

FOURTH EVALUATION ROUND

Measures to prevent and detect vulnerabilities
to human trafficking

EVALUATION REPORT UNITED KINGDOM

GRETA
Group of Experts
on Action against
Trafficking in Human Beings



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on Action against Trafficking
in Human Beings

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Preamble

In accordance with Article 38, paragraph 1, of the Convention on Action against Trafficking in Human Beings ("the Convention"), GRETA evaluates the implementation of the Convention following a procedure divided into rounds. At the beginning of each round, GRETA selects the specific provisions on which the evaluation procedure is based.

The first round of monitoring of the Convention provided an overview of its implementation by States Parties. The second evaluation round examined the impact of legislative, policy and practical measures on the prevention of trafficking in human beings (THB), the protection of the rights of victims, and the prosecution of traffickers, paying particular attention to measures taken to address new trends in human trafficking, in particular trafficking for the purpose of labour exploitation, and child trafficking. The third evaluation round focused on trafficking victims' access to justice and effective remedies.

For the fourth evaluation round of the Convention, GRETA has decided to focus on vulnerabilities to human trafficking and measures taken by States Parties to prevent them, detect and support vulnerable victims, and punish the offenders. An additional focus concerns the use of information and communication technology (ICT) to commit human trafficking offences, which brings structural changes to the way offenders operate and exacerbates existing vulnerabilities.

A number of provisions of the Convention establishing substantive and procedural obligations are relevant to this topic. The concept of "vulnerability" appears in Articles 4 (definitions), 5 (prevention of trafficking in human beings) and 12 (assistance to victims) of the Convention. According to paragraph 83 of the Explanatory report to the Convention, "by abuse of a position of vulnerability is meant abuse of any situation in which the person involved has no real and acceptable alternative to submitting to the abuse. The vulnerability may be of any kind, whether physical, psychological, emotional, family-related, social or economic. The situation might, for example, involve insecurity or illegality of the victim's administrative status, economic dependence or fragile health. In short, the situation can be any state of hardship in which a human being is impelled to accept being exploited. Persons abusing such a situation flagrantly infringe human rights and violate human dignity and integrity, which no one can validly renounce."

GRETA refers to the ICAT Issue Brief No. 12/2022 on Addressing vulnerability to trafficking in persons which refers to vulnerability as "those inherent, environmental or contextual factors that increase the susceptibility of an individual or group to being trafficked". It classifies vulnerability factors in three categories: personal (e.g. age, gender, ethnicity, disability), situational (e.g. destitution, unemployment, legal status) and contextual (e.g. discriminatory laws, policies and social norms, armed conflicts, crises) factors, which interact and may increase the risk of human trafficking for certain individuals, groups and/or communities.¹ Vulnerability to human trafficking is also subject to intersectional factors, such as gender, belonging to a minority group and socio-economic status.

In addition to the thematic focus on vulnerabilities to human trafficking, GRETA has decided that each State Party will receive country-specific follow-up questions related to recommendations not implemented or partially implemented after the third evaluation round.

GRETA recalls that it has adopted the use of three different verbs - "urge", "consider", and "invite" - which correspond to different levels of urgency for bringing the State Party's legislation and/or practice into compliance with the Convention. Thus, GRETA uses the verb "urge" when it assesses that the national legislation or policies are not in compliance with the Convention or when it finds that, despite the existence of legal provisions and other measures, the implementation of a key obligation of the Convention is lacking. In other situations, GRETA "considers" that it is necessary to make further improvements to fully comply with an obligation of the Convention. By "inviting" a country to pursue its efforts, GRETA acknowledges that the authorities are already on the right track and encourages them to continue existing action.

¹ [ICAT Issue Brief No. 12 on Addressing vulnerability to trafficking in persons - Search \(bing.com\)](#)

Executive summary

This report, covering the period from July 2021 to November 2025, evaluates the measures taken by the United Kingdom (UK) to prevent vulnerabilities to trafficking in human beings (THB), detect and support vulnerable victims, and punish the offenders. In doing so, it pays particular attention to the use of information and communication technology (ICT) to commit human trafficking offences as well as to the use of technological innovations to prevent THB, protect victims, and prosecute traffickers. The report also evaluates progress made in selected areas examined by GRETA during previous evaluation rounds.

A series of steps have been taken to develop the legislative, policy and institutional framework for action against THB in the four constituent countries. Legislative developments include the adoption of the Nationality and Borders Act (NABA), which introduced changes to the system for the identification and protection of victims of THB, and the Online Safety Act, as well as the development of legislation aimed at preventing abuses in the employment sphere and child criminal exploitation. Following the UK general elections in July 2024, the UK Government has renewed engagement and consultation with civil society, including through the organisation of roundtables chaired by the Home Office Minister for Safeguarding and Violence against Women and Girls who was given the lead on modern slavery. GRETA welcomes the adoption of new policy documents, in particular the Home Office Action Plan on Modern Slavery 2025/26, Northern Ireland's Modern Slavery and Human Trafficking Strategy 2024/27, and Scotland's refreshed Trafficking and Exploitation Strategy in 2025.

The UK is a country of origin, destination and transit for victims of human trafficking. The number of referrals to the National Referral Mechanism (NRM) has significantly increased over the years (from 12 687 in 2021, to 17 390 in January-September 2025). Labour exploitation was the predominant form of exploitation and concerned mostly adult victims with foreign citizenship. For child victims, the main form of exploitation was criminal exploitation, affecting predominantly UK children. The UK has remained the first nationality of persons referred to the NRM, followed by Eritrea, Vietnam and Albania.

Considerable research has been carried out in the UK into vulnerabilities to THB and the effectiveness of preventive measures. Asylum seekers, refugees and irregular migrants are particularly vulnerable to THB, as well as migrant workers in sectors at heightened risk of exploitation, such as domestic and care work, hospitality and agriculture. Children and young persons are also particularly vulnerable to THB, including unaccompanied or separated children, children under the child protection system and children from ethnic minorities. GRETA welcomes the efforts made by the authorities to engage with persons with lived experiences of human trafficking.

Across the UK, child protection referral mechanisms have been set up in order to prevent child trafficking, identify children at-risk and refer them to assistance. Awareness raising on trafficking risks and online safety are taking place at schools. Measures have been taken to address the criminal exploitation of children, in particular the phenomenon of 'county lines'. However, less attention has been paid to other forms of exploitation of children. Effective prevention is also hampered by insufficient resources of local authorities. Further, due to a shortage of places in foster families and children's homes, many unaccompanied children have been placed in hotels or unregulated accommodation such as caravans or tents, GRETA urges the UK authorities to ensure that these children are placed in safe and appropriate accommodation and are appointed legal guardians. It also calls on the authorities to improve the support provided to children under the care of local authorities in their transition to adulthood with a view to preventing them from being trafficked.

The UK authorities have taken steps to prevent THB for the purpose of labour exploitation, such as the visa sponsorship and employer licensing systems, as well as obliging employers to pay domestic workers at least the national minimum wage. However, the safeguards put in place are insufficient, as demonstrated by the number of victims identified each year among migrant workers. GRETA calls on the UK authorities to improve effective possibilities for migrant workers to change employers and to increase

the resources allocated to labour market enforcement bodies. GRETA also considers that the UK authorities should improve the provision of information to migrant workers and strengthen the prevention of trafficking in supply chains and the enforcement of the modern slavery statements.

The UK authorities have taken measures to improve the assessment of vulnerabilities of asylum seekers and irregular migrants, including through new screening guidance for asylum and immigration staff. However, the fact that migrants face increased risks of detention and deportation prevents them from reporting exploitation to the authorities and seeking support, a situation which is abused by traffickers to target migrants and maintain control over them. GRETA urges the UK authorities to ensure that a vulnerability assessment is systematically carried out at an early stage, to strengthen access to legal aid for asylum seekers, to provide safe and adequate accommodation to asylum seekers and refugees and to improve their access to the labour market.

GRETA considers that the UK authorities should take additional measures to address the gender dimension of human trafficking, including by developing interventions targeting the intersections between human trafficking and violence against women and domestic violence, measures aimed at reducing demand for the exploitation of persons in prostitution and at supporting persons wishing to exit prostitution, and further efforts to prevent child and forced marriages.

The 2014 Modern Slavery Strategy recognises homelessness as a vulnerability factor. Despite measures taken to prevent homelessness, GRETA notes that the 'no recourse to public funds condition (NRPF), which can be imposed on foreigners under working visa schemes or who are irregularly in the UK, increase risks of homelessness. GRETA calls on the UK authorities to assess the NRPF condition on vulnerabilities to human trafficking and reconsider its application to persons at risk of human trafficking.

People from Black and other ethnic minorities, as well as Roma and Travellers, are vulnerable to human trafficking due to intersecting factors such as poverty, discrimination and marginalisation. GRETA considers that the UK authorities should make additional efforts to prevent human trafficking of persons from disadvantaged minorities, including by addressing root causes (poverty, access to employment, education and housing and discrimination) and involving organisations or individuals representing ethnic minorities in the design of anti-trafficking policies and activities.

While welcoming the research conducted on the intersection between human trafficking and disability, GRETA considers that the UK authorities should take additional measures to address the vulnerability of persons with disabilities to human trafficking, including by developing guidance and training on human trafficking for professionals working with persons with disabilities and special needs and by strengthening the early identification of persons with disabilities who are at risk of trafficking.

With a view to reducing the delays in the identification of victims of human trafficking, the UK authorities are undertaking reforms to the National Referral Mechanism (NRM), alongside recruiting additional decision-making staff and devolving NRM decisions concerning children to local multi-agency panels. However, GRETA notes that the NRM decision-making process has become increasingly complex, with a high threshold of proof, turning into a quasi-judicial mechanism that is very difficult for victims to navigate. GRETA calls on the UK authorities to ensure that the identification procedure has a reasonable duration and that all individuals for whom there are reasonable grounds to believe that they are victims of trafficking are identified and referred for support, irrespective of their immigration status.

There have been changes in the duration of the assistance provided to victims of THB in England and Wales following the entry into force of the NABA. Victims are currently entitled to a recovery period of at least 30 days (previously it was 45) after a positive reasonable grounds decision, followed by a move-on period of at least 45 days (previously 90 days) after a positive conclusive grounds decision. In Scotland, access to support is available for 90 days or longer in some circumstances. In Northern Ireland, the provision of support after the conclusive grounds decision was extended to 12 months or more, depending

on the individual circumstances of the victim. GRETA considers that the authorities should improve victims' access to long-term support in England and Wales and ensure victims' timely access to psychological assistance across the UK. As regards children, the authorities should ensure that specialised assistance is provided to all child victims and victims transitioning to adulthood, and make the Independent Child Trafficking Guardianship scheme operational across the whole territory of England and Wales.

GRETA welcomes the measures taken by the UK authorities to strengthen the criminal justice response to human trafficking. The National Crime Agency (NCA) has continued to co-ordinate targeted law enforcement operations on human trafficking, but part of its human resources have been reassigned to fighting migrant smuggling. There is a need for increased prioritisation and resources, better co-ordinated approach among law enforcement and other agencies, and strengthened guidance and training. GRETA considers that the UK authorities should reinforce financial investigations and the use of special investigative techniques in trafficking cases, ensure that human trafficking is investigated and prosecuted as such, and provide further training and guidance to relevant professionals.

Efforts are being made by police forces across the UK to use specialised web crawlers and other technology tools to detect human trafficking and collect and analyse digital evidence. The Online Safety Act 2023 introduced a list of priority offences, including human trafficking, for which online service providers are obliged to put in place the necessary systems and processes to identify, assess and address these offences. GRETA welcomes the efforts made to address human trafficking facilitated by ICT and considers that the UK authorities should strengthen co-operation with ICT companies and Internet service providers, develop data-sharing procedures with companies holding relevant data, and reduce risks of human trafficking facilitated by adult services websites.

In relation to follow-up issues from the previous evaluation round, GRETA welcomes the steps taken in England and Wales to increase the amount of funding allocated to legal aid providers. In Scotland and Northern Ireland, efforts are being made to offset shortages of legal aid providers through the provision of public funding or dedicated programmes for legal advice to victims of trafficking. Notwithstanding these developments, GRETA is concerned by the continuing difficulties faced by victims in accessing legal assistance and free legal aid. It once again urges the UK authorities to ensure that legal assistance is provided during the identification process and prior to entering the NRM, and that free legal aid is accessible across the UK and covers the procedure for obtaining state compensation.

The number of victims of trafficking who are granted compensation from the perpetrators by criminal courts remains low. There continue to be obstacles to the compensation of victims of labour exploitation in employment tribunals. GRETA urges the UK authorities to ensure that victims can obtain compensation of the full damage suffered and that compensation is available for all victims of trafficking, including undocumented workers. Further, GRETA calls upon the authorities to enable victims of human trafficking to effectively access state compensation within reasonable time (through the Criminal Injuries Compensation Authority and Northern Ireland's Criminal Injuries Compensation Scheme) and to review the eligibility criteria for state compensation in order to make it accessible to victims of all forms of human trafficking.

With a view to executing the judgment of the European Court of Human Rights in *V.C.L. and A.N. v. United Kingdom*, revised guidance on the non-prosecution of victims of human trafficking was produced in England, Wales and Scotland. However, GRETA is concerned that victims of trafficking continue to be prosecuted and convicted for offences that they were compelled to commit as part of their exploitation. GRETA once again urges the UK authorities to ensure that the non-punishment provision can be applied to all unlawful activities that victims were compelled to commit, that coercion and other means are not required for the statutory defence of children, and that the allocation of the burden of proof does not substantially hinder the application of the non-punishment provision.

Following the adoption of the NABA, access to the recovery and reflection period has been enshrined in UK law. Section 63 of NABA provides for the disqualification of victims from accessing the recovery and reflection period if they are a threat to the public order or if they claimed to be victims of trafficking in bad faith. In July 2024, the UK authorities updated the Modern Slavery Statutory Guidance, obliging the decision-makers to conduct an assessment of the re-trafficking risks of the victim once it is determined that a public order disqualification can apply. GRETA urges the UK authorities to ensure that 'public order' and 'bad faith' disqualifications are applied in very exceptional circumstances, with due regard to the circumstances of the individual cases and with respect for the principle of proportionality.

Section 65 of NABA provides for the granting of residence permits to victims of trafficking for the purpose of assisting victims in their recovery from any physical or psychological harm, enabling victims to seek compensation, or enabling victims to co-operate with the authorities in an investigation or criminal proceedings. In practice, requests for residence permits are often denied on the grounds that assistance and compensation can be obtained in the country of return of the victim. GRETA urges the UK authorities to ensure that all victims of trafficking who have received a positive conclusive grounds decision and whose immigration status requires it are issued a renewable residence permit.

List of acronyms

APPG	All-Party Parliamentary Group
ASW	Adult Service Website
ATMG	Anti-Trafficking Monitoring Group
CEDAW	Committee on the Elimination of Discrimination against Women
CEOP	Child Exploitation and Online Protection
CICA	Criminal Injuries Compensation Authority
CICS	Criminal Injuries Compensation Scheme
CPS	Crown Prosecution Service
CQC	Care Quality Commission
EAS	Employment Agency Standards
ECF	Exceptional Case Funding
EU	European Union
EWCA	England and Wales Court of Appeal
EWHC	England and Wales High Court
FMU	Forced Marriage Unit
FRO	First Responder Organisation
FWA	Fair Work Agency
GLAA	Gangmasters and Labour Abuse Authority
GRETA	Group of Experts on Action against Trafficking in Human Beings
HMCPSP	His Majesty's Crown Prosecution Service
HMPPS	His Majesty's Prisons and Probation Service
HMRC	His Majesty's Revenue and Customs
IASC	Independent Anti-Slavery Commissioner
ICIBI	Independent Chief Inspector of Borders and Immigration
ICT	Information and Communication Technology
ICTG	Independent Child Trafficking Guardians
IECA	Immigration Enforcement Competent Authority
IMA	Illegal Migration Act
IOM	International Organization for Migration
IRC	Immigration Removal Centre
LGBTI	Lesbian, Gay, Bisexual, Trans and Intersex

MSA	Modern Slavery Act
MSEF	Multi-Slavery Engagement Forum
MSVCC	Modern Slavery Victim Care Contract
NABA	Nationality and Borders Act
NCA	National Crime Agency
NCLCC	National County Lines Coordination Centre
NHS	National Health Service
NPCC	National Police Chiefs' Council
NRM	National Referral Mechanism
NRPF	No Recourse to Public Fund
ODIHR	Office of Democratic Institutions and Human Rights
PEC	Policy and Evidence Centre
PPS	Public Prosecution Service
RNA	Recovery Needs Assessment
RSHE	Relationships, Sex and Health Education
SCA	Single Competent Authority
SEND	Special Educational Needs and Disabilities
STPO	Slavery and Trafficking Prevention Orders
STRO	Slavery and Trafficking Risk Orders
TARA	Trafficking Awareness Raising Alliance
THB	Trafficking in Human Beings
TOEX	Tackling Organised Exploitation
VRS	Voluntary Returns Service
UKVI	United Kingdom Visas and Immigration
UNHCR	United Nations Refugee Agency

General information on trafficking in human beings in the United Kingdom

(covering the period 2021 - 2025)

<p>Entry into force of the Council of Europe Convention on Action against Trafficking in Human Beings (THB)</p> <p>Previous evaluations by GRETA</p>	<p>1 February 2008</p> <ul style="list-style-type: none"> • 1st evaluation report (published on 12 September 2012) • 2nd evaluation report (published on 7 October 2016) • 3rd evaluation report (published on 20 October 2021)
<p>Co-ordination of national action against THB</p>	<p>Home Office (Modern Slavery Unit)</p> <p>Modern Slavery Strategy and Implementation Group (MSSIG), until 2023</p> <p>Multi-Slavery Engagement Forums (MSEFs), set up as of July 2023</p> <p>Northern Ireland: Department of Justice and Organised Crime Task Force Modern Slavery and Human Trafficking Sub-group</p> <p>Scotland: Human Trafficking Team (Scottish Government) and Trafficking and Exploitation Strategy Action Area Groups</p> <p>Wales: Welsh Government's Modern Slavery and Workers' Rights Team and Anti-Slavery Wales Forum</p>
<p>National Rapporteur on THB</p>	<p>Home Office (Modern Slavery Unit)</p>
<p>Specialised bodies and NGOs</p>	<p><i>UK:</i></p> <p>Independent Anti-Slavery Commissioner (IASC)</p> <p>National Crime Agency (NCA) Modern Slavery and Human Trafficking Unit</p> <p>Gangmasters and Labour Abuse Authority (GLAA)</p> <p>Independent Child Trafficking Guardians (ICTG)</p> <p><i>England and Wales:</i></p> <p>National Police Chief Council (NPCC) Modern Slavery and Organised Immigration Crime Unit (MSOICU)</p> <p>Crown Prosecution Office (CPS) Modern Slavery Network</p> <p><i>Scotland:</i></p> <p>Police Scotland National Human Trafficking Unit (NHTU)</p> <p><i>Northern Ireland:</i></p> <p>Police Service Northern Ireland (PSNI) Modern Slavery and Human Trafficking Unit</p> <p><i>NGOs:</i></p> <p>Anti-Trafficking Monitoring Group (ATMG)</p>
<p>National Strategy/Action Plan</p>	<p>UK Modern Slavery Strategy (2014)</p> <p>Home Office Action Plan on Modern Slavery (2025-2026)</p> <p>Scotland Trafficking and Exploitation Strategy (refreshed in 2025)</p> <p>Northern Ireland Modern Slavery and Human Trafficking Strategy (2024-2027)</p>
<p>Relevant legislation</p>	<ul style="list-style-type: none"> • Modern Slavery Act 2015 • Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 • Human Trafficking and Exploitation (Scotland) Act 2015

	<ul style="list-style-type: none">• Nationality and Borders Act 2022• Irregular Migration Act 2023
National Referral Mechanism	The National Referral Mechanism (NRM) was set up in 2009 and has been repeatedly reformed over the years.
Trafficking profile	The United Kingdom is a country of origin, destination and transit for victims of trafficking. The number of referrals to the NRM has significantly increased over the years. The majority of the referrals (76%) were of male victims. Children constituted 44% of the referrals. Labour exploitation was the predominant form of exploitation (29% of the referrals) and concerned mostly adult victims with foreign citizenship. For child victims, the main form of exploitation was criminal exploitation, which affects predominantly UK children. The majority of the presumed victims were UK nationals, followed by nationals of Eritrea, Vietnam and Albania.

I. Introduction

1. The Council of Europe Convention on Action against Trafficking in Human Beings (“the Convention”) entered into force for United Kingdom (UK) on 1 April 2008. The third evaluation of the UK by GRETA took place in 2020, amidst the COVID-19 pandemic, making it impossible for GRETA to carry out a physical visit due to the sanitary and travel restrictions. The third GRETA report on the UK was drawn up on the basis of written information and online meetings and was adopted on 8 July 2021.

2. Over the years, the UK authorities² have taken a series of measures to develop the legislative, institutional and policy framework relevant for action against trafficking in human beings (THB) in the four constituent countries. These include the setting up and periodic revision of a National Referral Mechanism (NRM) for the identification and provision of assistance to victims of trafficking, the adoption of dedicated legislation on human trafficking and modern slavery, including certain groundbreaking provisions of the Modern Slavery Act 2015, and the development of strategies for combating human trafficking. Further, steps have been taken to establish co-ordinating structures and specialised bodies, including the Independent Anti-Slavery Commissioner, provide guidance and training to relevant professionals, develop engagement with civil society organisations, and promote research, in particular through the Modern Slavery Policy and Evidence Centre (PEC). However, after three rounds of evaluation, GRETA concluded that there were continuing gaps in certain areas, such as the provision of legal assistance and free legal aid to victims of human trafficking, effective access to compensation, and the application of the non-punishment provision. GRETA also urged the authorities to improve the identification of victims of trafficking and to reduce the length of the NRM procedure, as well as to ensure that victims have effective access to a recovery and reflection period, residence permits and the right to safe return to their country of origin.

3. On the basis of GRETA’s third report, on 17 December 2021 the Committee of the Parties to the Convention adopted a recommendation to the UK authorities, requesting them to inform the Committee within a two-year period of measures taken to comply with the recommendation. The report submitted by the UK authorities was considered at the 35th meeting of the Committee of the Parties (29 November 2024) and was made public.³

4. On 4 June 2024, GRETA launched the fourth round of evaluation of the Convention in respect of the United Kingdom by sending the questionnaire for this round to the UK authorities. The deadline for submitting the reply to the questionnaire was 4 October 2024 and the authorities’ reply was received on 31 October 2024.⁴

5. An evaluation visit to the United Kingdom took place from 3 to 11 December 2024 in order to hold meetings with relevant governmental and non-governmental actors, collect additional information and examine the practical implementation of adopted measures. The visit was carried out by a delegation composed of:

- Ms Helga Gayer, President of GRETA;
- Mr Peter Van Hauwermeiren, member of GRETA;
- Ms Petya Nestorova, Executive Secretary of the Convention;
- Ms Parvine Ghadami, Administrator in the Secretariat of the Convention.

² Throughout the report, the “UK authorities” refers to the responsible authorities based on the rules about reserved and devolved matters.

³ Report submitted by the UK authorities on measures taken to comply with Committee of the Parties Recommendation CP/Rec(2021)07 on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings, available at <https://rm.coe.int/report-submitted-by-the-authorities-of-the-united-kingdom-on-measures-/1680b2bd6b>

⁴ The initial reply to the questionnaire, which was used for the preparation of GRETA’s report, was not authorised for publication by the UK authorities. An updated version of the authorities’ reply to the questionnaire, which was received on 12 January 2026, was authorised for publication and is available at: <https://rm.coe.int/reply-from-the-united-kingdom-to-the-questionnaire-for-the-evaluation-/48802a333b>.

6. During the visit, the GRETA delegation met the Minister for Safeguarding and Violence against Women and Girls, Jess Phillips MP, and officials from the Home Office, the Ministry of Justice, the Foreign, Commonwealth and Development Office, the Department for Education, the Department of Business and Trade, the Crown Prosecution Service, the National Crime Agency (NCA), the National Police Chiefs' Council (NPCC), the Gangmasters and Labour Abuse Authority (GLAA), His Majesty's Prisons and Probation Service (HMPPS), UK Border Force, UK Visas and Immigration, the Metropolitan Police, the Office of Communications, and the Office for Standards in Education, Children's Services and Skills (Ofsted). Separate meetings were held with the Independent Chief Inspector of Borders and Immigration (ICIBI), David Bolt, and staff of the Office of the Independent Anti-Slavery Commissioner (IASC). Further, GRETA's delegation exchanged with members of the UK Parliament's All-Party Parliamentary Group (APPG) on Human Trafficking and Modern Slavery.

7. In addition to holding meetings in London, GRETA met representatives of the devolved administrations. In Cardiff, the GRETA delegation met Welsh Government officials, members of the Anti-Slavery Wales Forum, and staff at First Responder Organisations in Wales. In Glasgow, meetings were held with officials from the Scottish Government, the Crown Office and Procurator Fiscal Service, Police Scotland, the Scottish Guardianship Service, Glasgow City Council and GLAA. Separate meetings were held with the Scottish Human Rights Commission and Commissioner for Children and Young People. Further, GRETA met representatives of the Criminal Injuries Compensation Authority, based in Glasgow. In Belfast, the GRETA delegation met officials from Northern Ireland's Department of Justice, Department of Health, Police Service, Public Prosecution Service, and GLAA. Discussions were also held with representatives of the Northern Ireland Human Rights Commission.

8. GRETA's delegation held separate meetings with representatives of non-governmental organisations (NGOs) and trade unions, lawyers, researchers and persons with lived experience of human trafficking. It also met representatives of the International Organization for Migration (IOM).

9. In the course of the visit, the delegation visited safe houses for victims of trafficking in London, Cardiff, Glasgow and Belfast, as well as an immigration detention centre and a women's prison.

10. The list of the national authorities, NGOs and other organisations with which the delegation held consultations is set out in Appendix 3 to this report. GRETA is grateful for the information provided by them.

11. GRETA wishes to place on record the co-operation provided by the UK authorities and in particular by Ms Simranjeet Aujla and Ms Robynne Kiblawi of the Modern Slavery Unit of the Home Office, Mr Joshua Vuglar, Head of Modern Slavery and Workers' Rights at the Welsh Government, Mr Gordon Smith of the Human Trafficking Team of the Scottish Government, and Mr Ross Moore of the Department of Justice in Northern Ireland.

12. The draft version of the present report was approved by GRETA at its 54th meeting (30 June - 4 July 2025) and was submitted to the UK authorities for comments. The authorities' comments were received on 30 October and 13 November 2025 and were taken into account by GRETA when adopting the final report at its 55th meeting (18-21 November 2025). The report covers the situation up to 21 November 2025; developments since that date are not taken into account in the following analysis and conclusions. GRETA's conclusions and proposals for action are summarised in Appendix 2.

II. Overview of trends and changes in the legislative, institutional and policy framework for action against human trafficking

13. The United Kingdom is a country of origin, destination and transit for victims of trafficking. The number of referrals to the National Referral Mechanism (NRM) has significantly increased during the reporting period (2021-2025), with 12 691 possible victims referred in 2021, 16 906 in 2022, 16 990 in 2023 and 19 125 in 2024 (see the table in Appendix I).⁵ From January to September 2025, there were 17 397 referrals, which represents an increase compared to the same months of the previous year. The majority of the referrals were of male victims (76% in 2021-2024) and adults (66% in 2021-2024). Similarly to the previous reporting period, the UK remains the first nationality of victims referred to the NRM, followed by Eritrea, Vietnam and Albania. However, the proportion of Albanians has been decreasing and that of Eritreans increasing, particularly in 2025. Labour exploitation has remained the predominant form of exploitation (29% of the referrals in 2021-2024), concerning mostly adult victims with foreign citizenship. Sectors considered at high risk include agriculture, care work, domestic work, hospitality, construction, fishing, car washes, nail bars, waste management, logistics, food processing and warehousing (including packaging).⁶ For child victims, the main form of exploitation has remained criminal exploitation. A high number of referrals continues to relate to the so-called 'county lines' (2 218 in 2021, 2 416 in 2022, 1 891 in 2023, 1 981 in 2024, and 1 513 in January-September 2025).⁷ The proportion of possible victims who were granted the status of presumed victims upon positive reasonable grounds decision has decreased since 2022, when a new evidentiary threshold was introduced by the UK authorities (see paragraph 120).

14. As regards trends of human trafficking, the authorities have noted a significant decrease in the proportion of EU nationals referred to the NRM, with only Romania being among the top 10 countries of nationality of possible victims of exploitation with a UK nexus in 2023. There has been an increase in the number of victims with very complex needs. Further, the authorities noted that the use of online platforms in recruitment and the facilitation of exploitation is highly likely to have increased since the third evaluation report. The last National Strategic Assessment of Serious and Organised Crime of the National Crime Agency (NCA), published in 2025, noted that while there is no evidence of substantial change in the overall nature and scale of modern slavery and human trafficking in the UK in 2024, it is almost certain that there has been demographic change within the threat, with shifts in migration patterns a key factor driving change. Further, according to the NCA assessment, although it is almost certain that the vast majority of migrants entering the UK to work are aware of the nature of the work in which they will be employed, with terms and conditions (including costs and debts associated to travel and facilitation) agreed before travel, migrants with no or limited right to work in the UK are vulnerable to their status being used as a means of recruitment into or control within exploitation.

15. There have been a number of changes to the legislative framework relevant for action against THB since the previous evaluation by GRETA. The Nationality and Borders Act (NABA), which was passed into law on 28 April 2022, introduced changes to the system for the identification and protection of victims of THB. It increased the threshold for taking decisions on whether there are reasonable grounds to believe that a person is a victim of human trafficking (see paragraph 120), introduced the possibility to disqualify foreign victims from protection on grounds of public order and bad faith (see paragraph 255), established the conditions under which confirmed victims can be granted residence permits (see paragraph 267), and decreased the minimum duration of the recovery and reflection period from 45 to 30 days (see paragraph 254).

⁵ By way of comparison, the number of referrals to the NRM was 1 182 in 2011, 3 255 in 2015, and 10 627 in 2019. Source: NRM statistics (<https://www.gov.uk/government/collections/national-referral-mechanism-statistics>.)

⁶ See the GLAA's list of risks sectors: <https://www.glaa.gov.uk/who-we-are/modern-slavery/industry-profiles>.

⁷ 'County Lines' is a term used to describe gangs and organised criminal networks based in major cities which are involved in exporting illegal drugs into one or more smaller urban and rural areas, using dedicated mobile phone lines or other form of "deal line". These gangs often exploit children and vulnerable adults to move and store drugs and money, often using coercion, intimidation, violence (including sexual violence) and weapons. Source of statistics: NRM data tables for quarter 3 of 2025.

16. Furthermore, the Illegal Migration Act 2023 (IMA) was passed into law on 20 July 2023. It notably introduced the duty to detain and remove persons entering irregularly in the UK, including possible victims of trafficking. Further, the Safety of Rwanda (Asylum and Immigration) Act, adopted on 25 April 2024, provided for the possibility to remove to Rwanda persons who had entered irregularly to the UK, including possible victims of trafficking. The new UK Government which was appointed in July 2024 announced that it would not implement the migration partnership with Rwanda and on 30 January 2025, it introduced the Border Security, Asylum and Immigration Bill which proposes to repeal the Safety of Rwanda (Asylum and Immigration) Act and most of the provisions of the IMA impacting victims of human trafficking, including the duty to remove those who arrived irregularly in the UK. However, the Border Security, Asylum and Immigration Bill maintains the possibility to disqualify from the application of modern slavery protections individuals to whom a positive reasonable grounds decision has been made who are non-British nationals liable to deportation or sentenced to a period of imprisonment for any offence (see paragraphs 256-257). At the time of adopting the GRETA report (21 November 2025), the Bill was still pending adoption by the UK Parliament.⁸

17. With a view to improving workers' rights and preventing abuses in the employment sphere, the UK Government introduced the Employment Rights Bill on 10 October 2024.⁹ It proposes the creation of a single enforcement body, the Fair Work Agency, which would merge several existing labour market enforcement bodies and be responsible for inspecting workplaces and investigating labour market criminal offences (based on the Labour Market Enforcement regime in the Immigration Act 2016), including labour exploitation and human trafficking (see paragraph 0). The Bill also includes several provisions to improve the security and rights of workers, such as ending zero hours contracts and fire and rehire practices, removing the two-year qualifying period of employment for the right to claim unfair dismissal, and providing for the establishment of Fair Pay Agreements in the care sector.

18. The Online Safety Act 2023 was passed on 26 October 2023, introducing obligations for online service providers to prevent and remove harmful content online, including in relation to THB (see paragraph 194).

19. On 25 February 2025, the UK Government introduced the Crime and Policing Bill which proposes the introduction of the criminal offences of child criminal exploitation and 'cuckooing',¹⁰ preventive orders to prevent exploitative conduct committed by adults against children, and an offence to tackle 'coerced internal concealment'.¹¹ According to the authorities, these new offences will allow the interconnected and exploitative practices used by criminal gangs to be tackled, especially in 'county lines' cases. The Bill also criminalises the possession of artificial intelligence (AI) to generate child sexual abuses materials and manuals explaining how to use AI to generate such materials, as well as the criminalisation of online services that facilitate child sexual abuse (see also paragraphs 48 and 173). At the time of adopting the GRETA report, the Bill was pending adoption by the UK Parliament.

20. The Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 was amended in 2022 to extend the provision of support to victims after the NRM conclusive grounds decision, expand the list of offences concerned by the statutory defence to drug offences, and provide for the possibility to introduce slavery and trafficking risk orders (see paragraphs 147, 178 and 246).

⁸ Following the adoption by GRETA of the final report on the UK, the Border Security, Asylum and Immigration Bill received Royal Assent on 2 December 2025 and is now the Border Security, Asylum and Immigration Act 2025.

⁹ Following the adoption by GRETA of the final report on the UK, the Employment Rights Bill received Royal Assent on 18 December 2025, and is now the Employment Rights Act 2025.

¹⁰ 'Cuckooing' or home invasion is when criminals use or take over the home of another person, often a vulnerable person, to use it for criminal purposes.

¹¹ 'Coerced internal concealment' is when criminals force people to hide items (e.g. drugs) inside their bodies to avoid detection.

21. In relation to the institutional framework for action against THB,¹² following the last UK general elections in July 2024 and the appointment of a new government, the Home Office Minister for Safeguarding and Violence against Women and Girls was given the lead on modern slavery, amongst other areas (under the previous government, modern slavery was part of the immigration portfolio). The Home Office's Modern Slavery Unit remains in charge of the co-ordination of action against THB and also acts as National Rapporteur of THB (see paragraph 25). Since 2021, the Home Office has stopped publishing annual reports on modern slavery. In February 2024, the UK Government announced that it would resume the publication of the annual report on modern slavery, but it has not yet done so.¹³ Noting that the Home Office's annual reports on modern slavery provided information on the measures taken in the areas of criminal justice, prevention, victim identification and support, transparency of supply chains and international cooperation, GRETA considers that the UK authorities should resume publishing annual reports on modern slavery.

22. The Modern Slavery Strategy and Implementation Group (MSSIG), which had been set up in 2016 to engage with civil society actors, was replaced by Modern Slavery Engagement Forums (MSEFs) as of July 2023. Through sharing of research, expertise, evidence and best practices, the MSEFs seek to inform the development and analysis of anti-trafficking policies and measures. Since January 2025, the MSEF groups have been split into a core group of senior leaders from NGOs and law enforcement for strategic discussions, underpinned by several working-level stakeholder groups to drive policymaking. At the more senior level of engagement, bi-annual modern slavery roundtables, chaired by the Minister for Safeguarding and Violence against Women, are used to discuss longer-term strategic vision and update on the delivery of the Home Office Action Plan on Modern Slavery (see paragraph 29). The most recent roundtable was held on 15 October 2025. The three working-level stakeholder groups that are currently being held are the Data and Evidence Group (quarterly), forced labour forum and first responder forum (ad hoc).

23. In Wales, in 2023 the Anti-Slavery Leadership Group was replaced by the Anti-Slavery Wales Forum. It comprises relevant public agencies and non-governmental actors and meets quarterly. It has four thematic working groups focusing on: 1) victims and survivors, 2) prevention, 3) training and awareness raising, and 4) supply chains and international co-operation.

24. In Scotland and Northern Ireland, the institutional frameworks for tackling THB have remained unchanged.¹⁴

25. In December 2023, the UK Government appointed a new Independent Anti-Slavery Commissioner (IASC). The position had been vacant since the end of April 2022, at a time when important legislation impacting action against modern slavery was passed (see paragraphs 15-16). Following consultations with relevant stakeholders, the Commissioner published a Strategic Plan for 2024-2026.¹⁵ However, there are concerns regarding the limited resources allocated to the activities of the IASC, which include research, preparation of reports and making recommendations to the UK Government (£597 000 in 2024, covering mostly staff salaries). As noted in previous GRETA reports, the IASC is not independent of the UK Government and is not intended to be the UK's National Rapporteur on human trafficking, even if some of its functions are akin to that of a National Rapporteur.¹⁶

¹² See GRETA's 3rd report on the UK, paragraphs 20-24; GRETA's 2nd report on the UK, paragraphs 26-45.

¹³ Source: UK Government's response to the House of Commons' Committee on Human Trafficking, February 2024.

¹⁴ See GRETA's 3rd report on the UK, paragraphs 41-42.

¹⁵ More information at: <https://www.gov.uk/government/publications/independent-anti-slavery-commissioner-strategic-plan-2024-to-2026/independent-anti-slavery-commissioner-strategic-plan-2024-to-2026-accessible>.

¹⁶ See GRETA's 3rd report on the UK, paragraph 23; GRETA's 2nd report on the UK, paragraph 30.

26. As previously noted by GRETA, one of the key features of National Rapporteurs' mechanisms according to Article 29, paragraph 4, of the Convention should be the ability to critically monitor the efforts and effectiveness of all state institutions, including national co-ordinators, and to that end to maintain a constant exchange with civil society, the research community and other relevant stakeholders.¹⁷ GRETA considers that the UK authorities should take the necessary steps to establish an independent National Rapporteur or to designate another existing mechanism for monitoring the anti-trafficking activities of state institutions, as provided for in Article 29, paragraph 4, of the Convention.

27. The Independent Chief Inspector of Borders and Immigration (ICIBI) monitors the efficiency and effectiveness of the immigration, asylum, nationality and custom functions carried out by the Home Office. During the reporting period, the ICIBI issued several reports which are of relevance for action against trafficking in human beings, notably a report on the performance of the Immigration Enforcement Competent Authority (IECA) in 2024 (see paragraphs 125, 214 and 262).

28. The Houses of Parliament's All-Party Parliamentary Group (APPG) on Human Trafficking and Modern Slavery has remained active. Since the previous GRETA evaluation, the UK Parliament has undertaken inquiries into human trafficking and forced labour. The Home Affairs Committee of the House of Commons published an inquiry report in January 2023 which assesses the scale of human trafficking and investigates governments policy, legislation and criminal justice response.¹⁸ Further, in January 2024, the House of Lords established a Select Committee on the Modern Slavery Act 2015 to look at the implementation of the Act and assess whether it needed to be updated. The report of the Committee was published in October 2024.¹⁹ The UK Government responded to the House of Commons and the House of Lords in February and December 2024 respectively, detailing the measures envisaged to implement their recommendations.²⁰ Recently, in January 2025, the Joint Committee on Human Rights of the UK Parliament announced an inquiry into forced labour in UK supply chains.²¹

29. As regards the policy framework, the UK's Modern Slavery Strategy, which was published in 2014, remains in force. In March 2025, the Home Office developed an Action Plan on Modern Slavery for 2025-2026, in partnership with key stakeholders, including law enforcement, civil society, businesses and international partners.²² It is focused on four pillars: 1) developing an approach to prevention; 2) reforming the identification system; 3) tailoring victim support; and 4) improving criminal justice outcomes. The Action Plan sets out 15 actions for the financial year 2025-2026 and specifies that these are only the priority actions and that a more comprehensive approach to drive cross-government and cross-sector action will be developed in 2026. While welcoming the adoption of the Home Office Action Plan, GRETA notes that there are advantages in developing an anti-trafficking strategy which provides a longer-term approach to planning of national anti-trafficking policy and involves all relevant stakeholders. GRETA invites the UK authorities to update the 2014 Modern Slavery Strategy or to develop a new one.

¹⁷ See GRETA's 1st report on the UK, paragraph 24.

¹⁸ Available at: <https://publications.parliament.uk/pa/cm5804/cmselect/cmhaff/124/summary.html>.

¹⁹ Available at: <https://publications.parliament.uk/pa/ld5901/ldselect/ldmodslav/8/802.htm>.

²⁰ Government responses to the House of Commons and the House of Lords available at:

<https://publications.parliament.uk/pa/cm5804/cmselect/cmhaff/566/report.html>;

<https://www.gov.uk/government/publications/modern-slavery-government-response-to-house-of-lords-committee-report>.

²¹ More information at: <https://committees.parliament.uk/committee/93/human-rights-joint-committee/news/204830/new-inquiry-forced-labour-in-uk-supply-chains/>.

²² Available at : committees.parliament.uk/publications/47622/documents/248850/default/.

