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Group of Experts on Action
against Trafficking in Human Beings

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Reply from the United Kingdom
to the Questionnaire
for the evaluation of the implementation
of the Council of Europe Convention on Action
against Trafficking in Human Beings

Fourth evaluation round

Thematic focus: Addressing vulnerabilities to
trafficking in human beings

Updated reply submitted on 12 January 2026

The initial reply to the questionnaire submitted on 31 October 2024, which was used for the preparation of GRETA's report, was not authorised for publication by the UK authorities.

Introduction

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 of the Convention 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 of trafficking, 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 the vulnerability of children to trafficking. The third evaluation round focused on trafficking victims’ access to justice and effective remedies.

GRETA has decided that the fourth evaluation round of the Convention will focus on vulnerabilities to human trafficking and measures taken by States Parties to prevent them, detect and support vulnerable victims, and punish the offenders. This includes a focus on the use of information and communication technology (ICT), which brings structural changes to the way offenders operate and exacerbates existing vulnerabilities.¹

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.² Vulnerability to human trafficking is also subject to intersectional factors, such as gender, belonging to a minority group and socio-economic status.

Applying a socio-ecological approach to the analysis of vulnerability to human trafficking demonstrates how different risk factors influence vulnerability, and how protective factors may reduce the risk of victimisation by increasing resilience.³ The socio-ecological model considers the complex interplay between individual, relationship, community and societal factors. It helps to understand how anti-trafficking strategies should: (a) reduce the vulnerability of individuals, (b) work with the communities (which may also include relationships) concerned to ensure that their practices or current dynamics

¹ [Paolo Campana, Online and Technology-Facilitated Trafficking in Human Beings, Council of Europe, April 2022.](#)

² [ICAT Issue Brief No. 12 on Addressing vulnerability to trafficking in persons - Search \(bing.com\)](#)

³ https://www.avoiceforcentraloregon.com/uploads/1/3/9/9/139904528/socio_ecological_model_and_trafficking.pdf

do not exacerbate or contribute to vulnerabilities to human trafficking and, (c) change a number of system-driven or structural elements (such as policies) so that they do not facilitate but discourage an environment conducive to human trafficking.

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.

States Parties are requested to transmit to GRETA a reply to this questionnaire within four months from the date it was sent. The reply to the questionnaire should be submitted in one of the official languages of the Council of Europe (English and French), and preferably also in the original language. Where appropriate, in order to avoid unnecessary repetition, the reply may refer to information contained in the report submitted by the national authorities on measures taken to comply with the Committee of the Parties' recommendation concerning the implementation of the proposals made in GRETA's third evaluation report. States Parties should provide links, copies or extracts of relevant legislation, regulations, national action plans and case law mentioned in the reply to the questionnaire, in the original language and, wherever possible, also in one of the official languages of the Council of Europe.

A variety of stakeholders and civil society representatives should be effectively consulted in the preparation of the reply to the questionnaire, to ensure that the information provided is as comprehensive as possible.

Part 1 – Addressing vulnerabilities to trafficking in human beings

I. PREVENTION (Articles 5, 6 and 7)

1. Do you have specific data/research/analysis of what makes people vulnerable to trafficking in human beings (THB) in your country? Please provide information on the categories/groups of people identified as being at risk of becoming victims of human trafficking, and how they are addressed in the national anti-trafficking strategy and/or action plan. Have you identified geographical regions or economic sectors in your country as particularly vulnerable to THB, and how do you address them in your strategy or policy?

England and Wales

We hold data on referrals into the National Referral Mechanism (NRM) and have analysed the biggest groups of victims in the NRM which would indicate potential risk and vulnerabilities.⁴

- In 2024, three-quarters of referrals were for males (74%; 14,157) and 26% (4,937) were for females. In 2024, males most frequently reported labour exploitation (39%; 5,462), whereas females most frequently reported sexual exploitation (31%; 1,546).
- Most referrals were for adults (at age of referral) (68%; 13,100), who most commonly reported labour exploitation (41%; 5,360). Referrals for children accounted for 31% (5,999), with almost half reporting criminal exploitation (48%; 2,891).
- The most common nationality in 2024 was UK (23%; 4,441). This was followed by Albanian (13%; 2,492) and Vietnamese (11%; 2,153).
- In both 2023 and 2024, the most common type of referral for UK nationals were male children who reported criminal exploitation, with 2,090 referrals made for this group in 2024.
- In 2024, 1,845 county lines referrals were flagged, accounting for 10% of all referrals. The majority (76%) of these referrals were for male children.
- 2024 saw the largest number of referrals for female children reporting sexual exploitation since the NRM began, increasing by 19% (356 to 423). This group is now the second most common type of referral for UK nationals in 2024.

