

Committee of the Parties
to the Council of Europe Convention
on Action against Trafficking in Human Beings



Recommendation CP/Rec(2026)08
on the implementation of the Council of Europe Convention
on Action against Trafficking in Human Beings
by the United Kingdom

*adopted at the 38th meeting of the Committee of the Parties
on 3 July 2026*

The Committee of the Parties to the Council of Europe Convention on Action against Trafficking in Human Beings (hereinafter referred to as “the Convention”), acting under the terms of Article 38(7) of the Convention;

Having regard to the purposes of the Convention to prevent and combat trafficking in human beings, while guaranteeing gender equality, protect the human rights of victims of trafficking, design a comprehensive framework for the protection and assistance of victims and witnesses, ensure the effective investigation and prosecution of the offences related to trafficking in human beings, and promote international co-operation;

Bearing in mind the provisions of Article 36(1) of the Convention concerning the monitoring role of the Group of Experts on Action against Trafficking in Human Beings (GRETA) in the implementation of the Convention;

Having regard to the Rules of Procedure of the Committee of the Parties;

Having regard to the instrument of ratification deposited by the United Kingdom on 17 December 2008;

Having examined the fourth report concerning the implementation of the Convention by the United Kingdom, adopted by GRETA at its 55th meeting (17-21 November 2025), as well as the comments of the UK Government received on 13 February 2026;

Bearing in mind the focus of the fourth evaluation round of the Convention on vulnerabilities to human trafficking and measures taken to prevent them, detect and support vulnerable victims, and punish the offenders, as well as the additional focus on the use of information and communication technology (ICT);

Considering the conclusions and proposals for action contained in Appendix 2 of GRETA's fourth report on the United Kingdom related to the thematic focus of the fourth evaluation round and follow-up topics specific to the United Kingdom;

Welcoming the measures taken and the progress achieved by the United Kingdom in implementing the Convention, and in particular:

- the adoption of new policy documents, namely 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 renewed engagement and consultation with civil society, including the periodic holding of roundtables and stakeholder groups which seek to inform the development and analysis of anti-trafficking policies and measures;
- the adoption of the Employment Rights Act, which establishes a single enforcement body responsible for inspecting workplaces and investigating labour market criminal offences (the Fair Work Agency) and improves the security and rights of workers;
- the extensive research in relation to modern slavery and human trafficking and the efforts made to ensure that anti-trafficking policies and activities are informed by the experiences of survivors of human trafficking;
- the steps taken to improve the identification of victims of trafficking, through the reform the National Referral Mechanism (NRM), the recruitment of additional decision-making staff, the provision of training and guidance, and devolving NRM decisions concerning children to local multi-agency panels;
- the efforts made to address human trafficking facilitated by information and communication technology (ICT), through awareness raising, public-private initiatives, and the use of specialised digital investigative tools and the adoption of the Online Safety Act strengthens responsibility of online service providers;
- the revised guidance on the non-prosecution of victims of trafficking, the provision of related training to police officers, prosecutors and judges, and the collection of data on the application of the non-punishment provision.

A. Recommends that the Government of the United Kingdom take measures to address the following issues for urgent action¹ identified in GRETA's report:

1. 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);
2. referring to GRETA's 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, take measures 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);

¹ The number of the paragraph setting out GRETA's proposals in the report is indicated in brackets.

3. 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).
4. 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);
5. 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;
 - 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);
6. 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);
7. 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 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);
8. 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);
9. referring to GRETA's Guidance Note on the recovery and reflection period, ensure compliance with Article 13 of the Anti-Trafficking Convention, and in particular 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);
10. improve access to residence permits for victims of trafficking, by ensuring 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).

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- B. Bearing in mind GRETA's conclusions that some recommendations made repeatedly in preceding evaluation rounds have not been implemented or have been only partially implemented, requests the UK authorities to take steps to implement the recommendations in points 6, 7 and 8 as a matter of priority;
- C. Recommends that the UK authorities take measures to implement the other proposals for action listed in Appendix 2 of GRETA's fourth evaluation report;
- D. Requests the UK Government to report to the Committee of the Parties on the measures taken to comply with this recommendation by 3 July 2028;
- E. Invites the UK Government to continue the dialogue in progress with GRETA and to keep GRETA regularly informed of the measures taken in response to GRETA's conclusions.