30. The Home Office Action Plan on Modern Slavery affirms the UK Government's commitment to tackling all forms of modern slavery, holding perpetrators to account, and ensuring that victims are supported to recover and rebuild their lives. GRETA notes positively the renewed engagement and consultation with civil society following the appointment of the current UK Government, including the round-tables with civil society actors (see paragraph 22). GRETA trusts that the legislative initiatives of the previous UK Governments which had a detrimental impact on the situation of victims of THB (see paragraphs 137 and 254-257), will be repealed and the victim-centred approach to combating human trafficking of the Convention will be put at the heart of the UK authorities' efforts to tackle modern slavery.

31. In Northern Ireland, a new Modern Slavery and Human Trafficking Strategy 2024/27 was published in July 2024. Developed together by public agencies and NGOs, the Strategy focuses on prevention through addressing vulnerabilities to human trafficking, improving the legislative framework and the accountability of perpetrators, promoting responsible business practices, and raising awareness of human trafficking.²³ GRETA welcomes the adoption of Northern Ireland's Modern Slavery and Human Trafficking Strategy.

32. In Scotland, a review of the 2017 Trafficking and Exploitation Strategy was published in September 2023.²⁴ At the time of GRETA's visit in December 2024, work was underway on preparing a refreshed Strategy, through broad consultations with stakeholders, which was expected to be published in February 2025. The refreshed Trafficking and Exploitation Strategy was published on 30 July 2025.²⁵ It follows a public health approach and includes a strong focus on prevention of human trafficking. A delivery plan of the Strategy will be developed to define short and medium term outcomes as well as activities. The Strategy will be reviewed after three years. GRETA welcomes the revision of Scotland's Trafficking and Exploitation Strategy.

33. In Wales, the Welsh Government has developed a 10-year draft Strategy for Preventing and Responding to Child Sexual Abuse (2026-2036) which was publicly consulted on in July-October 2025. It focuses on four strategic outcomes: preventing child sexual abuse, protecting children when there are concerns about child sexual abuse, supporting children and families to recover, and supporting adult victim-survivors to recover. The Strategy was published on 11 March 2026.²⁶

²³ Available at: <https://www.justice-ni.gov.uk/publications/modern-slavery-and-human-trafficking-strategy-2024-2027>.

²⁴ Available at: <https://www.gov.scot/publications/trafficking-exploitation-strategy-review/>.

²⁵ Available at: <https://www.gov.scot/publications/scotlands-trafficking-exploitation-strategy-2025/>.

²⁶ [National strategy for preventing and responding to child sexual abuse in Wales 2026 to 2036 | GOV.WALES](#)

III. Addressing vulnerabilities to trafficking in human beings

1. Prevention of trafficking in human beings

a. Introduction

34. Prevention is crucial in combating trafficking in human beings. Article 5 of the Convention therefore requires States Parties to establish and/or strengthen effective policies and programmes to prevent THB in co-ordination between relevant public agencies, non-governmental organisations and other elements of civil society. Such policies and programmes should have a particular focus on persons vulnerable to trafficking and professionals concerned with trafficking in human beings, and shall include research, information, awareness-raising and education campaigns, social and economic initiatives and training programmes. In the development and implementation of prevention measures, States Parties are required to promote a human rights-based approach and to use gender mainstreaming and a child-sensitive approach, taking specific measures to reduce children's vulnerability to trafficking. Furthermore, Article 5 of the Convention requires States parties to take measures to enable migration to take place legally. In addition, Article 6 of the Convention places a positive obligation on Parties to adopt measures to discourage the demand that fosters all forms of exploitation of persons which leads to trafficking.

35. Considerable research has been carried out in the UK into vulnerabilities to THB and the effectiveness of preventive measures, which is referenced throughout the report.²⁷ The most common vulnerability factors which are abused by traffickers include poverty, unemployment, homelessness, restrictive or insecure immigration status, disabilities and mental health disorders, drug or alcohol misuse, as well as previous criminal convictions.²⁸ Asylum seekers, refugees and irregular migrants are particularly vulnerable, as well as migrant workers in sectors at heightened risk of exploitation, such as domestic and care work, hospitality and agriculture. Children and young persons are also especially vulnerable to human trafficking, in particular those belonging to ethnic minorities, unaccompanied or separated children, children and young persons with mental health disorders, specific education needs or disabilities, children under the child protection system ("looked after children") or transitioning out of it, and children out of school. Further, due to difficulties in accessing the NRM and obtaining adequate assistance, survivors of trafficking face significant risks of re-trafficking (see paragraph 144). The Modern Slavery Statutory Guidance outlines the categories of individuals who are most susceptible to fall victim of human trafficking.²⁹ GRETA welcomes the extensive research carried out in the United Kingdom in relation to modern slavery and human trafficking and considers that the UK authorities should ensure that the findings and recommendations of research are taken into account in the design and implementation of preventive policies and activities.

36. The 2014 Modern Slavery Strategy underlines the importance of developing new techniques to prevent individuals falling victim to modern slavery, in co-operation with local actors. However, GRETA notes that the Strategy places greater emphasis on prevention activities targeting potential offenders than on addressing the vulnerability of victims and persons at risk. According to research, prevention is a relatively underdeveloped aspect, with interventions focusing more on treating harm after exploitation has taken place, rather than on preventing exploitation in the first place.³⁰ The IASC has called on the UK authorities to make prevention a core pillar of the Government's future Modern Slavery Strategy. In their

²⁷ Numerous research projects are carried out or supported by the Modern Slavery Policy and Evidence Centre (PEC), which was launched in 2019 with the support of the UK government. See <https://www.modernslaverypec.org/>.

²⁸ Independent Anti-Slavery Commissioner and University of Nottingham Rights Lab, *Overlapping threats to freedom. Understanding vulnerability to modern slavery*, May 2025. Available at: https://www.antislaverycommissioner.co.uk/media/otrprxxx/overlapping-threats-to-freedom_insight-briefing.pdf.

²⁹ See Annex D of the 'Modern Slavery: statutory guidance for England and Wales (under Section 49 of the Modern Slavery Act 2015) and non-statutory guidance for Scotland and Northern Ireland'.

³⁰ Such as E. and others, *Prevention of adult sexual and labour exploitation in the UK: what does or could work*, Modern Slavery and Human Rights Policy and Evidence Centre, March 2022. Available at: <https://www.modernslaverypec.org/resources/prevention-what-works>.

comments on the draft report, the UK authorities underlined that the Home Office Action Plan on Modern Slavery 2025-2026 outlines their long-term vision on prevention, which is embedded in wider programmes focused on tackling the root causes of exploitation, through addressing vulnerabilities and taking a proactive approach to early intervention with perpetrators, identifying and disrupting exploitative behaviours before they escalate. GRETA notes that while the Action Plan refers to co-operation with civil society, transparency in supply chains and international co-operation, it lacks concrete actions to prevent vulnerabilities to THB. GRETA considers that the UK authorities should ensure that the Home Office Action Plan and the future Modern Slavery Strategy contains stronger and more comprehensive measures on preventing human trafficking, especially by addressing the vulnerabilities of persons at risk of human trafficking.

37. In Northern Ireland, the new Modern Slavery and Human Trafficking Strategy (2024-2027) contains among its core objectives reducing vulnerabilities and envisages research, the provision of guidance and training for the private sector and other relevant initiatives.

38. In Scotland, the Trafficking and Exploitation Strategy adopted in 2017 sought to address conditions that foster trafficking and exploitation, through public awareness, research, the provision of guidance to businesses about how to eradicate trafficking from supply chains, and working with communities who may not come forward. GRETA positively notes that the refreshed strategy for Scotland (see paragraph 32) has a stronger focus on prevention by following a public health approach.

39. Efforts have been made to ensure that anti-trafficking policies and activities are informed by the experiences of survivors of human trafficking. NGOs and research centres³¹ have established survivor boards and Lived-Experience Advisory Panels.³² In May 2024 the Home Office engaged with survivors for the revision of the Modern Slavery Victim Care Contract (MSVCC). In addition, the Welsh Government engaged the Human Trafficking Foundation's Lived Experience Advisory Panel in the development of Anti-Slavery Wales Online Learning, launched in October 2025, and in the holding of the Anti-Slavery Wales 2025 conference in the same month. The Wales Strategy on Preventing and Responding to Child Sexual Abuse was developed together with adult survivors and foresees the setting up of a survivors' advisory group. In Scotland, the GRETA delegation attended a roundtable organised by the Scottish Government, Police Scotland and TARA's Advisory Group in order to provide feedback on survivors' experiences with the police. In Northern Ireland, the new Modern Slavery Strategy envisages research into the experiences of adult and child victims of human trafficking. .

40. GRETA welcomes the efforts made by the UK authorities to engage with persons with lived experiences of human trafficking. However, according to NGOs, this engagement is project-based rather than systematic. During the visit in December 2024, GRETA was informed by the Office of the IASC of a proposal to set up a survivor advisory council, which could not materialise due to failure to secure long-term funding. In their comments on the draft report, the UK authorities recognised the need to increase their engagement with survivors and indicated that they are focusing on strengthening engagement with existing Lived-Experience Advisory Panels. GRETA stresses the importance of taking into account the experiences and views of survivors to support the design and implementation of measures to prevent trafficking and protect victims, and refers to the ODIHR Guidance on establishing and maintaining National Survivors of Trafficking Advisory Councils as well as ICAT's Issue Brief on Ensuring Ethical Survivor Inclusion.³³

³¹ For instance, the Anti-Trafficking Monitoring Group, Hestia, the Human Trafficking Foundation, Migrant Help, the Policy and Evidence Centre (PEC), Trafficking Awareness Raising Alliance (TARA), Policy and Evidence Centre (PEC), and Unseen UK.

³² People with lived experiences are those who have first-hand experience of human trafficking and modern slavery.

³³ OSCE/ODHIR, *Guidance on establishing and maintaining National Survivors of Trafficking Advisory Councils (NSTACs)*, 2024; ICAT, *Ensuring Ethical Survivor Inclusion*, Issue Brief, 2025.

b. Measures to prevent the vulnerability of specific groups to trafficking in human beings

41. This section examines the preventive measures taken with regard to certain vulnerable groups on the basis of the information provided by the UK authorities as well as non-state actors. GRETA underlines that not every individual belonging to one of these groups is vulnerable to trafficking *per se*, there are usually additional vulnerability factors involved. The different groups selected should be viewed with due regard to the complexity and intersectionality of vulnerabilities to trafficking.

i. Children and young people

42. As noted in paragraph 13, the majority of the children referred to the NRM were exploited in criminal activities, in particular drug trafficking ('county lines'). In July 2024, a "Disrupting County Lines Policing Strategy 2024 to 2027" was launched by the National Police Chiefs' Council (NPCC) and the National County Lines Coordination Centre (NCLCC). It seeks to prevent children and adults from engaging in county lines through measures such as high-visibility hot-spot patrols and community engagement, as well as use of civil and criminal orders to prevent reoffending.³⁴ Further, the authorities underlined that through the Home Office's County Lines Programme, more than 2 100 vulnerable individuals were referred for safeguarding between July 2024 and March 2025. The authorities are funding the NGO Catch22, a specialist support and rescue service for young people who are exploited through county lines. Additional funding was provided in 2025 to roll out the County Lines Programme for West Yorkshire. In Northern Ireland, a two-year action plan on child criminal exploitation was adopted in 2023, focusing on awareness raising and preventing criminal exploitation of children and young people.³⁵ Further, the Executive Programme on Paramilitarism and Organised Crime has been operating since 2016 to address issues associated with paramilitarism, including risks of criminal exploitation of children and young people and links with human trafficking.³⁶ In Scotland, the Child Trafficking Strategy Group, composed of relevant public bodies and non-governmental actors, promotes better understanding of trafficking and exploitation of children.

43. During the reporting period, a number of research studies have focused on the prevention of child trafficking. Reference can be made to the report "Prevention and identification of children and young adults experiencing, or at risk of, modern slavery in the UK" by the Rights Lab of the University of Nottingham and ECPAT, published in 2024.³⁷ In December 2024, the Welsh Parliament produced the report "Children on the margins" which addresses the issue of child exploitation.³⁸ The Scottish Government commissioned the report "Understanding child criminal exploitation in Scotland" which was published in May 2023.³⁹ In Northern Ireland, the Department of Justice commissioned research into barriers to the recognition of victims of child criminal exploitation, which was published in June 2025.⁴⁰

³⁴ More information available at: <https://news.npcc.police.uk/releases/launch-of-the-county-lines-policing-strategy-2024-to-2027>.

³⁵ Available at: <https://www.health-ni.gov.uk/publications/child-criminal-exploitation-cce-action-plan-health>

³⁶ More information available at: <https://www.justice-ni.gov.uk/articles/executive-programme-tackling-paramilitary-activity-and-organised-crime#:~:text=The%20Executive%20urguesProgramme%20on%20Paramilitarism,with%20paramilitarism%20in%20Northern%20Ireland> and <https://www.endingtheharm.com/about-us/>.

³⁷ Celiksoy, E. and others, *Prevention and identification of children and young adults experiencing, or at risks of, modern slavery in the UK*, University of Nottingham Rights Lab, ECPAT UK and Modern Slavery and Human Rights Policy and Evidence Centre, January 2024. Available at: <https://www.ecpat.org.uk/prevention-identification-of-children-and-young-adults-experiencing-or-at-risk-of-modern-slavery-in-the-uk>

³⁸ Available at: <https://senedd.wales/media/xmhhaypg/cr-ld16844-e.pdf>.

³⁹ Dixon, D., *Understanding Child Criminal Exploitation in Scotland: A Scoping Review*, CYCJ, Action for Children and Scottish Government, May 2023. Available at: <https://www.cycj.org.uk/wp-content/uploads/2023/05/Understanding-Child-Criminal-Exploitation-in-Scotland.pdf>

⁴⁰ Kane, G. and others, *Identifying modern slavery and human trafficking in the context of child criminal exploitation in Northern Ireland*, Modern Slavery and Human Rights PEC, Department of Justice of Northern Ireland, Ulster, University and IOM UK, June 2025. Available at: <https://www.modernslaverypec.org/resources/identifying-child-criminal-exploitation-northern-ireland>.

Research on other forms of exploitation, such as forced labour, domestic servitude or child marriage, is more limited.⁴¹

44. Child protection referral mechanisms have been set up in order to prevent child trafficking, identify children at-risk and refer them to assistance. In relation to England and Wales, the Statutory Guidance on Working Together to Safeguard Children was revised in 2023 to strengthen multi-agency co-operation, support for children and work with parents and caregivers. In March 2023, the Tackling Child Exploitation Support Programme, which was funded by the Department of Education, published multi-agency principles for responding to child exploitation and extra-familial harm. Similar statutory safeguarding guidance has been adopted in Wales, Scotland and Northern Ireland.⁴² All documents explain the responsibilities of agencies, organisations and practitioners to safeguard children and identify children at risk, and how they should work together to address cases.

45. In their reply to GRETA's questionnaire, the UK authorities referred to awareness-raising activities on child trafficking and online safety carried out in schools, notably through the "relationships, sex and health education" (RSHE) course, which has been compulsory in England since 2020 and is an important means to keep children safe, or its equivalent in the devolved administrations. In July 2025, the UK Government published a revised RSHE statutory guidance for England.⁴³ It maintains that sensitive topics, e.g. grooming and exploitation, are discussed from secondary school (when children are around 11 years old). GRETA underlines the importance of early sensitisation of children on sexual abuse and risks of human trafficking.

46. Children out of school are less likely to be in the care of professionals who can identify exploitation and support them, and criminals target this vulnerability.⁴⁴ Children from certain groups are disproportionately excluded from education, such as children from low-income households, children with special educational needs and disabilities (SEND), as well as children from Black and other ethnic minorities. The Children's Commissioner of England estimated that more than 11 500 children went missing from education between spring 2022 and spring 2023. According to the Commissioner's report, local authorities lack consistent access to information they need to support search for children missing education, and there is little one-to-one support available for children missing education to reintegrate into school.⁴⁵

47. According to non-governmental actors, efforts to prevent child trafficking have mostly focused on child criminal exploitation (County Lines), leaving behind other forms of exploitation, such as child sexual exploitation and child labour. Effective prevention of child trafficking and early identification of vulnerable children is hampered by insufficient human, material and financial resources of local authorities, which are often the first line of contact for vulnerable children. Transition to adulthood is also particularly challenging for children under the care of local authorities ("looked after children") as there are limited support opportunities for care leavers, and safeguarding for adults is not necessarily adapted to young

⁴¹ Skeels, A. and others, *Prevention of child trafficking and exploitation. A research summary*, Modern Slavery and Human Rights Policy and Evidence Centre, December 2024, p. 3.

⁴² Wales Safeguarding Procedures, notably the ones in relation to children and young people at risk of harm; Scotland National Guidance for Child Protection, Criminal Exploitation Practitioner Guidance, developed in 2023; Northern Ireland Co-operating to safeguard children and young people policy framework, revised in 2024.

⁴³ Available at: <https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education>.

⁴⁴ IASC, *Policy brief on child exploitation: prevention, protection and support for children and young people*, August 2024. Available at: https://www.antislaverycommissioner.co.uk/media/u5adrjje/24-08-07-child-exploitation-brief_final.pdf.

⁴⁵ *Excluded or missing from education and child exploitation: literature review and stakeholder views on safeguarding practices*, Tackling Child Exploitation Support Programme, University of Bedfordshire and The Children's Society, November 2021. Available at: https://tce.researchinpractice.org.uk/wp-content/uploads/2022/02/2757_TCE_Education_Exploitation_report_v2.pdf; *Children missing education: The Unrolled Story*, Children's Commissioner of England, September 2024. Available at: <https://www.childrenscommissioner.gov.uk/resource/children-missing-education-the-unrolled-story/>.

persons.⁴⁶ According to research, the understanding of child trafficking and child exploitation varies among professionals and, as a result, indicators of exploitation are often overlooked, hindering early identification of children at risk, and highlighting the need for further training and guidance for child care professionals.⁴⁷ NGOs have repeatedly called for the adoption of a comprehensive strategy on child exploitation.⁴⁸

48. To improve the protection of vulnerable children and young people, legislative initiatives were introduced by the UK Government, namely the Crime and Policing Bill which introduces a criminal offence of child criminal exploitation, makes grooming a statutory aggravating factor of criminal offences, and creates a civil preventive order in cases of child criminal exploitation. Further, a Children's Wellbeing and Schools Bill was introduced on 17 December 2024 in order to improve the safeguarding of children and young people and strengthen the role of the education system and local authorities. It requires the establishment of multi-agency child protection teams in every local area and introduces a new duty on safeguarding partners to include education and childcare settings in their multi-agency safeguarding arrangements. Further, it proposes to revise the Programme "Staying Close" which provides an enhanced support package for young people leaving care and obliges local authorities to systematically assess whether children will require support from this programme after turning 18. It also foresees the setting up of a compulsory Children Not in School register in every local authority and other measures to increase the attendance of children in schools. At the time of adoption of the GRETA report, the Children's Wellbeing and School Bill was pending adoption. Further, in June 2025, the Scottish Government introduced the Children (Care, Care Experience and Services Planning) (Scotland) Bill with a view to improving the services and support provided to children and young people who are or have been in residential or foster care.

49. The number of unaccompanied asylum-seeking children remains high.⁴⁹ Upon arrival, they undergo a welfare interview by Home Office staff, in the presence of an interpreter if needed, which intends to identify any welfare concerns or safeguarding needs. Guidance exists to assist Home Office staff and local authorities in assessing the age of children,⁵⁰ and a National Age Assessment Board has been set up to conduct age assessments upon referral from local authorities, the Home Office or other agencies. However, the age assessment carried out by the Home Office often relies on physical appearance and demeanour, as a result of which individuals can be treated as adults and are not referred to local authorities. The number of instances of age disputes has considerably increased over the years. In their comments on the draft report, the UK authorities underlined that an age disputed person will only be treated as an adult without conducting further enquiries where two staff of the Home Office independently assess that the physical appearance and demeanour very strongly suggest that the individual is significantly over 18. If not, the principle of the benefit of the doubt applies and the person is transferred to a local authority for further consideration of their age, which often involves a more comprehensive Merton-compliant age assessment. If a person has been determined to be an adult by the

⁴⁶ *Shattered lives, stolen futures, A Jay Review of Criminally Exploited Children*, Action for Children, March 2024. Available at: <https://www.actionforchildren.org.uk/our-work-and-impact/policy-work-campaigns-and-research/policy-reports/the-jay-review-of-criminally-exploited-children/>.

⁴⁷ Dixon, D., *Understanding Child Criminal Exploitation in Scotland: A Scoping Review*, CYCJ, Action for Children and Scottish Government, May 2023. Available at: <https://www.cycj.org.uk/wp-content/uploads/2023/05/Understanding-Child-Criminal-Exploitation-in-Scotland.pdf> ; See also the ongoing research of the Modern Slavery and Human Rights PEC on definitions of child exploitation: <https://www.modernslaverypec.org/research-projects/definitions-of-child-exploitation>

⁴⁸ Dixon, D., *Understanding Child Criminal Exploitation in Scotland: A Scoping Review*, CYCJ, Action for Children and Scottish Government, May 2023, p. 8; See also: <https://www.ecpat.org.uk/news/ecpat-uk-calls-for-a-uk-wide-child-exploitation-strategy-with-key-priorities-for-action-for-the-new-uk-government-to-tackle-child-trafficking>

⁴⁹ According to [official immigration system statistics](#), there were 5 817 unaccompanied children claiming asylum in the UK in 2022, 4 880 in 2023, 4 104 in 2024, and 3 553 from January to June 2025. Further, according to data from the Department of Education, 7 800 unaccompanied asylum-seeking children were in council care across England in March 2024, compared to 5 080 in 2020. Source: <https://www.bbc.com/news/articles/cr52484rvz1o>

⁵⁰ Age assessment joint working guidance, Home Office and Association of Directors of Children's Services (ADCS), March 2023; Guidance on Assessing age, Home Office, March 2025; Age assessment toolkit for Unaccompanied Asylum-Seeking Children, Welsh Government, 2021; Age assessment: practice guidance, Scottish Government, 2018.

Home Office and no referral to a local authority is made, the person concerned can still approach local authorities so that they conduct their own age assessment. This approach was considered lawful by the Supreme Court.⁵¹ According to NGO data, in 2023, at least 867 individuals treated as adults who had been placed in adult accommodation for asylum seekers or detention centres were found to be children by local authorities.⁵² GRETA notes that an inspection into the Home Office's use of age assessments was conducted by the ICIBI. The report of the inspection, published in July 2025, underlines concerns regarding the training and standards of initial age decision makers and the lack of information sharing by the Home Office with local authorities. The UK Government accepted all recommendations made in the report.

50. Shortcomings in the age assessment procedure have also been evidenced in Scotland, including delays in referring age-disputed children to local authorities and refusal of local authorities to perform age assessment if the child did not go first to the police to have their fingerprints taken.⁵³ The Scottish authorities stated that they funded training on age assessment for local authorities in 2024 and published a revised age assessment practice guidance in July 2025.⁵⁴

51. In Scotland and Northern Ireland, unaccompanied children are appointed an independent guardian from, respectively, the Guardianship Scotland and the Independent Guardian Service (see paragraph 157). The Scottish Government underlined that it provides over £ 2 million in funding to Guardianship Scotland which is currently supporting over 1 000 unaccompanied children. As noted in previous GRETA reports, there is no independent guardian system for unaccompanied or separated children in England and Wales, who can have access to a legal representative to assist them in making their asylum claim, but that person does not act as a legal guardian.⁵⁵ Only unaccompanied foreign children who are possible victims of trafficking can be appointed an Independent Child Trafficking Guardian (ICTG) to represent and support them. However, this service continues to be available in only two thirds of local authorities in England and Wales (see paragraph 157). In their comments on the draft report, the UK authorities underlined that the Independent Unaccompanied Asylum-Seeking Children (UASC) Support Service, funded by the Home Office and delivered by the Refugee Council, provides impartial and independent information, advice, guidance and assistance to unaccompanied or separated asylum-seeking children in England. In its recent report on "Children on the margins", the Welsh Parliament acknowledged that the significant rise in the number of unaccompanied asylum-seeking children may mean that there needs to be a dedicated guardianship service in Wales.⁵⁶

52. Due to a shortage of places in foster families and children's homes, many unaccompanied foreign children have been placed in hotels or unregulated accommodation such as caravans or tents, notably children for whom the age was disputed.⁵⁷ According to civil society, from July 2021 to June 2023, some 5 400 unaccompanied children were housed in Home Office commissioned hotels, some as young as 10, and several hundred children disappeared. Following a ruling of the High Court of London which considered the placement of children in hotels unlawful,⁵⁸ the use of hotels was completely abandoned by the Home Office at the end of January 2024. The UK Government has taken steps to prevent the

⁵¹ BF (Eritrea) v Secretary of State for the Home Department [2021] UKSC 38.

⁵² *Disbelieved and denied. Children seeking asylum wrongly treated as adults by the Home Office*, Humans for Rights Network, Helen Bamber Foundation and Asylum Aid, April 2023. Available at: <https://www.humansforrights.org/disbelieved-and-denied>.

⁵³ *Unlocking Support: age disputed young people in Scotland*, JustRight Scotland, September 2024. Available at: <https://www.justrightscotland.org.uk/wp-content/uploads/2024/09/24.09.16-Report-FINAL-APPROVED-notes-checked.pdf>.

⁵⁴ Available at: <https://www.gov.scot/publications/age-assessment-practice-guidance-scotland/pages/4/>.

⁵⁵ See GRETA's 2nd report on the UK, paragraph 203.

⁵⁶ Kane, G. and others, *Identifying modern slavery and human trafficking in the context of child criminal exploitation in Northern Ireland*, Modern Slavery and Human Rights PEC, Department of Justice of Northern Ireland, Ulster, University and IOM UK, June 2025, p. 114. Available at: <https://www.modernslaverypec.org/resources/identifying-child-criminal-exploitation-northern-ireland>.

⁵⁷ Ayeb-Karlsson, S. and others, *Behind closed doors: a storytelling legal and empirical analysis of human trafficking risks in Home Office hotels compared to other accommodation for unaccompanied children and young people seeking asylum in the UK*, ECPAT UK, University College London and Modern Slavery and Human Rights PEC, July 2024. Available at: <https://www.ecpat.org.uk/behind-closed-doors>.

⁵⁸ ECPAT UK v. Kent County Council, 2023.

placement of children in unregulated accommodation, which has been forbidden for children aged 15 and below. For children aged 16-18, a revised guide of the Department of Education states that mobile and non-permanent settings are unlikely to be able to meet quality standards, other than in very exceptional individual cases.⁵⁹ However, GRETA was informed that private companies contracted by the Home Office have continued to regularly house unaccompanied asylum-seeking children in unregulated accommodation. In their comments on the draft GRETA report, the UK authorities stated that the Home Office and the Department for Education work closely with Kent County Council to ensure that they can meet their statutory obligations in relation to all unaccompanied and separated children arriving in their area.

53. GRETA is concerned by the situation of unaccompanied or separated children in the UK who are highly vulnerable to trafficking due to shortcomings in the age assessment procedure, placement in unsafe accommodation settings and lack of legal guardians. Due to lack of resources and capacities of local authorities, such children face difficulties in accessing support and a protective environment that can prevent human trafficking and exploitation. The immigration legislation adopted over the last years further increases the vulnerabilities of unaccompanied children to trafficking, making them less likely to seek support for fear of criminalisation and deportation.

54. GRETA urges the UK authorities to take additional measures to prevent human trafficking of children and young people, including by:

- ensuring that across the UK unaccompanied and separated children are placed in safe and appropriate accommodation, and strengthening actions to prevent their disappearance;
- putting in place a system ensuring that all unaccompanied and separated children in England and Wales are appointed legal guardians;
- improving the support provided to all looked after children in their transition to adulthood.

55. Further, GRETA considers that the UK authorities should:

- ensure that the age assessment procedure is conducted without delay and in line with international standards, including the Council of Europe Committee of Ministers Recommendation to Member States CM/Rec(2022)22 on human rights principles and guidelines on age assessment in the context of migration;
- develop and implement comprehensive policies on the prevention of human trafficking of children and young persons, covering education, awareness-raising and measures to prevent children from going missing from school;
- increase the funding, resources and capacities of local authorities to enable them to play an effective role in the prevention of child trafficking;
- provide further training and guidance to professionals working with children and young people on human trafficking and child exploitation, how to identify children at risk and provide adequate support to avoid harm from taking place.

ii. Migrant workers

⁵⁹ *Guide to Supported Accommodation Regulations including Quality Standards*, Department of Education, March 2023, p. 7-8. Available at: <https://www.gov.uk/government/publications/providing-supported-accommodation-for-children-and-young-people>.

56. According to the NRM statistics, labour exploitation was the most commonly reported exploitation type by possible adult victims referred to the NRM. The majority of adults reporting labour exploitation were non-UK nationals.⁶⁰ High-risk sectors include agriculture, domestic and care work, fishing, hospitality and construction, where there is a high demand for migrant workers and their number is constantly growing.⁶¹

57. As explained in previous GRETA reports, several bodies are responsible for ensuring compliance with labour rights and standards in the UK: the Gangmasters and Labour Abuse Authorities (GLAA), the Employment Agency Standards (EAS) Inspectorate, the National Minimum Wage Team of His Majesty's Revenue and Customs (HMRC), the Health and Safety Executive (HSE), UK Visa and Immigration, as well as Northern Ireland's Employment Agencies Inspectorate (EAI). These bodies have different mandates and geographical coverage, but the GLAA has the broadest powers applicable across the UK and can investigate cases of labour exploitation and labour trafficking in England and Wales.⁶² However, given this geographical difference, forced labour offences (which are included in different legislation for Scotland and for Northern Ireland) cannot be investigated by the GLAA in Scotland nor in Northern Ireland.

58. While GLAA staff are highly specialised in labour exploitation and human trafficking, there remain concerns regarding the GLAA's lack of human and financial resources. At the time of GRETA's visit in December 2024, the GLAA had 115 staff across the UK, including 28 labour abuse and prevention officers in England and Wales, 2 enforcement officers in Northern Ireland and one in Scotland, and only one victim navigator to support victims. Although the number of inspections in high risks sectors appears to have increased, it still remains low (123 in April 2023 - March 2024), and most of them are based on a complaint.⁶³ Only 44 possible victims were referred to the NRM by the GLAA in 2021-2024.⁶⁴ The GLAA's budget in 2024-2025 has decreased (£6.26 million, compared to £7.77 million in 2023-2024). The lack of sufficient resources also affects the other inspection bodies mentioned above.

59. The fragmentation of labour market enforcement bodies in the UK raises a number of concerns. The lack of clarity on the roles and responsibilities of different bodies makes it difficult for workers, in particular migrant workers, to navigate the system. The plans to establish a Single Enforcement Body mentioned in GRETA's third report⁶⁵ have not yet materialised. As mentioned in paragraph 17, through the Employment Rights Bill which was introduced in Parliament in October 2024, the UK Government proposed the creation of a single enforcement body, called the 'Fair Work Agency' (FWA), which will merge three bodies, namely the GLAA, the EAS Inspectorate and the HMRC National Minimum Wage Team. The FWA will have the powers to inspect workplaces, impose civil sanctions for violation of labour rights, bring proceedings before labour tribunals on behalf of workers, and investigate criminal offences related to employment. The FWA will have jurisdiction over England, Wales and Scotland, as labour market enforcement is devolved in Northern Ireland. Concerns have been raised that placing the FWA under the Department of Business and Trade, while the GLAA was part of the Home Office, will undermine its investigative functions. GRETA welcomes the UK Government's plan to set up the FWA and stresses the importance of endowing it with a broad remit and geographical coverage, as well as adequate human, financial and material resources to enable it to play an effective role in the prevention and fight against human trafficking for the purpose of labour exploitation. In their comments on the draft report, the UK authorities underlined that the new FWA will take on the enforcement scope and powers of the existing

⁶⁰ The number of referrals to the NRM which concerned labour exploitation was: 3 122 in 2021 (25% of referrals); 5 131 in 2022 (30% of referrals); 4 652 in 2023 (27% of referrals); 6 153 in 2024 (32% of referrals); and 1 805 in the first quarter of 2025 (34% of referrals). 37.4% of adult victims referred to the NRM reported labour exploitation in 2021-2024 (2 141 in 2021; 3 433 in 2022; 2 902 in 2023; 5 360 in 2024). Source: NRM statistics (<https://www.gov.uk/government/collections/national-referral-mechanism-statistics>).

⁶¹ See the latest data from the Migration Observatory at the University of Oxford (August 2024). Available at: <https://migrationobservatory.ox.ac.uk/resources/briefings/migrants-in-the-uk-labour-market-an-overview/>.

⁶² See GRETA's 3rd report on the UK, paragraphs 27 and 244; GRETA's 2nd report on the UK, paragraph 95.

⁶³ See the GLAA's Annual Report and Accounts for 2023-2024. Available at: <https://www.gov.uk/government/publications/gangmasters-and-labour-abuse-authority-annual-report-and-accounts-2023-to-2024>.

⁶⁴ Source: NRM statistics.

⁶⁵ See GRETA's 3rd report on the UK, paragraph 28.

enforcement bodies, including the GLAA's first responder status in the NRM. In addition, it will have enhanced powers and resources to identify and address labour exploitation, including powers to investigate under the Fraud Act. The UK Government plans to have the FWA established by April 2026.⁶⁶

60. In Scotland, the authorities have continued to implement the Fair Work First policy.⁶⁷ In 2024, the Fair Work First Guidance was updated. It is intended for companies involved in public grants or contracts and encourages them to adopt fair work practices, including payment of at least the real Living Wage and no inappropriate use of zero hours contracts. The Scottish authorities have also been promoting the Living Wage and Living Hour Accreditation Schemes developed by the Living Wage Foundation.

61. During the reporting period, there has been an increasing number of reported cases of labour exploitation of migrant workers in the care sector.⁶⁸ In 2022, the Home Office added this sector to the Shortage Occupational List, making care workers and home care eligible to the Skilled Worker Sponsorship regime. Following this change, the number of Health and Care visas granted considerably increased (from 47 194 in the year ending June 2022 to 121 290 in the year ending June 2023), until around Autumn 2023 when intake dropped in response to extra UKVI sponsorship scrutiny. According to a report by the NGO Unseen, the number of modern slavery cases in the care sector detected through its helpline increased from 15 in 2021 to 106 in 2022. The report shows that many migrant care workers were requested to pay fees to employment agencies in their home country, but there were also instances of fees applied by UK agencies. On average, the debt accrued was around £2 000, but in many cases, it exceeded £20 000. In addition to debt bondage, the report underlined other methods of control such as withholding of wages, excessive fees for breaking the contract, tied accommodation, as well as threats to revoke the sponsorship certificate or to report victims for deportation.⁶⁹ The UK authorities underlined that by January 2026, UKVI revoked more than 1 000 sponsor licences from companies sponsoring care workers. The 2024 report of the House of Lords' Committee on the Modern Slavery Act noted that the regulation of the care sector is complex, with a wide range of bodies involved that lack adequate resources, hence hindering proper oversight.⁷⁰

62. In order to prevent abuses, in 2024, the UK Government introduced the obligation for companies providing care services which sponsor overseas workers to register with the Care Quality Commission (CQC). The GLAA continues to include the care sector among its priority areas of control and has conducted joint inspections with the CQC. However, these measures have had a limited impact in practice. In 2025, following concerns of widespread exploitation and abuse in the sector, the Home Office decided to close the care worker visa route. For a transition period until 2028, the Home Office will permit visa extensions and in-country switching for those already in the country with working rights.⁷¹ These arrangements are being kept closely under review by the authorities.

63. In relation to migrant domestic workers, following amendments to the Minimum Wage Regulations in April 2024, the family workers exemption and the live-in workers exemption were removed and, as a consequence, employers are obliged to pay domestic workers at least the national minimum wage. GRETA welcomes this change which corresponds to recommendations made in previous GRETA reports.⁷² However, the authorities have not yet implemented the main recommendations of the 2015 Independent Review of the overseas domestic workers visa scheme (Ewins review), notably to allow workers to renew

⁶⁶ See the roadmap "Implementing the Employment Rights Bill", July 2025: <https://www.gov.uk/government/news/roadmap-unveiled-to-boost-rights-for-half-of-all-uk-workers-and-provide-certainty-to-employers>.

⁶⁷ More information at: <https://www.mygov.scot/fair-work-first>.

⁶⁸ See the following media reports, for instance: <https://www.theguardian.com/politics/2023/dec/19/modern-slavery-care-sector-england-brexit>.

⁶⁹ Unseen, *Who cares? A review of reports of exploitation in the care sector*, published in October 2023. Available at: <https://www.unseenuk.org/reports/care-sector-report/>.

⁷⁰ See the Report of the House of Lords, Modern Slavery Act 2015 Committee, published on 16 October 2024, para. 81-84.

⁷¹ See UK Government's "Restoring control over the immigration system: white paper", May 2025.

⁷² See GRETA's 3rd report on the UK, paragraphs 118, 132 and 251-252.

their visa and broaden the possibility of changing employers. Over the years, the number of visas granted under the overseas domestic workers scheme has increased, amounting to about 20 000 in 2023. The predominant countries of origin of domestic workers are the Philippines and India. According to several recent reports, migrant domestic workers remain vulnerable to human trafficking and exploitative labour practices are widespread. A report by the University of Nottingham's Rights Lab published in October 2023 recommended the introduction of a registration scheme for employers of domestic workers and the ratification of the ILO Convention No 189.⁷³ According to another report, published in July 2024 by the NGO Kalayaan, the UK authorities focused on addressing cases of abuse of domestic workers when they occurred, rather than on prevention and improving the legislative and policy frameworks.⁷⁴ In this context, reference is made to the recent report on migrant domestic workers and trafficking in persons issued by the UN Special Rapporteur on trafficking in persons, especially women and children.⁷⁵ In their comments on the draft report, the UK authorities indicated that they were working on reconsidering the purpose of the Overseas Domestic Worker Scheme.

64. The Seasonal Workers Pilot, which was introduced in 2019 as a response to labour shortages in agriculture (horticulture and poultry), was extended by the UK Government until 2029.⁷⁶ The quotas of seasonal worker visas have significantly increased over the years (from 2 500 in 2019 to 45 000 in 2025),⁷⁷ with workers coming mainly from Central Asian countries (Kazakhstan, Uzbekistan, Kyrgyzstan and Tajikistan).⁷⁸ Since 2022, the IOM has been receiving funding from the UK authorities to assist migrant workers from Central Asia by providing them with information and pre-departure orientation sessions. According to a 2023 report, there are widespread concerns around the welfare of workers brought to the UK under this scheme, including recruitment fees, debt bondage, long hours, wage theft, impossibility to change employers given the short term of their visa (6 months) and lack of clarity regarding labour market enforcement.⁷⁹ In 2024, the Migration Advisory Committee conducted a review of the scheme, which found that seasonal workers are particularly vulnerable to exploitation and that possible cases of modern slavery, forced labour and exploitation had been reported in connection with the scheme. The review made a number of recommendations, including making the visa more flexible, improving co-ordination between enforcement bodies and giving the GLAA statutory powers to visit farms where seasonal workers are employed. The UK Government has not yet responded to these recommendations. In their comments on the draft report, the authorities indicated that the GLAA had signed agreements with counterparts in Central Asian countries to further protect the rights of workers who come to do agricultural work in the UK.

⁷³ Yilmaz, S. and Emberson, C. 2023, *Exploring the Nature of Labour Exploitation among Domestic Workers in the UK*. Rights Lab of the University of Nottingham. Available at: <https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2023/october/exploring-the-nature-of-labour-exploitation-among-domestic-workers-in-the-uk.pdf>.

⁷⁴ *12 years of modern slavery: the smokescreen used to deflect state accountability for migrant domestic workers*, Kalayaan, June 2024. Available at: <https://www.kalayaan.org.uk/campaign-posts/12-years-of-modern-slavery-kalayaans-new-report-exposes-the-smokescreen-used-to-deny-rights-to-migrant-domestic-workers-that-would-keep-them-safe-at-work/>.

⁷⁵ *A/HRC/59/56: Migrant domestic workers and trafficking in persons: prevention, rights protection and access to justice - Report of the Special Rapporteur on trafficking in persons, especially women and children* | OHCHR

⁷⁶ More information at: https://www.farminguk.com/news/seasonal-worker-visa-route-extended-to-2029-amid-labour-shortages_64634.html.

⁷⁷ Source: <https://freemovement.org.uk/seasonal-worker-visa/>.

⁷⁸ Source: Home Office. <https://assets.publishing.service.gov.uk/media/66bf1ab13263567d66dbdfe1/entry-clearance-visa-outcomes-datasets-jun-24.xlsx>.

⁷⁹ Mc Andrews, C. and others, *Debt, Migration and Exploitation. The Seasonal Worker Visa and the Degradation of Working Conditions in UK Horticulture*, New Economics Foundation, JCW, Sustain, FLEX and Landworkers Alliance, July 2023. Available at: <https://landworkersalliance.org.uk/lwa-report-digs-into-exploitation-of-migrant-workers-in-uk-horticulture/>.

65. GRETA was informed of suspected cases of labour exploitation of Ukrainian workers in Northern Ireland. Several of them had reportedly been scammed by an employment agency that made them sign a false employment contract and found themselves in an irregular situation, working and living in very precarious conditions. According to civil society, the authorities have taken little action to follow up on these allegations. In their comments on the draft report, the Northern Irish authorities indicated that there was no record of investigations of possible human trafficking of Ukrainians under temporary protection.

