principally in cases of forced labour, modern slavery and human trafficking which have

taken place in the UK itself rather than in the UK's supply chains abroad.

The Report observes the UK's support of voluntary international initiatives such as the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct—but that these are “*advisory and unenforceable in the UK*”.

### Existing UK Legislation on Forced Labour

The Report notes that the UK has a “*patchwork*” of domestic legislation relevant to forced labour and supply chains.<sup>[6]</sup> Key amongst these is the Modern Slavery Act 2015 (**MSA 2015**), which was “*world-leading*” when it was passed.<sup>[7]</sup> Section 54 of the MSA 2015 introduced the UK's first corporate reporting regulation for in-scope companies, requiring preparation and publication of an annual slavery and human trafficking statement (**Section 54**).<sup>[8]</sup> The Committee concluded, however, that such statements are “*not effectively motivating companies to address forced labour in their supply chains*”.<sup>[9]</sup>

The Report notes that other statutes in the “*patchwork*” include the Foreign Prison-Made Goods Act 1897, the Proceeds of Crime Act 2002, the Procurement Act 2023 and—to a lesser extent—the Human Rights Act 1998.<sup>[10]</sup> Sector-specific legislation is also in place in the UK. For example, under the Great British Energy Act 2025, one of Great British Energy's (**GBE**) objectives is facilitating, encouraging and participating in “*measures for ensuring that slavery and human trafficking is not taking place in [GBE's] business or supply chains*”.<sup>[11]</sup>

Overall, however, the legislation is, in the Committee's view, “*currently inadequate to address forced labour in UK supply chains*”.<sup>[12]</sup> According to the Committee, legislation should, therefore, be strengthened.

### Import Bans

The Report observes that the UK does not currently have any comprehensive import ban on goods produced by forced labour—which can send a strong message that forced labour in supply chains will not be tolerated. The Report explains that such bans can be an appropriate response to state-imposed forced labour, where conventional due diligence approaches may be inappropriate.

The Report discusses the Uyghur Forced Labour Prevention Act 2021 (**UFLPA**) in the US, which established a rebuttable presumption that all goods “*mined, produced, or manufactured wholly or in part in the [Xinjiang region in China], or by an entity on the UFLPA Entity List*” are presumed to be linked to forced labour unless and until it is proved otherwise.<sup>[13]</sup> The Report also noted the US' legislation prohibiting any goods produced by North Korean citizens being imported since 2017.

The Report notes that the EU has introduced its own forced labour legislation, through the Forced Labour Regulation 2024, which is expected to apply from 14 December 2027 (**Regulation**).<sup>[14]</sup> This Regulation prohibits “*the placing and making available on the Union market of products made with forced labour or exporting domestically produced or imported products made with forced labour*”.<sup>[15]</sup> Article 37 requires Member States to lay down rules on

penalties which are “*effective, proportionate and dissuasive*”, and for compliance to be monitored by a competent authority.<sup>[16]</sup> In comparison to the UFLPA, the Regulation applies to imported and exported goods produced by forced labour globally (including in Member States). As such, it is broader in scope than the UFLPA.

Given the import bans being introduced in competitor markets such as the EU and US, the Report declared that there is a risk that the UK could become a more attractive destination for goods produced by forced labour.

### **Other Enforcement Mechanisms in the UK**

The Report explains that the UK has a number of other domestic measures which could be better utilised to tackle forced labour in UK supply chains—in particular, the Proceeds of Crime Act 2002 (**POCA**). The Committee observed, however, that the POCA has, to date, been “*underutilised by law enforcement agencies to seize goods linked to forced labour*”.<sup>[17]</sup> In particular, the Report points to Part 5 of the POCA, which empowers agencies to seize assets linked to forced labour through civil recovery (without requiring a conviction); and Part 7 of the POCA, which requires businesses to report suspicious transactions and assist with prosecution efforts in relation to forced labour (i.e., helping to disrupt the financial drivers of forced labour).<sup>[18]</sup> The Report recommends overcoming barriers to enforcement so that agencies can use their powers under POCA to address the risk of forced-labour goods being sold in the UK.