We have also analysed the geographic trends in the annex to the latest annual NRM statistics release, available here: [Annex: An analysis of NRM referrals and DtN reports for potential victims of modern slavery, 2023 to 2024 - GOV.UK](#).

The National Crime Agency (NCA) established Project AIDANT in 2014 and co-ordinated two phases of AIDANT in 2024. This work, which includes national law enforcement activity aimed at tackling modern slavery threats, has raised the profile of modern slavery/human trafficking and brought a more focused response from police forces and partner agencies to tackle specific aspects of vulnerability and exploitation.

Each AIDANT phase was planned based on emerging or under-reported threats, such as focusing on a specific modus operandi, or an enabler of exploitation. This was in order to improve knowledge and reporting so that UK law enforcement and the wider system can address it more effectively. The NCA utilised assessments and strategic reporting from the National Assessment Centre (NAC), as well as data from the NRM in order to direct activity.

⁴ [Modern slavery: NRM and DtN statistics, end of year summary 2024 - GOV.UK](#)

Recent NCA operations have included targeting cash-intensive businesses, including barbershops, car washes, vape shops, nail bars, and American-themed sweet shops. We know these to be high-risk sectors linked to modern slavery and human trafficking.

The Home Office continues to work closely with our academic partners to build our understanding of risks and vulnerabilities, and strategies to prevent trafficking and modern slavery.

The Modern Slavery and Human Rights Policy and Evidence Centre (PEC) funds and co-creates research to provide independent, innovative and authoritative insight and analysis on modern slavery. The PEC is publicly funded, by the Arts and Humanities Research Council, but is independent from Government. Some of this research has considered individual vulnerabilities; for example, children and young people with special educational needs and disabilities, are particularly vulnerable.⁵ Research funded by the PEC has shown that the scale and nature of modern slavery in the UK are influenced by global phenomena, such as pandemics, conflict, and poverty. For instance, the Covid-19 pandemic exacerbated many underlying drivers of modern slavery worldwide and domestically, such as poverty, inequality, and unemployment, particularly for vulnerable and marginalised groups.⁶ Evidence also shows that individual and structural vulnerabilities to modern slavery also include irregular migration status, power imbalances between workers and employers, gender-based violence, forced displacement and weak rule of law – which in turn are drivers of other issues, such as conflict.⁷

Scotland

Individuals can often become vulnerable to human trafficking and exploitation due to a range of socio-economic and personal factors. Issues such as social isolation, unemployment, insecure immigration status, drug and alcohol dependency can all significantly increase the risk of someone falling victim to trafficking and exploitation. Children are, by default, more vulnerable to coercion and abuse than adults due to their age and dependency on others for their care and are therefore at greater risk of becoming victims. A child's vulnerability can be increased where they experience a physical or learning disability or any other particular set of characteristics or experiences which would increase their reliance on adult care.

The risks to children can be even greater when they are moved to another location, where they have no associations or shared language. How child victims will experience trafficking and exploitation will differ and may be impacted by their gender. Section 4 of the Scottish Government's Trafficking & Exploitation Strategy⁸ brings together the specific children's actions where the situation for children who are, or may be victims of human trafficking and exploitation, differs from that for adults. The incorporation of the UNCRC into Scots Law under the UNCRC (Incorporation) (Scotland) Act 2024 further enhances children's rights in Scotland, for example:

- Article 35: Calls for measures to prevent the abduction, sale, or trafficking of children.
- Article 36: Protects children from all forms of exploitation prejudicial to their welfare.