66. In relation to risks of human trafficking in hand car washes, the UK authorities have continued to support and promote non-governmental initiatives such as the Safe Car Wash App and the Responsible Car Wash Scheme.⁸⁰ In 2022, the Home Office Modern Slavery Prevention Fund supported a project aimed at assessing problems in the hand car wash sector and making recommendations to the authorities. According to the project report, the level of compliance in relation to checks, payslips and employment contracts was very poor in all inspected sites. The report underlined that the lack of unified approaches and the fragmentation of enforcement bodies are enablers of non-compliance, and called for better information sharing, reporting and monitoring of at-risk sites, as well as engagement with workers to raise awareness of their rights.⁸¹

67. According to research by the University of Nottingham's Rights Lab published in 2022, there has been an increase in the number of migrants working on UK-flagged fishing vessels, primarily from the Philippines, Ghana, Indonesia, India and Sri Lanka. They are brought to the UK under transit visas, which requires them to work most of the time beyond the UK territorial waters. Many of them reportedly work under poor working conditions and are prevented from seeking help due to their insecure immigration status.⁸² In 2024, following a BBC documentary shedding light on the exploitative practices of a Scottish fishing company, 35 migrant fishermen were recognised as victims of modern slavery.⁸³ In their comments on the draft report, the Scottish authorities underlined that efforts are being made to improve detection, disruption and prosecution capabilities of cases of exploitation in the fishing industry and that in November 2024, two men were arrested and charged for human trafficking offences related to this sector.⁸⁴ Further, the Home Office stated that it is taking a range of measures to tackle modern slavery in the fishing sector, including imposing penalties on businesses or suspending their sponsor licence.

68. As mentioned in the third GRETA report on the UK, with a view to preventing trafficking in supply chains, Section 54 of the MSA of 2015 requires companies with a turnover of £36 million or more per year that provide products or services in the UK, to publish annually a modern slavery statement explaining the steps taken to tackle modern slavery in their business and their supply chains.⁸⁵ Since 2021, the statements have been gathered in a central registry for modern slavery statements,⁸⁶ and the Home Office launched a public dashboard that enables easy interrogation of data by civil society, academia and the public. There have been no sanctions for failure to comply with the obligation to publish modern slavery statements. According to the UK Government, the power to seek injunction has not been used to date due to the cost to the taxpayer and difficulties in assessing compliance within the legislation.⁸⁷ In 2025, the UK Government published new transparency in supply chains statutory guidance and a new

⁸⁰ See GRETA's 3rd report on the UK, paragraph 247.

⁸¹ Sayers, T. and others, *Car Wash Code of Practice Project Report*, prepared by the Responsible Car Wash Scheme and the Nottingham Trent University, with the support of the Home Office Modern Slavery Prevention Fund, October 2022. Available at: <http://files.localgov.co.uk/carwash.pdf>; See also: <https://www.ntu.ac.uk/about-us/news/news-articles/2024/05/exploitation-in-the-hand-car-wash-sector>.

⁸² Decker Sparks, J.L., *Letting exploitation off the hook? Evidencing labour abuses in UK fishing*, Rights Lab of the University of Nottingham, May 2022. Available at: <https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2022/may/letting-exploitation-off-the-hook.pdf>.

⁸³ More information available at: <https://www.bbc.com/news/articles/cd9dnk34k41o>.

⁸⁴ More information available at: <https://www.scotland.police.uk/what-s-happening/news/2024/november/two-men-arrested-from-fishing-boats-off-the-west-coast-of-scotland-for-human-trafficking-offences>.

⁸⁵ See GRETA's 3rd report on the UK, paragraphs 227-232.

⁸⁶ As of November 2025, the registry hosted over 19 600 modern slavery statements, covering over 32 500 organisations.

⁸⁷ See the Government's reply to the House of Lords' Committee, p. 24.

transparency reporting template, but it has not yet taken measures to strengthen penalties for non-compliance and create an enforcement regime as announced in its response to the report of the House of Lords Modern Slavery Act Committee.

69. While welcoming the UK Government's plans to establish the FWA, GRETA regrets that the Employment Rights Bill does not address the systemic challenges faced by migrant workers. GRETA notes with concern that despite the steps taken by the UK authorities to prevent THB for the purpose of labour exploitation, such as the visa sponsorship and employer licensing systems, the safeguards put in place are insufficient, as demonstrated by the number of victims identified each year among migrant workers. The labour market enforcement system is fragmented and complex, and it does not have adequate resources to play an effective role in preventing abuses in the field of employment. A common feature of all visa schemes is that exploited workers are afraid to seek help from the authorities for fear that this will affect their ability to remain in the country, as their visas tie them to their sponsor/employer. This is evidenced by the growing number of cases where migrant workers risk deportation following the cancellation of their sponsor/employer's license.⁸⁸ The restrictive immigration legislation adopted in the last years has increased the fear of migrant workers that priority will be given to deportation over their protection. GRETA was informed during the visit that GLAA officers may inform immigration enforcement when they come across an irregular worker. In their comments on the draft report, the UK authorities stressed that although information is shared to aid identification of exploitation, there is a separation between labour inspection and immigration control.

70. Referring to its Guidance Note on combating trafficking for labour exploitation⁸⁹ and the Council of Europe Committee of Ministers Recommendation to Member States CM/Rec(2022)21 on preventing and combating trafficking in human beings for the purpose of labour exploitation,⁹⁰ GRETA urges the UK authorities to:

- address vulnerabilities to labour exploitation of migrant workers in the framework of the different visa sponsorship schemes and improve effective possibilities for migrant workers to change employers;
- increase the human, material and financial resources allocated to labour market enforcement bodies to ensure that they can play an effective role in the prevention of human trafficking and the detection of victims of trafficking;
- prioritise unannounced and proactive labour inspections in sectors at high risk of trafficking and exploitation.

71. GRETA also considers that the UK authorities should:

- ensure that the future Fair Work Agency has a broad remit and geographical coverage (including UK's territorial waters), adequate human, financial and material resources, and is easily accessible to workers;
- provide further training on trafficking in human beings to relevant professionals, with a focus on vulnerabilities that lead to THB and on early detection of cases of THB for the purpose of labour exploitation;
- improve the provision of information to migrant workers about labour standards, risks of trafficking for the purpose of labour exploitation and the rights of victims of trafficking;

⁸⁸ See for instance: <https://www.thebureauinvestigates.com/stories/2024-05-11/one-hell-to-another-thousands-of-care-workers-risk-deportation-after-employers-breach-rules>.

⁸⁹ <https://rm.coe.int/guidance-note-on-preventing-and-combating-trafficking-in-human-beings-/1680a1060c>.

⁹⁰ <https://rm.coe.int/booklet-preventing-and-combating-trafficking-in-human-beings-for-the-p/1680aa08ef>.

- strengthen the prevention of human trafficking in supply chains and the enforcement of the modern slavery statements.

iii. Asylum seekers, refugees and irregular migrants

72. During the reporting period, the number of persons seeking international protection in the UK has increased: 108 000 individuals applied for asylum in 2024, double the number in 2021. The majority of applicants were adult men (59%), and the main countries of origin were Pakistan, Afghanistan, Iran, Bangladesh and Syria. 3% of the claims (4 104) were made by unaccompanied asylum-seeking children. 37 000 migrants arriving on small boats across the English Channel were detected in 2024 (compared to 28 526 in 2021 and 299 in 2018), mostly from Afghanistan, Syria and Vietnam, and the vast majority of them applied for asylum. In 2024, 84 000 individuals received an initial decision on their asylum applications which was positive in 47% of cases, compared to 67% in 2023. The decrease in the rate of positive decisions is attributable to the entry into force of the NABA which raised the standard of proof of asylum claims introduced after 28 June 2022. The main countries of origin of individuals granted asylum in 2024 were Iran, Eritrea, Sudan, Syria and Afghanistan.⁹¹

73. Staff of the Home Office who are competent to register and process asylum claims (UK Visas and Immigration, Immigration Enforcement and Border Force) are instructed to undertake a screening of asylum applicants with a view to establishing any health needs, disabilities and other vulnerabilities or safeguarding concerns, including if the asylum seeker is a possible victim of trafficking. The screening includes an interview based on a dedicated questionnaire. According to the authorities, staff follow mandatory safeguarding training to identify and address vulnerabilities of asylum applicants. There are also dedicated safeguarding and modern slavery champions to provide assistance to staff. Further, as part of the screening process, all asylum seekers must be provided with the leaflet 'Information about your asylum claim', which informs them of their rights and responsibilities as well as where to get support and legal aid. However, this leaflet is only available in English.

74. According to a joint report by UNHCR and ECPAT UK published in 2022, the assessment of vulnerabilities is not systematically carried out at the early stages of the asylum procedure and lacks a trauma-informed approach in order to allow individuals to disclose experiences and needs.⁹² In May 2023, UNHCR published an audit report of the UK's screening procedures which highlighted that Home Office staff work under difficult conditions, with inadequate training, facilities, guidance and oversight. It recommended several measures, notably to ensure that the procedures are carried out by more specialised staff, develop standardised procedures, redesign the screening questionnaire, provide training to interview officers, and introduce safeguarding and modern slavery officers at points of initial contacts.⁹³ In July 2024, screening guidance was made available by the Home Office to relevant staff. Further, dedicated waiting and screening facilities were introduced for families and children (Kent Intake Unit and Manston) or vulnerable persons (Croydon). Further, in Kent, a dedicated training team was established and a training programme has been delivered to all new workers, who are also allocated a work-based mentor.

75. Accommodation of asylum seekers is delegated by the Home Office to private contractors running reception centres. Due to the increase in asylum seekers, the use of hostels and hotels has intensified over the past years. According to the authorities, Home Office staff put details of any safeguarding concerns or alerts on the accessible shared database for the hotel providers to provide appropriate

⁹¹ Source: Home Office. Available at: <https://www.gov.uk/government/statistics/immigration-system-statistics-year-ending-december-2024/summary-of-latest-statistics>

⁹² UNHCR and The British Red Cross, *At risk: exploitation and the UK asylum system*, August 2022. Available at: <https://www.redcross.org.uk/about-us/what-we-do/we-speak-up-for-change/at-risk-exploitation-and-the-uk-asylum-system>.

⁹³ UNHCR, *Asylum screening in the UK. An audit of the UK's asylum intake, registration and screening procedures and recommendations for change*, May 2023. Available at: <https://www.unhcr.org/uk/publications/asylum-screening-uk>.

accommodation. However, reports suggest that there is a lack of vulnerability assessment in the allocation of accommodation to asylum seekers and, as a result, vulnerable individuals, including possible victims of trafficking, are placed in inappropriate large-scale accommodation which increases risks of trafficking and exploitation.⁹⁴ Difficulties in relation to housing also arise after being granted asylum as refugees have only 28 days to transition from asylum accommodation and receive limited support to do so, which increases the risk of homelessness and vulnerabilities to human trafficking.

76. NGO interlocutors underlined that asylum seekers lack information and guidance through the asylum process, as well as access to timely and specialised legal aid. According to 2024 data published by the Law Society in relation to England and Wales, most legal aid providers are concentrated in big cities such as London and Birmingham, far from where asylum seekers are accommodated.⁹⁵ The lack of access to legal aid increases the risk of the asylum claim being denied, especially following the entry into force of the NABA and the IMA. In their comments on the draft report, the UK authorities indicated that following a comprehensive review of civil legal aid, the Ministry of Justice recently announced increases in legal aid fees for immigration and asylum, as well as housing and debt matters, which will inject an additional £20 million into the civil legal aid sector each year. In relation to Scotland, the authorities indicated that in 2023/24 civil legal assistance in immigration and asylum was funded by £12 million.

77. Asylum seekers have the right to work if they have been awaiting a decision on their asylum claim for over 12 months. Job possibilities are limited to the ones included in the Immigration Salary List (formerly entitled Shortage Occupation List) which usually require specific skills and qualifications. According to the authorities, asylum seekers are encouraged to take part in volunteer activities while waiting for their asylum claim to be processed and can participate in languages classes. However, the restrictions imposed on asylum seekers in terms of access to employment, combined with the low level of financial support they receive (around £50 per week, or £9 for those receiving meals in their accommodation), increase the risk that they will accept jobs in the informal economy or in exploitative conditions in order to meet their basic needs.

78. The number of migrants held in immigration detention has increased: 20 604 in 2024, which is 12% more than in 2023. The majority were from Albania, Romania and Brazil.⁹⁶ The statutory guidance "Adults at risk in immigration detention" was updated in May 2024. The guidance defines 'adults at risk' as individuals suffering from a condition or having experienced a traumatic event, including human trafficking, that would likely render them particularly vulnerable to harm if they are placed or maintained in detention. According to the guidance, in all cases in which immigration detention is being considered, an assessment must be made of whether the individual is an 'adult at risk'. Further, based on rule 35 of the Detention Centre Rules and rule 32 of the Short-Term Holding Facility Rules, medical practitioners must report to the Home Office cases in which there is evidence that a detainee may have been a victim of torture, or for any other reason their health would be injuriously affected by detention, for release to be considered. In January 2023, the ICIBI published a report on the third annual inspection of 'Adults at risk in immigration detention'. According to it, inspectors found missed opportunities by Home Office, health care and contractor staff to identify vulnerable detainees for whom rule 35 might be appropriate. It also noted that disclosures of detainees in relation to experiences of modern slavery were not always followed up. In their comments on the draft report, the UK authorities indicated that, following engagement with NGOs, they are currently reviewing the 'adults at risk' policy.

⁹⁴ UNHCR and The British Red Cross, *At risk: exploitation and the UK asylum system*, August 2022. Available at : <https://www.redcross.org.uk/about-us/what-we-do/we-speak-up-for-change/at-risk-exploitation-and-the-uk-asylum-system.>;

Helen Bamber Foundation and Asylum Aid, *Suffering and squalor: the impact on mental health of living in hotel asylum accommodation*, June 2024. Available at: https://www.helenbamber.org/sites/default/files/2024-06/Suffering%20and%20squalor_Final_June%202024.pdf; also: <https://www.helenbamber.org/resources/latest-news/expensive-exercise-cruelty-private-companies-are-profiting-dehumanising>

⁹⁵ More information at: <https://www.lawsociety.org.uk/campaigns/civil-justice/legal-aid-deserts>.

⁹⁶ Source : <https://www.gov.uk/government/statistics/immigration-system-statistics-year-ending-december-2024/how-many-people-are-detained-under-immigration-powers-in-the-uk>.

79. In October 2024, His Majesty's Inspectorate of Prisons published a report on the short-term facilities at Western Jet Foil, Manston and Kent Intake Units where migrants are detained following their arrival by small boats. The report noted that progress had been made in addressing the challenges caused by the increased arrivals of migrants, but also highlighted shortcomings, such as inadequate co-ordination among agencies, lack of safe environment for children, insufficient privacy and recourse to interpretation to facilitate the disclosure of vulnerabilities, as well as delays in taking safeguarding measures for vulnerable individuals.⁹⁷

80. During the evaluation visit, GRETA visited the Heathrow Immigration Removal Centre (IRC) which combines Colnbrook and Harmondsworth removal centres under one management structure, making it the largest IRC in Europe, with a capacity of 965. It is a prison-like structure managed by a private company (Mitie Care and Custody Ltd). At the time of the visit, the IRC was holding around 700 adult men. About 50% of them had been issued a deportation order at the end of a prison sentence served in a prison in the UK. The rest were foreign nationals whose asylum claims had been rejected and who refused to leave the UK voluntarily. The main countries of origin of detainees were Albania, India, Pakistan and Romania. Within 48 hours of arrival at the IRC, detainees are interviewed by the induction teams which follow a questionnaire including questions about trafficking and vulnerabilities. An interpreter is present if needed. Detainees are also examined by medical staff who can apply rule 35 of the Detention Centre Rules if needed. Measures taken by IRC staff to identify possible victims of trafficking are detailed in paragraph 0130. GRETA notes positively the commitment of staff to detecting and supporting vulnerable individuals.

81. While recognising the challenges faced by the UK authorities in the context of the increased arrival of asylum seekers and irregular migrants, GRETA is concerned that the immigration legislation adopted in recent years (NABA and IMA) has increased vulnerabilities to human trafficking of persons with insecure or irregular immigration status. The fact that migrants face increased risks of detention and deportation prevents them from reporting exploitation to the authorities and seeking support, a situation which is abused by traffickers to target migrants and maintain control over them. Further, the NABA and IMA have considerably reduced opportunities to obtain refugee status in the UK and thus to receive protection and support which could reduce their vulnerability to exploitation and trafficking. The application of the 'public order disqualification' (see paragraph 255) and the 'no recourse to public fund' (see paragraph 97) have further increased these vulnerabilities by denying migrants access to support mechanisms and putting them at risk of homelessness.

82. GRETA urges the UK authorities to take further measures to address the vulnerabilities of asylum seekers, refugees and irregular migrants to THB, in particular by:

- ensuring that a vulnerability assessment of asylum seekers, refugees and irregular migrants is systematically conducted at an early stage, and that safeguarding referrals and measures are made;
- strengthening access to legal aid for asylum seekers at all stages of the international protection proceedings;
- providing safe and adequate accommodation to asylum seekers and refugees and improving their access to the labour market, vocational training and English language courses;
- raising awareness of asylum seekers, refugees and irregular migrants on their rights, the risks of human trafficking and the rights of victims of THB;

⁹⁷ Available at: https://hmiprisons.justiceinspectores.gov.uk/hmipris_reports/western-jet-foil-manston-and-kent-intake-units/.

- assessing the impact of the Nationality and Borders Act and the Illegal Migration Act on the prevention of human trafficking and the vulnerabilities of migrants.

iv. Vulnerabilities related to the gender dimension of human trafficking

83. As evidenced by the NRM annual statistics, exploitation types have gendered patterns. Male victims are most often subjected to labour exploitation and criminal exploitation, whereas female victims are primarily subjected to sexual exploitation. Further, adult female victims are overrepresented in cases of domestic servitude.⁹⁸

84. Tackling violence against women and girls is a top priority for the current UK Government whose manifesto included the mission to halve violence against women and girls in a decade. The UK authorities have implemented a number of measures to address the vulnerabilities of women and girls to sexual exploitation or exploitation in prostitution. In July 2021, the UK Government adopted the Tackling Violence against Women and Girls Strategy which applies in England and partially in Wales. It notes that prostitution and sex work can lead to the exploitation of women and involve sex trafficking and modern slavery.⁹⁹ Further, the Government financially supported the NGO Changing Lives which provides early intervention and targeted support to women and girls who are victims of online sexual exploitation in England.

85. In July 2024, the IASC issued a policy brief on violence against women and girls and the protection of female victims of modern slavery. It called for a holistic and across-government approach to tackle the root causes and prevent exploitation, including by addressing demand for sexual exploitation and noted that Section 53A of MSA (use of services of a person forced into prostitution) is under-utilised and more should be done to protect women and girls online and to regulate adult services websites.¹⁰⁰

86. In Wales, a Strategy on Violence against Women, Domestic Abuse and Sexual Violence 2022-2026 was adopted in May 2022.¹⁰¹ The authorities have also supported the programme "Safer Wales" which provides assistance to women and girls who are victims of violence and domestic abuse, as well as those exploited in prostitution.

87. In Northern Ireland, there is a Strategic Framework for ending violence against women and girls 2024-2031, which includes commercial and non-commercial sexual exploitation, trafficking, child sexual abuse and honour-based violence.¹⁰² Northern Ireland is the only part of the UK where buying sexual services has been criminalised by Article 64A of the Sexual Offences (Northern Ireland) Order 2008 as amended by the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015. In September 2019, the Department of Justice of Northern Ireland published an assessment of the operation of Article 64A.¹⁰³ The research was commissioned to Queen's University Belfast, following a public procurement process, in order to assist the Department of Justice in fulfilling its duty under Section 15 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act 2015 to carry out a review of the operation of Article 64A after a period of three years. On the basis of the finding of the research, the Department of Justice concluded that there was no evidence that the offence of purchasing sexual services had produced a downward pressure on the demand for, or supply of, sexual services. Further, there was no evidence to suggest that the legislation had had an

⁹⁸ Source: NRM statistics (<https://www.gov.uk/government/collections/national-referral-mechanism-statistics>).

⁹⁹ Available at: <https://www.gov.uk/government/publications/tackling-violence-against-women-and-girls-strategy>

¹⁰⁰ Available at: <https://www.antislaverycommissioner.co.uk/media/uakmmdl/240719-iasc-vawg-policy-paper.pdf>.

¹⁰¹ More information at: <https://www.gov.wales/violence-against-women-domestic-abuse-and-sexual-violence-strategy-2022-2026.html>

¹⁰² More information at: <https://www.executiveoffice-ni.gov.uk/topics/ending-violence-against-women-and-girls>.

¹⁰³ Ellison, G. and others, *A review of the criminalisation of paying for sexual services in Northern Ireland*, Queen's University Belfast, September 2019. Available at: <https://www.justice-ni.gov.uk/publications/assessment-impact-criminalisation-purchasing-sexual-services>

impact on the levels of trafficking for sexual exploitation. In their comments on the draft report, the authorities indicated that there is no plan to amend or further review the implementation of Article 64A. No information was provided by the authorities of Northern Ireland on exit programmes from prostitution.

88. In 2023, the Scottish authorities adopted a revised Strategy for preventing and eradicating violence against women and girls (Equally Safe Strategy) which recognises commercial sexual exploitation and trafficking in human beings as forms of violence against women.¹⁰⁴ Through the Delivering Equally Safe Fund, the authorities fund NGO projects supporting women wishing to leave prostitution. Further, a Strategic approach to challenging and deterring men's demand for prostitution was adopted in February 2024. Its aim is to improve support for women, including sustainable exit from prostitution, and to challenge and deter men's demand through education, awareness raising, information for the general public and the private sector. Relevant measures include the creation of a multi-agency group on commercial sexual exploitation and a new support pathway for persons with experience of prostitution.¹⁰⁵ Since 2025, Police Scotland has implemented a new approach on prostitution (Operation Begonia), with police officers focusing on areas known for street prostitution, engaging with people involved in prostitution to signpost them to support from local agencies, and arresting and charging with soliciting anyone attempting to purchase sex. Further, in May 2025, a Member's Bill titled Prostitution (Offences and Support) (Scotland) Bill was introduced with a view to creating a new offence of paying for sexual acts.¹⁰⁶

89. Across the UK, civil society organisations underlined that most strategies on gender-based violence are limited to recognising human trafficking as a form of violence against women, but in practice there are limited interventions targeting the intersections between trafficking and violence against women and domestic violence. While NGOs positively noted the fact since July 2024 human trafficking is under the portfolio of the Minister for Safeguarding and Violence against Women and Girls, they also expressed concerns that treating trafficking as a form of violence against women might result in less attention being paid to trafficking of men and boys, who constitute the majority of the possible victims referred to the NRM.

90. NGOs have also raised concerns that preventive measures against trafficking in women and girls focus mainly on sexual exploitation and do not take into account the risks associated with other forms of exploitation. For example, insufficient measures are taken to address the vulnerability of female migrant workers in sectors such as domestic work, the care sector or *au pair* placement. In their comments on the draft report, the UK authorities indicated that the GLAA is currently conducting research into the additional vulnerabilities of women and girls that could lead to labour exploitation.

91. There is no NRM data on trafficking for the purpose of forced marriage as this form of exploitation is not included in the definitions of human trafficking and modern slavery in the MSA 2015. Cases of forced marriage may be recorded under domestic servitude or sexual exploitation depending on the circumstances. In February 2023, the minimum age for marriage was raised to 18 in England and Wales, following the entry into force of the Marriage and Civil Partnership (Minimum Age) Act 2022, and all marriages below that age are considered as forced marriage. In Scotland and Northern Ireland, the minimum age for marriage is 16. The Scottish Government announced its intention to conduct a consultation at the end of 2025 on whether to raise the minimum age to 18, and to extend the criminalisation of forced marriage. The UK has set up the Forced Marriage Unit (FMU), which provides support to victims and possible victims of forced marriage, both within the UK and as regards UK nationals

¹⁰⁴ More information at: <https://www.gov.scot/publications/equally-safe-scotlands-strategy-preventing-eradicating-violence-against-women-girls/>.

¹⁰⁵ More information at: <https://www.gov.scot/publications/scotlands-strategic-approach-challenging-deterring-mens-demand-prostitution-supporting-recovery-sustainable-exit-those-involved-prostitution/pages/2/>.

¹⁰⁶ More information at: <https://www.scotland.police.uk/what-s-happening/news/2025/april/op-begonia-new-national-approach-to-prostitution/>; <https://www.parliament.scot/bills-and-laws/bills/s6/prostitution-offences-and-support-scotland-bill>.

overseas.¹⁰⁷ In 2022, the FMU dealt with 297 cases, assisting women to leave forced marriages and ensuring their repatriation to the UK. In most cases, the countries to which the forced marriages related (other than the UK) were Pakistan (49%), Bangladesh (14%) and India (7%).¹⁰⁸ In Wales, the NGO Bawso provides support to victims of domestic violence, exploitation, trafficking and forced marriage. According to a report published by Bawso in August 2024, in several cases victims of forced marriage also suffered domestic abuse and severe labour exploitation.¹⁰⁹

92. GRETA considers that the UK authorities should take additional measures to address the gender dimension of trafficking in human beings, including by:

- developing interventions targeting the intersections between human trafficking and violence against women and domestic violence;
- continuing efforts aimed at reducing demand for the exploitation of persons in prostitution and at supporting persons wishing to exit prostitution;
- strengthening efforts to prevent child and forced marriages, paying particular attention to persons at risk, notably among ethnic minorities.

v. Homeless persons

93. In its third report on the UK, GRETA underlined the vulnerabilities of homeless people to human trafficking.¹¹⁰ Traffickers target homeless persons because they are susceptible to manipulation, coercion and deceit. They can have associated support needs, such as alcohol or drug addiction and mental health issues, which can impair their judgement or ability to protect themselves and expose them to being exploited by criminals.¹¹¹ GRETA was informed that homeless shelters are increasingly becoming hubs to recruit victims of trafficking. The threat of homelessness is also a control method used by traffickers, notably in labour trafficking cases where accommodation is provided by the employer.

94. In September 2024, UK media reported the case of men from Czechia who had been forced by a gang to work at a fast-food chain and a company supplying products to major supermarkets in the UK. The victims had been targeted because they were homeless. They worked up to 100 hours per week and were not paid the promised wages.¹¹² GRETA was also informed of an investigation in Northern Ireland in relation to a trafficker who targeted women in situation of homelessness and with drug addiction in order to exploit them in prostitution.

95. The NGO The Passage has worked on the intersection between human trafficking and homelessness for many years. According to a report of November 2024, out of 204 referrals made to its Modern Slavery Service between July 2018 and March 2024, 42% experienced homelessness prior to exploitation and 94% after exploitation. The majority were victims of labour exploitation and had Romanian, UK or Polish nationality.¹¹³ The Passage runs a specialist Navigator project in the London boroughs of Westminster and Camden, in co-operation with the local authorities, assisting potential victims of modern slavery who are homeless to access appropriate care. Further, it has launched a Modern

¹⁰⁷ More information at: <https://www.gov.uk/guidance/forced-marriage>.

¹⁰⁸ Data available at: <https://www.gov.uk/government/statistics/forced-marriage-unit-statistics-2022/forced-marriage-unit-statistics-2022>

¹⁰⁹ Lidudwi, N., *Understanding Forced Marriage: A critical Analysis*, BAWSO, March 2024.

¹¹⁰ See GRETA's 3rd report, paragraphs 16 and 48.

¹¹¹ The Passage, *Responding to modern slavery and exploitation within the homeless sector*, January 2017. Available at: <https://passage.org.uk/wp-content/uploads/2022/12/Modern-Slavery-Report-2017.pdf>.

¹¹² More information at: <https://www.bbc.com/news/articles/c2kdg84zj4wo>

¹¹³ The Passage, *Five-year report of the Modern Slavery Service*, November 2024. Available at: <https://passage.org.uk/wp-content/uploads/2024/11/The-Passage-Modern-Slavery-Service-Five-Year-Report.pdf>.

Slavery Toolkit to help the homelessness sector and local authorities identify and support survivors of modern slavery.¹¹⁴

96. The 2014 Modern Slavery Strategy recognises homelessness as a vulnerability factor. The Homeless Reduction Act 2017 obliges local authorities to take measures to prevent people from becoming homeless by identifying people at risk and to provide or secure the provision of suitable accommodation to homeless people. There is a Homeless Code of guidance for local authorities which contains a dedicated chapter on modern slavery with a view to helping local authorities identify victims of modern slavery or people at risk among individuals applying for housing assistance. A revised strategy 'Ending Rough Sleeping for Good' was published in September 2022 and is supported by over £2 billion up to 2025.¹¹⁵ Dedicated legislation and strategies have also been adopted in Scotland and Northern Ireland. In December 2024, the Government of Northern Ireland announced the provision of £6 million of additional public funding in order to prevent the closure of some homelessness services.

97. Despite these efforts, restrictive immigration policies, such as the 'no recourse to public funds' condition (NRPF), increase risks of homelessness and therefore vulnerabilities to trafficking and re-trafficking. Based on Section 115 of the Asylum and Immigration Act 1999, foreigners with a temporary leave to enter or remain in the UK, including foreigners under working visa schemes, can be imposed the NRPF condition, pursuant to which they cannot access a range of public benefits, including social benefits, child benefits, housing assistance and homelessness assistance. For foreigners who are irregularly in the UK, the NRPF condition is automatic. Asylum seekers are also imposed the NRPF condition, but have access to support under the asylum system. According to the previously mentioned report by The Passage (see paragraph 95), 64% of the individuals referred to its Modern Slavery Service did not have recourse to public benefits. Many children are reportedly pushed into criminal exploitation because they do not have access to public benefits as a result of the NRPF condition imposed on their parents. In their comments on the draft report, the UK authorities stated that victims of trafficking who are in the NRM and those victims who have been granted residence permits have recourse to public funds.

98. A report commissioned by the IASC and The Passage on enhancing modern slavery prevention within the homeless sector in the UK, published in June 2025, underlines the need for training of housing professionals and homelessness teams, as well as joint actions between local authorities, charities, healthcare providers and law enforcement agencies.¹¹⁶ The Modern Slavery PEC is also conducting a research project into adult victims of modern slavery who have experienced or are at risk of homelessness in the UK.¹¹⁷

99. GRETA urges the UK authorities to assess the impact of the 'no recourse to public funds' (NRPF) condition on vulnerabilities to human trafficking and reconsider its application to persons at risk of human trafficking.

100. Further, while welcoming the steps taken to address the links between homelessness and human trafficking, GRETA considers that the UK authorities should continue engaging with the homelessness sector on addressing the vulnerabilities of homeless people to human trafficking.

¹¹⁴ Available at: <https://passage.org.uk/get-informed/modern-slavery-and-homelessness/toolkit/>.

¹¹⁵ Available at: <https://www.gov.uk/government/publications/ending-rough-sleeping-for-good#:~:text=%27Ending%20rough%20sleeping%20for%20good,rough%20sleeping%20in%20this%20Parliament.>

¹¹⁶ More information at: <https://www.antislaverycommissioner.co.uk/news-insights/report-enhancing-modern-slavery-prevention-within-the-homelessness-sector-in-the-uk/>.

¹¹⁷ More information at: <https://www.modernslaverypec.org/research-projects/homelessness-modern-slavery-uk>

vi. Disadvantaged minorities

101. There is very little research on the vulnerability to human trafficking of persons from ethnic minority groups in the UK. The NRM does not collect data on victims based on their ethnicity. According to civil society, human trafficking affects people from Black and other ethnic minorities due to intersecting vulnerability factors, such as poverty and discrimination. Black and ethnic children are over-represented in county line cases.¹¹⁸ Further, research shows that Black children are most likely to experience 'adultification' bias and are therefore at heightened risk of their safeguarding needs being unmet.¹¹⁹ During the visit, persons with lived experiences of human trafficking stated that ethnic and migrant children who are possible victims of trafficking are often disbelieved by institutions and punished for offences committed while they were being trafficked.

102. None of the human trafficking strategies adopted in the UK contain specific measures addressing the vulnerabilities of ethnic minorities. According to the authorities, the "Working Together to Safeguard Children" Statutory Guidance requires professionals to be sensitive to economic and social circumstances and ethnicity. In addition, the authorities underlined measures taken to improve the socio-economic situation of persons from ethnic minorities. In Scotland, the Tackling Child Poverty Delivery Plan for 2022-2026 focuses on families at greater risk of poverty, including minority ethnic families. In Wales, the Welsh Government provides funding to local authorities to support improved educational outcomes for children and young people of ethnic minority groups.

103. Civil society underlined that insufficient efforts are being made by the authorities to tackle the root causes of trafficking of persons from ethnic minorities, including discrimination and poor socio-economic situation, and expressed concerns over the lack of engagement with ethnic communities to address them. In 2021, the NGO network BASNET (Black and Minority Ethnic Anti-Slavery Network) adopted an action plan for the UK modern slavery and human trafficking sector on promoting racial equality, diversity and inclusion. The action plan advocates for measures such as the use of ethnicity data to ensure equitable treatment of victims at all stages of the NRM process, the appointment of cultural mediators in law enforcement agencies, engagement with local communities, as well as more diversity in the anti-slavery sector.¹²⁰ Further, in August 2024 the Modern Slavery PEC published a research report on "Cultural competency in UK responses to modern slavery" which looks at the cultural and identity barriers for people with lived experience of modern slavery and how they can be overcome.¹²¹

104. Roma and Travellers are vulnerable to exploitation and human trafficking due to marginalisation. According to civil society, this group faces significant challenges in accessing accommodation, health and education. Scotland has adopted a specific action plan "Improving the Lives of Scotland's Gypsy/Travellers" with measures in the areas of accommodation, education and health. Initially planned for 2019-2021, the plan was extended until 2023 as a result of the COVID-19 pandemic and a new action plan was published in September 2024.¹²² During the visit, GRETA was informed that the GLAA had recently participated in a multi-agency inspection focusing on the exploitation of persons from the Travellers communities in Scotland. In Northern Ireland, GRETA was informed that there was a lack of data concerning Irish Travellers who face discrimination in access to housing, education and health care. In their comments on the draft report, the UK authorities noted that in recognition of the vulnerabilities of the Roma community to exploitation, the Home Office's Romania Modern Slavery Fund programme is undertaking research on human trafficking within Roma communities in the West Midlands and Romania.

¹¹⁸ ['County lines', inequalities and young people's rights: a moment of pause and reflection - Tackling Child Exploitation](#)

¹¹⁹ 'Adultification' happens when certain children are perceived as being more adult like, and when notions of innocence and vulnerability are not afforded to them. Davis, J., *Adultification bias within child protection and safeguarding*, His Majesty's Inspectorate of Probation, June 2022.

¹²⁰ Available at: <https://bmeantislavery.org/s/BASNET-Race-EDI-Action-Plan.pdf>.

¹²¹ Shirgholami, Z. and others, *Cultural competency in UK responses to modern slavery*, Modern Slavery and Human Rights PEC, August 2024.

¹²² <https://www.gov.scot/publications/improving-the-lives-of-scotlands-gypsy-travellers-2-action-plan-2024-2026/>.

105. GRETA considers that the UK authorities should make additional efforts to prevent trafficking in human beings of persons from disadvantaged minorities, including by:

- carrying out or supporting research on their vulnerabilities to human trafficking and the efficiency of preventive measures taken, and ensuring that the outcomes of such research are taken into account in the design and implementation of preventive policies;
- involving organisations or individuals representing ethnic minorities in the design of anti-trafficking policies and activities;
- addressing the root causes of the vulnerabilities to human trafficking of disadvantaged minorities, including poverty, inadequate access to education, employment and housing, and discrimination.

vii. Persons with disabilities

106. Persons with disabilities¹²³ are not expressly mentioned in the Council of Europe Anti-Trafficking Convention, but their vulnerability to human trafficking is documented in reports issued by GRETA and other international bodies. Amongst the factors which render persons with disabilities vulnerable to THB are dependence on caregivers or support systems, limited access to information and resources, difficulty communicating or advocating for themselves, stigma and discrimination, as well as lack of or limited access to the labour market and decent work.¹²⁴ Reference can also be made to the CEDAW General recommendation No. 38 (2020), which states that women and girls with disabilities are a group particularly vulnerable to being trafficked, and calls on States to provide them with special economic and social support.¹²⁵

107. In the UK, support for persons with disabilities is provided by local authorities. Relevant statutory guidance or codes of practice have been adopted to help local authorities implement their obligations.¹²⁶ The Scottish authorities underlined the efforts made to improve access to employment, notably through the 'Fairer Scotland for Disabled People: Employment Action Plan' and the 'No One Left Behind' strategy. Work is ongoing in the Northern Ireland Assembly to adopt an Adult Protection Bill which will seek to introduce specific rules on adult safeguarding and will cover persons with disabilities. It will also introduce new duties, powers and offences to strengthen and underpin the adult protection process and bring Northern Ireland in line with other parts of the UK.

¹²³ According to Article 1 of the UN Convention on the Rights of Persons with Disabilities, persons with disabilities include those who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others.

¹²⁴ See OSCE, *Invisible Victims: The Nexus between Disabilities and Trafficking in Human Beings*, March 2022, p. 16.

¹²⁵ CEDAW, [General recommendation No. 38 \(2020\) on trafficking in women and girls in the context of global migration](#), paragraphs 40 and 55.

¹²⁶ See for instance: <https://www.gov.uk/government/publications/send-code-of-practice-0-to-25>.

108. While information on victims' disabilities is not collected as part of the NRM, several research projects conducted in recent years underline that persons with disabilities are particularly vulnerable to human trafficking and exploitation in the UK.¹²⁷ According to a project which focused on the area of Nottingham, out of 147 referrals which were made to the City Council's Slavery and Exploitation Risk Assessment Conference, cognitive impairments were a recorded vulnerability in 34% of referrals¹²⁸ and physical disability in 21%. Referrals with cognitive impairment commonly experienced what is referred to as 'financial exploitation' (39%), where perpetrators lure victims into a loving relationship to exploit them financially. Other referrals related to 'cuckooing' (37%), sexual exploitation (32%) and criminal exploitation (29%). However, very few of the referrals were identified as victims of modern slavery or human trafficking.¹²⁹

109. A research report published in May 2024 underlined that there was little recognition of the increased vulnerability and risk for children and young people with special education needs and disabilities (SEND) in policy and guidance, and insufficient discussion of appropriate preventative responses. It noted that the practical guidance on 'Safeguarding disabled children' contains no information in relation to human trafficking and there is insufficient training on modern slavery for professionals working with people with SEND, leading to missed opportunities to recognise early signs and respond to harm before it occurs.¹³⁰ Another challenge identified by research is that persons with SEND or mild cognitive impairment remain unidentified due to very long waiting lists for the assessment and recognition of their disability status, or because they do not meet the threshold for social intervention and therefore do not receive support that would prevent exploitation.¹³¹ Further, there is a disproportionate number of children with SEND who are outside of mainstream education and are therefore at increased risk of exploitation (see also paragraph 46).¹³²

110. Further, according to civil society, because of resource constraints and understaffing of local authorities, inspections of institutions and foster care for persons with disabilities by social services are infrequent. Complaint mechanisms are not always accessible and easy to navigate for persons with disabilities, leaving individuals without means to seek help in case of exploitation.

111. GRETA notes that, in March 2024, the UN Committee on the rights of persons with disabilities published a report on the follow-up to an inquiry on the UK which had been launched in 2016 on the basis of reliable information indicating grave or systemic violations of the rights set forth in the Convention. The Committee expressed concerns about the lack of significant progress in relation to the right of persons with disabilities to living independently. It also underlined that persons with disabilities continue to face important challenges in relation to work and employment, adequate standard of living and social protection.

¹²⁷ Robinson, G., and others, *Intersections between exploitation and cognitive impairments: An exploratory study in Nottingham, UK*, University of Nottingham Rights Lab, 2022. Available at: <https://www.nottingham.ac.uk/research/beacons-of-excellence/rights-lab/resources/reports-and-briefings/2022/march/intersections-between-exploitation-and-cognitive-impairment.pdf>; Human Trafficking Foundation, *Learning Disabilities and Modern Slavery*, January 2022. Available at: <https://www.humantraffickingfoundation.org/s/HTF-Post-Event-Summary-Report-v2.pdf>; Franklin and others, *Internal trafficking and exploitation of children and young people with special educational needs and disabilities (SEND) in England and Wales*, Modern Slavery and Human Rights PEC, May 2024. Available at: <https://www.modernslaverypec.org/resources/children-special-needs-disabilities>.

¹²⁸ Referrals with a cognitive impairment include intellectual disabilities, learning disabilities, diagnosed mental health vulnerabilities, or other cognitive impairments.

¹²⁹ Robinson, G. and others, *Intersections between exploitation and cognitive impairments: An exploratory study in Nottingham, UK*, University of Nottingham Rights Lab, 2022.

¹³⁰ Franklin, A. and others, *Internal trafficking and exploitation of children and young people with special educational needs and disabilities (SEND) in England and Wales*, May 2024.

¹³¹ Ibidem.

¹³² Human Trafficking Foundation, *Learning Disabilities and Modern Slavery*, January 2022.