### **Free Trade Agreements (FTAs)**

The Report also considered the UK’s policy of including human rights language in FTAs. By way of context, it is increasingly common for provisions to be included in FTAs which display the parties’ values. Typically, such clauses commit the parties to upholding or improving rights as part of the FTA. Clauses might comprise commitments to uphold human rights in general, or be more focused commitments to uphold specific rights, such as labour rights. These clauses can create legal obligations when they are operative terms (rather than just political statements), meaning that the parties can (where the FTA permits) use a breach of the provision to initiate dispute resolution proceedings, and to potentially suspend or terminate the agreement.

Ensuring that clauses on human rights are included in FTAs can demonstrate the UK’s values and principles towards forced labour. According to the Committee, the Government should make it an explicit policy to include forced labour provisions in future trade deals. In this regard, the EU’s systemic approach to including human rights clauses in its FTAs “*provides an example*” for the UK.<sup>[19]</sup>

The authors note that concluding FTAs is a priority of the current Government. The UK has recently concluded an FTA with the US and there are on-going FTA negotiations between the UK and the Gulf Cooperation Council, which includes Saudi Arabia, the United Arab Emirates, Qatar, Kuwait, Oman, and Bahrain. Thus, we may soon see whether the UK Government will take the Committee’s FTA recommendations on board.

## Forced Labour Litigation

As regards litigation, the Report observes that, in the UK, some cases are being brought by survivors of forced labour, most commonly under tort law. The Committee considers that these cases can be protracted, complex, and expensive. Consequently, in the Committee's view, providing a dedicated route for civil claims to be brought against companies would benefit survivors, as well as place the burden on companies to demonstrate that they have taken measures to prevent forced labour in their supply chains (i.e., establish a "duty to prevent").

## Observations

The Report's overarching recommendation is for the UK Government to strengthen existing legislation and its enforcement, as well as create new laws to establish corporate responsibility (including mHRDD) and an import ban on goods linked to forced labour. The Report also recommends a "duty to prevent" to establish civil liability for companies who do not take adequate steps to prevent forced labour in their supply chains. As noted, it remains to be seen to what extent the UK Government will take account of the Committee's recommendations or seek to introduce new legislation, although the Government is in fact already considering reforms to the MSA 2015 following a recommendation from a House of Lords Committee in October 2024.<sup>[20]</sup> In the event that the Committee's recommendations were adopted, even in part, UK companies could face a significantly enhanced burden to proactively tackle forced labour in their supply chains.

<sup>[1]</sup> See 'Forced Labour in UK Supply Chains', *Joint Committee on Human Rights*, 24 July 2025, available [here](#) (the **Report**).

<sup>[2]</sup> Report, PDF p. 13, 82.

<sup>[3]</sup> Report, PDF p. 27.

<sup>[4]</sup> See Report, PDF p. 82.

<sup>[5]</sup> Report, PDF p. 9.

<sup>[6]</sup> Report, PDF p. 15.

<sup>[7]</sup> Report, PDF p. 15.

<sup>[8]</sup> See Report, PDF pp. 15, 20.

<sup>[9]</sup> Report, PDF p. 23.

<sup>[10]</sup> See Report, PDF p. 15.

<sup>[11]</sup> Report, PDF p. 15.

[12] Report, PDF p. 15.

[13] Report, PDF p. 44.

[14] See Forced Labour Regulation (Regulation (EU) 2024/3015), 27 November 2024 (coming into force on 13 December 2024) (the **Regulation**).

[15] Regulation, Recital 16.

[16] Regulation, Article 37. See also Recital 66.

[17] Report, PDF p. 47.

[18] See Report, PDF pp. 47-48.

[19] Report, PDF p. 58.

[20] 'Government response to House of Lords Modern Slavery Act 2015 Committee report, "The Modern Slavery Act 2015: becoming world-leading again"', *UK Home Office*, 16 December 2024, available [here](#).

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