The Scottish Government has implemented various measures to combat trafficking and exploitation of children and young people, for example:

⁵ [Microsoft Word - SEND full report Final.docx](#)

⁶ [Modern Slavery PEC | Submission of Evidence to the Home Affairs...](#)

⁷ <https://files.modernslaverypec.org/production/assets/downloads/MSPEC-UKgov-priorities-policy-report-final.pdf?dm=1736268038>

⁸ [Trafficking and Exploitation Strategy - Human trafficking - gov.scot \(www.gov.scot\)](#)

- Establishing a statutory Independent Child Trafficking Guardian (ICTG) service in accordance with section 11 of the Human Trafficking and Exploitation (Scotland) Act 2015, for all unaccompanied children arriving in Scotland who are vulnerable to becoming, or victim of, trafficking or exploitation.
- Progressing its commitment to establish a rights-based national Bairns' Hoose model, which is a transformational, whole-system approach to delivering child protection, justice, and health support and services to child victims and witnesses of abuse and harm. It will provide safe, trauma-informed environments for child victims and witnesses to access multi-agency support and recover services. The Scottish Government is introducing a three-phased approach to rollout, beginning with a Pathfinder phase which launched in 2023.
- Improving outcomes for children through the Getting it right for every child (GIRFEC⁹) approach which ensures that all children receive the support they need early on, aiming to prevent issues from escalating to the point where urgent child protection measures are necessary.

The Scottish Government's National Guidance for Child Protection 2021, updated in 2023¹⁰, provides guidance in respect of child trafficking and exploitation. It highlights that all necessary actions and inter-agency child protection procedures should be followed to ensure child victims are protected. The National Guidance remains the primary guidance document for child protection and vulnerability investigations. Examples of recent reports and studies that provide insights into the vulnerabilities related to child trafficking and exploitation in Scotland:

- Understanding Child Criminal Exploitation in Scotland: A Scoping Review¹¹ (CYCJ, Action for Scotland, Scottish Government, 2023)
- Survivor-informed support for trafficked children in Scotland¹² (University of Stirling, 2023)
- The Jay Review of Criminally Exploited Children¹³ (Action for Children, 2024)

Other factors which make people vulnerable to THB within Scotland are also detailed within Police Scotland's (PS) Human Trafficking Handbook. Victims of trafficking can be vulnerable due to their immigration status, whether that be as an irregular entrant into the UK, or whilst on a pending application which limits their ability to work/earn a living. Such foreign nationals can have their documentation withheld from them or are forced to use false documentation upon entry to Scotland. Their travel is often controlled by their exploiter, with it being paid for by someone else, and have no knowledge of where they are travelling/who they are meeting on arrival. Victims of trafficking from overseas who may speak little English and have a limited knowledge of Scotland can be at increased risk of exploitation. A distrust of authorities together with an element of control due to debt bonding, may make them dependant on their exploiter.

Northern Ireland (NI)

The National Referral Mechanism (NRM) statistics include detail on victims and potential victims of trafficking identified in Northern Ireland, including nationality, sex, age group and type of exploitation. The majority of individuals identified as potential victims of Modern Slavery and Human

⁹ [Getting it right for every child \(GIRFEC\) - gov.scot \(www.gov.scot\)](https://www.gov.scot/getting-it-right-for-every-child-girfec/)

¹⁰ [National Guidance for Child Protection in Scotland 2021 - updated 2023 - gov.scot \(www.gov.scot\)](https://www.gov.scot/national-guidance-for-child-protection-in-scotland-2021-updated-2023/)

¹¹ [Understanding Child Criminal Exploitation in Scotland: A Scoping Review - Children and Young People's Centre for Justice \(cycj.org.uk\)](https://www.cycj.org.uk/understanding-child-criminal-exploitation-in-scotland-a-scoping-review/)

¹² [Research Report | Survivor-informed support for trafficked children in Scotland | University of Stirling](https://www.stirling.ac.uk/research-report-survivor-informed-support-for-trafficked-children-in-scotland/)

¹³ [The Jay Review of Criminally Exploited Children | Action For Children](https://www.actionforchildren.org.uk/the-jay-review-of-criminally-exploited-children/)

Trafficking (MSHT) in Northern Ireland are foreign nationals and were identified as having been exploited outside of the UK.

In July 2024, the Department of Justice for Northern Ireland (DoJ) published the *Modern Slavery and Human Trafficking Strategy 2024-27* (the Strategy), which has been developed and implemented in partnership with other statutory agencies and our NGO partners. The Strategy includes commitments to improve and enhance multi-sector collaboration in assessing and responding to emerging threats through partnership working with statutory agencies and voluntary sector organisations.

The Strategy includes a commitment to ensure high-risk sectors and frontline professionals are equipped with the appropriate skills and knowledge to identify potential victims, including UK victims, and how to report cases of MSHT. This includes delivery of training and awareness sessions across key sectors and professional disciplines such as health & social care, police, prisons, transport, education, district councils, Department for Communities (DfC), and the Department of Agriculture, Environment and Rural Affairs (DAERA).