112. While welcoming the research conducted on the intersection between human trafficking and disability, GRETA considers that the UK authorities should take additional measures to address the vulnerability of persons with disabilities to human trafficking, including by:

- developing guidance and training on human trafficking for professionals working with persons with disabilities and special needs;
- strengthening the early identification of persons with disabilities who are at risk of trafficking and the provision of support, by providing adequate resources to social services;
- ensuring the availability of accessible complaint mechanisms and regular inspections of institutions and foster care for persons with disabilities;
- improving access to education, vocational training and employment for persons with disabilities.

viii. LGBTI people

113. GRETA emphasises that, in general, LGBTI people are at an increased risk of becoming victims of trafficking, particularly because they are often marginalised in society and excluded from their families, making them ideal targets for traffickers looking for people with less protection. They also face difficulties in accessing the labour market, as employment opportunities are scarce for those who identify outside the traditional gender binary, leading them to work more in the informal economy (including prostitution) or even to accept abusive job offers. In addition, there is a significant proportion of LGBTI people among homeless people, and LGBTI people can be victims of discrimination by the authorities and services, making them less likely to file a complaint or ask for help.¹³³

114. In September 2024, research commissioned by the UK Government was published on lesbian, gay, bisexual and transgender people's experiences of homelessness. According to it, LGBTI people may be at greater risks of becoming homeless and are more likely to be victims of sexual exploitation and other abuses and take part in risky sexual behaviour and survival sex.¹³⁴ A report of the Modern Slavery PEC indicates that there is a need for more research on the interaction between human trafficking and equality, diversity and inclusion (EDI) issues, such as sexual orientation and gender assignment.¹³⁵

115. No information was provided by the authorities on cases where traffickers exploited victims based on their sexual orientation or gender identity. According to the NRM statistics, the number of referrals whose gender was recorded as "other" was 10 in 2021, 13 in 2022, 12 in 2023 and 29 in 2024. NGOs underlined that victims may be reluctant to share this personal information for fear of stigma and discrimination.¹³⁶

¹³³ See: ILGA, *Intersections: The LGBTI II Survey – Homelessness Analysis, 2023*; <https://lac.iom.int/en/blogs/lgbtqi-victims-human-trafficking> ; <https://2017-2021.state.gov/wp-content/uploads/2019/02/272968.pdf>.

¹³⁴ Available at: <https://www.gov.uk/government/publications/lgbt-peoples-experiences-of-homelessness/lesbian-gay-bisexual-and-transgender-peoples-experiences-of-homelessness#conclusion-5>.

¹³⁵ Such, E. and others, *Prevention of adult sexual and labour exploitation in the UK: what does or could work*, Modern Slavery and Human Rights PEC, March 2022. Available at: <https://www.modernslaverypec.org/resources/prevention-what-works>.

¹³⁶ Source: NRM statistics for 2021, 2022, 2023 and 2024 (<https://www.gov.uk/government/collections/national-referral-mechanism-statistics>).

116. GRETA takes note of a report of the UN Independent Expert on protection against violence and discrimination based on sexual orientation and gender identity, published in April 2024, according to which the UK has developed strong frameworks for the protection of LGBTI persons, but there remain gaps notably in relation to the right to housing.¹³⁷

117. GRETA considers that the UK authorities should take steps to address the vulnerability of LGBTI people to trafficking in human beings, particularly through research, data collection and measures aimed at improving their socioeconomic situation.

2. Measures to protect and promote the rights of victims of trafficking

118. Chapter III of the Convention provides for a series of measures to protect and promote the rights of victims. In the first place, it is of paramount importance to identify victims of trafficking correctly as identification enables them to benefit from the other measures and rights contained in the Convention. Pursuant to Article 10 of the Convention, States Parties shall ensure that the authorities competent to identify victims of trafficking have persons trained and qualified to perform the identification, and that these authorities collaborate with relevant support organisations in the identification process. Further, Article 12 of the Convention sets out the assistance measures which States Parties must provide to trafficking victims. Paragraph 7 of this article requires Parties to ensure that services are provided taking due account of the special needs of persons in a vulnerable position as well as the rights of children. Given the relevance of victim identification and assistance to the thematic focus of the fourth evaluation round of the Convention, this part of the report examines the application of these two provisions. Other provisions of Chapter III of the Convention, which have been examined in detail by GRETA during the previous evaluation rounds, are discussed in the chapter of the report entitled "Follow-up issues".

a. Identification of victims of THB

119. The framework for the identification of victims of THB provided by the National Referral Mechanism (NRM), initially put in place in April 2009, has been repeatedly reformed over the years.¹³⁸ There continues to be a two-stage decision-making process. After referral of a possible victim to the NRM by designated First Responder Organisations (FROs), which include public authorities (police, NCA, GLAA, local authorities, Home Office Border Force, UKVI and Immigration Enforcement) and specialised NGOs, a first "reasonable grounds" decision is taken by a Competent Authority, triggering the granting of a recovery and reflection period and access to assistance measures. This is followed by a period during which more information and evidence are collected to enable the making of a "conclusive grounds" decision confirming the status of victim. Pursuant to Section 52 of MSA, specified public authorities in England and Wales have a statutory duty to notify the Home Office when they come across possible victims of modern slavery. At the end of 2021, a second decision-making body was set up, the Immigration Enforcement Competent Authority (IECA), to take decisions regarding a specific cohort of adult foreign victims (in particular: foreign national offenders in prison, IRC or awaiting deportation; foreigners in IRC; rejected asylum seekers). The Single Competent Authority (SCA) has remained responsible for other adult foreigners, all child victims, regardless of their nationality, and adult victims who are British nationals. The UK authorities specified that the SCA and, in limited exceptional circumstances, trained staff from the IECA, follow a triage process to determine which competent authority will progress the case. A reasonable grounds decision is then made by the relevant competent authority, based on all available general and specific evidence. This represents a return to a dual system with separate decision-making authorities for UK nationals and for foreigners, which was in place until April 2019, and has been criticised by the IASC and NGOs for risking to conflate the fight against irregular migration with the protection of vulnerable people.¹³⁹ Further, the multi-agency assurance panels of independent experts, which had been set up in

¹³⁷ Available at: <https://docs.un.org/en/A/HRC/56/49/ADD.1>.

¹³⁸ See GRETA's 3rd report on the UK, paragraphs 254-256.

¹³⁹ Letter from the Independent Anti-Slavery Commissioner to the Home Secretary, 'Creation of the Immigration Enforcement Competent Authority' (11 November 2021). <https://www.antislaverycommissioner.co.uk/media/1717/iasc-and-hs->

2019 to review negative conclusive grounds decisions, were abolished in 2022 on the grounds that they prolonged the NRM procedure.

120. Following the adoption of the NABA in 2022, the UK Government introduced changes to the identification procedure. Under Section 63 of NABA, possible or confirmed victims of modern slavery and human trafficking can be disqualified from accessing the NRM on public order grounds, the so-called 'public order disqualification' (see also paragraph 255). Further, pursuant to Section 60 of NABA, the competent authorities shall determine whether "on the balance of probabilities" there are sufficient grounds to decide that an individual is a victim. In order to incorporate this requirement, the Modern Slavery Guidance was revised in January 2023, specifying that reasonable grounds decisions should be based on "objective factors but falling short of conclusive proof" and cannot rely on the victim's account alone. Following requests for judicial review, the Government revised the Modern Slavery Guidance in July 2023 to lower the threshold, as a result of which decision makers are now required to consider "all available general and specific evidence".¹⁴⁰ There was a significant drop in the rate of positive reasonable grounds decisions, from around 88% in 2021-2022, to 55% in 2023 and 53% in 2024. As of February 2024, the time limit for applying for a reconsideration of a negative reasonable grounds decision was reduced from 3 months to 30 days.¹⁴¹

121. GRETA was informed that the National Police Chiefs' Council Sex Work National Police Guidance for England and Wales, which is produced independently from Government, was last updated in April 2025.¹⁴² Recognising that many of those involved in the sex industry experience violence and exploitation, its objectives are to assist the police to bring to justice those who criminally exploit people and improve the safety and welfare of those whose engagement in the sex industry increases their vulnerability to exploitation.

122. In 2023, the digital form for referrals to the NRM by FROs was amended, reportedly without prior warning and guidance given to FROs, becoming longer and requesting additional information which is difficult to provide. As a result, making NRM referrals has become more complex and time consuming. As mentioned in paragraph 13, the number of referrals to the NRM has continued to increase, generating significant pressure on the victim identification system, particularly in England where the vast majority of the referrals are made.¹⁴³ The number of NGOs designated as FROs has not increased and they do not receive adequate resources to perform their role. This creates bottlenecks and delays, and some organisations have even temporarily stopped accepting NRM referrals. In a joint statement made in August 2024, NGOs called on the UK Government to provide them with funding to carry out their First Responder roles, extend the list of FROs, develop a nationwide training programme, and revise the digital NRM referral form in consultation with FROs.¹⁴⁴ According to the UK Government, efforts are ongoing to develop a First Responder toolkit and simplify the digital form for referrals, but there is no plan to amend the list of FROs.¹⁴⁵ In their comments on the draft report, the UK authorities indicated that the Home Office had made a number of improvements to the NRM referral form following a consultation that gathered over 450 survey responses and engagement with FROs, the Competent Authorities, the Human

[exchange-of-letters-december-2021.pdf](#); Letter from the 'Detention Taskforce', November 2021: https://labourexploitation.org/app/uploads/2021/11/Detention-Taskforce_-_Response-to-the-Immigration-Enforcement-Competent-Authority-signs.pdf.

¹⁴⁰ The latest version of the Modern Slavery guidance, updated on 2 June 2025, is available at: [Modern Slavery: statutory guidance for England and Wales \(under s49 of the Modern Slavery Act 2015\) and non-statutory guidance for Scotland and Northern Ireland \(accessible version\) - GOV.UK](#)

¹⁴¹ See also ATMG and ATLEU, *Fact sheet on Modern Slavery Reconsiderations*, March 2025. <https://www.antislavery.org/wp-content/uploads/2025/03/Briefing-Modern-Slavery-Reconsiderations-After-Exploitation-ATMG.pdf>

¹⁴² [Sex-work-national-police-guidance-2025.pdf](#).

¹⁴³ In 2024, 89% of NRM referrals were referred to police forces in England for investigation.

¹⁴⁴ More information available at: <https://bawso.org.uk/en/2024/08/joint-statement-non-statutory-first-responder-capacity-and-resources/>.

¹⁴⁵ See the letter from Jess Phillips MP, Minister for Safeguarding and Violence Against Women and Girls, to Rt Hon Dame Karen Bradley MP, April 2025. Available at: <https://committees.parliament.uk/publications/47622/documents/248850/default/>.

Trafficking Foundation, the IASC's Office, researchers, service designers and a trauma-informed specialist. The new online NRM form was launched on 30 April 2025. The updates to the form aim to improve the quality of referrals, support more informed decision-making and ensure the form better reflects the experiences of potential victims in a trauma-informed way. Quarterly FRO meetings are held to identify challenges faced by them, resolve issues and improve outcomes for potential victims.

123. The number of referrals to the NRM varies significantly across FROs. In 2024, most referrals were made by public authorities, such as UKVI (30.8%), Immigration Enforcement (14.7%), police forces (20%) and local authorities (22%). NGOs accounted for only 5% of referrals. The number of referrals made by the Border Force and the GLAA was very low. The rate of positive reasonable grounds referrals is lower for Home Office agencies: in 2023, 71% of referrals from Home Office FROs received a negative decision, compared to 31% from NGOs.¹⁴⁶ Available information suggests that the rate of positive decisions continues to be higher for UK nationals than foreign nationals.¹⁴⁷

124. First responders are trained by their respective organisations on making NRM referrals and the Home Office has also made available several e-learning training modules. However, the training is not mandatory, and the e-learning course has not been updated since the entry into force of the NABA. In Scotland, a toolkit for first responders on the NRM was prepared with the support of the Scottish Government.¹⁴⁸ GRETA was informed that due to lack of resources and capacities as well as insufficient training, FROs cannot fulfil their role timely and effectively. In their comments on the draft report, the UK authorities indicated that, to assist FROs, the Home Office has developed two e-learning modules. The First Responder module covers the indicators of modern slavery and what to do when First Responders encounter a potential victim. The child victim support module covers child-specific indicators of modern slavery, forms of exploitation that are particularly prevalent and safeguarding. As previously noted (see paragraph 122), the Home Office is in the process of developing a First Responder Toolkit to provide clear, user-friendly guidance.

125. In December 2024, the ICIBI published a report on the performance of the IECA since its establishment in 2021, which identified challenges in relation to the quality of decision-making, safeguarding measures and workforce management. The report recommended clarifying the process that decision makers should follow when considering that they have insufficient evidence.¹⁴⁹ All recommendations of the report were accepted by the UK Government, either fully or in part.¹⁵⁰

126. In 2024, 20 090 reasonable grounds decisions and 17 304 conclusive grounds decisions were taken, compared to respectively 10 665 and 2 866 in 2021. However, at the end of 2024, there were still around 23 000 cases in the NRM backlog, most of which concerned referrals to the SCA. The average time from referral to reaching a reasonable grounds decision was 9 days in 2024, but the procedure for conclusive grounds decisions continues to be extremely lengthy. At the end of December 2024, the average age of cases awaiting conclusive grounds decision was 630 days,¹⁵¹ with some victims waiting for more than 1 000 days. In 2024, the UK Government announced the provision of an additional £10 million funding for the recruitment of 200 more staff for the SCA in order to clear the backlog of cases within two years. In their comments on the draft report, the UK authorities indicated that new staff started arriving in December 2024 with the task of eradicating the backlog by December 2026. As of August 2025, 189 new decision makers had been recruited. The provisional data shared by the authorities shows that

¹⁴⁶ Source: NRM statistics and data tables for 2024.

¹⁴⁷ While official statistics on positive decisions are not disaggregated by country of origin, there is a lower percentage of positive reasonable grounds decisions by IECA which deals with adult foreign nationals referred to the NRM (36% in 2024), compared to SCA which deals with UK nationals and foreign children (57% in 2024).

¹⁴⁸ Available at: <https://staging.migrationscotland.org.uk/wp-content/uploads/2022/07/National-Referral-Mechanism-Toolkit-March-2021.pdf>.

¹⁴⁹ Available at: <https://www.gov.uk/government/news/inspection-report-published-an-inspection-of-the-immigration-enforcement-competent-authority-january-june-2024>.

¹⁵⁰ Available at: <https://www.gov.uk/government/publications/response-to-an-inspection-of-the-immigration-enforcement-competent-authority/home-office-response-to-the-icibis-report-an-inspection-of-the-immigration-enforcement-competent-authority>.

¹⁵¹ Source: NRM data for 2024.

as of 30 September 2025, there were 9 107 cases awaiting a conclusive grounds decision, which corresponds to a 55% decrease compared to 30 September 2024. As of 30 September 2025, the average age of cases awaiting a conclusive grounds decision was 141 days, a decrease of 80% (576 days) when compared to the total of 717 days on 30 September 2024.

127. In order to ensure the timely identification of child victims of trafficking, the UK authorities have continued to implement the Devolved Decision-Making Pilot.¹⁵² Currently covering 30 local authorities (out of a total of 382 in the UK), it consists in devolving NRM decisions concerning children to local multi-agency panels composed of representatives from local authorities, police and health professionals, except in cases of public order disqualification or when the age is disputed. The panels are supposed to take reasonable grounds decisions within 45 days and conclusive grounds decisions within another 45 days. Decisions, together with evidence, are sent to the SCA for review. During the visit, GRETA met members of the Devolved Decision-Making Pilot in Glasgow, who stated that decisions were usually taken within a few days and it was very rare that the SCA disagreed with them. The positive aspects of the Devolved Decision-Making Pilot have been acknowledged by the UK authorities.¹⁵³ In their comments on the draft report, the UK authorities stated that following an open competition launched in April 2025 to expand the pilot, there are now 27 pilot sites covering 39 local authorities in England, Wales and Scotland and all of Northern Ireland. City of Edinburgh Council have joined Glasgow City Council in the pilot to enable further testing of how the devolved approach to child decision-making works in Scotland while Northern Ireland will be adopting a regional model that will incorporate all six Health and Social Care Trusts. It is anticipated the majority of the new sites will have made their first NRM decisions by the end of 2026. The pilot has resulted in faster decision-making: between October 2023 and September 2024, the average time taken to reach a conclusive grounds decision was 101 days (compared to an average of 471 days for non-pilot children).

128. The positive effects of the Devolved Decision-Making Pilot are still limited to few local authorities and shortcomings in the identification of child victims persist. GRETA was informed that professionals have different understandings of what constitutes child trafficking and exploitation, which leads to cases not being referred to the NRM. The Telford Inquiry into child sexual exploitation (July 2024) established that a significant number of girls who are victims of sexual exploitation were not referred to the NRM due to lack of guidance for professionals on the intersections between child sexual exploitation, child criminal exploitation and human trafficking. The report recommended to adopt a definition of child criminal exploitation and child sexual exploitation.¹⁵⁴ A policy brief of the IASC made similar recommendations.¹⁵⁵ Further, in June 2025, a National Audit report on Group-based Child Sexual Exploitation and Abuse was published, analysing the UK authorities' response to the so-called 'grooming gangs' cases in England. The report notably underlines the lack of data and shortcomings in the sharing of information between safeguarding actors.¹⁵⁶ Very few children in these cases were identified as victims of trafficking and referred to the NRM.

¹⁵² See GRETA's 3rd report on the UK, paragraphs 224 and 285.

¹⁵³ See also the evaluation conducted by the UK Government: [An evaluation of the pilot to devolve decision-making for child victims of modern slavery - GOV.UK](#)

¹⁵⁴ Report available at: <https://www.telford.gov.uk/children-and-young-people/safeguarding-children/child-sexual-exploitation-cse/independent-inquiry-into-telford-child-sexual-exploitation-iitcse/>.

¹⁵⁵ IASC, *Child Exploitation: prevention, protection and support for children and young people*, policy brief, 2024.

¹⁵⁶ Available at: <https://www.gov.uk/government/publications/national-audit-on-group-based-child-sexual-exploitation-and-abuse>. 'Grooming gangs' involve groups of men targeting vulnerable adolescent children – mostly girls and often those in care, or children with learning or physical disabilities – grooming them into a love relationship and subsequently abusing and exploiting them sexually. In its second report on the UK (paragraph 108, GRETA mentioned large-scale organised sexual exploitation cases involving children in the North and centre of England.

129. In Northern Ireland, the number of identified child victims remains low. Only 53 possible victims have been referred to the NRM in Northern Ireland since data collection began in 2014. According to research on child criminal exploitation in Northern Ireland, none of the referrals to the NRM were children despite the acknowledgment that paramilitaries and organised crime groups exploit children and young people in Northern Ireland.¹⁵⁷ The report identified barriers such as the absence of legal duty to identify victims and lack of knowledge of the NRM. The authorities of Northern Ireland indicated that several measures are envisaged to address the gaps identified in the report, including the introduction of a statutory duty to refer possible victims and a new regional approach to devolved NRM decision-making for children (see paragraph 127). Further, as part of the Child Criminal Exploitation Action Plan (see paragraph 42) a Child Exploitation Toolkit was developed for professionals, and a full-time Child Criminal Exploitation Professional Officer was appointed in August 2024 in order to work with relevant stakeholders on the issue. As noted in paragraph 127, the Devolved Decision-Making Pilot is being expanded to cover the whole of Northern Ireland.

130. A series of measures have been taken by His Majesty's Prison and Probation Service (HMPPS) to improve the identification of victims in prisons in England and Wales, following a request for judicial review initiated by the NGO ATLEU. These include the publication in February 2023 of Modern Slavery Guidance for prison staff and prisoners, as well as a modern slavery needs assessment.¹⁵⁸ The HMPPS has also established a dedicated team at the central level to provide ongoing support to prison staff on modern slavery issues and Modern Slavery Single Points of Contact in all 122 prisons in England and Wales. In addition, the Salvation Army has delivered training for prison staff on identifying signs of human trafficking and the initiation of the NRM process. As a result, 368 suspected victims of trafficking were detected in prisons of England and Wales from March 2023 to June 2024. Work is ongoing to extend efforts to the probation service. In Scotland and Northern Ireland, there is no specific guidance for prison staff on modern slavery. GRETA was informed that the NGO Survivors of Human Trafficking in Scotland (SOHTIS) is working with prison staff to improve the identification of victims. In their comments on the draft report, the Scottish Government indicated that it has commenced preparatory work to deliver guidance to staff of the Prison Service. In Northern Ireland, the anti-trafficking NGO Flourish runs a three-year prison project as part of which it intervenes in prisons to support vulnerable persons.

131. During the evaluation visit, GRETA's delegation visited HMP Bronzefield near London, which is the largest women's prison in the UK (with a capacity of 527). GRETA was informed that upon arrival, all prisoners are asked questions which are intended to detect indicators of trafficking and if such indicators are present, subject to their consent, they are referred to the Salvation Army as a FRO for further interviews and possible referral to the NRM. The HMPPS may also flag to the prison that there is a possible victim. Further, prisoners are provided with information about human trafficking to enable them to self-identify. At the time of the visit, there were 6 prisoners who had received positive grounds decisions, 3 prisoners who had been referred to the Salvation Army for interviewing, 2 prisoners flagged as possible victims, and 1 prisoner who had received a negative decision.

132. GRETA welcomes the efforts made by the authorities to improve the identification of victims of trafficking in prisons, notably in England and Wales. However, as prison staff are not FROs, they are dependent upon existing First Responders which are overburdened (see paragraph 122), leading to significant delays in referring prisoners to the NRM. There are reportedly disparities in the response between prisons, and further training and capacity building are needed.

¹⁵⁷ Kane, G. and others, *Identifying modern slavery and human trafficking in the context of child criminal exploitation in Northern Ireland*, Modern Slavery and Human Rights Policy and Evidence Centre, Department of Justice of Northern Ireland, Ulster, University and IOM UK, June 2025. Available at: <https://www.modernslaverypec.org/resources/identifying-child-criminal-exploitation-northern-ireland>.

¹⁵⁸ Available at: <https://www.gov.uk/government/publications/modern-slavery-guidance>.

133. To facilitate the identification of victims among asylum seekers and refugees, guidance exists to screen asylum seekers and individuals in immigration detention for vulnerabilities and trafficking indicators. The relevant authorities (in particular Border Force, Immigration Enforcement, UKVI) have introduced safeguarding and appointed modern slavery officers/champions in order to assist colleagues when encountering an individual who may be a victim of trafficking. However, reports highlight shortcomings in the identification of victims among asylum seekers and irregular migrants, including lack of referrals despite the presence of trafficking indicators and opportunities to detect victims which are missed by officials.¹⁵⁹ The number of possible victims referred to the NRM by the Border Force is very low. There have been cases of asylum seekers denied victim status which were later reconsidered by UK courts, for instance in March 2025 in relation to a victim of trafficking for the purpose of kidnapping for ransom.¹⁶⁰ In their comments on the draft report, the UK authorities noted that the Safeguarding and Modern Slavery (SAMS) Border Force network was established in 2017 and currently has over 1 000 specialists. The authorities stated that every individual arriving by a small boat and claiming asylum undergoes a screening interview using a standard questionnaire which asks the applicant directly if they have been a victim of exploitation, including sexual exploitation, being forced to carry out work or forced to commit a crime. During this standard questioning, if there are trafficking indicators, Border Force officers are trained to ask further questions to gather more information to support an eventual referral to the NRM. As part of their three-day baseline training, all screening officers complete modules on modern slavery and human trafficking indicators and issues, as well as NRM and duty to notify actions. These are also covered in the foundation training delivered to all new Border Force staff and in refresher training and Advanced Interview Skills Training. Moreover, Irregular Migration Intake Unit staff undertake a three-day baseline training in safeguarding which covers modern slavery and human trafficking indicators, first responder responsibilities and the NRM. In addition, all Border Force staff are mandated to complete the Modern Slavery First Responders e-learning every two years.

134. In Kent, which has the highest number of small boat arrivals, GRETA was informed that 1 527 possible victims of trafficking were detected by staff of the Border Force in 2024, which corresponds to one in 10 arrivals. This suggests that more attention is being paid to detecting possible victims of trafficking compared to the previous year when the ICIBI conducted a re-inspection of the initial processing of migrants arriving on small boats and noted that no individuals had been recorded as adults at risk, despite claims they had been victims of modern slavery.¹⁶¹ At the Immigration Removal Centre (IRC) at Heathrow Airport which was visited by GRETA (see also paragraph 80), officials underlined that staff were making efforts to detect possible victims of trafficking, notably during the induction interview and medical checks done upon arrival. Around 200 referrals or duty to notify reports are made to the NRM per month. GRETA was told that this high number poses difficulties due to the limited staff resources and training of the IRC.

135. In July 2025, the UK and French Governments concluded an “Agreement on the Prevention of Dangerous Journeys” which facilitates the readmission to France of people arriving on small boats to the UK and, in exchange, provides for a safe route for entry to the UK of third-country nationals in France who want to apply for asylum in the UK. The aim is to ensure a balance between the number of people sent back to France and those arriving to the UK through the safe route. However, there are concerns that among the people returned to France there are potential victims of human trafficking. In

¹⁵⁹ See for instance: UNHCR, *Asylum Screening in the UK. An audit of the UK's asylum intake, registration and screening procedures and recommendations for change*, May 2023; UNHCR and the Red Cross, *At risk: exploitation and the UK asylum system*, August 2022; ICIBI, *Third annual inspection of Adults at Risk Immigration Detention*, January 2023.

¹⁶⁰ [2025] EWHC 447 (Admin). In this case, a Syrian national who had fled to Libya was kidnapped for the purpose of obtaining ransom from his family. The UK competent authority considered that the claimant's experience in Libya did not amount to modern slavery as he was not exploited as a result of the kidnapping and ransom demands. The EWHC overturned this decision considering that the authorities had adopted a too narrow approach and underlining that depending on the circumstances, kidnapping for the purpose of ransom, can amount to exploitation. Available at: [https://www.bailii.org/cgi-bin/format.cgi?doc=/ew/cases/EWHC/Admin/2025/447.html&query=\(duncan\)+AND+\(lewis\)+AND+\(solicitors\)](https://www.bailii.org/cgi-bin/format.cgi?doc=/ew/cases/EWHC/Admin/2025/447.html&query=(duncan)+AND+(lewis)+AND+(solicitors)).

¹⁶¹ Available at: <https://www.gov.uk/government/publications/a-re-inspection-of-the-initial-processing-of-migrants-arriving-via-small-boats-including-at-western-jet-foil-and-manston-january-february-2023>

September 2025, the High Court of England and Wales suspended the return of an Eritrean asylum seeker to France on the grounds that his trafficking claim in the UK was still pending. He had been referred to the NRM by Immigration Enforcement as a potential victim of trafficking in Ethiopia and Libya but was denied identification by the IECA and was awaiting reconsideration of his case. The Court considered that the asylum seeker would not be able to continue his trafficking claim from France and therefore would be deprived of the opportunity to get a positive reasonable grounds decision if returned to France. This decision was confirmed on appeal.¹⁶² GRETA recalls that pursuant to Article 10 of the Convention, States Parties have the obligation to take appropriate measures to identify victims of human trafficking. To this end, States Parties shall ensure that if the competent authorities have reasonable grounds to believe that a person has been trafficked, that person shall not be removed from the territory until the identification process has been completed.¹⁶³

136. GRETA acknowledges the challenges faced by the UK authorities in the context of the significant rise in the number of NRM referrals, and welcomes the steps taken to reform the NRM and increase the number of decision-making staff. Nevertheless, GRETA is concerned by the excessive length of the NRM decision-making process and the impact this has on victims who are left in a state of uncertainty, without access to the labour market and opportunities to rebuild their lives. The NRM has become increasingly complex, with a high threshold of proof, turning into a quasi-judicial mechanism that is very difficult for victims to navigate, especially without free legal aid when being referred to the NRM. The UK Government has recognised that there are systematic issues with the NRM and that it needs a fundamental reform. As foreseen by the Home Office Action Plan on Modern Slavery, the UK Government launched a public call for evidence on reforming the identification system which was open for 12 weeks and closed on 8 October 2025.¹⁶⁴ The UK Government will continue holding engagement sessions with key stakeholders, including survivors, first responders, law enforcement and prosecution services and devolved administrations. GRETA would like to be kept informed of the measures taken by the UK authorities to reform the NRM following the public consultation.

137. Moreover, GRETA is concerned by the negative impact of immigration legislation adopted in recent years (NABA and IMA) on the identification of victims of trafficking. Due to fear of detention and deportation, many victims of trafficking do not want to be referred to the NRM. This is evidenced by a report of the IASC published in May 2025, according to which an increasing number of possible victims refuse to give consent to a referral into the NRM. Further, the implementation of the public order disqualification has disproportionately affected victims of criminal exploitation who are not identified as victims and cannot benefit from support (see paragraph 261). In their comments on the draft report, the UK authorities stated that the purpose of the public order disqualification is to ensure that it is possible to withhold the protections and support of the NRM from individuals who pose a threat to national security or have been involved in serious criminality. Decisions are made on a case-by-case basis. The authorities also underlined that the application of Section 45 of the MSA (statutory defence, see paragraph 237) ensures that the criminal justice system can distinguish between perpetrators and those who have been exploited.

138. GRETA urges the UK authorities to take further steps to improve the identification of victims of trafficking in human beings, and in particular to:

- ensure that the identification procedure has a reasonable duration and is victim-centred;

¹⁶² [2025] EWCA Civ 1264. Available at : <https://www.judiciary.uk/wp-content/uploads/2025/10/CTK-v-Secretary-of-State-for-the-Home-Department-1.pdf>.

¹⁶³ See [Explanatory Report](#) of the Anti-trafficking Convention, see paragraph 132.

¹⁶⁴ More information available at: <https://www.gov.uk/government/calls-for-evidence/identification-of-victims-of-modern-slavery/call-for-evidence-background-information-accessible#introduction>.

- ensure that all individuals for whom there are reasonable grounds to believe that they are victims of trafficking are identified and referred for support, irrespective of their immigration status (see also the recommendation in paragraph 82);
- ensure that persons referred to the NRM are not removed from UK territory until the completion of the identification process, in compliance with Articles 10 and 13 of the Convention.

139. Further, GRETA considers that the UK authorities should:

- continue rolling out the Devolved Decision-Making Pilot;
- provide further resources to First Responders so that they can effectively and timely perform their role;
- provide guidance and training to prison staff in Scotland and Northern Ireland to enable the detection and referral of victims in prisons;
- provide further guidance and training to professionals on the identification of child victims of trafficking (see also the recommendation in paragraph 55);
- continue providing training to, and strengthen the capacities of, the Competent Authorities so that they can improve the quality of decision-making.

b. Assistance to victims

140. As described in previous GRETA reports, in England and Wales, adult victims of trafficking referred to the NRM receive assistance under the Modern Slavery Victim Care Contract (MSVCC) which is periodically tendered by the Home Office and has been repeatedly awarded to the Salvation Army as the prime contractor.¹⁶⁵ In order to provide support across England and Wales, 13 NGOs are subcontracted by the Salvation Army. The minimum length of support under the MSVCC has been reduced following the entry into force of the NABA. Victims are currently entitled to a recovery period of at least 30 days (previously it was 45) after a positive reasonable grounds decision, followed by a move-on period of at least 45 days (previously 90 days) after a positive conclusive grounds decision. In practice, the length of support is much longer given the delays in obtaining a conclusive grounds decision. In their comments on the draft report, the UK authorities stated that the Recovery Needs Assessment process ensures MSVCC support continues, in part or in full, after the positive conclusive ground decision, where necessary until other services are able to meet any ongoing recovery needs arising from their modern slavery experiences or until the victim has no such ongoing recovery needs. On 9 July 2025, the UK Government launched a tender for a new Support for Victims of Modern Slavery (SVMS) contract, in replacement of the MSCVCC. As part of the SVMS contract, service providers will be required to assign a support worker to each user and to provide appropriate and safe accommodation, means-tested financial support and psychological assistance.

¹⁶⁵ See GRETA's 3rd report on the UK, paragraph 271.

141. In England and Wales, access to a safe house and other support under the MSVCC prior to a reasonable ground decision is possible on an emergency basis to prevent destitution, if victims cannot be accommodated through other services such as those provided by local authorities or the asylum system. An individual will not be considered to be destitute if they have the right to homelessness assistance by the local authority, have recourse to public funds, or have claimed asylum and are supported under Section 4(2) of the Immigration and Asylum Act 1999. In practice, the number of victims provided with MSVCC accommodation is low compared to the number of victims receiving outreach support.¹⁶⁶ Some civil society actors consider that there is a lack of transparency on the reasons why victims are denied accommodation under the MSVCC. In their comments on the draft report, the UK authorities stated that the Home Office has published guidance on how decisions are taken on an individual's accommodation needs at every stage of their NRM journey.

142. Access to appropriate and secure accommodation remains challenging for victims who are British nationals and victims with regular immigration status, including refugees, who should be supported by the local authorities. Their status of possible or confirmed victims of trafficking does not give them a priority right to accommodation. An assessment of their vulnerability has to be made by the local authority in order to determine whether they should be provided with accommodation. In addition, there is a significant shortage of places and long waiting lists for accommodation provided by the local authorities, and the housing conditions and safety standards are usually lower than those in safe houses under the MSVCC. In their comments on the draft report, the UK authorities indicated that British potential victims and those with a regular immigration status are entitled to MSVCC accommodation if they do not have suitable accommodation or are at risk of re-exploitation. The authorities stated that if such victims receive a positive conclusive grounds decision, they can be supported by the MSVCC to access longer term housing. Local authorities can determine that a modern slavery victim has a priority need for housing under existing legislation if they are assessed as vulnerable as per the Homelessness Code of Guidance.¹⁶⁷

143. With a view to reducing vulnerabilities and risks of homelessness of persons referred to the NRM who are destitute after leaving the NRM following a negative decision, in March 2024, the Home Office issued Modern Slavery Victim Care Contract Assessing Destitution Guidance. Pursuant to it, the transitioning ('move-on') period to exit the NRM was extended from 9 to 14 working days.

144. Access to long-term support remains a challenge for victims of trafficking as the MSVCC is envisaged as a temporary support. Victims continue to face difficulties in transitioning to independent living. A Recovery Needs Assessment (RNA) has to be prepared for confirmed victims in order to identify their needs during the move-on period, support their safe exit from the NRM and avoid risks of being re-trafficked or becoming destitute or homeless. A tailored transition plan should be prepared for each confirmed victim by support workers, and Guidance on RNA has been published by the Home Office. However, the RNA process is reportedly overly complex and bureaucratic, and can lead to re-traumatisation.¹⁶⁸ There are an increasing number of victims who become homeless after exiting the NRM and are at a risk of re-trafficking. In their comments on the draft report, the UK authorities stated that to ensure that the overall package of support is tailored to the individual's specific needs, relevant documentation may be requested to support the RNA process, but victims are only asked to provide the most crucial information about their needs and are supported by their support worker to provide this information. The Reach-In service is available to help confirmed victims maintain their independence and there is no time limit to the support that is provided under the Reach-In service. Individuals with a positive conclusive grounds decision who have exited the main MSVCC support service are eligible to be considered for re-entry to MSVCC support through self-referral if their circumstances change.

¹⁶⁶ In September 2023, 13% (1,000) adult survivors were in MSVCC accommodation. 87% (6,837) were receiving outreach support. Source: Human Trafficking Foundation, *The Key Issue: Housing for Survivors of Modern Slavery*, October 2023.

¹⁶⁷ [Chapter 8. Homelessness code of guidance for local authorities - Chapter 25: Modern slavery and trafficking - Guidance - GOV.UK](#)

¹⁶⁸ ATMG, *One day at a time. A report on the Recovery Needs Assessment by those experiencing it on a daily basis*, April 2022. Available at: https://www.antislavery.org/wp-content/uploads/2022/04/RNA_One_Day_At_A_Time.pdf.

145. According to the last annual report on the MSVCC, from June 2023 to June 2024, 2 741 possible victims were supported, which corresponds to a 22% decrease compared to the previous 12-month period.¹⁶⁹ This decrease could be explained by the new immigration legislation and the increase in the threshold to access the NRM.

146. In Scotland, the victim support programme remains as described in the previous GRETA reports.¹⁷⁰ Access to support is available for 90 days or longer in some circumstances. Some support is also available prior to entering the NRM. Two NGOs continue to be subcontracted by the Scottish Government: TARA, providing support to female victims who were trafficked for commercial sexual exploitation, and Migrant Help, providing support to all other adult victims. Provision of long-term support is available through the NGO SOHTIS which also receives funding from the Scottish Government.

147. In Northern Ireland, the Government has delegated support to two NGOs: Belfast and Lisburn Women's Aid, and Migrant Help. Following a revision of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act in 2022, the provision of support after the conclusive grounds decision was extended to 12 months or more, depending on the individual circumstances of the victim. GRETA welcomes this development.

148. Risk assessments and recovery plans are prepared by the support providers, in consultation with the victims. Several NGOs noted that there is a need for the MSVCC to better take into account the needs of LGBTI persons and persons from ethnic minorities, and that specific services should be envisaged for the children of victims. In their comments on the draft report, the UK authorities indicated that while the MSVCC is primarily designed for adult victims of modern slavery, it recognises the need to support victims' dependants, who may be entitled to accommodation, financial assistance and access to education (for children of school age). For child dependants, support is provided by the local authority where needed.

149. GRETA was informed that there are safe houses for victims with specific needs, including victims with disabilities and victims with children. If the disability or care needs of a victim cannot be accommodated in a safe house, the Salvation Army co-ordinates with the Home Office and the local authority to find alternative accommodation. However, local authorities sometimes consider that accommodation is the responsibility of the MSVCC and MSVCC support workers have to make extra efforts to convince them otherwise. In 2021-2022, the Care Quality Commission was commissioned by the Home Office to inspect all MSVCC safe houses and assess the quality of outreach services. The Commission recommended improvements to the assessment of risks, suitability and accessibility of the safe house estate but was overall positive about the provision of support.¹⁷¹ In Scotland, Migrant Help's safe house can accommodate victims with disabilities. TARA's safe houses are not accessible for persons with disabilities, but GRETA was informed that an emergency hotel accessible to people with disabilities can be provided while the NGO works with local authorities to find suitable accommodation.

150. Victims who are asylum seekers are entitled to accommodation under the National Asylum Support Service. GRETA was informed that in England and Wales, the Salvation Army works with the Home Office to ensure that appropriate accommodation is provided to them. However, an assessment of whether the accommodation is appropriate for a victim of trafficking is often not conducted and victims are often placed in hostels, hotels or large-scale accommodation, sometimes in very precarious conditions and far from their network of support.¹⁷² Particular concerns have been raised about the Wethersfield reception centre where a number of male victims of trafficking are placed in conditions akin to detention and in

¹⁶⁹ 61% of service users were male, 39% female and less than 1% transgender. 64% had experienced labour exploitation, 19% sexual exploitation, 10% criminal exploitation, 6% domestic servitude, and less than 1% organ removal. Available at: <https://indd.adobe.com/view/a0b7cbf3-b8d6-4cf8-959b-9fbc3ad1b43b>.

¹⁷⁰ See GRETA's 3rd report on the UK, paragraph 276.

¹⁷¹ Available at: <https://www.cqc.org.uk/publications/services-survivors-human-trafficking-and-modern-slavery>.

¹⁷² UNHCR and the Red Cross, *At risk: exploitation and the UK asylum system*, August 2022.

overcrowded premises, without appropriate access to health care.¹⁷³ In their comments on the draft report, the UK authorities stated that although asylum accommodation is provided on a no-choice basis, individuals with a positive reasonable grounds decision (as well as persons identified as vulnerable) are not suitable for military barracks or for room sharing and are accommodated in other parts of the asylum estate, pursuant to the Decent Homes Standards.¹⁷⁴

151. As mentioned in paragraphs 130 and 134, an increasing number of victims of trafficking are identified in immigration detention centres and prisons. In 2021, the Home Office's Adults at Risk in Immigration Detention Guidance was amended to allow for the detention of victims to be continued if the risk to them in detention was "balanced" by immigration control factors. The Modern Slavery Guidance for prison staff states that an assessment of the needs of the victims should be conducted within 5 days after receiving a positive decision, but it does not specify if and under what conditions victims could be released. In practice, victims are rarely released upon receiving a positive conclusive grounds decision, but only when their prison term or immigration detention period ends. In their comments on the draft report, the Scottish authorities mentioned that, in October 2023, a Memorandum of Understanding was concluded by the Crown Office and Procurator Fiscal Service (COFPS) with the NGOs TARA and Migrant Help to ensure that potential victims of trafficking receive support immediately after their release from custody or prison.

152. Following the introduction of the 'public order disqualification' by the NABA (see paragraphs 120 and 255), possible or confirmed victims of trafficking may be detained after having been disqualified from the NRM, but the competent authorities do not necessarily share this information with the prison authorities. This precludes the implementation of appropriate safeguarding measures in detention.¹⁷⁵ Further, even when released from prison, victims who have been convicted of a criminal offence are very likely to fall under the 'public order disqualification' clause.

153. Access to health care and psychological assistance for victims of trafficking is provided through the public healthcare systems (NHS or its equivalent in the devolved countries). GRETA was informed that across the UK, there has been an increase in the number of victims of trafficking with complex psychological needs, but access to psychological assistance is challenging due to long waiting lists. As noted in paragraph 140, the MSVCC contract will be replaced by the new SVMS contract in 2027. Under the new contract, victims will be entitled to psychological assistance, including a mental health assessment by a qualified healthcare professional. Should the assessor deem local NHS service waiting times do not align to the urgency of the identified need, the victim would be in scope to receive short-term therapeutic support. In Scotland, the Anchor Service (NHS Greater Glasgow and Clyde) is funded by the Scottish Government to provide psychological services to adult victims of human trafficking and exploitation (£265 000 in 2025/26).

154. Access to work remains very limited for victims of trafficking. Victims who are irregular migrants are unable to work whilst they are in the NRM process, until such time as they receive a positive conclusive grounds decision which may entitle them to a residence permit. While the Convention allows State Parties to limit the right to work to victims who are lawfully resident within its territory, the fact that it takes such a long time for a victim to access this right makes it in practice ineffective. GRETA reiterates that restrictions on the right to work prevent victims from recovering their autonomy and dignity, and affect their decision on whether to enter the NRM or remain in a situation of exploitation (see also paragraph 68). In their comments on the draft report, the UK authorities stated that support workers through the MSVCC actively work with victims to support them with their employment and to access services of the Department for Work and Pensions (DWP). DWP work coaches are trained to tailor employment and

¹⁷³ See for instance: <https://helenbamber.org/resources/reportsbriefings/what-cost-ongoing-harm-caused-men-seeking-asylum-held-wethersfield>; <https://helenbamber.org/resources/reportsbriefings/ghettoised-and-traumatised-experiences-men-held-quasi-detention>.

¹⁷⁴ <https://www.gov.uk/government/publications/a-decent-home-definition-and-guidance>

¹⁷⁵ Jovanović, M. and others, *Tackling the blind spot of the UK anti-slavery regime. The Role and responsibility of prisons in securing the rights of modern slavery survivors*, November 2023. Available at: <https://www.modernslaverypec.org/resources/modern-slavery-uk-prisons>.

benefit support based on individual conversations and to be sensitive to the unique challenges faced by modern slavery victims. Where a victim is also seeking asylum, they may be eligible to work in jobs on the Immigration Salary List if their claim has been outstanding for 12 months or more through no fault of their own.

155. Child victims of trafficking receive support through the local authorities. Contrary to adults, they do not have access to specialised support as victims of trafficking but are treated as any other “looked after children”, except for the provision of an Independent Child Trafficking Guardian (ICTG) when available. As noted previously, local authorities face significant challenges due to the lack of sufficient financial and material resources which negatively affects their capacity to provide effective support to child victims of trafficking. In their comments on the draft report, the UK authorities specified that child social care services are funded through the Local Government Finance Settlement. As part of the Settlement, the UK Government is providing local authorities with £5.9 billion to be distributed via the Social Care Grant, an increase of £880 million from 2024-25. Pursuant to the Department for Education’s statutory guidance documents the ‘Care of unaccompanied migrant children and child victims of modern slavery’ and ‘Working together to safeguard children’ (2018), where children are found to be victims of modern slavery or identified as a potentially trafficked child, a lead practitioner assesses the child’s needs and draws up a care plan which sets out how the local authority intends to respond to the full range of the child’s needs as a victim of modern slavery. This should happen regardless of any NRM decision about the child. The Department for Education’s Families First Partnership Programme, backed by over £500 million per year over the next three years (from 2025-26), is rolling out reforms to family help and multi-agency child protection. Funding will be increased by at least £300 million between 2026-27 and 2027-28, as part of the £555 million investment from the Transformation Fund.

156. Victims who are unaccompanied children seeking asylum or other child victims under the care of local authorities are placed in hotels, hostels or unregulated accommodation, and many go missing. While there are no official statistics on the number of trafficked children who go missing, a report by the NGOs ECPAT UK and Missing People published in April 2022 estimated that one in three trafficked children were reported missing from care. The report identifies the lack of safe accommodation, shortcomings in age assessment and fear of immigration detention as factors that increase the risks of children going missing and being re-trafficked.¹⁷⁶ As mentioned in paragraph 52, some preventive measures have been taken by the UK authorities, including forbidding the recourse to hotels or hostels for unaccompanied children aged 15 and below.

157. In England and Wales, child victims of trafficking are assigned an Independent Child Trafficking Guardian (ICTG). This service, delegated by the UK Government to the NGO Barnardo’s, is still covering only two third of local authorities in England and Wales (there are some 60-70 guardians).¹⁷⁷ The Home Office Action Plan on Modern Slavery makes the rollout of the ICTG service a priority and a tender for the contract to provide national coverage in England and Wales of the ICTG service was launched in September 2025. In Scotland, until 2023, unaccompanied child victims of trafficking were supported by the Scottish Guardianship Service. Since 2023, following the adoption of the Human Trafficking and Exploitation (Scotland) Act 2015 (Independent Child Trafficking Guardians) (Scotland) Regulations 2023, this non-statutory service was replaced by a statutory service of Guardianship Scotland which is available throughout Scotland and provides ICTG to all unaccompanied asylum-seeking children, victims of trafficking and children vulnerable to trafficking. This ICTG service has been delegated to the NGOs Aberlour Children’s Charity and Scottish Refugee Service. In Northern Ireland, children who are victims of trafficking or vulnerable to it, as well as all unaccompanied children, have access to legal guardians of the Independent Guardian Service.

¹⁷⁶ <https://www.ecpat.org.uk/news/one-in-three-trafficked-children-go-missing-from-local-authority-care>.

¹⁷⁷ See GRETA’s 3rd report on the UK, paragraph 287.

158. Child victims of human trafficking continue to face significant challenges as they transition to adulthood. In theory, after turning 18, they can continue receiving support through local authorities if they meet the criteria for care leavers. They can also be eligible for support under the MSVCC if they consent to it. According to civil society, the number of children turning 18 who consent to remain in the NRM and receive support under the MSVCC is low.¹⁷⁸ The IASC considers that the UK Government should review the policies for children transitioning into adulthood within the NRM and amend the Modern Slavery Statutory Guidance and the MSVCC in this regard.¹⁷⁹ The Home Office Action Plan on Modern Slavery indicates that the Government will consult with civil society on possible measures to improve transition rates of children in the NRM once turning 18, including improving the provision of information to children and updating the Statutory Guidance. In their comments on the draft report, the UK authorities indicated that the updated Modern Slavery Statutory Guidance under preparation will include changes to the consent process to remain in the NRM upon turning 18, and development of two tailored information packs for children approaching adulthood within the NRM and for professionals supporting them. Further, the Scottish authorities underlined that support from independent guardians can continue until the age of 26, and that unaccompanied children who are victims of trafficking can remain in foster, kinship or residential care placement until 21 and are eligible for Aftercare until the age of 26.

159. GRETA considers that the UK authorities should take additional steps to ensure that all assistance measures provided for in the Convention are guaranteed in practice, and in particular:

- improve victims' access to long-term support in England and Wales;
- ensure that specialised assistance is provided to all child victims and victims who are transitioning to adulthood;
- provide secure and appropriate accommodation to victims of trafficking who are asylum seekers and unaccompanied or separated children;
- make the Independent Child Trafficking Guardianship (ICTG) scheme operational across the whole territory of England and Wales;
- increase funding to support providers, including local authorities, so that they can provide appropriate assistance to victims of trafficking;
- ensure victims' timely access to psychological assistance;
- allow access to work to possible victims of trafficking if they have not received a conclusive grounds decision after the expiration of the term for making such a decision.

¹⁷⁸ ATMG, *Breaking Barriers: Supporting young victims of human trafficking transitioning to adulthood*, May 2024. Available at: https://www.antislavery.org/wp-content/uploads/2024/05/ATMG_Transition-to-adulthood_final_May-24.pdf.

¹⁷⁹ IASC and ECPAT, *Child Trafficking in the UK 2024: a snapshot*, December 2024; IASC, *Child Exploitation: prevention, protection and support for children and young people*, Policy brief, 2024.

3. Substantive criminal law and procedural law

160. The Convention places on States Parties a series of obligations aimed at enabling the effective prosecution of traffickers and ensuring that they are punished in a proportionate and dissuasive manner. As the implementation of these provisions of the Convention was examined in detail by GRETA during the preceding evaluation rounds, given the focus of the fourth round, particular attention is paid to the notion of “abuse of a position of vulnerability” and its application in case-law. Further, GRETA has decided to examine as part of the fourth evaluation round the application of Article 19 of the Convention on the criminalisation of the use of services of victims of trafficking.

a. Notion of “abuse of a position of vulnerability” in the law and case-law

161. Abuse of a position of vulnerability is an integral part of the international legal definition of trafficking in human beings and is central to any understanding of trafficking.¹⁸⁰ It is one of the means by which trafficking acts are committed and is relevant to all forms of trafficking and all exploitative purposes. Abuse of a position of vulnerability occurs when “an individual’s personal, situational or circumstantial vulnerability is intentionally used or otherwise taken advantage of, to recruit, transport, transfer, harbour or receive that person for the purpose of exploiting him or her, such that the person believes that submitting to the will of the abuser is the only real or acceptable option available to him or her, and that belief is reasonable in light of the victim’s situation.”¹⁸¹

162. The notion of “abuse of a position of vulnerability” is not part of the offence of human trafficking in any of the relevant legislation in the UK. In the MSA 2015, the “means” component of the Convention’s definition of human trafficking is limited only to one form of exploitation, “securing services etc.”, by force, threats or deception, or because the person is a child, is mentally or physically ill or disabled, or has a family relationship with another person.¹⁸² Further, for the purpose of determining whether a person committed the offence of slavery, servitude and forced or compulsory labour, regard may be given to any of the personal circumstances of the victim that make him or her vulnerable, such as being a child, family relationship, or mental or physical illness.¹⁸³ As noted in GRETA’s second report on the UK, the UK authorities maintain that the offence of human trafficking does not specify the “means” by which the person must arrange or facilitate travel, but all of the “means” listed in the Convention could be taken into account when investigating and prosecuting offences under the MSA 2015.¹⁸⁴ A decision of the Court of Appeal ruled that force or compulsion can take subtler forms of psychological nature, such as threats to denounce to the authorities a worker whose employment status is illegal.¹⁸⁵ Pursuant to the sentencing guidelines on the MSA, the deliberate targeting of a victim who is particularly vulnerable due to age or other reason should be considered as an aggravating factor.

163. Similarly, in Scotland, pursuant to Section 1(7) of the Human Trafficking and Exploitation Act 2015, the “means” component is only mentioned in relation to securing services and benefits through force, threat or deception, but “abuse of a position of vulnerability” is not specifically mentioned.

¹⁸⁰ See UNODC Issue Paper *Abuse of a position of vulnerability and other “means” within the definition of trafficking in persons*, United Nations, April 2013, p. 3.

¹⁸¹ UNODC [Guidance Note](#) on “abuse of a position of vulnerability” as a means of trafficking in persons in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime.

¹⁸² See Section 3 (5) and (6) of MSA.

¹⁸³ See Section 1 (4)(a) of MSA.

¹⁸⁴ See GRETA’s 2nd report on the UK, paragraph 262.

¹⁸⁵ *R v Rooney (Martin Senior)* [2019] EWCA Crim 681.

164. In Northern Ireland, the offence of human trafficking in Section 2 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act 2015 does not refer to any means. For the offence of slavery, servitude and forced or compulsory labour (Section 1), regard may be given to the personal circumstances of the victims, such as if they are children or vulnerable persons. According to the authorities, “a person is vulnerable if, as a result of their situation or circumstances, they are unable to take care of or protect themselves or others from harm or exploitation.” The Policy for Prosecuting Cases of Modern Slavery and Human Trafficking of the Public Prosecution Service (PPS) of Northern Ireland, adopted in 2022, refers to the notion of “abuse of a position of vulnerability” in international law and underlines that the means used by traffickers may be subtle, such as when the victim has an emotional attachment to the trafficker, is totally dependent on those who are exploiting them due to age or disability, or is under threat of cultural practices such as Juju or Voodoo rituals. It is also specified that it should be considered as an aggravating factor if the victim is a child or a vulnerable person, or if the perpetrator abused a position of trust.

165. According to the UK authorities, the abuse of the victim’s vulnerability is taken into account when investigating, prosecuting and adjudicating cases of THB. By way of example, in a recent case of human trafficking for the purpose of organ removal, the judge considered as an aggravating factor the fact that the victim was particularly vulnerable due to his young age, isolation from his family and situation of poverty.¹⁸⁶

166. Following the adoption of the NABA in 2022, a definition of victim of trafficking was introduced in the Slavery and Human Trafficking Regulations 2022, which refers to “abuse of a position of vulnerability” as one of the means for committing human trafficking, and is used by the competent authorities to identify victims.¹⁸⁷

b. Investigation, prosecution and sanctions

167. According to the National Crime Agency (NCA), modern slavery and human trafficking remain among the most serious criminal threats in the UK and are one of the agency’s strategic priorities.¹⁸⁸ The NCA redrafted its National Control Strategy for Serious and Organised Crime and Strategic Action Plan specific to Modern Slavery and Human Trafficking in 2025, with delivery starting in April 2025. Both outline modern slavery and human trafficking as a strategic priority, with the Strategic Action Plan setting out key deliverables across UK law enforcement in tackling the threat, whilst complementing the Home Office’s Action Plan. These deliverables include actions such as NCA international leadership and engagement with law enforcement in key priority countries, establishing and improving investigative frameworks and guidance for UK law enforcement, and system leadership through setting roles, responsibilities and operational guidance to more effectively tackle organised crime groups and key enablers in the UK and upstream. Further, in November 2024, the National Police Chiefs’ Council (NPCC) and the National County Lines Coordination Centre (NCLCC) launched a Disrupting County Lines Strategy 2024-2027. It includes among its goals to pursue offenders by implementing intelligence-led approaches, focusing on arresting and charging those controlling drug lines and developing capabilities to tackle online threats.

168. The NCA has continued to co-ordinate the project AIDANT, which involves a series of targeted law enforcement operations aimed at tackling modern slavery threats and enablers.¹⁸⁹ Operations are run nationally, with four operations undertaken each calendar year involving local police forces working alongside partner agencies. GRETA was informed that during the reporting period, several AIDANT investigations focused on adult service websites (see also paragraph 201). Further, in England and Wales, the Home Office has been funding the Tackling Organised Exploitation (TOEX) Programme, an intelligence capability that provides dedicated expertise in support of police forces undertaking complex investigations

¹⁸⁶ <https://www.judiciary.uk/wp-content/uploads/2023/05/R-v-Obeta-and-others-sentencing-remarks.pdf>.

¹⁸⁷ Slavery and Human Trafficking (Definition of Victim) Regulations 2022, Section 3 (5) (iv).

¹⁸⁸ See the National Action Plan of the NCA for 2024-2025.

¹⁸⁹ See GRETA’s 3rd report on the UK, paragraph 138.

in the field of modern slavery and human trafficking, organised migrant smuggling, county lines, adult and child sexual abuse and exploitation. TOEX teams are embedded within each of the nine Regional Organised Crime Units. There is also a dedicated team covering London and a national team in the NPCC which oversees regional activity. Funding of TOEX has been secured for 2025-2026, and there are plans to expand the programme's support to frontline investigators. During the visit, many interlocutors praised the activities of the TOEX programme, particularly in relation to trafficking facilitated by information and communication technologies.

169. According to official statistics (see Appendix I), in England and Wales, there were 3 553 ongoing investigations into modern slavery and human trafficking in December 2022, 3 360 in December 2023 and 2 728 in December 2024. Most of them related to criminal exploitation (2 183 in 2022, 1 946 in 2023 and 1 621 in 2024). There were 466 completed prosecutions and 332 convictions in 2021, 405 prosecutions and 282 convictions in 2022, 410 prosecutions and 311 convictions in 2023, and 454 completed prosecution and 353 convictions in 2024. The conviction rate remains relatively high (76% of prosecutions resulted in a conviction between July 2023 and June 2024).¹⁹⁰ In Scotland, the number of investigations for human trafficking was 75 in 2021, 44 in 2022, 133 in 2023 and 141 in 2024, without indications of the types of exploitation. There were also 32 prosecutions and 7 convictions in 2021-2023. While most prosecutions concerned cases of labour exploitation (23 cases), there was only one conviction for this form of exploitation. In Northern Ireland, 14 investigations into modern slavery and human trafficking were launched in the period from 1 January 2021 to November 2023, all but one of which concerned sexual exploitation. There were 8 cases prosecuted in 2021-2024 and 6 convictions, all of them related to sexual exploitation.

170. Over the past years, the UK authorities have given priority to the fight against irregular migration in law enforcement activities, to the detriment of human trafficking and modern slavery. The human resources of the Modern Slavery and Human Trafficking Unit of the NCA have been reduced by 50% since 2021 in order to shift resources to tackling organised migrant smuggling, in line with government priorities. The inquiry report of the House of Commons noted that some police officers and prosecutors preferred to focus on easier cases in order to secure prosecution, and that prosecutors sometimes waited for the outcome of the NRM process to decide on charges, which could take several years (see paragraph 126).¹⁹¹ Further, human trafficking cases are often (re)qualified as lesser offences in order to ensure conviction of perpetrators.¹⁹² During the visit, GRETA was informed that an internal review was ongoing in Scotland in relation to human trafficking cases that did not lead to a prosecution. In their comments on the draft report, the Scottish authorities underlined that only where there is insufficient evidence of human trafficking will prosecutors consider prosecution of an alternative offence.

171. Following the approval of the draft report on the UK in July 2025, GRETA received a submission from a group of survivors ('No One Above')¹⁹³ regarding an investigation launched by the Metropolitan Police into allegations of sexual exploitation and abuse by the former owner of the luxury department store Harrods in London, Mohamed Al Fayed, who died in 2023, and the involvement of possible accomplices. This investigation was launched following complaints lodged by nearly 60 women (the number has increased over time) and relates to decades of alleged abuses. The submission states that the women were recruited, often under the guise of legitimate employment, and harboured and transported to controlled environment for the purpose of sexual exploitation. Several means of coercion were apparently used, including abuse of power, economic dependency, deception, intimidation, surveillance, confiscation of passports, and non-consensual medical checks. The abuses were reportedly facilitated by the involvement of the personnel and resources of Harrods's corporate infrastructure. The

¹⁹⁰ Heys, A. and others, *Barriers to prosecutions and convictions under the Modern Slavery Act 2015*, Modern Slavery & Human Rights PEC, May 2025. Available at: <https://www.modernslaverypec.org/resources/prosecutions-modern-slavery-act>.

¹⁹¹ Available at: <https://publications.parliament.uk/pa/cm5804/cmselect/cmhaff/124/summary.html>.

¹⁹² Heys, A. and others, *Barriers to prosecutions and convictions under the Modern Slavery Act 2015*, Modern Slavery & Human Rights PEC, May 2025. Available at: <https://www.modernslaverypec.org/resources/prosecutions-modern-slavery-act>.

¹⁹³ <https://www.nooneabove.org/>.

authors of the submission express concern over the fact that the Metropolitan Police decided not to investigate the case as human trafficking but as isolated sexual assaults, despite the presence of all the elements of the crime and the involvement of an organised trafficking enterprise. GRETA notes that in November 2025, an investigation was opened in France on the grounds of aggravated human trafficking for similar allegations of abuses committed by the former owner of Harrods and the involvement of possible accomplices.¹⁹⁴

172. GRETA refers to an inspection report published in 2023 concerning the handling of cases of sexual and criminal exploitation of children by the Metropolitan Police. According to the report, in the majority of cases analysed (244 in total) the response of the police was inadequate and ineffective, with delays in action being taken, lines of enquiry not being followed, poor supervision of investigations, and failure to identify the link between children going missing and human trafficking. In September and October 2024, a follow-up inspection visit was conducted. It concluded that the Metropolitan Police had improved its policy and guidance on children going missing, focused more on child exploitation, and developed training and awareness raising of staff on victim blaming language.¹⁹⁵

173. With a view to addressing the low number of prosecutions for criminal exploitation under the MSA and closing the gap between the scale of the threat and the enforcement response to it, the UK Government has proposed to introduce the criminal offence of child criminal exploitation as part of the Crime and Policing Bill (see also paragraphs 19 and 48).¹⁹⁶ Pursuant to Clause 40 of the Bill, an adult who engages in conduct towards or in respect of a child with the intention of causing the child to engage in criminal conduct, commits a criminal offence and can be liable to imprisonment for a maximum 10 years. Further, Clause 56 of the Bill proposes to introduce an offence of ‘cuckooing’, according to which a person who exercises control over the dwelling of another person for the purpose of using it to commit offences without the consent of that other person, is liable to imprisonment for a maximum of 5 years or a fine (or less under summary conviction). In their comments on the draft report, the UK authorities stated that the new offence of child criminal exploitation is necessary to increase convictions against exploiters, deter gangs from enlisting children, and improve the identification of victims. By introducing this offence, the police will be provided with an additional tool to tackle criminal exploitation which reflects more specifically the harm done to child victims and recognises offenders more clearly as exploiters of children. In addition, providing a clear and dedicated criminal offence of cuckooing and coerced internal concealment will allow to identify and prosecute those who encourage or cause others to conceal items in a way which is harmful and dangerous to themselves. Likewise, a new ‘cuckooing’ offence will target an appalling practice associated with violence, exploitation and anti-social behaviour in which children and vulnerable adults are commonly exploited.

174. According to research, there is high reliance on victims’ testimonies to secure convictions in trafficking cases, and alternative methods of building cases through financial investigations and intelligence-led approaches are under-developed due to limited resources, training and prioritisation within law enforcement agencies.¹⁹⁷ In England and Wales, the guidance on modern slavery of the Crown Prosecution Service (CPS) contains some indications on how to prosecute without the victim’s testimony. While there is no such guidance in the Policy for Prosecuting Cases of Modern Slavery and Human Trafficking of the Public Prosecution Service (PPS) of Northern Ireland, GRETA was provided with the example of Operation Liverless which concerned several victims from Brazil who had been trafficked to Northern Ireland for the purpose of sexual exploitation.¹⁹⁸ In this case, the prosecution was only based on the investigation done by the police, including online and financial investigation, as the victims were not able to provide testimonies. GRETA was informed that the accused pleaded guilty and their sentencing remain pending. To strengthen financial investigations, the NCA has worked closely with the banking

¹⁹⁴ More information at: <https://www.bbc.com/news/articles/cpv17g0e72ko>.

¹⁹⁵ Reports available at: <https://hmicfrs.justiceinspectorates.gov.uk/publications/metropolitan-police-service-handling-of-sexual-and-criminal-exploitation-of-children-causes-of-concern-revisit/>.

¹⁹⁶ See the Home Office Action Plan on Modern Slavery for 2025-2026.

¹⁹⁷ Heys, A. and others, *Barriers to prosecutions and convictions under the Modern Slavery Act 2015*, Modern Slavery & Human Rights PEC, May 2025.; see also the reports of the House of Lords and House of Commons.

¹⁹⁸ More information on the case available at: <https://www.bbc.com/news/uk-northern-ireland-63706632>.

sector through the Joint Money Laundering Intelligence Taskforce to identify red flags in financial transactions and alert these to the authorities. Additionally, all NCA investigations have allocated Financial Investigation capabilities. The Modern Slavery and Organised Immigration Crime Unit (MSOICU) also recruited a Financial Crime Specialist to support forces in financial investigations. As part of the Turnstone Project, the MSOICU is working to establish a nationally trained Financial Investigation network and delivers bespoke financial investigator courses, as well as a series of lunch and learn online sessions which commenced in August 2025 and will continue into March 2026. In Scotland, the police's trafficking units use financial and special investigation techniques in all THB investigations, police officers have had financial investigation training and there is a dedicated financial analyst. The Proceeds of Crime Unit within the COPFS will instruct further investigation where necessary with the focus on securing confiscation orders.

175. One of the main challenges for criminal justice professionals relates to the engagement of victims in the proceedings, which is affected by fear from the perpetrators as well as from the authorities, particularly for those with insecure or irregular migration status. There are also reports of police officers using victim-blaming language or methods of communication that are not trauma informed.¹⁹⁹ In their comments on the draft report, the Scottish authorities underlined that specialist trained officers, such as Sexual Offences Liaison Officers, have trauma-informed training, and that a trauma-informed strategy is being designed and implemented for all officers in Police Scotland. Further in March 2025, the COPFS launched two specific e-learning modules on trauma-informed justice.

176. The UK authorities have supported and funded several initiatives of civil society organisations with a view to improving victims' participation in criminal proceedings. Since 2018, the NGO Justice and Care has deployed Modern Slavery Victim Navigators in several police forces of England and Scotland. Victim navigators act as a bridge between the victim and the criminal justice authorities and can be involved from a very early stage in the investigation. They provide specialised care and support to victims and strategic advice into criminal investigations. According to Justice and Care, since the beginning of the programme up until November 2022, 92% of victims supported by victim navigators chose to engage in police investigations, compared to 44% of similar cases without such support.²⁰⁰ In Scotland, GRETA met with the two victim navigators embedded in the national human trafficking unit of the police, thanks to funding from the Scottish Government. The positive role played by victim navigators to facilitate victims' engagement and improve the outcomes of the proceedings has been acknowledged and there are calls to extend this service throughout the UK. Another initiative has been set up by the NGO Hope for Justice, which since 2021 has deployed Independent Modern Slavery Advocates (IMSA) to provide individual support for victims, including in the framework of criminal proceedings, and act as a co-ordinating focal point for all professional and services involved in the case. Further, in Wales, one member of staff of the anti-trafficking NGO BAWSO has been seconded to the police in order to assist in criminal investigations.

177. New sentencing guidelines under the MSA entered into force for England and Wales in October 2021. According to them, offenders in a leading role who expect substantial financial advantage and who expose victims to an extremely high risk of death, should be sentenced to imprisonment of up to 18 years. There is also guidance on how to assess the harm caused to victims in case they are unwilling or unable to give evidence.²⁰¹ However, NGOs met by GRETA underlined that sentences are often not commensurate with the gravity of the exploitation and the vulnerability of the victim, notably in child trafficking cases. In England and Wales, between July 2023 and June 2024, imprisonment of 63.5 months (around 5.2 years) was imposed on average on perpetrators of human trafficking, while under the MSA

¹⁹⁹ Heys, A. and others, *Barriers to prosecutions and convictions under the Modern Slavery Act 2015*, Modern Slavery & Human Rights PEC, May 2025; see also: <https://hmicfrs.justiceinspectorates.gov.uk/publications/metropolitan-police-service-handling-of-sexual-and-criminal-exploitation-of-children-causes-of-concern-revisit/>;

²⁰⁰ <https://justiceandcare.org/app/uploads/2023/01/JC-Victim-Navigator-Programme-Overview.pdf>

²⁰¹ More information available at: <https://www.sentencingcouncil.org.uk/news/item/new-sentencing-guidelines-for-modern-slavery-offences-published/>.

they can be liable to life imprisonment.²⁰² In Northern Ireland, the authorities indicated that sentences ranged from 9 months to 5 years' imprisonment. In Scotland, the average length of sentences in the period July 2023 - June 2024 was 8 years (2 convictions).

178. As mentioned in previous GRETA reports, Slavery and Trafficking Risk Orders (STROs) and Prevention Orders (STPOs) can be issued, respectively, by the police and courts to those who pose a risk of harm from committing modern slavery offences in future.²⁰³ They are currently available in England, Wales and Scotland. In Northern Ireland, preventive orders can be issued and, following the revision of the Human Trafficking and Exploitation Act in 2022 (see paragraph 20), risk orders shall be introduced through a future regulation which is expected to be adopted in 2026. Further, the Crime and Policing Bill proposes to introduce prevention orders in case of child criminal exploitation. GRETA notes that while STROs and STPOs are of particular importance to allow the criminal justice system to prevent harm from happening, they are underused due to lack of awareness and limited resources, and there is a need for guidance and training in this regard.

179. With a view to improving the criminal justice response to THB, the Home Office Action Plan 2025-2026 envisages developing a national framework for investigations of modern slavery which should be available in all local police forces and include best practices that police officers should employ at every stage of the investigation to secure better outcomes, including with regard to financial investigation and engagement with victims. The National Policing Lead for Modern Slavery and Organised Immigration Crime will lead work to develop a new national framework for the investigation of modern slavery. The framework, Project Turnstone, will draw on the learnings from MSOIC delivering the programme over the years, to identify, develop and test the practices that improve criminal justice outcomes. It will set out the practices that police officers should employ at every stage of the investigation to secure better outcomes and will be made available to all local police forces in England and Wales on a digital platform. It is also planned to commission research on the nexus between organised migrant smuggling and human trafficking, and to strengthen the collection and sharing of modern slavery data and intelligence. In Northern Ireland, the Human Trafficking and Exploitation Strategy 2024-2027 includes among its objectives to enhance operational co-ordination and early engagement between the human trafficking unit of the police and the Public Prosecution Service.

180. GRETA welcomes the measures taken by the UK authorities to improve the criminal justice response to human trafficking, but notes the need for increased prioritisation and resources, better co-ordinated approach among law enforcement and other agencies, and strengthened guidance and training.

181. GRETA considers that the UK authorities should continue strengthening the criminal justice response to human trafficking, including by:

- reinforcing financial investigations and the use of special investigative techniques in order to gather material, documentary, financial and digital evidence and not having to rely exclusively on testimony by victims or witnesses;
- ensuring that human trafficking offences are investigated and prosecuted as such, rather than as lesser offences, every time the circumstances of the case allow this, and lead to effective, proportionate and dissuasive sanctions for those convicted;
- providing further training and guidance to investigators, prosecutors and judges on ensuring effective investigations, prosecutions and convictions in human trafficking cases, as well as on trauma-informed communications with victims;

²⁰² Heys, A. and others, *Barriers to prosecutions and convictions under the Modern Slavery Act 2015*, Modern Slavery & Human Rights PEC, May 2025.

²⁰³ See GRETA's 3rd report on the UK, paragraphs 154 and 42.

- expanding victim navigators in order to improve victims' participation in the criminal proceedings across the country;
 - analysing the reasons for the low number of prosecutions and convictions for other purposes of exploitation than sexual exploitation in Scotland and Northern Ireland.
- c. Protection of victims and witnesses in criminal proceedings

182. As mentioned in the previous GRETA reports on the UK, special protection measures can be taken to protect victims of trafficking in the framework of criminal proceedings pursuant to the relevant legislation applicable in England, Wales, Scotland and Northern Ireland.²⁰⁴ These include screening the witness from the accused, giving evidence by live link, giving evidence in private, video recorded evidence-in-chief and video recorded cross-examination or re-examination. In England and Wales, the national roll-out of the pre-recorded cross examination, which was announced during the previous evaluation round, was completed in 2022.²⁰⁵ Risks and needs assessments are carried out by the police or the prosecution at different stages of the proceedings to decide on the application of protective measures.

183. With a view to facilitating the provision of information and support to victims engaged in criminal proceedings, there are victim liaison units at the CPS and the Victim Contact Scheme (England and Wales), Victim Information and Advice Service at the level of the Crown Office and Procurator Fiscal Service (Scotland), and Witness Care Unit in the PPS (Northern Ireland). Further, as mentioned in paragraph 176, modern slavery victim navigators have been deployed in some police forces of England and Wales to support victim participation in the criminal proceedings. As part of their functions, they advocate before the criminal justice authorities for the implementation of special protection measures for victims.

184. According to civil society, while there is a reasonable understanding of some of the special protection measures, such as screens and live link, understanding of other measures is patchy and victims are not clearly explained what special measures are available. GRETA was informed that in cases of child criminal exploitation, special protection measures are not always applied. When cases are (re)qualified under lesser offences, victims are not eligible for special protection measures.

185. In their comments on the draft report, the UK authorities referred to Section 17(4) of the Youth Justice and Criminal Evidence Act 1999 (YJCEA), pursuant to which a victim of a sexual offence or victims of offences under Sections 1 and 2 of the MSA are automatically eligible for assistance unless they wish to opt out. Under Section 28 of the YJCEA, victims can pre-record their cross-examination before trial where their evidence in chief has also been recorded and they meet the criteria of Section 17(4) of the YJCEA. This can also be used alongside other special measures such as giving evidence over a live link, using privacy screens so that victims cannot see the defendant while they give evidence and clearing the court of all non-essential personnel. The use of Section 28 for victims of modern slavery was rolled out to all Crown Court centres in England and Wales on 26 September 2022. This allows vulnerable victims and witnesses to have their cross-examination and re-examination to be video-recorded before the full trial, away from the court room and on average within 3 to 6 months of charge. Issues relating to human trafficking are specifically addressed in the current training programme of the Judicial College at seminars on sentencing and on long and complex trials. The College also produces resources which summarise recent developments in the criminal law and reported cases of importance.

²⁰⁴ See GRETA's 3rd report on the UK, paragraphs 180-181.

²⁰⁵ More information available at: <https://www.gov.uk/government/publications/impact-evaluation-of-pre-recorded-cross-examination>.

186. On 17 September 2025, the Scottish Parliament passed the Victims, Witnesses and Justice Reform (Scotland) Act. With a view to improving the experience of victims and witnesses in the justice system, the Act introduces, *inter alia*, the office of Victims and Witnesses Commissioner, embed trauma-informed practice in criminal and civil courts, increase the availability of special measures for vulnerable witnesses and parties in civil court, and create a new sexual offences court. Further, efforts have been made to further develop the Barnahus Model ('Bairn hoose') in Scotland. A three-phased project plan includes the adoption of Barnahus standards and the setup of new pilot sites. Further, in Northern Ireland, the Justice Minister conducted a consultation on proposals for a Victims and Witnesses Crime Bill in November 2024-February 2025. According to the authorities, the proposals received broad support, and a Bill is scheduled for introduction to the Northern Ireland Assembly in early 2026.

187. While welcoming the availability of a broad range of special protection measures, GRETA considers that the UK authorities should make full use of all available measures to protect victims and witnesses of THB and to prevent intimidation during the investigation, as well as during and after court proceedings.

d. Criminalisation of the use of services of a victim

188. In England and Wales, the use of services of victims of trafficking, with the knowledge that the person is a victim of trafficking, is not criminalised. In their reply to the questionnaire, the authorities underlined that it would be difficult for a user to know that the person is exploited. Section 53A of the Sexual Offences Act 2003 criminalises the payment for sexual services of a person who is forced, coerced or threatened, with a fine not exceeding £1 000. As this is a summary offence, the police retain the discretion not to arrest or report to the prosecutor those suspected of committing the offence, or to charge them without reporting to a prosecutor. There are no official statistics on the activity of the police in relation to Section 53A, but only in relation to cases sent to courts, of which there were three in the last three years. According to the authorities, it is challenging to enforce the offence because of the evidential threshold which requires proof that the suspect made or promised a payment and that a third party engaged in exploitative conduct, and probably also requires direct evidence from the victim or a witness. According to the IASC, the Sexual Offences Act 2003 is failing to deter sex buyers, partly due to lack of enforcement, and the legislation should be looked at afresh to ensure that it is fit-for-purpose and applied correctly to tackle demand for sexual exploitation.²⁰⁶

189. The use of services of a trafficked person is not criminalised in Scotland and Northern Ireland. Nevertheless, as mentioned in paragraph 87, Northern Ireland is the only part of the UK where paying for sexual services is a criminal offence, punishable with a fine and/or one year of imprisonment. The sentence is aggravated if the victim is a child.²⁰⁷ According to the information available, there were 21 charges and one conviction for this offence between 2018 and 2023.²⁰⁸

190. GRETA considers that the UK authorities should adopt a legal provision criminalising the use of all services which are the object of exploitation as referred to in Article 4 of the Convention, with the knowledge that the person is a victim of THB.

²⁰⁶ IASC, *Violence Against Women and Girls: protecting female victims of modern slavery*, Policy brief, 2024.

²⁰⁷ Section 15 of the Human Trafficking and Exploitation Act (Northern Ireland).

²⁰⁸ Source: <https://www.bbc.com/news/uk-northern-ireland-67802849>.

IV. Addressing human trafficking facilitated by information and communication technology (ICT)

191. Countries monitored by GRETA have reported an increased use of information communication technologies (ICT) for recruiting and controlling victims of trafficking. In 2022, GRETA conducted a study to assess the extent to which technology impacts trafficking and explore the operational and legal challenges that states face in detecting, investigating and prosecuting online and ICT-facilitated trafficking.²⁰⁹ As highlighted by the study, the impact of technology is particularly acute in relation to the recruitment and exploitation of victims, including their control throughout the different stages of the trafficking process. This study highlighted a number of challenges to the identification, investigation and prosecution of THB cases due to the high volume of online activities and the associated high volume of digital evidence, the use of encrypted communications, nicknames and aliases, and the time-consuming process of acquiring evidence from private companies and/or other jurisdictions. At the same time, anti-trafficking stakeholders are using technological innovations to prevent human trafficking, protect victims, and prosecute traffickers. It is therefore essential to invest in human capital and technological tools to harness the potential of ICT for effectively combating human trafficking.

192. In the UK, according to the 2025 National Strategic Assessment of the National Crime Agency (NCA), the threat of serious and organised crime has continued to increase, with technology being both the driver and enabler of this trend.²¹⁰ Both state and non-state actors have noted an increasing use of ICT to recruit victims of trafficking, facilitate exploitation and control victims, particularly since the COVID-19 pandemic. Social media and classified advertising platforms are used to recruit victims through fraudulent and misleading job offers. After initial contact is created by the victim responding to one of these offers, exchanges continue through closed channels and encrypted messaging apps. This method is particularly used by traffickers for recruiting victims of sexual exploitation and labour exploitation. In relation to criminal exploitation, recruitment of victims is often initiated through social media by offenders portraying a lifestyle to attract vulnerable persons.

193. Adult service websites (ASWs) are considered as significant enablers of trafficking for the purpose of sexual exploitation, with traffickers using these websites to advertise the services of trafficked persons. The UK authorities underlined that, in recent years, some platforms have embedded policy changes to prevent traffickers using their services, such as the use of third-party ID verification services, and preventing a single payment card purchasing advertising space for multiple profiles. However, these initiatives are voluntary. According to a research report of 2023, regulation must increase responsibility of ASWs in relation to modern slavery and human trafficking, through ID verification and reporting tools, mandatory and proactive data sharing, safeguarding policies and proactive content moderation.²¹¹

194. The Online Safety Act was adopted in 2023 with a view to preventing and reducing the presence of harmful contents online and strengthening the duties of online service providers, including social media companies and adult service websites. The Act has introduced a list of priority offences, including human trafficking, facilitation of prostitution for gain, and child sexual exploitation and abuse, for which online service providers are obliged to put in place the necessary systems and processes to identify, assess and address these offences based on a risk assessment. Further, the biggest social media companies have the duty to set out clearly in their Terms and Conditions how they will address harmful contents and enforce these consistently.

²⁰⁹ Paolo Campana, *Online and Technology-Facilitated Trafficking in Human Beings*, Council of Europe: <https://rm.coe.int/online-and-technology-facilitated-trafficking-in-human-beings-full-rep/1680a73e49>, published in April 2022.

²¹⁰ <https://www.nationalcrimeagency.gov.uk/nsa-overview-of-soc-2025>.

²¹¹ Sanders, T. and others, *The role of adult service websites in addressing modern slavery*, Modern Slavery and Human Rights PEC, University of Leicester and Unseen, November 2023. Available at: <https://www.modernslaverypec.org/resources/adult-services-websites>.

195. The Office of Communication (Ofcom), which is responsible for ensuring the implementation of the Online Safety Act, has enforcement powers to ensure that companies comply with their obligations, including fines of up to £18 Million or 10% of qualifying annual global turnover (whichever is higher) and business disruption measures. In order to assist companies in implementing their duties, Ofcom has published tools and voluntary codes of practice, for example one on handling complaints and resolving disputes. The NCA is supporting Ofcom with its policy development around best practice and effective specific measures for ASWs. There are calls for Ofcom to set up minimum standards and detailed guidelines for ASWs to improve their modern slavery detection and eradication, including ID and consent verification.²¹²

196. According to NGOs, co-operation with some social media platforms can be challenging, notably when information is shared which could put survivors or a safe house location at risk, and there is a lack of response from the platform to remove this information.

197. Awareness raising on online and safety risks is conducted for children in schools, notably through the “relationships, sex and health education” (RSHE) course or its equivalent in the devolved administrations (see paragraph 45). Further, a Child Exploitation and Online Protection (CEOP) Command operates under the NCA as a multi-agency law enforcement and child protection centre specialised in online child sexual exploitation. Children can contact CEOP directly to report online sexual abuse or other behaviour. The CEOP education team also provides training and information sessions for children, parents, carers and professionals to raise awareness and increase confidence in identifying and reporting online sexual abuse. In Scotland, a national campaign was conducted in 2022 to support parents and carers to help keep children safer online, and the authorities launched an Online Safety Hub and a Child Sexual Abuse and Exploitation Hub to provide resources to parents. Police Scotland also co-ordinates a multi-agency group on preventing online child sexual abuse and exploitation in order to develop knowledge, support partners’ campaigns and maximise exposure of the issue. Nevertheless, NGOs underlined that, across the UK, there is insufficient digital education for children and parents or carers on ICT and on how they are used by traffickers to recruit and exploit victims. They also noted that professionals working with children received limited training on risks of trafficking online.