In recognition of the low numbers of referrals to the NRM for UK children in Northern Ireland, in contrast to the significant number referred in other parts of the UK for child exploitation, DoJ are actively seeking to explore the issue of child criminal exploitation (CCE) in the context of Northern Ireland. A new 2-year CCE action plan is intended to implement measures to prevent the criminal exploitation of children and young people, and ensure those responsible for exploiting them are brought to justice. DoJ in partnership with the Modern Slavery Policy and Evidence Centre (MSPEC) have commissioned research, to be delivered by Ulster University and the International Organisation for Migration, to explore the barriers to the recognition and identification of victims of child criminal exploitation (CCE) in Northern Ireland.

2. What specific measures are taken to reduce children's vulnerability to THB by creating a protective environment for children? Please provide information in the following areas:

- a. protecting children's rights from attitudes, customs, behaviour and practices that can have an adverse effect (including child, early and forced marriage, and illegal adoption);
- b. developing children's life skills (including media literacy and online safety skills), knowledge and participation;
- c. putting in place a system for monitoring and reporting cases of abuse;
- d. providing training to childcare professionals, legal guardians, education professionals;
- e. access to education and health care for vulnerable children, including from minority groups, unaccompanied migrant children, and children of migrant workers;
- f. birth registration for all children born in the country.

England and Wales

In England, HM Government's [Working Together to Safeguard Children](#), and [Keeping Children Safe in Education](#) statutory safeguarding guidance documents signpost safeguarding professionals and school staff to further information and help on child trafficking. Child protection and safeguarding

protocols and procedures must be followed as a priority if a potentially trafficked child is identified. Where there are concerns that any child is at risk of, or has suffered, significant harm – which includes being vulnerable to exploitation and trafficking – this should be reported to the police or to local authority children’s social care department. *Working Together to Safeguard Children* (2023) sets out how agencies, organisations and practitioners should work together in fulfilling their responsibility to safeguard children, maintaining a child-centred approach while bringing a whole-family focus, and embedding strong, effective and consistent multi-agency child protection practice.

This guidance, which applies in England, is clear that children at risk of harm from outside their home should receive the support they need, recognising threats may arise from school, peer groups, online or the wider community. It clarifies that children at risk of, or experiencing harm outside the home, including online, should receive a multi-agency safeguarding response. The guidance includes information on the National Referral Mechanism, the UK’s system for identifying victims of modern slavery and human trafficking, and the Independent Child Trafficking Guardianship Service.

In Wales, the [Wales Safeguarding Procedures](#) detail the essential roles and responsibilities for practitioners to ensure that they safeguard children and adults who are at risk of abuse and neglect. The Procedures helps practitioners apply the legislation [Social Services and Wellbeing \(Wales\) Act 2014](#) and the statutory safeguarding guidance, [Working Together to Safeguard People](#). The Wales Safeguarding Procedures are supported by [All Wales Practice Guides](#) on supporting trafficked and exploited children.

Multi-agency practice principles for tackling harm outside the home, including serious violence and exploitation, were published in March 2023. These were developed by the Tackling Child Exploitation Support Programme (funded by the Department for Education and supported across government) and draw on the views of both professionals and young people with lived experience of these harms. [Multi-agency Practice Principles for responding to child exploitation and extra-familial harm \(researchinpractice.org.uk\)](#)

Under the Curriculum and Assessment (Wales) Act 2021, Relationships and Sexuality Education (RSE) is a mandatory cross cutting theme for all learners aged 3 to 16 in Wales. The mandatory RSE Code sets out learning at developmentally appropriate phases, and this includes learning about healthy relationships, keeping safe online, and offline, and being confident to raise issues with responsible adults. [Cross-cutting themes for designing your curriculum - Hwb](#)

Learners in Wales are supported to develop the knowledge, skills and behaviours that will assist in protecting them throughout their lives and supports them to navigate the world safely. ‘Empowerment, Safety and Respect’ is one of three key strands within the Code, and the Welsh Government’s RSE guidance is clear that learners should be supported to recognise all forms of discrimination, violence, abuse and neglect, including violence against women, domestic abuse and sexual violence; and how to seek help, support and advice where appropriate.