198. The authorities have supported several civil society initiatives aimed at preventing online trafficking and exploitation. For example, under the Tackling Violence Against Women and Girls strategy, the Home Office committed to providing £1.36 Million to the NGO Changing Lives for its Net-Reach project, which aims to tackle violence against women and girls online, providing early intervention and targeted support for women and girls at high-risk of commercial online exploitation and the risk on online sexual harm.²¹³

199. There are many examples of research projects and public-private initiatives in the UK exploring the critical intersection of technology and human trafficking and the opportunities posed by technology in disrupting human trafficking networks. Tech against Trafficking²¹⁴ is a coalition of technology companies working with civil society, academia, technologists and persons with lived experiences to advance the use of technology to prevent, disrupt, and reduce human trafficking and to address the misuse of technology to facilitate trafficking. Another example is the NGO Stop the Traffik,²¹⁵ which has partnered with IBM to develop a global trafficking data hub enabling the aggregation and analysis of large datasets from various sectors, including law enforcement, NGOs and private companies, to identify trafficking hotspots and patterns. The project RESTART, funded by the Modern Slavery PEC, and implemented by Aberystwyth University in cooperation with civil society organisations (Causeway and FiftyEight) and the private company Trilateral Research, looked at how AI can be used to improve support to survivors.

²¹² Ibid.; see also the report of the House of Lords on the Modern Slavery Act.

²¹³ More information available at: <https://www.changing-lives.org.uk/find-support/net-reach-programme>.

²¹⁴ <https://techagainstrafficking.org/>

²¹⁵ <https://stopthetraffik.org/what-we-do/our-story/>

200. Limited information was provided by the authorities in relation to prevention of online risks associated with labour exploitation. GRETA was informed that, in 2024, Stop the Traffik launched a campaign targeting Romanian speakers living, working and/or visiting London to reduce risks of labour exploitation in different sectors. A campaign was also created offline for Albanian speakers.²¹⁶

201. Law enforcement agencies have continued to intensify the monitoring of online platforms and adult services websites to prevent and identify cases of human trafficking or child sexual exploitation online. The NCA leads a multi-agency 'online enabler working group' which seeks to improve the standards on technological platforms that enable exploitation, prioritising those with the greatest impact, and approaching moderators to understand how they address risks, and influence them to do more. The NCA is also the leader of the "Online enablers of THB" action under the European Multidisciplinary Platform against Criminal Threats (EMPACT). As mentioned in paragraph 168, in recent years, intensification activities under the Project AIDANT of the NCA have focused on online trafficking and adult services websites. The authorities underlined that during recent AIDANT operations, the NCA produced and circulated guidance to UK police forces to initiate open-source intelligence research on websites and social media platforms deemed to present a high risk of being misused for victim recruitment.

202. Efforts are being made by police forces across the UK to use specialised web crawlers and other technology tools to detect human trafficking and collect and analyse digital evidence. As mentioned in paragraph 168, the Programme TOEX operates at national and regional level to support investigations of serious and organised crime with specialised tools and expertise. TOEX has developed several digital tools, in particular TOEX Translate and TOEX Transcript, which are often used by police forces in investigations.²¹⁷ There is also an adult service website referral pilot, where adverts on these platforms are referred to TOEX capability for analysis. GRETA was informed of several successful investigations of human trafficking and child exploitation which were supported by TOEX. Recently, following an increase in incidents where the supply of vapes were being used as an incentive for grooming, TOEX Northeast team conducted Operation Everett to identify any links between the supply of vape devices to underage/vulnerable persons and child sexual exploitation and/or child criminal exploitation.²¹⁸

203. In Scotland, the Police's Human Trafficking Units have dedicated intelligence support and work with internal partners in cyber units. Efforts are ongoing to introduce Digital Evidence Sharing Capability which will facilitate the exchange of digital evidence between police forces, prosecutors and courts. In Northern Ireland, prosecutors specialised in human trafficking participated in a training organised by the Cyber Support Unit of the Police Service to improve their knowledge on cyber-related issues.

204. The UK has been a party to the Council of Europe Convention on Cybercrime (Budapest Convention) since 2011 and has signed, but not yet ratified, its Second Additional Protocol on enhanced co-operation and disclosure of electronic evidence.

205. GRETA welcomes the efforts made by the UK authorities to address risks and cases of human trafficking facilitated by ICT, notably through intensified police operations and the use of specialised digital investigative tools, as well as through the adoption of the Online Safety Act which has strengthened responsibility of online service providers in relation to THB-related content online. It notes, however, that there are challenges that need to be addressed. The House of Commons' report on Human Trafficking noted that technology companies have little incentive to change current practices and there is a need for more collaboration between platforms, the police and third sector organisations.²¹⁹

²¹⁶ See Stop the Traffik's annual report for 2024.

²¹⁷ TOEX Translate is a secure tool for the bulk translation of extracted foreign language text from seized mobile devices. TOEX Transcript is a transcription tool for the conversion of audio / video media to text, saving vast amounts of officer and staff administration time. More information available at: <https://www.toexprogramme.co.uk/supporting-forces/toex-tools>.

²¹⁸ More information available at: <https://www.rocu.police.uk/news/2025/March/commitment-to-tackling-serious-and-organised-crimes-linked-to-vapes/>.

²¹⁹ Available at: <https://publications.parliament.uk/pa/cm5804/cmselect/cmhaff/124/summary.html>.

206. GRETA considers that the UK authorities should develop further measures aimed at addressing human trafficking facilitated by ICT, and in particular:

- strengthen co-operation with ICT companies and Internet service providers, and develop data-sharing procedures with companies holding relevant data;
- reduce risks of human trafficking facilitated by adult services websites, notably by strengthening their regulation and monitoring compliance with their obligations under the Online Safety Act.

207. Furthermore, GRETA invites the UK authorities to:

- continue investing in capacity building and digital tools to conduct proactive investigations in cases of human trafficking. This should involve training of law enforcement officers, labour inspectors and financial police officers in the areas of Internet monitoring and online investigation, such as cyber-patrolling, undercover online investigation, and social network analysis, in order to identify victims of human trafficking recruited and/or exploited online;
- ratify the Second Additional Protocol to the Convention on Cybercrime on enhanced co-operation and disclosure of electronic evidence.

V. Follow-up topics specific to the United Kingdom

1. Legal assistance and free legal aid

208. In its 3rd report on the UK, GRETA urged the authorities to take further steps to ensure that victims of human trafficking receive legal assistance during the identification procedure and are properly informed of their rights and options before entering the NRM, and that access to free legal aid is provided across the UK and in a timely manner, as well as for state compensation procedures.²²⁰

209. The legal framework on victims' access to legal assistance and free legal aid remains as described in the 3rd GRETA report. After being referred to the NRM, following a reasonable grounds decision, victims have access to free legal aid. In England and Wales, free legal aid can only be performed by a registered lawyer who holds a procurement contract either in relation to civil or criminal matters.²²¹ In Scotland and Northern Ireland, free legal aid can be provided by any registered practitioner. Free legal aid is granted based on means and merits tests. In England and Wales, following revision of the Means Assessment Guidance of the Legal Aid Agency in November 2024, financial payments received by victims under the MSVCC are no longer taken into account in the financial resources of victims.²²² Despite this change, according to NGOs supporting victims, the resource test continues to exclude many victims from access to free legal aid if they have a source of income, however modest. Victims must prove their lack of assets not only in the UK but also abroad, which can be difficult.²²³

210. There has been a considerable decrease in legal aid providers since 2012 when the Legal Aid, Sentencing and Punishment Offenders Act was passed. GRETA was informed that several law firms with

²²⁰ See GRETA's 3rd report on the UK, paragraphs 92-93.

²²¹ For civil issues: claims against public authorities, clinical negligence, community care, housing and debt, discrimination, education, family, immigration, mental health, public law, welfare benefits, and family mediation. For criminal issues, the tender is general.

²²² More information available at: <https://www.gov.uk/government/news/victims-given-greater-access-to-justice-through-legal-aid-reform>.

²²³ Gauci, J.P., and others, *Impact of lack of legal advice on adults with lived experience of modern slavery*, Modern Slavery and Human Rights Policy Evidence Centre, British Institute of International and Comparative Law and Unseen, January 2023, p. 16-17. Available at: https://www.biicl.org/documents/158_legal_advice_full_report.pdf.

a procurement contract for free legal aid stopped assisting victims of trafficking considering that the fixed fees paid to legal aid providers are not commensurate with the complexity of THB cases and the time lawyers must devote to them. Support workers assisting victims of trafficking reportedly spend a great part of their time trying to secure legal aid for victims.

211. In November 2024, the UK Government announced an additional £20 million per year for free legal aid in England and Wales in cases related to housing and debt, as well as immigration and asylum, in order to increase the overall spending in these categories by 24% and 30%, respectively.²²⁴ In addition, in December 2024, a 6% increase in legal aid fees for criminal cases was announced for work in police stations and youth courts, as well as for the reimbursement of lawyers' travel time. In May 2025, the UK Government also launched a public consultation on legal aid in criminal cases, which is expected to result in an additional increase of up to £92 million. GRETA welcomes these increases, but notes that they do not concern legal aid providers in compensation claims against perpetrators.

212. In Scotland and Northern Ireland, efforts are being made to offset shortages of legal aid providers through the provision of public funding or dedicated programmes designed to provide legal advice to victims of trafficking.²²⁵ The Scottish Government funds the NGO JustRight Scotland to provide legal advice and representation to victims of trafficking through the Scottish Anti-Trafficking & Exploitation Centre (£43 000 in 2025/26). This service is available to children and adults who are victims of trafficking and exploitation in Scotland and covers a wide range of areas, including the identification process, applications for international protection, compensation from the perpetrators and state compensation, labour law, criminal proceedings, immigration and citizenship. However, GRETA was informed that this programme has limited capacity and is not sufficient to cover all victims. In Northern Ireland, the Department of Justice funds the NGOs Migrant Help and Belfast and Lisburn Women's Aid to organise the provision of legal assistance and legal aid to victims.

213. With the exception of Scotland, access to free legal aid is still not available during the identification procedure or when applying for the reconsideration of a negative decision. As noted in paragraph 136, it has become increasingly difficult for victims of trafficking to navigate the NRM process which requires them to provide detailed evidence of their trafficking experience. As a result, it is essential for victims to receive legal advice before and during the identification process. The NABA introduced the possibility to grant free legal aid prior to reasonable grounds decisions for victims whose immigration status is questioned, but this provision has not yet entered into force.

214. Access to legal assistance prior to the NRM is not only a matter of protecting victims, but also a means of improving the efficiency and speed of the identification process. The ICIBI noted in a report issued in 2024 that the quality of referrals improved when possible victims had access to legal advice.²²⁶ When referrals are of good quality, this reduces the burden on the competent authorities and shortens the identification process.

²²⁴ More information available at: <https://www.lawsociety.org.uk/topics/legal-aid/civil-legal-aid-first-increase-to-fees-in-28-years-welcomed>.

²²⁵ Gauci, J.P., and others, *Impact of lack of legal advice on adults with lived experience of modern slavery*, Modern Slavery and Human Rights Policy Evidence Centre, British Institute of International and Comparative Law and Unseen, January 2023, p. 22.

²²⁶ ICIBI, *An inspection of the Immigration Enforcement Competent Authority (January - June 2024)*, December 2024, p. 14 and 61. Available at: <https://www.gov.uk/government/news/inspection-report-published-an-inspection-of-the-immigration-enforcement-competent-authority-january-june-2024>

215. Free legal aid remains unavailable for proceedings before state compensation schemes, except in Scotland or if a request for Exceptional Case Funding (ECF) is granted by the relevant legal aid agency in England and Wales.²²⁷ The UK authorities maintain that applying for state compensation does not require the assistance of a lawyer. The application form for compensation from the Criminal Injuries Compensation Authority (CICA), competent for England, Wales and Scotland, has been simplified and can be completed online. Further, guidance for applying for ECF has been updated in England and Wales. Despite these measures, NGOs supporting victims of THB continue arguing that applying for state compensation is complex and only applications supported by lawyers are successful. In April 2025, the High Court of England and Wales ruled that the refusal to grant ECF to four victims of trafficking for their application before CICA would be in breach of Article 6 of the European Convention of Human Rights (ECHR). The Court considered that because the victims had nobody to assist them in completing the form, had serious mental health issues, and did not have sufficient command of English, they would not be able to effectively apply for state compensation without legal aid.²²⁸

216. While welcoming the steps taken to increase the amount of funding allocated to legal aid providers, GRETA is concerned by the continuing difficulties encountered by victims of THB in accessing legal assistance and free legal aid. This has negative repercussions on their identification, access to compensation and the application of the non-punishment principle. It may also increase risks of homelessness, forced removal, as well as re-trafficking, and contribute to victims' anxiety and poor mental health.²²⁹

217. GRETA once again urges the UK authorities to take steps to improve access to legal assistance and free legal aid for victims of human trafficking, in particular by:

- ensuring the provision of legal assistance to possible victims during the identification process and prior to entering the NRM;
- ensuring access to free legal aid across the UK and in a timely manner;
- ensuring that legal aid is available for the procedure before the Criminal Injuries Compensation Schemes, by expanding the eligibility criteria and/or facilitating access to Exceptional Case Funding.

2. Compensation

218. In its 3rd report on the UK, GRETA urged the authorities to guarantee effective access to compensation for victims of trafficking, including by enabling victims who are undocumented migrants and domestic workers to exercise their right to compensation, and ensuring that victims of labour exploitation can obtain more than two years owed in National Minimum Wage. In relation to state compensation, GRETA urged the authorities to enable victims to effectively exercise their right within reasonable time, and to ensure that the amount is not made dependent on the victim's co-operation with the authorities or prior convictions.²³⁰

²²⁷ See GRETA's report on the UK, paragraphs 78-83.

²²⁸ HJK & Ors, R (On the Application Of) v Director of Legal Aid Casework [2025] EWHC 774 (Admin) (01 April 2025). Available at: [https://www.bailii.org/cgi-bin/format.cgi?doc=/ew/cases/EWHC/Admin/2025/774.html&query=\(HJK\)](https://www.bailii.org/cgi-bin/format.cgi?doc=/ew/cases/EWHC/Admin/2025/774.html&query=(HJK)).

²²⁹ ATLEU, '*It has destroyed me*': A legal advice system on the brink, October 2022. Available at: <https://respect.international/wp-content/uploads/2022/10/%E2%80%98It-Has-Destroyed-Me-A-Legal-Advice-System-on-the-Brink.pdf>; Gauci and others, *Impact of lack of legal advice on adults with lived experience of modern slavery*, Modern Slavery and Human Rights PEC, British Institute of International and Comparative Law and Unseen, January 2023, p. 31-38.

²³⁰ See GRETA's 3rd report on the UK, paragraphs 132-133.

219. There have been no changes to the legal provisions for claiming compensation.²³¹ As explained in previous GRETA reports, victims of THB can obtain compensation from the perpetrators upon conviction through a compensation order, provided that they acted as witnesses in the case, through Slavery and Trafficking Reparation Orders (STROs) which exist in the legislation of England, Wales and Northern Ireland and allow, after conviction, direct compensation of victims of trafficking from confiscated assets, or through a civil claim or an employment tribunal claim.

220. In relation to England and Wales, the Sentencing Guidelines on modern slavery and human trafficking were revised in October 2021. They recall that the court must consider whether to make a STRO and if none is made the judge must give the reason.²³²

221. There is no data on the number of victims who were granted compensation or reparation orders by criminal courts. GRETA was informed that the number of victims of trafficking who are granted compensation through compensation or reparation orders remains low. According to a policy brief of the IASC published in 2022, between 2015 and April 2022, a total of 206 confiscation orders with a value of over £5.8 Million were granted in cases where modern slavery or trafficking is listed as the primary offence, but only 41 compensation orders and eight reparation orders were granted.²³³ When compensation orders are granted, the amount is usually very low, does not cover unpaid wages, and can be difficult to enforce. Compensation is usually higher through reparation orders. In Northern Ireland, no trafficking reparation orders have ever been granted to victims.

222. By way of example, GRETA was informed of a case of domestic servitude in which the CPS managed to obtain confiscation through a STRO amounting to £200,000.²³⁴ In another case, in May 2025, a victim of domestic servitude was awarded £12 160 through a compensation order.²³⁵

223. In relation to civil proceedings, as mentioned in paragraph 63, the 'Family Worker Exemption' and the 'Live-in domestic worker Exemption' were abolished in April 2024 following a review of the National Minimum Wage regulations. GRETA welcomes the removal of these exemptions which were restricting access to compensation for many domestic workers.

224. However, GRETA notes that there continue to be obstacles to the compensation of victims of labour exploitation in employment tribunals.²³⁶ The time limit for bringing cases to these tribunals is three months from the moment when the abuse took place, which is too short as it often takes time for victims to realise that they have been abused and initiate legal proceedings, while the waiting time for obtaining legal aid is longer than three months. The amount of compensation for loss of earnings remains limited to two years owed in National Minimum Wage and an employment contract is required. Moreover, proceedings before employment tribunals are very lengthy.

225. Employers can still invoke the 'illegality defence' which prevents undocumented workers from accessing compensation unless they can prove that they were unaware that the workers were undocumented.²³⁷ In their comments on the draft report, the UK authorities underlined that no review is planned of the use of the 'illegality defence', which is a longstanding common law doctrine based on the

²³¹ See GRETA's 3rd report on the UK, paragraphs 112-116.

²³² <https://www.sentencingcouncil.org.uk/offences/magistrates-court/item/slavery-servitude-and-forced-or-compulsory-labour-human-trafficking/>.

²³³ Available at: <https://antislaverycommissioner.co.uk/media/pihjjck/iasc-policy-paper-access-to-compensation-and-reparation-for-survivors-of-trafficking-april-2022-final.pdf>.

²³⁴ More information available at : <https://www.cps.gov.uk/cps/news/millionaire-landlady-jailed-modern-slavery-offences-forced-pay-ps200k-victim>.

²³⁵ R v Mugambe, sentencing remarks: <https://www.judiciary.uk/wp-content/uploads/2025/05/R-v-Mugambe-Sentencing-Remarks.pdf>.

²³⁶ The Centre for Social Justice and Justice & Care, *At what cost? Exploring the impact of forced labour in the UK*, October 2024, p. 70-72. Available at: <https://www.centreforsocialjustice.org.uk/library/at-what-cost>.

²³⁷ See GRETA's 3rd report on the UK, paragraph 120.

rationale that it would be contrary to the public interest to enforce a claim if to do so would be harmful to the integrity of the legal system. They also underlined that the application of the 'illegality defence' is determined on a case-by-case basis by the courts. GRETA reiterates its concerns that the 'illegality defence' constitutes a significant obstacle for the compensation of victims of trafficking who are irregular migrants. It also raises concern in relation to the application of the principle of non-punishment (see paragraph 236 and following). Many victims are forced into undocumented status by their traffickers and should not have to bear the consequences of abuses committed by them.

226. In view of the challenges faced by victims in obtaining compensation, NGOs are advocating for the creation of a specific civil remedy for victims of human trafficking. At present, there is no possibility to obtain compensation before civil courts for damages suffered by victims as part of their trafficking experience. Victims must rely on other rights with a civil remedy to obtain compensation, such as assault or battery, harassment, false imprisonment, discrimination, breach of employment contract, etc. These civil remedies are often not suitable for trafficking cases and claims can be lengthy and costly.²³⁸

227. State compensation is often the only option for victims to receive reparation for the damages suffered, through the Criminal Injuries Compensation Scheme 2012, administered by the Criminal Injuries Compensation Authority (CICA), which is competent for England, Wales and Scotland, or to the Northern Ireland's Criminal Injuries Compensation Scheme (CICS).²³⁹ With a view to improving access to CICA, as mentioned in paragraph 215, the application form was simplified and is now completely digitalised. Victims can still make a request by phone or in writing if they wish. Further, staff of CICA have been provided with online training on a trauma-informed approach, which is provided by the NHS in Scotland. In Northern Ireland, a leaflet was prepared by the Department of Justice on victim's access to CICS.

228. Victims of human trafficking must demonstrate that they have suffered physical or psychological injuries due to a crime of violence in order to obtain compensation from CICA as human trafficking itself is not considered as a crime of violence under the 2012 Scheme. The "crime of violence" requirement is particularly difficult to implement in cases of labour exploitation. GRETA was informed that, in practice, victims are expected to provide a high level of evidence. The UK authorities reiterated that where applicants may have difficulty in accessing the diagnosis or prognosis of a psychiatrist or clinical psychologist to support their claim, CICA can refer them to one of the clinical psychologists it employs or a third-party provider of medical experts. In contrast, in Northern Ireland, being a victim of trafficking allows to have access to the CICS, provided that other eligibility criteria are met.

229. Other requirements continue to limit victims' access to state compensation before CICA and the CICS in Northern Ireland, in particular the requirement to have co-operated with the authorities in the criminal proceedings. While before CICA, co-operation is required "as far as reasonably practicable", NGOs underlined that cases where this requirement is lifted are rare. In Northern Ireland, lack of co-operation can lead the state compensation authority to reject or reduce compensation. Another requirement that can result in a rejection or reduction of compensation from CICA is whether an applicant has an "unspent conviction" (i.e., a conviction which remains on an individual's basic criminal record for the duration of the sentence and a rehabilitation period) that resulted in a certain type of sentence. While the 2012 Scheme requires an application to be refused because of an unspent conviction, this requirement cannot be lifted and penalises victims of criminal exploitation who did not benefit from the non-punishment principle.

²³⁸ More information at:

<https://static1.squarespace.com/static/65537d22e3e15a7904032075/t/67406b000b05265b2f9c6366/1732274945744/September+2023+ATLEU+briefing+-+The+need+for+a+civil+remedy+for+trafficking+and+modern+slavery.pdf>.

²³⁹ See GRETA's 3rd report on the UK, paragraphs 123-124 and 130.

230. The process for obtaining state compensation continues to be lengthy, both before CICA and CICS. By way of illustration, a victim of domestic servitude in Northern Ireland managed to obtain £10 000 in state compensation following a six-year procedure. According to the UK authorities, for the past financial year, 41% of new applications to CICA were decided within six months, and 66% within 12 months. However, these averages concern all cases before CICA, not only those of victims of trafficking. The authorities underlined that when CICA claims are delayed this is usually because expert evidence of psychological injury should be obtained, or because the prognosis is pending about more complex injuries.

231. There is no official data on the number of victims of trafficking who applied for and/or were granted state compensation. According to a report by the NGO After Exploitation, 133 applications for compensation to CICA were recorded from January 2021 to May 2024.²⁴⁰ The main reasons for the low number of compensation claims is the absence of information, lack of access to specialised legal aid and the time-limit of two years to apply. From January 2023 to June 2024, almost all trafficking victims who applied to CICA were denied state compensation (between 82% to 100% of refusal). In most cases, the reason for the refusal was that the exploitation suffered by victims was not a "crime of violence" as defined by the Scheme.

232. In 2022-2023, the UK Government conducted consultations on the 2012 CICA scheme, notably on the scheme's scope and time limits for victims of child sexual abuses. In April 2025, the UK Government published its response to the consultations, according to which no amendments are envisaged, considering that changing the CICA rules only for victims of child sexual abuse would undermine the universality of the scheme. Instead, the UK Government intends to focus on improving victims' rights through a possible revision of the Victims' Code.²⁴¹ The Victims' Commissioner for England and Wales underlined that victims continue to face significant barriers in navigating the CICA.²⁴²

233. In Northern Ireland, the Modern Slavery and Human Trafficking Strategy 2024-2027 envisages to address barriers to accessing state compensation. Work in this regard will be progressed in 2026.

234. GRETA once again urges the UK authorities to make additional efforts to facilitate access to compensation for victims of trafficking, in particular by:

- ensuring that victims of trafficking can obtain compensation of the full damage suffered as part of their exploitation, including moral and material damages, either in criminal proceedings or civil proceedings;
- ensuring that the 'illegality defence' does not prevent victims of trafficking who are undocumented workers from obtaining compensation;
- ensuring that victims of labour exploitation have accessible remedies for obtaining compensation of more than two years owed in National Minimum Wage, reflecting their real loss of wages, and increasing the time limit to request compensation before employment tribunals;
- improving training programmes on compensation for legal practitioners, prosecutors and the judiciary, and encouraging them to use all the possibilities the law offers to uphold compensation claims by victims of THB;

²⁴⁰ After Exploitation, *The Final piece of the puzzle. Information sheet on modern slavery and compensation (CICA)*, July 2024. Available at: <https://afterexploitation.com/modern-slavery-human-trafficking-compensation-cica-an-information-sheet/>.

²⁴¹ More information at: <https://www.gov.uk/government/consultations/criminal-injuries-compensation-scheme-review-additional-consultation-2023/outcome/criminal-injuries-compensation-scheme-review-2022-and-2023-consultations-government-response#fn:4>.

²⁴² More information at: <https://victimscommissioner.org.uk/news/criminal-injuries-compensation-scheme-victims-commissioner-disappointed-by-decision-to-abandon-much-needed-wholesale-review/>.

- enabling victims of trafficking to effectively exercise their right to state compensation within reasonable time, by ensuring their access to free legal aid when submitting applications to the Criminal Injuries Compensation Authority and Northern Ireland's Criminal Injuries Compensation Scheme (see also the recommendation in paragraph 217) as well as to experts who can assess psychological injuries;
- reviewing the eligibility criteria for state compensation, notably the requirement of "crime of violence", with a view to making it accessible to victims of all forms of trafficking, and ensuring that state compensation is not made dependent on the victim's co-operation with the authorities.

235. GRETA also considers that the UK authorities should collect data on compensation claims and awards to victims of trafficking.

3. Non-punishment provision

236. In its 3rd report on the UK, GRETA urged the authorities to ensure that the non-punishment provision can be applied to all offences that victims were compelled to commit and that the allocation of the burden of proof does not substantially hinder the application of the provision, to remove the requirement of the "reasonable person" test for children, and to further develop guidance and training for professionals in order to ensure compliance with the non-punishment principle in practice.²⁴³

237. The legal framework related to the non-punishment of victims of THB remains unchanged.²⁴⁴ Section 45 of MSA provides for a statutory defence for victims of human trafficking who were compelled to commit criminal offences as a result of their exploitation. It has equivalents in Scotland (Section 8 of the Human Trafficking and Exploitation Act) and Northern Ireland (Section 22 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act).

238. With a view to executing the judgment of the European Court of Human Rights in the case of *V.C.L. and A.N. v. United Kingdom*,²⁴⁵ the UK authorities have prepared an action plan which was updated in 2022, 2023 and 2025.²⁴⁶ As part of it, the CPS published revised guidance on the non-prosecution of victims of human trafficking and the statutory defence.²⁴⁷ According to the action plan, prosecutors should follow a four-stage approach in cases involving suspects or defendants who might be victims of human trafficking in order to ensure application of the non-punishment principle.²⁴⁸ The revised guidance also emphasises that once a person has been identified as a possible victim of trafficking, the decision on whether to prosecute him or her should, so far as possible, be deferred after the final NRM decision, particularly where the suspect is a child.

²⁴³ See GRETA's 3rd report on the UK, paragraph 177.

²⁴⁴ See GRETA's 3rd report on the UK, paragraphs 160-162 and 175-176.

²⁴⁵ *A.N. v. United Kingdom*, no. 74603/12, and *V.C.L. v. United Kingdom*, no. 77587/12. See GRETA's 3rd report on the UK, paragraph 174.

²⁴⁶ More information at : [https://hudoc.exec.coe.int/#{%22exidentifier%22:\[%22CM/Notes/1507/H46-42E%22\]}](https://hudoc.exec.coe.int/#{%22exidentifier%22:[%22CM/Notes/1507/H46-42E%22]}).

²⁴⁷ Available at: <https://www.cps.gov.uk/legal-guidance/modern-slavery-and-human-trafficking-offences-and-defences-including-section-45>.

²⁴⁸ The four-stage approach is the following: 1) Is there a reason to believe that the person is victim of modern slavery? 2) If yes, is there clear evidence of a credible common law defence of duress? If yes, the case should not be charged or should be discontinued; 3) If not, is there clear evidence of a statutory defence under Section 45 of the Modern Slavery Act? If yes, the case should not be charged or should be discontinued; 4) If not, is it in the public interest to prosecute?

239. In 2023, His Majesty's Crown Prosecution Service Inspection (HMCPSI) conducted an inspection of the effectiveness of the prosecution service policy and guidance. It found that the CPS guidance is effective and extensive, the four-stage approach being considered as particularly useful. Nevertheless, the inspection found that some aspects could be enhanced, notably regarding the pre-charge stage, noting that practical advice should be provided on how to manage delays in conclusive grounds decisions. It also underlined that the guidance was extremely lengthy, which for prosecutors dealing with high volume of cases may be impractical. The report recommended to revise the guidance to make it more accessible, and to develop an assurance system to ensure that CPS regional teams (CPS Areas) adopt a consistent approach in the prosecution of cases involving the statutory defence.²⁴⁹

240. Following the inspection, the CPS revised the guidance and updated the terms of reference of its Modern Slavery Network which brings together the modern slavery lead of the CPS and representatives of all CPS regional teams. As part of the monthly meetings of the network, a consistency exercise is organised focusing on selected cases involving the statutory defence. In 2024, the network reviewed 11 cases, reaching consensus with decision-making in 10 of them. It also conducted a further dip sample of 53 cases nationally. Further, a 'train the trainers' session was delivered in December 2024. In February 2025, the HMCPSI published a follow-up report to its inspection of 2023, which found that its recommendations had been implemented, except in relation to the system of assurance. It noted that the consistency exercise of the CPS Modern Slavery Network was helpful, but revealed variation in the quality and the depth of analysis, and that there remained a lack of standard approaches across all CPS areas.²⁵⁰ The HMCPSI plans to conduct a new follow-up inspection in early 2026.

241. Training and guidance on the statutory defence has continued to be delivered to police officers by the National County Lines Co-ordination Centre, as well as to judges through the Judicial College.

242. In Scotland, the Lord Advocate's Instructions for non-prosecution of victims of trafficking were updated in January 2024.²⁵¹ The purpose of the revision was to take into account the recommendations of international bodies, highlight evolving trends such as county lines, 'cuckooing' and online sexual exploitation, and provide indicators for prosecutors to identify victims of human trafficking and criminal exploitation. According to the instructions, prosecutors must as a rule wait for the conclusive grounds decision before making any final decision on whether to prosecute the accused person and before serving an indictment. The instructions also state that when there is a negative reasonable grounds decision, but clear indicators of trafficking or exploitation, the police should be instructed to submit a reconsideration of the negative decision. Further, the instructions underline that the absence of NRM referrals does not mean that the individual is not a victim of trafficking. In such cases, prosecutors must assess the situation based on the information available to them and by seeking information from other sources such as the police, NGOs or other organisations. Further, the mandatory training for prosecutors, which was updated in August 2024, contains a module on the identification of victims and the non-punishment principle.

243. In Northern Ireland, the Modern Slavery and Human Trafficking Strategy for 2024-2027 envisages a review of the statutory defence provision (Section 22 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act) and refreshed guidance for police officers and prosecutors.²⁵² In their comments on the draft report, the authorities indicated that following a first case where the statutory defence was successfully used, work is underway to review the guidance for prosecutors in this regard. Further, the intranet of the PSNI was refreshed and includes detailed information on Section 22.

²⁴⁹ Available at: <https://hmcpsi.justiceinspectors.gov.uk/report/an-inspection-of-the-effectiveness-of-crown-prosecution-service-policy-and-guidance-for-the-handling-of-cases-involving-the-national-referral-mechanism/>.

²⁵⁰ Available at: <https://hmcpsi.justiceinspectors.gov.uk/report/national-referral-mechanism-follow-up-inspection/>.

²⁵¹ Available at: <https://www.copfs.gov.uk/publications/lord-advocate-s-instructions-non-prosecution-of-victims-of-human-trafficking/html/>.

²⁵² See revised action plan on *V.C.L. and A.N.*, p. 8.

244. Officials met by GRETA underlined that while progress had been made in complying with the non-punishment provision, there is absence of corroborating data. In Scotland, GRETA was informed that since 1 April 2023, at least 62 accused persons, including 33 children, have had proceedings either discontinued or not raised against them on the basis that the requirement of the Lord Advocate's Instructions was satisfied.²⁵³ The UK authorities recognise that the absence of data is a gap and have noted that they are committed to work with criminal justice partners in order to explore how data can be captured.²⁵⁴ As of April 2025, police forces in England and Wales are required to use a new Section 45 identifier, which will provide investigators with a standard operating procedure to record when the statutory defence has been raised on a crime record, and should allow to extract data. GRETA welcomes the efforts to develop the collection of data on the application of the non-punishment principle.

245. There continue to be media reports of individuals convicted for drug related offences while presenting indicators of human trafficking.²⁵⁵ GRETA was informed that in many instances prosecutors do not wait for the final NRM decision before deciding to prosecute possible victims of trafficking. If the victim receives a positive conclusive grounds decision and was wrongly convicted for an offence committed under compulsion, the procedure to apply for expunging convictions is very cumbersome.

246. GRETA notes that in England, Wales and Northern Ireland, the statutory defence continues to be excluded for certain offences.²⁵⁶ In Northern Ireland, the Human Trafficking and Exploitation Act was amended in 2022 to allow the statutory defence to apply in cases of drug offences. GRETA notes that as part of the list of 100 offences excluded from the statutory defence in England and Wales, there are offences that victims are often compelled to commit as part of their exploitation. The Crime and Policing Bill proposes to extend the list of offences excluded from the statutory defence to the offence of criminal exploitation in the case of adults. GRETA is concerned by this extension as many victims of criminal exploitation are compelled by their trafficker to recruit other victims. GRETA stresses once again that the non-punishment provision should be able to be applied to all offences that victims of THB were compelled to commit. Providing for exceptions on a case-by-case basis, based on the principle of proportionality, rather than excluding *per se* all victims who have committed certain offences, could achieve the same result. The UK authorities have once again stressed that even when the statutory defence is excluded, prosecutors can still use their discretionary power not to prosecute. However, GRETA was not provided with any examples of such decisions.

247. The "reasonable person" test requirement has not been removed for child victims of trafficking in England and Wales.²⁵⁷ The UK authorities reiterated that the "reasonable person" test for children is lighter than for adults, as for the latter it would be necessary to determine that they had no realistic alternative to doing that act. However, GRETA was not provided with examples of the application of the "reasonable person" test to children and how it differs in practice from that for adults. The CPS guidance on the statutory defence contains little information in this regard, except that the seriousness of the offences will be a significant consideration when determining what a reasonable person would have done where the defendant is an adult. There is no guidance in relation to children.

²⁵³ See revised action plan on *V.C.L. and A.N.*, p. 10.

²⁵⁴ See the UK authorities' report to the Committee of the Parties under the 3rd evaluation round, p. 8.

²⁵⁵ See for instance: <https://www.northumberlandgazette.co.uk/news/crime/cannabis-farmer-caught-in-ashington-is-jailed-for-six-months-4571005>; <https://www.newsandstar.co.uk/news/23713744.carlisle-cannabis-farmer-250k-crop-trafficked-uk/>; <https://www.warwickshire.police.uk/news/warwickshire/news/2024/march/ty-nguyen-sentenced-to-10-months-for-cannabis-production/>; <https://www.newsandstar.co.uk/news/24431520.vulnerable-17-yaer-old-sent-barrow-sell-heroin-crack-cocaine/>.

²⁵⁶ See GRETA's 3rd report on the UK, paragraphs 160-161.

²⁵⁷ See GRETA's 3rd report on the UK, paragraph 162. In England and Wales, child victims of trafficking will not be considered guilty of an offence committed as a result of their exploitation if a reasonable person in the same situation and having the child's relevant characteristics would do that act.

248. According to NGOs, children are often denied the statutory defence on the grounds that they consented to committing the offence and are not in a situation of exploitation. Insufficient attention is reportedly paid to the issue of debt bondage that may force children and young people to commit criminal offences. Prosecutors pointed out that there are grey areas where children were first exploited by traffickers and then moved up the criminal gang hierarchy to become exploiters themselves. GRETA positively notes that in a judgment of 2023, the Court of Appeal of England and Wales overturned the decision of a crown court to refuse the statutory defence on the grounds that the children had not been compelled to commit the offence, recalling that compulsion is not an element of the statutory defence for children.²⁵⁸

249. The revised CPS guidance states that victims will only have to adduce sufficient evidence to allow the statutory defence to be considered by the jury. If the victim succeeds in discharging the evidential burden, then the legal burden falls on the prosecution to disprove the defence beyond reasonable doubt. GRETA reiterates its concern that such an allocation of the burden of proof could make the application of the non-punishment provision particularly difficult in practice,²⁵⁹ especially if victims are not represented by specialised lawyers. NGOs and lawyers met by GRETA pointed out that many individuals are encouraged by their lawyers to plead guilty to offences they have committed under compulsion, due to the lack of specialised legal aid in criminal matters and insufficient knowledge on the part of court-appointed lawyers about the provisions relating to modern slavery.²⁶⁰

250. GRETA notes that a 2024 decision of the Court of Appeal of England and Wales confirmed the UK authorities' decision to remove the British citizenship of a woman who had left the UK for the Islamic State territory in Syria at the age of 15 on grounds of public good.²⁶¹ GRETA refers to several UN Special Procedures mandate holders who expressed concerns that the UK authorities had failed to consider whether the person concerned had been groomed and could be a victim of human trafficking, calling on the authorities to take urgent action to provide her with assistance and protection, including repatriation to the UK, and to reconsider the decision to revoke her citizenship.²⁶² While GRETA is not in a position to assess this case, it recalls that the non-punishment provision applies not only to criminal convictions, but also to civil or administrative forms of punishment, such as deprivation of nationality.

251. While acknowledging the steps taken to comply with the non-punishment principle, through the provision of guidance and training, GRETA remains concerned that victims of trafficking are prosecuted and convicted for offences that they were compelled to commit as part of their exploitation, either because they are not properly identified as victims of trafficking or because they are denied the application of the statutory defence provisions despite being identified as victims of trafficking. Further, GRETA is concerned by the introduction of the public order disqualification clause which has resulted in many victims of trafficking being disqualified from identification and support as a result of offences committed under compulsion (see paragraphs 255 and following).

²⁵⁸ ADG & Another [2023] EWCA Crim 1309.

²⁵⁹ See GRETA's 3rd report on the UK, paragraph 167.

²⁶⁰ Currie, S. and others, *Access to legal advice and legal representation for survivors of modern slavery*. Available at: <https://www.modernslaverypec.org/research-projects/legal-advice-survivors>.

²⁶¹ Begum v Secretary of State for the Home Department [2024] EWCA Civ 152.

²⁶² For more information see: <https://www.ohchr.org/en/press-releases/2024/03/un-experts-deplore-continuing-failures-protection-shamima-begum>.

252. GRETA once again urges the UK authorities to make additional efforts to comply with the non-punishment provision, including by:

- ensuring that in England, Wales and Northern Ireland the non-punishment provision can be applied to all unlawful activities that victims of trafficking were compelled to commit;
- removing the requirement to apply the “reasonable person” test in the framework of the statutory defence of child victims pursuant to Section 45 of the Modern Slavery Act, and ensuring that coercion and other means, which are irrelevant for child victims of trafficking, are not taken into account for the statutory defence of children;
- ensuring that the allocation of the burden of proof does not substantially hinder the application of the non-punishment provision.

253. GRETA also considers that the UK authorities should:

- continue providing further training and guidance to law enforcement officers, prosecutors, judges and lawyers on the application of the non-punishment provision, which address the subtle ways by which victims can be compelled to commit offences, including through debt bondage, and how to consider them in the context of the statutory defence;
- facilitate the expunging of convictions of victims wrongly convicted for offences committed under exploitation.

4. Recovery and reflection period

254. Following the adoption of the NABA, access to the recovery and reflection period has been enshrined in UK law. Section 61 of NABA provides that when the positive reasonable grounds decision is taken, victims have access to the recovery and reflection period and cannot be removed or required to leave the UK territory. The minimum duration of the recovery and reflection period in England and Wales was reduced from 45 days to 30 days.²⁶³ If it takes longer than 30 days to issue a conclusive grounds decision, the duration of the recovery and reflection period is extended until the issuance of such decision.

255. Section 63 of NABA provides for the disqualification of victims from accessing the recovery and reflection period if they are a threat to the public order or if they claimed to be victims of trafficking in bad faith. Disqualifications apply to both adult and child victims. In such cases, victims lose protection from deportation as well as entitlement to assistance and other protection measures. Further, any ongoing process of identification is terminated, and victims are not entitled to have a final decision on their status. If either a reasonable or a conclusive grounds decision had already been taken, they would be revoked.²⁶⁴ While the previous version of the Modern Slavery Statutory Guidance already provided for the possibility to deny access to the NRM on grounds of public order or bad faith, the NABA introduced an open-ended list of circumstances where victims are automatically deemed to be a threat to the public order. These circumstances include persons convicted of terrorism offences or for whom there are reasonable grounds to believe that they have been involved in terrorism-related activity, persons convicted for an offence excluded from the non-punishment provision (see paragraph 246), as well as any foreign criminals subject to deportation (i.e. those convicted for a prison term of more than 12 months). In relation to the bad

²⁶³ Prior to the NABA, the recovery and reflection period was specified in the Modern Slavery Statutory Guidance and had a minimum duration of 45 days. See GRETA's 2nd report on the UK, paragraph 215.