Through the Children’s Wellbeing and Schools Bill, introduced in December 2024, we are introducing new measures to strengthen multi-agency working to keep children safe. Measures include better information sharing between agencies, requiring the establishment of multi-agency child protection teams in every area and a new duty on safeguarding partners to automatically include education and childcare settings in their multi-agency safeguarding arrangements so that opportunities to keep children safe are not missed. In 2022-23, the Department funded 4 local authorities, to further test a Risk Outside the Home child protection pathway, based on the model developed by Wiltshire Council, as part of Durham University’s Planning for Safety research project. From February 2023 to December 2024, we funded Durham University to conduct further research on the ROTH pathway, to help develop the evidence base further.

Trafficked children and unaccompanied migrant children are likely to require additional educational support to help them overcome any barriers to learning and assessment. Local authorities have a legal duty to ensure that education is available for all children of compulsory school age appropriate to age, ability and aptitudes and any special educational needs they may have. This duty applies irrespective of a child's immigration status or rights of residence.

Local authorities have a duty to accommodate all unaccompanied migrant children who arrive in their area under the Children Act 1989 (in England) and the Social Services and Well-being (Wales) Act 2014 (in Wales). All local authorities must exercise their duties under this legislation to all children, regardless of immigration status: therefore, unaccompanied migrant children and Trafficked Children who become looked after will be entitled to the same level of support and care as all other looked after children. Local children's services will work in close co-operation with the police and other statutory agencies to offer potentially trafficked children who are unaccompanied with the protection and support they require. This includes ensuring the child has all the necessary support they require, including access to health, education and appropriate and safe accommodation.

Local authorities are responsible for safeguarding and promoting the welfare of all children in their area, including child victims of exploitation and trafficking, regardless of their nationality or immigration status. Child victims do not need to provide consent to enter the NRM. If a First Responder Organisation encounters a child that they suspect to be a victim, they must refer them into the NRM and to the relevant local authority in line with child protection procedures. It is not possible for a child to give informed consent to engage in criminal or other exploitative activity, and they cannot give consent to be exploited, abused or trafficked. All NRM referrals are referred to the police.

In Wales, under the Social Services and Well-being (Wales) Act 2014, unaccompanied asylum-seeking children (UASC) have the same rights and entitlements as looked after children who are born in Wales and the UK, regardless of their immigration status. They are included in any policy or service that is implemented to support children looked after; this includes access to health, and education services.

As part of the Welsh Government's Programme for Government, the Welsh Government are committed to continue to support and uphold the rights of unaccompanied asylum-seeking children and young people. Unaccompanied asylum-seeking children were represented at the series of inaugural care experienced summits ensuring their voices are heard as part of the transformation of children's services.

During 2024-2025, the Welsh Government has continued to provide £325k to the Welsh Local Government Association (WLGA) to support local authorities with the implementation of the National Transfer Scheme alongside supporting UASC care leavers.

The Welsh Government's Anti-racist Wales Action Plan ensures that refugees and asylum seekers can access educational opportunities, including language skills, to help them rebuild their lives and fulfil their potential.

Young children of compulsory school age in Wales would normally in school be provided with English as an Additional Language (EAL) support; whereas children 16 years and above would access English for Speakers of Other Languages (ESOL), primarily offered by colleges but is also available through other providers.

The Welsh Government provides dedicated funding to local authorities to support improved educational outcomes for children and young people from ethnic minority communities, including Asylum Seekers and Refugees. This has supported the development and embedding of a wealth of expertise and good practice in education settings across Wales.

The Welsh Refugee Council (WRC), funded by the Welsh Government, provides specialised support through the Wales Sanctuary Service. This service helps individuals and families with practical needs, while also offering critical support in education, employment, and housing. For younger people, the WRC collaborates with local charities and organisations to help navigate educational pathways, including ESOL opportunities, and connects families with resources like school enrolment and GP registration. Through these partnerships, WRC ensures young refugees and asylum seekers can access ESOL classes and other essential services to support their language development and integration.

Young refugees and asylum seekers in temporary accommodation in Wales should have equal access to education and training. Local authorities work with ESOL providers and other agencies to deliver comprehensive wrap-around services that support these learners in their educational journey.