²⁶⁴ Jovanović, M. and others, *Non-Punishment of Victims/Survivors of Human Trafficking in Practice: A Case Study of the United Kingdom*, Council of Europe, September 2023, p. 43.

faith disqualification, the Modern Slavery Statutory Guidance states that “an individual may be considered to have claimed to be a victim of modern slavery in bad faith where they, or someone acting on their behalf, have knowingly made a dishonest statement in relation to being a victim of modern slavery.”

256. The IMA has further extended the possibility to disqualify victims from the recovery and reflection period, identification and assistance. Pursuant to Sections 22 to 28 of IMA, the Secretary of State is obliged to make arrangement for the removal of victims of trafficking who have arrived irregularly in the UK, regardless of whether they have been referred to the NRM, have received a positive reasonable grounds decision and/or benefit from the recovery and reflection period. The only possible exception is if the victims co-operate with the authorities in connection with an investigation or criminal proceedings, and if the Secretary of States for Home Department agrees. Further, pursuant to Section 29, the open-ended list of persons deemed to be a threat to public order includes any foreign nationals who have been convicted in the UK of an offence and sentenced to a period of imprisonment, as well as any foreign nationals liable to deportation. While under the NABA applying the public order disqualification was a possibility for the authorities (“may”), under the IMA it is an obligation (“must”). The only exception is when “there are compelling circumstances that the disqualification should not apply”, but it is not clear how this should be interpreted. GRETA expressed concerns about the IMA's compliance with the Anti-Trafficking Convention, in particular the fact that it excludes victims who entered the UK irregularly from access to the recovery and reflection period, identification and assistance.²⁶⁵

257. Since the modern slavery provisions of the IMA have not yet entered into force, the current UK Government has proposed to remove most of these provisions through the Border Security, Asylum and Immigration Bill (see paragraph 16), in particular Sections 22 to 28. However, the UK Government has decided to maintain Section 29 on the public order disqualification. GRETA welcomes the proposal of the UK Government to repeal Sections 22 to 28 of IMA, but remains concerned by the scope and impacts of the public order disqualification introduced by Section 63 of NABA and extended by Section 29 of IMA. Pursuant to these provisions, public order disqualifications apply to all individuals, including UK nationals and foreigners with a long-term residence permit, and extend beyond access to the recovery and reflection period by terminating the identification procedure and denying assistance to victims who have received a confirmation of their status.

258. Following a judicial review,²⁶⁶ the UK authorities updated the Modern Slavery Statutory Guidance in July 2024, obliging the decision-makers to conduct an assessment of the re-trafficking risks of the victim once it is determined that a public order disqualification can apply. The guidance also provides that a second pair of eyes review must take place before issuing all public order disqualifications.²⁶⁷ While welcoming the introduction of the re-trafficking risk assessment, NGOs noted that it is limited to “real and immediate risks” while in practice, victims and possible victims who are held in detention centres are not considered to be at an immediate risk. Further, the risk assessment does not cover risks of re-trafficking upon return to the country of origin. GRETA underlines that among the persons to whom the public order disqualification is applied are people who comply with the definition of a victim of human trafficking under the Convention, but do not have the chance to have their status confirmed by the UK competent authorities. GRETA is concerned that the disqualifications are applied to them, and subsequently they are returned to their country of origin without due regard for their rights, safety and dignity, contrary to the UK's obligations under Article 16 of the Convention.

²⁶⁵ See GRETA's statement, *UK's Illegal Migration Bill should be reviewed to ensure it complies with the anti-trafficking convention*, 29 March 2023. Available at: <https://www.coe.int/en/web/portal/-/uk-s-illegal-migration-bill-should-be-reviewed-to-ensure-it-complies-with-the-anti-trafficking-convention-says-greta>; GRETA's written evidence to the Joint Committee on Human Rights of the UK Parliament, 5 April 2023. Available at: <https://committees.parliament.uk/writtenevidence/119915/pdf/>.

²⁶⁶ More information at: <https://www.matrixlaw.co.uk/news/high-courts-orders-no-public-order-disqualifications-of-slavery-victims-may-take-place-without-a-risk-assessment-pending-trial/>.

²⁶⁷ See Modern Slavery Statutory Guidance (updated version as of June 2025), pages 180 to 183.

259. In Northern Ireland, a ruling of the High Court of Justice ordered the disapplication of several provisions of the IMA, including modern slavery provisions, considering that they run contrary to the Agreement on the withdrawal of the UK from the EU which maintains the application of some EU legislation in Northern Ireland, including the EU Trafficking Directive.²⁶⁸

260. The UK Government maintains that the disqualifications from the recovery and reflection period have been introduced pursuant to Article 13, paragraph 3, of the Anti-Trafficking Convention which provides that States “are not bound to observe this period if grounds of public order prevent it or if it is found that victim status is being claimed improperly”. As noted in GRETA’s Guidance on the recovery and reflection period, while neither the text of the Convention nor the Explanatory Report gives guidance on the interpretation of the notion of “public order”, grounds of public order are intended to apply in very exceptional circumstances and cannot be used by States to circumvent their obligation to provide access to the recovery and reflection period. The public order exception should be applied restrictively with due regard to the circumstances of the individual case and respect for the principle of proportionality. The State Party has the burden of proof and the decision to apply the public order exception must be substantiated with evidence.²⁶⁹ The public order disqualification introduced by the NABA applies broadly, under the basis of an open-ended list of circumstances that include mere suspicions of the commission of an offence. Given this broad and open-ended list of circumstances, there is a risk that the disqualification is applied arbitrarily. GRETA is also concerned that there is a reversal of the burden of proof, and it is for the victims to prove that they are not a threat to the public order, rather than for the authorities to substantiate their decision with evidence. Such a burden of proof is particularly challenging, not to say impractical, given that victims only have 10 days to provide evidence to the authorities following the notification of their intention to apply the public order disqualification, and that access to free legal aid is not available during the procedure as victims have not received a positive reasonable grounds decision (see also paragraph 213).

261. GRETA was provided with examples of victims who had been referred to the NRM and later issued a public order disqualification following their conviction for fraud (falsification of documents) which was committed as part of their trafficking experience. As noted in GRETA’s Guidance note on the recovery and reflection period, if a victim of human trafficking was compelled to be involved in unlawful activities, the public order clause should not be applied. The fact that victims may have difficulties disclosing their situation, including any unlawful activities they may have been compelled to commit, should be taken into account. It is for these reasons that the public order clause should be applied with the greatest caution. The protection of public order needs to be balanced against the need and positive obligation to provide support to victims of trafficking.²⁷⁰

262. In a report on the Immigration Enforcement Competent Authority (IECA) published in 2024, the Independent Chief Inspector for Borders and Immigration (ICIBI) assessed the implementation of the public order disqualification. The report referred to the case of a victim who had been convicted for fraud offences with a prison sentence of 12 months in 2014 and was denied access to the NRM on grounds of public order in April 2024, nearly 10 years after the conviction. In this case, although it was concluded that the need for modern slavery protection was considered to be high, the IECA decided that the risk the individual posed to public order outweighed the need for protection. According to the ICIBI, this case illustrates the “extremely high threshold required for a public order disqualification not to be applied”.²⁷¹

²⁶⁸ [2024] NIKB 35. Available at: <https://www.judiciaryni.uk/files/judiciaryni/2024-05/NIHRC%27s%20Application%20and%20JR295%27s%20Application%20and%20In%20the%20the%20matter%20of%20The%20Illegal%20Migration%20Act%202023.pdf>.

²⁶⁹ See GRETA’s Guidance Note on the recovery and reflection period, September 2024, paragraphs 32-36. Available at: <https://rm.coe.int/guidance-note-on-recovery-and-reflection-period-group-of-experts-on-ac/1680b1a3ca#:~:text=Article%2013%20of%20the%20Convention, person%20concerned%20is%20a%20victim.>

²⁷⁰ See GRETA’s Guidance Note on the recovery and reflection period, September 2024, paragraph 35.

²⁷¹ ICIBI, *An inspection of the Immigration Enforcement Competent Authority (January - June 2024)*, December 2024. Available at: <https://www.gov.uk/government/news/inspection-report-published-an-inspection-of-the-immigration-enforcement-competent-authority-january-june-2024>.

263. In relation to the bad faith disqualification, GRETA stresses that it should also be applied on a case-by-case basis by fully taking into account the individual circumstances of each victim. There are a number of reasons why victims of trafficking may not be able to provide the authorities with full and/or adequate information. It may seem like the victim is claiming victim status improperly, but the lack of information is actually due to the trauma caused by the trafficking situation.²⁷² GRETA positively notes that the Modern Slavery Statutory Guidance underlines that victims' accounts may be impacted by the effects of trauma and invites decision-making staff to establish whether there are credible explanations for gaps in evidence or a lack of credibility before applying the bad faith disqualification.

264. The UK authorities underlined that the number of individuals who are issued a public order disqualification is low. According to official statistics, in 2023, there were 337 disqualification requests made by the Home Office and 294 confirmed disqualifications. In 2024, 276 disqualification requests were made and 255 were confirmed. In the first quarter of 2025, 52 disqualifications requests were made and 55 disqualifications were confirmed. In GRETA's view, the fact that the public order disqualification has been applied to a limited number of victims so far is irrelevant, given the significant consequences it has at the individual level, with victims being denied any form of support. Furthermore, the future entry into force of the extension provided for in the IMA will result in the quasi-automatic disqualification of foreign victims who have been convicted of an offence or who have been subject to a deportation order.

265. Referring to its Guidance Note on the recovery and reflection period,²⁷³ GRETA urges the UK authorities to ensure compliance with Article 13 of the Anti-Trafficking Convention, and in particular to review the public order and bad faith disqualifications to ensure that:

- the disqualifications are applied in very exceptional circumstances, with due regard to the circumstances of the individual cases and with respect for the principle of proportionality;
- the decision to apply the disqualifications is substantiated with evidence and does not rely on a pre-defined list of circumstances where individuals are deemed to be a threat to the public order, and the burden of proof lies on the authorities;
- the disqualifications are limited to the categories of individuals concerned by the recovery and reflection period, and do not extend to those who have been formally identified as victims of human trafficking;
- the return of victims of human trafficking to whom the disqualifications are applied is carried out with due regard for the rights, safety and dignity of victims, and the principle of the best interests of the child.

5. Residence permits

266. In its 3rd report on the UK, GRETA urged the authorities to ensure that all victims who have received a positive conclusive grounds decision and whose immigration status requires it are issued a renewable residence permit on grounds of their personal situation or for co-operating with the authorities in criminal investigations or proceedings, and that all child victims are issued a residence permit in accordance with the best interests of the child.²⁷⁴

267. The legislative framework on residence permits has been revised following the adoption of the NABA, which enshrined the granting of residence permits for victims of trafficking in domestic law. Section

²⁷² See GRETA's Guidance Note on the recovery and reflection period, September 2024, paragraphs 37-39.

²⁷³ <https://rm.coe.int/guidance-note-on-recovery-and-reflection-period-group-of-experts-on-ac/1680b1a3ca#:~:text=Article%2013%20of%20the%20Convention, person%20concerned%20is%20a%20victim.>

²⁷⁴ See GRETA's 3rd report on the UK, paragraphs 313-314.

65 of NABA provides that upon a positive conclusive grounds decision, victims who are not British citizens and do not have 'leave to remain' (i.e. residence permit) in the UK may be granted it if it is necessary for the purpose of: 1) assisting victims in their recovery from any physical or psychological harm; 2) enabling victims to seek compensation; 3) enabling victims to co-operate with the authorities in an investigation or criminal proceedings, all in relation to the relevant exploitation (i.e. the exploitation they received a positive conclusive grounds decision for).

268. The requirements in relation to residence permits are detailed in the Immigration Rules Appendix Temporary Permission to Stay for Victims of Human Trafficking or Slavery,²⁷⁵ which came into force on 30 January 2023. The duration of the residence permits to assist victims in their recovery and for co-operation in criminal investigations or proceedings is of a maximum of 30 months across all applications, and for the purpose of seeking compensation, a maximum of 12 months across all applications. Residence permits allow victims to access public funds, work and study, and are also granted to dependent children of victims. Guidance for case workers on granting temporary permission to stay was issued in January 2023 and updated in August 2025.²⁷⁶

269. On 17 March 2022, the Court of Appeal of England and Wales handed down its judgment in *EOG & KTT v Secretary of State for the Home Department*. Both cases concerned whether the Secretary of State's policy on grants of leave to victims of trafficking was intended to and did in fact comply with the requirements of the Council of Europe Anti-Trafficking Convention. The Court found that the policy did not properly reflect the requirement of Article 14, paragraph 1.a, of the Convention.²⁷⁷ In a more recent judgment of 28 February 2025 concerning foreign victims of trafficking who had received a positive reasonable grounds decision, but were denied a residence permit due to a deportation order, the Court of Appeal of England and Wales found that the policy excluding victims of trafficking who are subject to deportation orders or proceedings from leave to remain is lawful.²⁷⁸ The Court also found that Article 14 of the Convention does not have direct effect in UK law, and that Section 65 of NABA does not intend to give effects to Article 14, paragraph 1.a., as it does not use the expression 'their stay is necessary owing to their personal situation'.

270. GRETA notes that the new grounds for leave to remain introduced by the NABA, namely, to "assist victims in their recovery from any physical or psychological harm", is narrower than "where necessary owing to personal circumstances" which applied previously.²⁷⁹ In GRETA's views, granting a residence permit on account of the personal situation of the victim, which is provided for in Article 14, paragraph 1.a, of the Convention, covers a whole range of situations, such as the victim's safety, state of health and family situation.

271. Following the judicial reviews, the UK Government has revised its policy and guidance on temporary permission to stay for victims of human trafficking.²⁸⁰ In July 2024, the UK Government temporarily paused all decision-making in relation to residence permits. In August 2024, decisions were reinstated, except in relation to residence permits necessary to assist victims in their recovery from physical or psychological harm. In October 2024, all decision-making resumed. In February 2025, the UK Government temporarily paused decisions that considered possible grants of residence permits for individuals subject to deportation orders. In June 2025, this temporary pause was amended to include individuals subject to deportation proceedings. In August 2025, decision-making resumed.

²⁷⁵ Available at : <https://www.gov.uk/guidance/immigration-rules/immigration-rules-appendix-temporary-permission-to-stay-for-victims-of-human-trafficking-or-slavery>.

²⁷⁶ Available at : <https://www.gov.uk/government/publications/temporary-permission-to-stay-for-victims-of-human-trafficking-and-slavery-caseworker-guidance>.

²⁷⁷ *EOG & KTT v Secretary of State for the Home Department* [2022] EWCA Civ. 307 (17 March 2022).

²⁷⁸ *Secretary of State for the Home Department v S and Secretary of State of Home Department v VLT* [2025] EWCA Civ 188 (28 February 2025). Available at: <https://www.bailii.org/ew/cases/EWCA/Civ/2025/188.html>

²⁷⁹ See GRETA's 3rd report on the UK, paragraph 302. Residence permits were granted based on the Modern Slavery Statutory Guidance and a previous version of the case worker guidance on temporary permission to stay.

²⁸⁰ Available at: <https://www.gov.uk/government/publications/temporary-permission-to-stay-for-victims-of-human-trafficking-and-slavery-caseworker-guidance>.

272. GRETA was not provided with official data on the number of residence permits granted and/or refused to victims of human trafficking. According to NGOs, which obtained data through Freedom of Information (FOI) requests, in 2020-2022, 364 adults and 21 children were granted leave to remain in the UK as victims of trafficking. In 2023, 123 victims were granted temporary permission to stay, including 110 on the basis of their recovery needs and 10 on the basis of their co-operation in criminal investigations or proceedings. It seems that no residence permits have ever been granted to victims to enable them to seek compensation. GRETA notes that the number of residence permits granted to victims is low compared to the number of victims who receive a conclusive grounds decision each year (6 578 in 2023, including both UK and foreign nationals). Further, the duration of the residence permit is often too short to allow victims to recover from trauma. In 2023, 24 victims received residence permits of less than 6 months, 36 received permits of 6 to 12 months, 39 received permits of 13 to 24 months, and 14 received permits of more than 24 months.

273. According to NGOs, requests for residence permits are often denied on the grounds that assistance and compensation can be obtained in the country of return of the victim. In order to determine if the support to recover from physical or psychological harm can be provided in the country of return, case workers are required to make an assessment of both the availability and the likely accessibility of treatment to the victim. Further, when a residence permit is granted to victims of trafficking, this is usually after a very lengthy procedure. GRETA was given the example of a victim who waited for 21 months before being granted a positive conclusive grounds decision, and another 12 months before being granted a residence permit. The process for requesting the renewal of a residence permit is also costly (between £1 000 and £3 000), which prevents many victims from requesting a renewal. In their comments on the draft report, the UK authorities specified that there is no fee payable for an initial consideration of a residence permit and in respect of an application for an extension of the residence permit where the individual has either not accrued in total 30 months of the granted residence permit or was not initially granted 30 months of the residence permit, and the application is to allow the individual to have a total of 30 months of the residence permit. When access to a residence permit is refused, this does not mean that victims will be returned to their country of origin, particularly if that country does not co-operate in their return or if it is considered that they would be at risk upon return (see paragraphs 278-280). As a result, many victims remain without regular migration status in the UK, despite having received a positive conclusive grounds decision.

274. As a result of these challenges, most victims of trafficking decide to go through the asylum process in order to regularise their stay in the UK.²⁸¹ However, pursuant to Section 16 of NABA, applications of asylum seekers "with connection to a safe third country", notably if they have transited through a safe country where they could have applied for asylum prior to arriving in the UK (which is the case of many victims of trafficking) may be declared inadmissible. Further, pursuant to Section 59 of IMA, asylum seekers from countries considered 'safe', such as EU countries and Albania, which is the case for a large number of victims of trafficking referred to the NRM, will have their asylum applications automatically declared inadmissible, except in exceptional circumstances. While Section 59 of IMA has not entered into force yet, the Border Security, Asylum and Immigration Bill does not propose to repeal it.

275. GRETA notes with concern the very low number of child victims of trafficking who are granted a residence permit (see paragraph 272). According to the UK authorities, for child victims, Section 55 of the Borders, Citizenship and Immigration Act 2009 requires that any functions related to immigration, asylum and nationality are discharged having regard to "the need to safeguard and promote the welfare of children." However, they did not specify in practice how the welfare of children is taken into account, and there is limited explanation in this regard in the guidance for case workers on temporary permission to stay.

²⁸¹ UNHCR and the Red Cross, *At Risk: Exploitation and the UK Asylum System*, August 2022.

276. In view of the limited progress made during the reporting period on access to residence permits for victims of trafficking, GRETA once again urges the UK authorities to ensure that:

- all victims of human trafficking who have received a positive conclusive grounds decision and whose immigration status requires it are issued a renewable residence permit, in accordance with Article 14(1) of the Convention, including on the basis of their personal situation;
- child victims are issued residence permits, in accordance with the best interests of the child, pursuant to Article 14(2) of the Convention;
- residence permits are issued to victims in a timely manner;
- victims of trafficking are not denied access to residence permits on the grounds of having committed offences as a result of their exploitation (see also the recommendation in paragraph 252).

6. Repatriation and return

277. In its 3rd report on the UK, GRETA urged the authorities to review the victim return and repatriation policies, including by ensuring that the principle of the best interests of the child is respected and that the return of victims is conducted with due regard for their rights, safety and dignity, is preferably voluntary and complies with the principle of non-refoulement, as well as by carrying out comprehensive risks assessment prior to the return, in compliance with Article 16 of the Convention.²⁸²

278. As noted in the previous GRETA report, the UK authorities do not run a dedicated return programme for victims of human trafficking. The Home Office Voluntary Returns Service (VRS) which is operated by Immigration Enforcement concerns all persons who are living in the UK without leave or have been refused leave to enter or stay in the UK. The assistance provided in the VRS includes a plane ticket, accessing travel documents and cash assistance from £1 500 to £3 000 depending on their personal circumstances and the country of return. The UK authorities indicated that, in 2023, the Home Office developed information sheets in English, Albanian and Vietnamese about the return programme and the support available in the country of destination. According to the authorities, individuals are encouraged to return voluntarily if they have no right to reside in the UK. They underlined that for any return, either voluntary or forced, all asylum and human rights claims are first carefully considered and individual assessments are made based on evidence taken from a wide variety of sources.

279. For victims referred to the NRM, risk assessment prior to the voluntary return is conducted by support providers under the MSVCC in England and Wales, or by the relevant support providers in Scotland and Northern Ireland. For instance, GRETA was informed that in Scotland, when victims express the wish to return to their country of origin and after given them time to reflect on their decision, the NGO TARA undertakes a risk assessment.

280. Different NGOs have also developed their own repatriation programmes. The Salvation Army operates the project 'Beyond' with a view to supporting victims wishing to return to their home country to reintegrate safely and with support. The process begins with a pre-departure plan to identify the needs of the victim, map out where the connections are and research the services that can be provided in their home country. This is followed by a risk and needs assessment to outline the plan on arrival. Contacts are maintained with the victims after their return to know whether they feel safe and if referrals to external organisations have gone as planned, and to identify any indicators of re-trafficking. The follow-up process

²⁸² See GRETA's 3rd report on the UK, paragraphs 322-323.

can be in place for up to 6 months after they leave the UK. In addition, the project also offers victims a grant of up to £1 000.

281. There is no official data on the number of returns of victims of trafficking. According to data from the Salvation Army, between June 2020 and June 2024, a total of 178 adult victims assisted by the MSVCC accessed either the Government or NGO funded Voluntary Returns Service in order to return to their country of origin.²⁸³ Further, in Scotland, at least 22 victims were supported in their repatriation in 2021-2024. There is no data on the voluntary return of child victims, nor forced returns of victims of trafficking.

282. The concerns expressed by GRETA in the previous report in relation to the victim's safety upon return remain valid.²⁸⁴ A report of the IASC called on the UK Government to develop protocols and protection mechanisms for victims upon return to their home nation, transparently and clearly defining the UK responsibilities in this process.²⁸⁵

283. In 2024, UK International Development provided a short-term grant to IOM UK in order to examine the current capacities of UK support organisations to conduct risk assessments and develop risk management plans with victims of trafficking who choose to return to their country of origin. The project also included mapping of support services for victims of trafficking in Albania, Brazil, China, India and Pakistan,²⁸⁶ as well as training of UK support organisations. In their comments on the draft report, the UK authorities stated that the 'Improving Reintegration Outcomes for Survivors of Modern Slavery' project, delivered by the IOM and funded by the Home Office through the Modern Slavery Fund, responded to the need for enhanced support in voluntary return and reintegration for survivors in the UK. Phase one ran from August 2024 to March 2025 and focused on strengthening the capacity of UK support providers assisting survivors with voluntary return or repatriation. According to the UK authorities, the project successfully delivered all planned outputs, including a national assessment of current return arrangements, five country-specific service directories, and a package of risk assessment and support tools. Webinars reached over 125 stakeholders across the UK, and a high number of attendees reported increases in knowledge and intention to apply learning.²⁸⁷ The Home Office has extended the project until March 2026. This next phase has continued to improve reintegration outcomes by updating service mapping, delivering capacity-building activities, conducting lived experience research, and piloting virtual orientation support for survivors considering return.

284. While noting positively the efforts made by the UK authorities to ensure the safe return of victims, notably to develop risk assessment prior to return and provide information on the return programme, GRETA considers that the UK authorities should continue their efforts to ensure that the return of victims of trafficking to other countries is conducted with due regards for the rights, safety and dignity of victims, including by:

- developing further repatriation programmes for victims of human trafficking in co-operation with destination countries;
- collecting data on the number of voluntary and/or forced returns of victims of trafficking.

VI. Conclusions

²⁸³ See the annual reports of The Salvation Army under the MSVCC published in 2021, 2022, 2023 and 2024.

²⁸⁴ See GRETA's 3rd report on the UK, paragraph 321.

²⁸⁵ IASC and University of Nottingham's Rights Lab, *Re-Trafficking: The current state of play*, November 2021.

²⁸⁶ See, for instance : <https://unitedkingdom.iom.int/sites/g/files/tmzbd11381/files/inline-files/albania-service-directory-english-a4.pdf>.

²⁸⁷ Resources developed during this phase are available here: [Improving Return and Reintegration for Survivors of Modern Slavery | IOM United Kingdom](#)

285. Since the publication of GRETA's third report on the United Kingdom on 8 July 2021, progress has been made in a number of areas covered by that report.

286. New policy documents have been adopted, including the Home Office Action Plan on Modern Slavery 2025/26, Northern Ireland's Modern Slavery and Human Trafficking Strategy 2024/27, and Scotland's refreshed Trafficking and Exploitation Strategy in 2025. Changes have been made to the legislative framework relevant for action against trafficking in human beings, including the adoption of the Online Safety Act and amendments to the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland). Further, the UK authorities have taken steps to reform the National Referral Mechanism (NRM) and strengthen the identification of victims of trafficking, notably through the recruitment of additional decision-making staff, the provision of training and guidance, and devolving NRM decisions concerning children to local multi-agency panels. Measures have also been taken to strengthen the criminal justice response to human trafficking and increase public funding for free legal aid. Moreover, the UK authorities have made efforts to ensure compliance with the non-punishment provision (statutory defence) through the provision of guidance and training to police officers, prosecutors and judges.

287. GRETA welcomes these positive developments. However, despite the progress achieved, several issues continue to give rise to concern. A certain number of recommendations made repeatedly by GRETA in its preceding reports have not been implemented or have been only partially implemented. In this report, GRETA once again urges the UK authorities to take action in the following areas:

- Legal assistance and free legal aid (Article 15, paragraph 2 the Convention). The UK authorities should ensure the provision of legal assistance to possible victims of human trafficking during the identification process and prior to entering the NRM, guarantee access to free legal aid across the UK and in a timely manner, and ensure that free legal aid is available for the procedure before the Criminal Injuries Compensation Schemes.
- Compensation (Article 15, paragraphs 3 and 4, of the Convention). The UK authorities should make efforts to facilitate access to compensation for victims of human trafficking, in particular by ensuring that the "illegality defence" does not prevent victims of trafficking who are undocumented workers from accessing compensation from the employers, and that victims of labour exploitation can obtain compensation of more than two years owed in National Minimum Wage, as well as by enabling victims of trafficking to effectively exercise their right to state compensation within reasonable time.
- Non-punishment provision (Article 26 of the Convention). The UK authorities should make additional efforts to comply with the non-punishment provision, including by ensuring that it can be applied to all offences that victims of trafficking were compelled to commit, removing the requirement to apply the "reasonable person" test in the framework of the statutory defence of child victims, and ensuring that the allocation of the burden of proof does not substantially hinder the application of the non-punishment provision.

288. Given that these recommendations have been made repeatedly, their priority implementation is requested and will be followed up as part of the monitoring of the implementation of the Convention.

289. As regards the thematic focus of the fourth evaluation round, which is on vulnerabilities to trafficking in human beings, the most common vulnerability factors which are abused by traffickers in the UK include poverty, unemployment, homelessness, restrictive or insecure immigration status, disabilities and mental health disorders, drug or alcohol misuse, as well as previous criminal convictions. Vulnerable groups include asylum seekers, refugees and irregular migrants, as well as migrant workers in sectors at heightened risk of exploitation, such as domestic and care work, hospitality and agriculture. Children and young persons are particularly vulnerable to human trafficking, in particular those belonging to ethnic minorities, unaccompanied or separated children, children with mental health disorders, specific

education needs, disabilities or under the child protection system. Considerable research has been carried out into vulnerabilities to THB and the effectiveness of preventive measures. While welcoming the measures taken by the UK authorities to prevent human trafficking through awareness raising, education and targeted sensitisation of vulnerable groups, GRETA has identified a number of areas of concern which require further action. The following issues should be addressed as a matter of priority:

- ensure that unaccompanied and separated children are placed in safe and appropriate accommodation and are appointed legal guardians, and improve the support provided to all looked after children in their transition to adulthood;
- prevent the vulnerabilities of migrant workers by improving their effective possibilities to change employers, increasing the human, material and financial resources allocated to labour market enforcement bodies, and prioritising unannounced and proactive labour inspections in sectors at high risk of trafficking and exploitation;
- ensure that a vulnerability assessment of asylum seekers, refugees and irregular migrants is systematically conducted at an early stage, strengthen access to legal aid for asylum seekers, provide safe and adequate accommodation for asylum seekers and refugees, and improve their access to the labour market, vocational training and English language courses;
- assess the impact of the ‘no recourse to public funds’ condition, which increases the risks of homelessness and vulnerabilities to human trafficking.

290. In addition, GRETA calls upon the UK authorities to continue improving the identification of victims of trafficking, ensuring that the procedure has a reasonable duration and that all individuals for whom there are reasonable grounds to believe that they are victims of trafficking are identified and referred for support, irrespective of their immigration status. The UK authorities should also ensure that disqualifications of presumed victims from accessing the recovery and reflection period on grounds of public order or bad faith are applied in exceptional circumstances, with due regard to the circumstances of the individual case and with respect for the principle of proportionality.

291. GRETA welcomes the efforts made by the UK authorities to address risks and cases of human trafficking facilitated by ICT, through awareness raising, public-private initiatives, intensified police operations and the use of specialised digital investigative tools. In order to address the routine use of ICT to recruit and exploit victims of trafficking, the UK authorities should strengthen co-operation with ICT companies and Internet service providers, develop data-sharing procedures with companies holding relevant data, and reduce risks of human trafficking facilitated by adult services websites by strengthening their regulation and monitoring compliance with the Online Safety Act.

292. GRETA invites the UK authorities to keep it regularly informed of developments as regards the implementation of the Convention. GRETA trusts that there will continue to be a political commitment in UK to sustain the efforts to combat human trafficking by following the human-rights based approach of the Convention, and looks forward to continuing the dialogue with the UK authorities and civil society.

Appendix 1

Table with statistics on victims and cases of THB in the United Kingdom in 2020-2025

The data presented in the table is not directly comparable across States Parties to the Convention due to variations in the methodologies used for data collection

Indicators*		Years				
		2021	2022	2023	2024	2025 ³
Number suspected victims of trafficking (NRM referrals)		12 691	16 906	16 990	19 125	17 397
Gender	Female	2 923	3 628	4 087	4 937	N/A
	Male	9 790	13 270	12 896	14 157	N/A
	Other or unknown	14	13	7	31	N/A
Age group	Adult	8 135	11 251	11 034	13 100	12 176
	Minor	4 551	5 630	5 937	5 999	5 202
	Unknown	5	25	19	26	19
Nationality ¹	UK national	3 942	4 159	4 292	4 441	N/A
	Albanian	2 505	4 609	4 055	2 492	N/A
	Vietnamese	987	763	991	2 153	N/A
	Eritrean	714	1 173	897	1 702	N/A
	Other	4 543	6 602	4 418	8 837	N/A
Type of exploitation ²	Sexual	1 266	1 644	1 678	1 898	N/A
	Labour	3 122	5 131	4 652	6 153	N/A
	Domestic Servitude	200	232	300	342	N/A
	Organ Harvesting	3	6	5	6	N/A
	Criminal	4 135	4 657	4 709	4 548	N/A
	Labour and criminal	1 541	1 965	2 015	1 631	N/A
	Labour and domestic	441	499	608	931	N/A
	Sexual and labour	327	396	524	641	N/A
Place of exploitation	UK	7 105	7 842	8 250	8 268	8 953
	Overseas	3 744	6 686	6 049	8 372	6 786
	UK and overseas	1 842	2 378	2 691	2 485	1 658
Number of presumed victims of trafficking (positive RG decisions) ⁴		11 299	14 796	8 304	10 589	10 357
Age group	Adult	7 204	9 774	4 449	5 412	5 993
	Minor	4 090	5 004	3 851	5 172	4 361
	Unknown	5	18	4	5	3
Nationality	UK national	N/A	N/A	N/A	N/A	N/A
	Foreigner	N/A	N/A	N/A	N/A	N/A

Indicators**		Years				
		2021	2022	2023	2024	2025
Investigations						
England and Wales ⁵	Sexual	N/A	577	581	520	N/A
	Labour	N/A	508	521	368	N/A
	Criminal	N/A	2 183	1 946	1 621	N/A
	Domestic servitude	N/A	76	85	72	N/A
	Forced marriage	N/A	2	2	4	N/A
	Other or unknown	N/A	209	225	153	N/A
Northern Ireland	Sexual	13 in 2021-2023			N/A	N/A
	Labour	1 in 2021-2023			N/A	N/A
Scotland		75	44	133	141	N/A

Prosecutions (cases)						
England and Wales		466	405	410	454	N/A
Northern Ireland	Sexual	2	0	2	4	N/A
	Labour	0	0	0	0	N/A
Scotland	Sexual	4	2	3	N/A	N/A
	Labour	7	7	9	N/A	N/A
Convicted persons						
England and Wales		332	282	311	353	N/A
Northern Ireland	Sexual	0	1	1	4	N/A
	Labour	0	0	0	0	N/A
Scotland	Sexual	0	4	2	N/A	N/A
	Labour	0	0	1	N/A	N/A

*Source: NRM data for 2021-2024, available at: <https://www.gov.uk/government/collections/national-referral-mechanism-statistics>. It was not possible to use only the latest cut of NRM data published by the UK authorities in order to present the statistics as the NRM data for quarter 3 of 2025 do not necessarily update the data of the previous years, in particular on gender, nationality and form of exploitation. Therefore, in order to present coherent and comparable data, the table uses the NRM data table published at the end of the relevant year, not the latest cut.

**Source: UK authorities' reply to GRETA's questionnaire under the 4th evaluation round.

N/A: not available.

¹ Dual nationality is not taken into account.

² Other combination of exploitation are not mentioned.

³ Data for January - September 2025.

⁴ RG decisions taken in year N can relate to a referral made in N-1.

⁵ The data refers to ongoing investigations in December of each year.

Appendix 2

List of GRETA's conclusions and proposals for action

The position of the proposals for action in the text of the report is shown in parentheses.

Topics related to the fourth evaluation round of the Convention

Prevention of trafficking in human beings

- GRETA welcomes the extensive research carried out in the United Kingdom in relation to modern slavery and human trafficking and considers that the UK authorities should ensure that the findings and recommendations of research are taken into account in the design and implementation of preventive policies and activities (paragraph 35);
- GRETA considers that the UK authorities should ensure that the Home Office Action Plan and the future Modern Slavery Strategy contains stronger and more comprehensive measures on preventing human trafficking, especially by addressing the vulnerabilities of persons at risk of human trafficking (paragraph 36).

Measures to prevent the vulnerability of specific groups to trafficking in human beings

Children and young people

- GRETA urges the UK authorities to take additional measures to prevent human trafficking of children and young people, including by:
 - ensuring that across the UK unaccompanied and separated children are placed in safe and appropriate accommodation, and strengthening actions to prevent their disappearance;
 - putting in place a system ensuring that all unaccompanied and separated children in England and Wales are appointed legal guardians;
 - improving the support provided to all looked after children in their transition to adulthood (paragraph 54);
- GRETA considers that the UK authorities should:
 - ensure that the age assessment procedure is conducted without delay and in line with international standards, including the Council of Europe Committee of Ministers Recommendation to Member States CM/Rec(2022)22 on human rights principles and guidelines on age assessment in the context of migration;
 - develop and implement comprehensive policies on the prevention of human trafficking of children and young persons, covering education, awareness-raising and measures to prevent children from going missing from school;
 - increase the funding, resources and capacities of local authorities to enable them to play an effective role in the prevention of child trafficking;
 - provide further training and guidance to professionals working with children and young people on human trafficking and child exploitation, how to identify children at risk and provide adequate support to avoid harm from taking place (paragraph 55).

Migrant workers

- Referring to its Guidance Note on combating trafficking for labour exploitation and the Council of Europe Committee of Ministers Recommendation to Member States CM/Rec(2022)21 on preventing and combating trafficking in human beings for the purpose of labour exploitation, GRETA urges the UK authorities to:
 - address vulnerabilities to labour exploitation of migrant workers in the framework of the different visa sponsorship schemes and improve effective possibilities for migrant workers to change employers;
 - increase the human, material and financial resources allocated to labour market enforcement bodies to ensure that they can play an effective role in the prevention of human trafficking and the detection of victims of trafficking;
 - prioritise unannounced and proactive labour inspections in sectors at high risk of trafficking and exploitation (paragraph 70);

- GRETA considers that the UK authorities should:
 - ensure that the future Fair Work Agency has a broad remit and geographical coverage (including UK's territorial waters), adequate human, financial and material resources, and is easily accessible to workers;
 - provide further training on trafficking in human beings to relevant professionals, with a focus on vulnerabilities that lead to THB and on early detection of cases of THB for the purpose of labour exploitation;
 - improve the provision of information to migrant workers about labour standards, risks of trafficking for the purpose of labour exploitation and the rights of victims of trafficking;
 - strengthen the prevention of human trafficking in supply chains and the enforcement of the modern slavery statements (paragraph 71).

Asylum seekers, refugees and irregular migrants

- GRETA urges the UK authorities to take further measures to address the vulnerabilities of asylum seekers, refugees and irregular migrants to THB, in particular by:
 - ensuring that a vulnerability assessment of asylum seekers, refugees and irregular migrants is systematically conducted at an early stage, and that safeguarding referrals and measures are made;
 - strengthening access to legal aid for asylum seekers at all stages of the international protection proceedings;
 - providing safe and adequate accommodation to asylum seekers and refugees and improving their access to the labour market, vocational training and English language courses;
 - raising awareness of asylum seekers, refugees and irregular migrants on their rights, the risks of human trafficking and the rights of victims of THB;
 - assessing the impact of the Nationality and Borders Act and the Illegal Migration Act on the prevention of human trafficking and the vulnerabilities of migrants (paragraph 82).

Vulnerabilities related to the gender dimension of human trafficking

- GRETA considers that the UK authorities should take additional measures to address the gender dimension of trafficking in human beings, including by:
 - developing interventions targeting the intersections between human trafficking and violence against women and domestic violence;
 - continuing efforts aimed at reducing demand for the exploitation of persons in prostitution and at supporting persons wishing to exit prostitution;
 - strengthening efforts to prevent child and forced marriages, paying particular attention to persons at risk, notably among ethnic minorities (paragraph 92).

Homeless persons

- GRETA urges the UK authorities to assess the impact of the 'no recourse to public funds' (NRPF) condition on vulnerabilities to human trafficking and reconsider its application to persons at risk of human trafficking (paragraph 99);
- While welcoming the steps taken to address the links between homelessness and human trafficking, GRETA considers that the UK authorities should continue engaging with the homelessness sector on addressing the vulnerabilities of homeless people to human trafficking (paragraph 100).

Disadvantaged minorities

- GRETA considers that the UK authorities should make additional efforts to prevent trafficking in human beings of persons from disadvantaged minorities, including by:
 - carrying out or supporting research on their vulnerabilities to human trafficking and the efficiency of preventive measures taken, and ensuring that the outcomes of such research are taken into account in the design and implementation of preventive policies;
 - involving organisations or individuals representing ethnic minorities in the design of anti-trafficking policies and activities;
 - addressing the root causes of the vulnerabilities to human trafficking of disadvantaged minorities, including poverty, inadequate access to education, employment and housing, and discrimination (paragraph 105).

Persons with disabilities

- While welcoming the research conducted on the intersection between human trafficking and disability, GRETA considers that the UK authorities should take additional measures to address the vulnerability of persons with disabilities to human trafficking, including by:
 - developing guidance and training on human trafficking for professionals working with persons with disabilities and special needs;
 - strengthening the early identification of persons with disabilities who are at risk of trafficking and the provision of support, by providing adequate resources to social services;
 - ensuring the availability of accessible complaint mechanisms and regular inspections of institutions and foster care for persons with disabilities;
 - improving access to education, vocational training and employment for persons with disabilities (paragraph 112).

LGBTI people

- GRETA considers that the UK authorities should take steps to address the vulnerability of LGBTI people to trafficking in human beings, particularly through research, data collection and measures aimed at improving their socioeconomic situation (paragraph 117).

Identification of victims of THB

- GRETA urges the UK authorities to take further steps to improve the identification of victims of trafficking in human beings, and in particular to:
 - ensure that the identification procedure has a reasonable duration and is victim-centred;
 - ensure that all individuals for whom there are reasonable grounds to believe that they are victims of trafficking are identified and referred for support, irrespective of their immigration status (see also the recommendation in paragraph 82);
 - ensure that persons referred to the NRM are not removed from UK territory until the completion of the identification process, in compliance with Articles 10 and 13 of the Convention (paragraph 138);
- GRETA considers that the UK authorities should:
 - continue rolling out the Devolved Decision-Making Pilot;
 - provide further resources to First Responders so that they can effectively and timely perform their role;
 - provide guidance and training to prison staff in Scotland and Northern Ireland to enable the detection and referral of victims in prisons;
 - provide further guidance and training to professionals on the identification of child victims of trafficking (see also the recommendation in paragraph 55);
 - continue providing training to, and strengthen the capacities of, the Competent Authorities so that they can improve the quality of decision-making (paragraph 139).

Assistance to victims

- GRETA considers that the UK authorities should take additional steps to ensure that all assistance measures provided for in the Convention are guaranteed in practice, and in particular:
 - improve victims' access to long-term support in England and Wales;
 - ensure that specialised assistance is provided to all child victims and victims who are transitioning to adulthood;
 - provide secure and appropriate accommodation to victims of trafficking who are asylum seekers and unaccompanied or separated children;
 - make the Independent Child Trafficking Guardianship (ICTG) scheme operational across the whole territory of England and Wales;
 - increase funding to support providers, including local authorities, so that they can provide appropriate assistance to victims of trafficking;
 - ensure victims' timely access to psychological assistance;
 - allow access to work to possible victims of trafficking if they have not received a conclusive grounds decision after the expiration of the term for making such a decision (paragraph 159).

Investigation, prosecution and sanctions

- GRETA considers that the UK authorities should continue strengthening the criminal justice response to human trafficking, including by:
 - reinforcing financial investigations and the use of special investigative techniques in order to gather material, documentary, financial and digital evidence and not having to rely exclusively on testimony by victims or witnesses;
 - ensuring that human trafficking offences are investigated and prosecuted as such, rather than as lesser offences, every time the circumstances of the case allow this, and lead to effective, proportionate and dissuasive sanctions for those convicted;
 - providing further training and guidance to investigators, prosecutors and judges on ensuring effective investigations, prosecutions and convictions in human trafficking cases, as well as on trauma-informed communications with victims;
 - expanding victim navigators in order to improve victims' participation in the criminal proceedings across the country;
 - analysing the reasons for the low number of prosecutions and convictions for other purposes of exploitation than sexual exploitation in Scotland and Northern Ireland (paragraph 181).

Protection of victims and witnesses in criminal proceedings

- While welcoming the availability of a broad range of special protection measures, GRETA considers that the UK authorities should make full use of all available measures to protect victims and witnesses of THB and to prevent intimidation during the investigation, as well as during and after court proceedings (paragraph 187).

Criminalisation of the use of services of a victim

- GRETA considers that the UK authorities should adopt a legal provision criminalising the use of all services which are the object of exploitation as referred to in Article 4 of the Convention, with the knowledge that the person is a victim of THB (paragraph 190).

Addressing human trafficking facilitated by information and communication technology (ICT)

- GRETA considers that the UK authorities should develop further measures aimed at addressing human trafficking facilitated by ICT, and in particular:
 - strengthen co-operation with ICT companies and Internet service providers, and develop data-sharing procedures with companies holding relevant data;
 - reduce risks of human trafficking facilitated by adult services websites, notably by strengthening their regulation and monitoring compliance with their obligations under the Online Safety Act (paragraph 206);
- GRETA invites the UK authorities to:
 - continue investing in capacity building and digital tools to conduct proactive investigations in cases of human trafficking. This should involve training of law enforcement officers, labour inspectors and financial police officers in the areas of Internet monitoring and online investigation, such as cyber-patrolling, undercover online investigation, and social network analysis, in order to identify victims of human trafficking recruited and/or exploited online;
 - ratify the Second Additional Protocol to the Convention on Cybercrime on enhanced co-operation and disclosure of electronic evidence (paragraph 207).

Follow-up topics specific to the United Kingdom

Overview of trends and changes in the legislative, institutional and policy framework for action against human trafficking

- Noting that the Home Office's annual reports on modern slavery provided information on the measures taken in the areas of criminal justice, prevention, victim identification and support, transparency of supply chains and international cooperation, GRETA considers that the UK authorities should resume publishing annual reports on modern slavery (paragraph 21);
- GRETA considers that the UK authorities should take the necessary steps to establish an independent National Rapporteur or to designate another existing mechanism for monitoring the anti-trafficking activities of state institutions, as provided for in Article 29, paragraph 4, of the Convention (paragraph 26);
- GRETA invites the UK authorities to update the 2014 Modern Slavery Strategy or to develop a new one (paragraph 29).

Legal assistance and free legal aid

- GRETA once again urges the UK authorities to take steps to improve access to legal assistance and free legal aid for victims of human trafficking, in particular by:
 - ensuring the provision of legal assistance to possible victims during the identification process and prior to entering the NRM;
 - ensuring access to free legal aid across the UK and in a timely manner;
 - ensuring that legal aid is available for the procedure before the Criminal Injuries Compensation Schemes, by expanding the eligibility criteria and/or facilitating access to Exceptional Case Funding (paragraph 217);

Compensation

- GRETA once again urges the UK authorities to make additional efforts to facilitate access to compensation for victims of trafficking, in particular by:
 - ensuring that victims of trafficking can obtain compensation of the full damage suffered as part of their exploitation, including moral and material damages, either in criminal proceedings or civil proceedings;
 - ensuring that the 'illegality defence' does not prevent victims of trafficking who are undocumented workers from obtaining compensation;
 - ensuring that victims of labour exploitation have accessible remedies for obtaining compensation of more than two years owed in National Minimum Wage, reflecting their real loss of wages, and increasing the time limit to request compensation before employment tribunals;
 - improving training programmes on compensation for legal practitioners, prosecutors and the judiciary, and encouraging them to use all the possibilities the law offers to uphold compensation claims by victims of THB;
 - enabling victims of trafficking to effectively exercise their right to state compensation within reasonable time, by ensuring their access to free legal aid when submitting applications to the Criminal Injuries Compensation Authority and Northern Ireland's Criminal Injuries

Compensation Scheme (see also the recommendation in paragraph 217) as well as to experts who can assess psychological injuries;

- reviewing the eligibility criteria for state compensation, notably the requirement of “crime of violence”, with a view to making it accessible to victims of all forms of trafficking, and ensuring that state compensation is not made dependent on the victim’s co-operation with the authorities (paragraph 234);
- GRETA also considers that the UK authorities should collect data on compensation claims and awards to victims of trafficking (paragraph 235).

Non-punishment principle

- GRETA once again urges the UK authorities to make additional efforts to comply with the non-punishment provision, including by:
- ensuring that in England, Wales and Northern Ireland the non-punishment provision can be applied to all unlawful activities that victims of trafficking were compelled to commit;
 - removing the requirement to apply the “reasonable person” test in the framework of the statutory defence of child victims pursuant to Section 45 of the Modern Slavery Act, and ensuring that coercion and other means, which are irrelevant for child victims of trafficking, are not taken into account for the statutory defence of children;
 - ensuring that the allocation of the burden of proof does not substantially hinder the application of the non-punishment provision (paragraph 252);
- GRETA considers that the UK authorities should:
- continue providing further training and guidance to law enforcement officers, prosecutors, judges and lawyers on the application of the non-punishment provision, which address the subtle ways by which victims can be compelled to commit offences, including through debt bondage, and how to consider them in the context of the statutory defence;
 - facilitate the expunging of convictions of victims wrongly convicted for offences committed under exploitation (paragraph 253).

Recovery and reflection period

- Referring to its Guidance Note on the recovery and reflection period, GRETA urges the UK authorities to ensure compliance with Article 13 of the Anti-Trafficking Convention, and in particular to review the public order and bad faith disqualifications to ensure that:
- the disqualifications are applied in very exceptional circumstances, with due regard to the circumstances of the individual cases and with respect for the principle of proportionality;
 - the decision to apply the disqualifications is substantiated with evidence and does not rely on a pre-defined list of circumstances where individuals are deemed to be a threat to the public order, and the burden of proof lies on the authorities;
 - the disqualifications are limited to the categories of individuals concerned by the recovery and reflection period, and do not extend to those who have been formally identified as victims of human trafficking.
 - the return of victims of human trafficking to whom the disqualifications are applied is carried out with due regard for the rights, safety and dignity of victims, and the principle of the best interests of the child (paragraph 265).

Residence permits

- In view of the limited progress made during the reporting period on access to residence permits for victims of trafficking, GRETA once again urges the UK authorities to ensure that:
 - all victims of human trafficking who have received a positive conclusive grounds decision and whose immigration status requires it are issued a renewable residence permit, in accordance with Article 14(1) of the Convention, including on the basis of their personal situation;
 - child victims are issued residence permits, in accordance with the best interests of the child, pursuant to Article 14(2) of the Convention;
 - residence permits are issued to victims in a timely manner;
 - victims of trafficking are not denied access to residence permits on the grounds of having committed offences as a result of their exploitation (paragraph 276).

Repatriation and return

- While noting positively the efforts made by the UK authorities to ensure the safe return of victims, notably to develop risk assessment prior to return and provide information on the return programme, GRETA considers that the UK authorities should continue their efforts to ensure that the return of victims of trafficking to other countries is conducted with due regards for the rights, safety and dignity of victims, including by:
 - developing further repatriation programmes for victims of human trafficking in co-operation with destination countries;
 - collecting data on the number of voluntary and/or forced returns of victims of trafficking (paragraph 284).

Appendix 3

List of public bodies, intergovernmental organisations and civil society organisations with which GRETA held consultations

Public bodies

- Home Office:
 - o Ms Jess Phillips, Minister for Safeguarding and Violence against Women and Girls
 - o Modern Slavery Unit
 - o Single Competent Authority (SCA)
 - o Immigration Enforcement Competent Authority (IECA)
 - o Irregular Migration Intake Unit (IMIU)
 - o UK Border Force
 - o Immigration Enforcement
 - o Voluntary Returns Service
 - o UK Visas and Immigration
 - o Border Security Command
- National Police Chiefs' Council Lead for Modern Slavery
- National Crime Agency (NCA)
- Metropolitan Police London
- Crown Prosecution Service (CPS)
- Ministry of Justice
- His Majesty's Prison and Probation Service (HMPPS)
- Gangmasters Labour Abuse Authority (GLAA)
- Department for Business and Trade, Labour Market Enforcement
- Office of Communications (Ofcom)
- Department for Education
- Office for Standards in Education, Children's Services and Skills (Ofsted)
- Foreign Commonwealth and Development Office (FCDO)
- Criminal Injuries Compensation Authority (CICA)
- Independent Anti-Slavery Commissioner (IASC)
- Independent Chief Inspector of Borders and Immigration (ICIBI)
- All-Party Parliamentary Group on Human Trafficking

Northern Ireland

- Department of Justice
- Department of Health
- Executive Programme for Tackling Paramilitary Activity and Organised Crime
- Police Service of Northern Ireland (PSNI)
- Public Prosecution Service (PPS)
- Northern Ireland's Human Rights Chief Commissioner

Scotland

- Scottish Government, Human Trafficking Team and Child Protection Team
- Crown Office and Procurator Fiscal Service (COPFS)
- Police Scotland
- Commissioner for Children and Young People
- Scottish Human Rights Commission
- Glasgow City Council

Intergovernmental organisation

- International Organization for Migration (IOM)

NGOs and other civil society organisations

- Aberlour (Guardianship Scotland)
- AFRUCA
- After Exploitation
- AMMA Birth Companions
- Anchor
- Anti-Slavery International / Anti Trafficking Monitoring Group
- Anti-Trafficking and Labour Exploitation Unit (ATLEU)
- Barnardo's (Independent Child Trafficking Guardians)
- BASNET
- Bawso
- Belfast and Lisburn Women's Aid
- British Red Cross
- Causeway
- Detention Taskforce
- ECPAT UK
- Flourish
- Focus on Labour Exploitation (FLEX)
- Helen Bamber Foundation
- Hestia
- Hope for Justice
- Human Trafficking Foundation
- Justice and Care
- JustRights Scotland
- Kalayaan
- Law Centre Northern Ireland
- LAWRS
- Migrant Help
- Modern Slavery and Human Trafficking Policy Evidence Centre (MSPEC)
- Safer Wales
- Scottish Refugee Council
- Survivors of Human Trafficking in Scotland (SOHTIS)
- Stop and Prevent Adolescent Criminal Exploitation (SPACE)
- Trafficking Awareness Raising Alliance (TARA)
- The Passage
- The Salvation Army
- The Voice of Domestic Workers
- Trade Union Congress (TUC)
- University of Sterling
- Unseen UK
- West Midlands Anti-Slavery Network
- Work Rights Centre
- Barristers and Solicitors specialised in THB cases
- Persons with lived experience of human trafficking

Government's comments

The following comments do not form part of GRETA's analysis concerning the situation in the United Kingdom

GRETA engaged in a dialogue with the UK authorities on a first draft of the report. A number of the authorities' comments were taken on board and integrated into the report's final version.

The Convention requires that "the report and conclusions of GRETA shall be made public as from their adoption, together with eventual comments by the Party concerned." GRETA transmitted its final report to the UK authorities on 19 December 2025 and invited them to submit any final comments by 30 January 2026. The comments of the authorities, submitted on 13 February 2026 and authorised for publication on 1 May 2026, are reproduced hereafter.

Comments from the UK on GRETA Fourth Round Report

This table details the UK Government’s comments which remain outstanding following the Council of Europe’s Group of Experts on Action against Trafficking in Human Beings fourth round evaluation report of the United Kingdom on vulnerabilities to human trafficking. These comments were made to provide further information, correct inaccuracies and suggest amendments. All previous comments which have now been incorporated into the report at previous stages of review have been removed.

Each comment relates to a highlighted section in the item box above it, where there is more than one highlighted section of a paragraph the comments have been numbered and, where there is no highlight in an item box, the corresponding comment below relates to the paragraph as a whole.

Item 16: Furthermore, the Illegal Migration Act 2023 (IMA) was passed into law on 20 July 2023. It notably introduced the duty to detain and remove persons entering irregularly in the UK, including possible victims of trafficking. Further, the Safety of Rwanda (Asylum and Immigration) Act, adopted on 25 April 2024, provided for the possibility to remove to Rwanda persons who had entered irregularly to the UK, including possible victims of trafficking. The new UK Government which was appointed in July 2024 announced that it would not implement the migration partnership with Rwanda and on 30 January 2025, it introduced the Border Security, Asylum and Immigration Bill which proposes to repeal the Safety of Rwanda (Asylum and Immigration) Act and most of the provisions of the IMA impacting victims of human trafficking, including the duty to remove those who arrived irregularly in the UK. **However, the Border Security, Asylum and Immigration Bill maintains the possibility to disqualify from the application of modern slavery protections individuals to whom a positive reasonable grounds decision has been made who are non-British nationals liable to deportation or sentenced to a period of imprisonment for any offence (see paragraphs 256-257).** At the time of adopting the GRETA report (21 November 2025), the Bill was still pending adoption by the UK Parliament.

Comments, corrections, suggestions (in relation to the highlighted section)

Following adoption of the GRETA report (November 2025), the Border Security, Asylum and Immigration Act received Royal Assent in December 2025. The Act repeals the modern slavery provisions linked to the duty to remove in the Illegal Migration Act (IMA) 2023. This ensures that there is no duty to remove, and no disapplication of modern slavery protections for individuals to whom the duty would apply.

The sole modern slavery measure being retained from the Illegal Migration Act 2023 (Section 29) would, if commenced, allow more foreign national offenders to be considered for disqualification from modern slavery protections on grounds of public order.

We want to ensure that all victims of modern slavery, regardless of nationality or residency status, are quickly identified and can access support through the National Referral Mechanism (NRM).

Unless an individual is disqualified on grounds of public order or bad faith, the NRM protects potential victims of exploitation and trafficking with a positive Reasonable Grounds decision from removal from the UK for a minimum of 30 days or until a Conclusive Grounds decision is made on their case, whichever is the longer.

Item 45: In their reply to GRETA’s questionnaire, the UK authorities referred to awareness-raising activities on child trafficking and online safety carried out in schools, notably through the “relationships, sex and health education” (RSHE) course, which has been compulsory in England since 2020 and is an important means to keep children safe, or its equivalent in the devolved administrations. In July 2025, the UK Government published a revised RSHE statutory guidance for England. It maintains that sensitive topics, e.g. grooming and exploitation, are discussed from secondary school (when children are around 11 years old). GRETA underlines the importance of early sensitisation of children on sexual abuse and risks of human trafficking.

Comments, corrections, suggestions (in relation to the highlighted section)

The updated RSHE guidance states that by the end of secondary school, pupils should be taught *‘the concepts and laws relating to harms which are exploitative, including sexual exploitation, criminal exploitation and abuse, grooming, and financial exploitation’*.

This content is built upon content taught in primary school, RSE in secondary should provide a clear progression from primary relationships education.

Primary relationships education should be anchored in an understanding of positive relationships, but should also equip children to keep themselves and others safe, and to recognise and report risks and abuse, including online. This can be delivered by focusing on boundaries, privacy, and children’s rights over their own bodies and personal information. Pupils should be able to recognise emotional, physical and sexual abuse. Even very young children can be equipped to understand what counts as abusive behaviour and to trust their instincts about behaviour that doesn’t feel right. Pupils should know how to report concerns and seek advice.

Further Information

Being Safe curriculum content to be taught by the end of primary school includes;

- What sorts of boundaries are appropriate in friendships with peers and others (including online)
- The concept of privacy and its implications for both children and adults; including that it is not always right to keep secrets if they relate to being safe.
- That each person’s body belongs to them, and the differences between appropriate and inappropriate or unsafe contact, including physical contact.
- How to respond safely and appropriately to adults they may encounter (in all contexts, including online), including those they do and do not know.
- How to recognise when a relationship is harmful or dangerous, including skills for recognising who to trust and who not to trust.
- How to report abuse, concerns about something seen online or experienced in real life, or feelings of being unsafe or feeling bad about any adult and the vocabulary and confidence needed to do so.
- How to ask for advice or help for themselves or others, and to keep trying until they are heard. Where to get advice e.g. family, school and/or other sources.

Item 52: Due to a shortage of places in foster families and children’s homes, many unaccompanied foreign children have been placed in hotels or unregulated accommodation such as caravans or tents, notably children for whom the age was disputed. According to civil society, from July 2021 to June 2023, some 5 400 unaccompanied children were housed in

Home Office commissioned hotels, some as young as 10, and several hundred children disappeared. Following a ruling of the High Court of London which considered the placement of children in hotels unlawful, the use of hotels was completely abandoned by the Home Office at the end of January 2024. The UK Government has taken steps to prevent the placement of children in unregulated accommodation, which has been forbidden for children aged 15 and below. For children aged 16-18, a revised guide of the Department of Education states that mobile and non-permanent settings are unlikely to be able to meet quality standards, other than in very exceptional individual cases. However, GRETA was informed that private companies contracted by the Home Office have continued to regularly house unaccompanied asylum-seeking children in unregulated accommodation. In their comments on the draft GRETA report, the UK authorities stated that the Home Office and the Department for Education work closely with Kent County Council to ensure that they can meet their statutory obligations in relation to all unaccompanied and separated children arriving in their area.

Comments, corrections, suggestions (in relation to the highlighted section)

The High Court reaffirmed that local authorities have a statutory duty to care for, and accommodate, unaccompanied children. A local authority's duties under the Children's Act 1989 apply to all children, irrespective of immigration status, based on need alone. In line with the direction of the court, ECPAT UK, R (On the Application Of) v Kent County Council & Anor [2023] EWHC 1953 (Admin) (27 July 2023), the Home Office closed the UASC Hotels in January 2024. Home Office have not accommodated UASCs in UASC hotels since the closure of the hotels.

Since these judgments, the Home Office and Department for Education have worked (and continue to work) closely with Kent County Council to provide support to ensure that Kent County Council can meet their statutory obligations in relation to all UASC arriving in their area. Local authorities are responsible for safeguarding and promoting the welfare of all children in their area, including child victims of modern slavery. If a trafficked child becomes looked after, they will be entitled to the same level of support and care as all looked after children regardless of their nationality or immigration status. Local children's services will work in close co-operation with the police and other statutory agencies to offer potentially trafficked children the protection and support they require.

In April 2023, the UK government introduced The Supported Accommodation (England) Regulations 2023, establishing mandatory national standards and requiring Ofsted registration and inspection for support accommodation providers accommodating 16–17-year-old looked after children and care leavers. From 28 October 2023, it became illegal for local authorities to place these young people in supported accommodation that is not registered with Ofsted or has not submitted a complete application by the deadline. Providers operating without registration are liable to prosecution under the Care Standards Act 2000. Furthermore, the placement of children under 16 in supported accommodation has been prohibited since 9 September 2021. Such settings are deemed inappropriate for younger children, who must instead be placed in foster care or registered children's homes.'

In response to pressures in Kent following the High Court judgment on UASC, the Department for Education allocated an additional £370k to the National Children's Bureau (NCB). This funding was intended to provide targeted support to Kent and neighbouring authorities, specifically to assist with the registration of supported accommodation providers and to help increase the availability of regulated placements.

Ofsted are continuing to register providers at pace and complete routine inspections to assess the quality of these provisions. Routine inspection began in September 2024 with outcomes of providers being published.

Item 61: During the reporting period, there has been an increasing number of reported cases of labour exploitation of migrant workers in the care sector. In 2022, the Home Office added this sector to the Shortage Occupational List, making care workers and home care eligible to the Skilled Worker Sponsorship regime. Following this change, the number of Health and Care visas granted considerably increased (from 47 194 in the year ending June 2022 to 121 290 in the year ending June 2023), until around Autumn 2023 when intake dropped in response to extra UKVI sponsorship scrutiny. According to a report by the NGO Unseen, the number of modern slavery cases in the care sector detected through its helpline increased from 15 in 2021 to 106 in 2022. The report shows that many migrant care workers were requested to pay fees to employment agencies in their home country, but there were also instances of fees applied by UK agencies. On average, the debt accrued was around £2 000, but in many cases, it exceeded £20 000. In addition to debt bondage, the report underlined other methods of control such as withholding of wages, excessive fees for breaking the contract, tied accommodation, as well as threats to revoke the sponsorship certificate or to report victims for deportation. The UK authorities underlined that by January 2026, UKVI revoked more than 1 000 sponsor licences from companies sponsoring care workers. The 2024 report of the House of Lords' Committee on the Modern Slavery Act noted that the regulation of the care sector is complex, with a wide range of bodies involved that lack adequate resources, hence hindering proper oversight.

Comments, corrections, suggestions (in relation to the highlighted section)

The Government published the Immigration White Paper '[Restoring Control over the Immigration System](#)' on 12 May 2025, which announced the intention to end overseas recruitment for social care visas. We have taken this action following significant concerns about the abuse and exploitation of individual workers, linked to unethical and potentially illegal international recruitment practices. The Migration Advisory Committee (MAC) have repeatedly pointed to issues in social care where employers subject workers to poor pay and conditions. We now know that even established, reputable employers have subjected workers to salary abuse including sub-minimum wages. The new Immigration Rules which prohibit overseas recruitment took effect on 22 July, however transitional arrangements exist for individuals already in the UK such as Graduates. In accordance with our public commitments, the transitional arrangements, due expire in 2028 are actively kept under review.

UKVI have exposed large scale non-compliance within the sector, revoking more than 1,000 care provider sponsor licenses, primarily related to salary underpayments and labour abuse. The Department of Health and Social care fund regional partnerships across England to support workers impacted and suspected victims of modern slavery are referred to the NRM. Work is ongoing to ensure similar levels of support are offered in Scotland, England and Wales, and Northern Ireland.

Item 62: In order to prevent abuses, in 2024, the UK Government introduced the obligation for companies providing care services which sponsor overseas workers to register with the Care Quality Commission (CQC). The GLAA continues to include the care sector among its priority areas of control and has conducted joint inspections with the CQC. However, these measures have had a limited impact in practice. In 2025, following concerns of widespread exploitation and abuse in the sector, the Home Office decided to close the care worker visa route. For a transition period until 2028, the Home Office will permit visa extensions and in-country

switching for those already in the country with working rights. These arrangements are being kept closely under review by the authorities.

Comments, corrections, suggestions (in relation to the highlighted section)

The requirement for sponsors of overseas care workers in England to be registered with the CQC was implemented in March 2024.

The CQC registration requirement applies only to companies that require a sponsor licence for roles requiring CQC registration, such as providing care services, and doesn't apply to all sponsoring companies.

Sadly, UKVI continue to expose unethical practices in CQC registered settings, a factor which was taken into account when the decision was made to end overseas recruitment. UKVI continue to work with relevant enforcement agencies and regulatory bodies, including the CQC to share information and best practice.

Item 68: As mentioned in the third GRETA report on the UK, with a view to preventing trafficking in supply chains, Section 54 of the MSA of 2015 requires companies with a turnover of £36 million or more per year that provide products or services in the UK, to publish annually a modern slavery statement explaining the steps taken to tackle modern slavery in their business and their supply chains. Since 2021, the statements have been gathered in a central registry for modern slavery statements, and the Home Office launched a public dashboard that enables easy interrogation of data by civil society, academia and the public. There have been no sanctions for failure to comply with the obligation to publish modern slavery statements. According to the UK Government, the power to seek injunction has not been used to date due to the cost to the taxpayer and difficulties in assessing compliance within the legislation. In 2025, the UK Government published new transparency in supply chains statutory guidance and a new transparency reporting template, **but it has not yet taken measures to strengthen penalties for non-compliance and create an enforcement regime as announced in its response to the report of the House of Lords Modern Slavery Act Committee.**

Comments, corrections, suggestions (in relation to the highlighted section)

The [Trade Strategy](#) (published in June 2025) set out a review of the Government's approach to Responsible Business Conduct (RBC) policy, which will focus on the global supply chains of businesses operating in the UK. The review will consider the effectiveness of the current UK regime and alternative means of supporting responsible business practices, including consideration of mandatory human rights and environmental due diligence laws and import controls on goods made by forced labour.

Alongside the broader RBC review, the Government will continue to consider how it may strengthen the Section 54 regime, including the reporting requirements, the turnover threshold, and penalties for non-compliance and will set out the next steps more broadly in due course.

Item 73: Staff of the Home Office who are competent to register and process asylum claims (UK Visas and Immigration, Immigration Enforcement and Border Force) are instructed to undertake a screening of asylum applicants with a view to establishing any health needs, disabilities and other vulnerabilities or safeguarding concerns, including if the asylum seeker is a possible victim of trafficking. The screening includes an interview based on a dedicated questionnaire. According to the authorities, staff follow mandatory safeguarding training to

identify and address vulnerabilities of asylum applicants. There are also dedicated safeguarding and modern slavery champions to provide assistance to staff. Further, as part of the screening process, all asylum seekers must be provided with the leaflet 'Information about your asylum claim', which informs them of their rights and responsibilities as well as where to get support and legal aid. **However, this leaflet is only available in English.**

Comments, corrections, suggestions (in relation to the highlighted section)

The point of claim leaflet is an official published Government document on gov.uk and therefore is only available in English. It is given to all Asylum Seekers before their appointment or given to them if they 'walk in' to an intake unit to claim Asylum.

The point of claim leaflet states if you do not understand the information in this document, to either contact one of the support services listed in the leaflet or seek legal advice.

Item 84: Tackling violence against women and girls is a top priority for the current UK Government whose manifesto included the mission to halve violence against women and girls in a decade. The UK authorities have implemented a number of measures to address the vulnerabilities of women and girls to sexual exploitation or exploitation in prostitution. In July 2021, the UK Government adopted the Tackling Violence against Women and Girls Strategy which applies in England and partially in Wales. It notes that prostitution and sex work can lead to the exploitation of women and involve sex trafficking and modern slavery. Further, the Government financially supported the NGO Changing Lives which provides early intervention and targeted support to women and girls who are victims of online sexual exploitation in England.

Comments, corrections, suggestions (in relation to the highlighted section)

Since the GRETA reporting period, the UK Government published '[Freedom from violence and abuse: a cross-government strategy to build a safer society for women and girls](#)' (December 2025). This development falls outside the scope of the reporting period and is provided for context.

Item 135: In July 2025, the UK and French Governments concluded an "Agreement on the Prevention of Dangerous Journeys" which facilitates the readmission to France of people arriving on small boats to the UK and, in exchange, provides for a safe route for entry to the UK of third-country nationals in France who want to apply for asylum in the UK. The aim is to ensure a balance between the number of people sent back to France and those arriving to the UK through the safe route. However, there are concerns that among the people returned to France there are potential victims of human trafficking. In September 2025, the High Court of England and Wales suspended the return of an Eritrean asylum seeker to France on the grounds that his trafficking claim in the UK was still pending. He had been referred to the NRM by Immigration Enforcement as a potential victim of trafficking in Ethiopia and Libya but was denied identification by the IECA and was awaiting reconsideration of his case. The Court considered that the asylum seeker would not be able to continue his trafficking claim from France and therefore would be deprived of the opportunity to get a positive reasonable grounds decision if returned to France. This decision was confirmed on appeal. GRETA recalls that pursuant to Article 10 of the Convention, States Parties have the obligation to take appropriate measures to identify victims of human trafficking. **To this end, States Parties shall ensure that if the competent authorities have reasonable grounds to believe that a person has been trafficked, that person shall not be removed from the territory until the identification process has been completed.**

Comments, corrections, suggestions (in relation to the highlighted section)

The reference in this paragraph relates to matters currently before the courts and does not directly concern whether an individual would be refused protection in France. As the issues are subject to ongoing proceedings, it would not be appropriate to comment further at this stage.

Item 149: GRETA was informed that there are safe houses for victims with specific needs, including victims with disabilities and victims with children. If the disability or care needs of a victim cannot be accommodated in a safe house, the Salvation Army co-ordinates with the Home Office and the local authority to find alternative accommodation. **However, local authorities sometimes consider that accommodation is the responsibility of the MSVCC and MSVCC support workers have to make extra efforts to convince them otherwise.** In 2021-2022, the Care Quality Commission was commissioned by the Home Office to inspect all MSVCC safe houses and assess the quality of outreach services. The Commission recommended improvements to the assessment of risks, suitability and accessibility of the safe house estate but was overall positive about the provision of support. 168 In Scotland, Migrant Help's safe house can accommodate victims with disabilities. TARA's safe houses are not accessible for persons with disabilities, but GRETA was informed that an emergency hotel accessible to people with disabilities can be provided while the NGO works with local authorities to find suitable accommodation.

Comments, corrections, suggestions (in relation to the highlighted section)

The MSVCC works in partnership with other support services including local authorities. Legislation requires local housing authorities to secure accommodation for an individual if there is a reason to believe that they may be homeless, eligible for assistance and have a priority need. Specific responsibilities of local authorities to support vulnerable individuals including victims of modern slavery are outlined in published guidance.

The Home Office has worked in collaboration with the Care Quality Commission to ensure that the provisions under the MSVCC are and continue to remain effective for victims of modern slavery.

Item 150: Victims who are asylum seekers are entitled to accommodation under the National Asylum Support Service. GRETA was informed that in England and Wales, the Salvation Army works with the Home Office to ensure that appropriate accommodation is provided to them. **However, an assessment of whether the accommodation is appropriate for a victim of trafficking is often not conducted and victims are often placed in hostels, hotels or large-scale accommodation, sometimes in very precarious conditions and far from their network of support.** Particular concerns have been raised about the Wethersfield reception centre where a number of male victims of trafficking are placed in conditions akin to detention and in overcrowded premises, without appropriate access to health care. In their comments on the draft report, the UK authorities stated that although asylum accommodation is provided on a no-choice basis, individuals with a positive reasonable grounds decision (as well as persons identified as vulnerable) are not suitable for military barracks or for room sharing and are accommodated in other parts of the asylum estate, pursuant to the Decent Homes Standards.

Comments, corrections, suggestions (in relation to the highlighted section)

Asylum seekers with a positive Reasonable Grounds decision are exempt from being accommodated in large asylum accommodation sites, including military barracks and are not required to room share, in line with published policy.

More broadly, the asylum accommodation system is able to meet the needs of potential victims of trafficking within the wider estate, in line with applicable standards and safeguarding processes.

All adult victims referred into the MSVCC, including asylum seekers, undergo an Initial Risk and Needs Based Assessment, which determines their individual needs and vulnerabilities, including where there may be a need for MSVCC safehouse accommodation. MSVCC accommodation is provided where there is a risk of re-trafficking from their exploiters present or where other accommodation the individual resides in is deemed unsuitable. The need for MSVCC accommodation is continuously reviewed in light of changes to the victim's circumstances.

Item 152: Following the introduction of the 'public order disqualification' by the NABA (see paragraphs 120 and 255), possible or confirmed victims of trafficking may be detained after having been disqualified from the NRM, but the competent authorities do not necessarily share this information with the prison authorities. This precludes the implementation of appropriate safeguarding measures in detention. Further, even when released from prison, victims who have been convicted of a criminal offence are very likely to fall under the 'public order disqualification' clause.

Comments, corrections, suggestions (in relation to the highlighted section)

It is the responsibility of the detention facility to support and safeguard individuals that are detained at the facility. Each public order decision is made on a case-by-case basis considering all the facts.

The public order disqualification decision balances public order risk with the individual's needs for modern slavery specific support, taking into account factors including convictions for offences and the individual's possible exploitation to commit those offences.

Item 155: Child victims of trafficking receive support through the local authorities. Contrary to adults, they do not have access to specialised support as victims of trafficking but are treated as any other "looked after children", except for the provision of an Independent Child Trafficking Guardian (ICTG) when available. As noted previously, local authorities face significant challenges due to the lack of sufficient financial and material resources which negatively affects their capacity to provide effective support to child victims of trafficking. In their comments on the draft report, the UK authorities specified that child social care services are funded through the Local Government Finance Settlement. As part of the Settlement, the UK Government is providing local authorities with £5.9 billion to be distributed via the Social Care Grant, an increase of £880 million from 2024-25. Pursuant to the Department for Education's statutory guidance documents the 'Care of unaccompanied migrant children and child victims of modern slavery' and 'Working together to safeguard children' (2018), where children are found to be victims of modern slavery or identified as a potentially trafficked child, a lead practitioner assesses the child's needs and draws up a care plan which sets out how the local authority intends to respond to the full range of the child's needs as a victim of modern slavery. This should happen regardless of any NRM decision about the child. The Department for Education's Families First Partnership Programme, backed by over £500 million per year over the next three years (from 2025-26), is rolling out reforms to family help

and multi-agency child protection. Funding will be increased by at least £300 million between 2026-27 and 2027- 28, as part of the £555 million investment from the Transformation Fund.

Comments, corrections, suggestions (in relation to the highlighted section)

Since the GRETA reporting period, [Working Together to Safeguard Children](#) has been updated (2026). This development falls outside the scope of the reporting period and is provided for context.

Item 158: Child victims of human trafficking continue to face significant challenges as they transition to adulthood. In theory, after turning 18 they can continue receiving support through local authorities if they meet the criteria for care leavers. They can also be eligible for support under the MSVCC if they consent to it. According to civil society, the number of children turning 18 who consent to remain in the NRM and receive support under the MSVCC is low. The IASC considers that the UK Government should review the policies for children transitioning into adulthood within the NRM and amend the Modern Slavery Statutory Guidance and the MSVCC in this regard. The Home Office Action Plan on Modern Slavery indicates that the Government will consult with civil society on possible measures to improve transition rates of children in the NRM once turning 18, including improving the provision of information to children and updating the Statutory Guidance. **In their comments on the draft report, the UK authorities indicated that the updated Modern Slavery Statutory Guidance under preparation will include changes to the consent process to remain in the NRM upon turning 18, and development of two tailored information packs for children approaching adulthood within the NRM and for professionals supporting them.** Further, the Scottish authorities underlined that support from independent guardians can continue until the age of 26 and that unaccompanied children who are victims of trafficking can remain in foster, kinship or residential care placement until 21 and are eligible for Aftercare until the age of 26.

Comments, corrections, suggestions (in relation to the highlighted section)

The information packs were published in February 2026.

Further Information

We recognise the challenges faced by children as they transition into adulthood, particularly those within the NRM.

As the National Referral Mechanism is consent-based for adults, when young people turn 18, they need to consent to remain in or withdraw from the NRM and to access adult support.

We have now completed our work to improve the transitional consent policy for potential victims turning 18, and to the withdrawal policy for all adults. We have worked with a vast range of stakeholders, including children with lived experience, to ensure these changes meet the needs of potential victims. These changes went live in the [Modern Slavery Statutory Guidance](#) on 13 February 2026 (following the GRETA reporting period).

The updated policy will allow verbal or written consent for 18-year-olds, making the process smoother and more accessible during what can be a vulnerable period. All adults, including those who turn 18 without a conclusive grounds decision, can now withdraw from the NRM verbally (via a conversation with a First Responder) or in writing, creating a more flexible and standardised process for all adults in the system. This increased flexibility aims to support

potential victims to make informed choices, ensuring that adults feel more in control of their recovery journey.

We have also developed new transitional information booklets to help young people, and the professionals supporting, them understand the NRM process as they approach adulthood. These materials will help encourage early conversations about transition. The booklet for young people is available on gov.uk: [National Referral Mechanism child to adult transition - GOV.UK](#).

Additionally, we have introduced the option for consenting young people to receive a call from The Salvation Army in the weeks preceding their 18th birthday. This will enable them to hear more about the support available to potential adult victims in the NRM through the MSVCC. These changes aim to improve transition rates and ensure young adults can confidently understand and access the support they are entitled to upon turning 18, if they chose to do so.

In addition to the transitional packs, we have developed two child-friendly information packs (one for primary-aged children and one for secondary-aged children) to support children's understanding of the NRM and what it means for them at the point of referral. These resources aim to support First Responders to have conversations with children in a consistent, age-appropriate and trauma-informed manner. These leaflets are now available on gov.uk: [Understanding the National Referral Mechanism: primary school children - GOV.UK](#); [Understanding the National Referral Mechanism: secondary school children - GOV.UK](#).

Item 209: The legal framework on victims' access to legal assistance and free legal aid remains as described in the 3rd GRETA report. **After being referred to the NRM, following a reasonable grounds decision, victims have access to free legal aid. In England and Wales, free legal aid can only be performed by a registered lawyer who holds a procurement contract either in relation to civil or criminal matters.** In Scotland and Northern Ireland, free legal aid can be provided by any registered practitioner. Free legal aid is granted based on means and merits tests. **In England and Wales, following revision of the Means Assessment Guidance of the Legal Aid Agency in November 2024, financial payments received by victims under the MSVCC are no longer taken into account in the financial resources of victims.** Despite this change, according to NGOs supporting victims, the resource test continues to exclude many victims from access to free legal aid if they have a source of income, however modest. Victims must prove their lack of assets not only in the UK but also abroad, which can be difficult.

Comments, corrections, suggestions (in relation to the highlighted section)

Victims of modern slavery with a positive reasonable or conclusive grounds decision have access to the legal aid system for immigration and asylum matters.

Victims of trafficking may also access civil legal aid for legal matters related to trafficking and exploitation, such as employment law advice, and advice on a civil claim for damages, as well as legally aided representation in any criminal proceedings against them. All applicants for legal aid must meet the relevant statutory criteria, which include means and merits tests.

Victims of trafficking and modern slavery can also access the full civil legal aid scheme on the same basis as other eligible individuals, for example if they need help with a family matter or homelessness.

We would like to clarify the reference to the Means Assessment Guidance of the Legal Aid Agency. It was not just that guidance changed, but a disregard was introduced via secondary legislation which was introduced in October 2024, coming into force November. Financial payments received by victims under the MSVCC are now ‘disregarded’ from the means test and are not taken into account for the income element of the means test ([Legal aid: Financial eligibility - GOV.UK](#)).

Item 215: Free legal aid remains unavailable for proceedings before state compensation schemes, except in Scotland or if a request for Exceptional Case Funding (ECF) is granted by the relevant legal aid agency in England and Wales. The UK authorities maintain that applying for state compensation does not require the assistance of a lawyer. The application form for compensation from the Criminal Injuries Compensation Authority (CICA), competent for England, Wales and Scotland, has been simplified and can be completed online. Further, guidance for applying for ECF have been updated in England and Wales. Despite these measures, NGOs supporting victims of THB continue arguing that applying for state compensation is complex and only applications supported by lawyers are successful. In April 2025, the High Court of England and Wales ruled that the refusal to grant ECF to four victims of trafficking for their application before CICA would be in breach of Article 6 of the European Convention of Human Rights (ECHR). The Court considered that because the victims had nobody to assist them in completing the form, had serious mental health issues, and did not have sufficient command of English, they would not be able to effectively apply for state compensation without legal aid.

Comments, corrections, suggestions (in relation to the highlighted section)

The relevant legal aid agency in England and Wales is the Legal Aid Agency ([Legal Aid Agency - GOV.UK](#))

In the court decision on CICA, the decision was fact specific and the conclusion followed from the Court finding.

Item 272: GRETA was not provided with official data on the number of residence permits granted and/or refused to victims of human trafficking. According to NGOs, which obtained data through Freedom of Information (FOI) requests, in 2020-2022, 364 adults and 21 children were granted leave to remain in the UK as victims of trafficking. In 2023, 123 victims were granted temporary permission to stay, including 110 on the basis of their recovery needs and 10 on the basis of their co-operation in criminal investigations or proceedings. It seems that no residence permits have ever been granted to victims to enable them to seek compensation. **GRETA notes that the number of residence permits granted to victims is low compared to the number of victims who receive a conclusive grounds decision each year (6 578 in 2023, including both UK and foreign nationals).** Further, the duration of the residence permit is often too short to allow victims to recover from trauma. In 2023, 24 victims received residence permits of less than 6 months, 36 received permits of 6 to 12 months, 39 received permits of 13 to 24 months, and 14 received permits of more than 24 months.

Comments, corrections, suggestions (in relation to the highlighted section)

For the purposes of this data comparison which compares grants of residence permits with the number of conclusive grounds decisions for UK and foreign nationals, it should be noted that; UK nationals are not eligible to be granted a residence permit; only individuals who have

received a **positive** conclusive grounds decision, can be considered for a residence permit, and; individuals who have received a **negative** conclusive grounds decision cannot be considered for a residence permit.