The Government-funded Independent Child Trafficking Guardianship service, where available, provides advocacy and specialist support to child victims of exploitation and trafficking who have been referred to the NRM. This service advocates on a child's behalf to ensure their best interests are reflected in the decision-making of the public authorities involved in their care. It is designed to protect children from further harm, prevent possible repeat victimisation, re-trafficking or going missing, and to promote the child's recovery. The service also supports professionals and carers to understand the complexities of the NRM, including raising awareness of indicators of modern slavery and human trafficking in children.

Additionally, the Home Office are seeking to improve the Modern Slavery Statutory Guidance to improve and standardise the NRM transition process to best support vulnerable individuals turning 18-years-old. The Home Office is developing an information pack to distribute to young people in the NRM need to provide their consent to remain in the NRM and access adult support services. The pack will provide information on next steps and support entitlements for children who reach 18 and consent to remain in the NRM and access support through the Modern Slavery Victim Care Contract (MSVCC).

The devolved decision-making pilot, currently running in 30 local authorities in England, Wales and Scotland, is testing whether determining if a child is a victim of modern slavery within existing safeguarding structures is a more appropriate model for making modern slavery decisions for children. This approach enables decisions about whether a child is a victim of modern slavery to be made by those involved in their care. It also ensures that decisions are closely aligned with the provision of local, needs-based support and any law enforcement response.

The pilot has seen a range of benefits including better local understanding of modern slavery and the National Referral Mechanism, as well as improved multi-agency join-up. It has also resulted in faster decision-making from referral to a conclusive grounds decision: between October 2023 and September 2024, the average (median) time taken to reach a conclusive grounds decision was 101 days. For non-pilot children, the average was 471 days.

Scotland

Illegal adoption is regulated by various laws in Scotland, such as the Adoptions with a Foreign Element (Scotland) Regulations 2009¹⁴, which outlines offences under regulation 63 relating to bringing a child into Scotland for the purpose of adoption. Forced marriage is a criminal offence in Scotland under the Anti-Social Behaviour Crime and Policing Act 2014¹⁵. The Forced Marriage etc. (Protection and Jurisdiction) (Scotland) Act 2011¹⁶ introduced protection orders to protect people who are at risk of forced marriage or have already been forced into marriage. The Forced Marriage

¹⁴ [The Adoptions with a Foreign Element \(Scotland\) Regulations 2009 \(legislation.gov.uk\)](#)

¹⁵ [Anti-social Behaviour, Crime and Policing Act 2014 \(legislation.gov.uk\)](#)

¹⁶ [Forced Marriage etc. \(Protection and Jurisdiction\) \(Scotland\) Act 2011 \(legislation.gov.uk\)](#)

Statutory Guidance outlines how cases of forced marriage will be responded to using existing frameworks for protection children, adults at risk and victims of abuse. In Scotland, the minimum age to enter into a marriage or civil partnership recognised by the state is 16. The Scottish Government intends to consult on whether this should be raised to 18.

Experiences and Outcomes for the Technologies area of the Curriculum for Excellence (CfE) including internet safety and cyber resilience can assist in developing children and young people's life skills (including media literacy and online safety skills), knowledge and participation. There are clear links between internet safety and Personal and Social Education (PSE)/health and wellbeing and these statements help teachers plan learning. Children and young people can learn about the safe and responsible use of different technologies, including the internet and social media, as part of their broad general education under CfE.

Health and wellbeing is one of the eight curricular areas in CfE. Its substantial importance is reflected in its position at the centre of the curriculum and at the heart of children and young people's learning – health and wellbeing is also a central focus of the Scottish Attainment Challenge and the National Improvement Framework for Education. Along with literacy and numeracy it is one of the three core areas that are the responsibility of all staff in schools following the CfE. Learning in health and wellbeing is designed to ensure that children and young people develop the knowledge and understanding, skills, capabilities and attributes which they need for mental, emotional, social and physical wellbeing. While the CfE framework is set at a national level, it is up to education authorities and schools to determine how they will deliver the curriculum to best suit the children and young people in their area.

The Scottish Government's National Guidance for child protection provides a framework for identifying, reporting, and responding to child abuse. The Guidance includes specific protocols for professionals working with children and promotes a multi-agency approach, to ensure that information about suspected abuse is shared promptly and effectively among relevant authorities. The Scottish Government is developing national multi-agency Inter-agency Referral Discussion (IRD) training to support more consistent practice across local areas.

The Guidance advises that organisations that work with children and young people should have policies in place that allow individuals to escalate a child protection concern out of their management structure. While these policies should be in place, any individual who has concerns about a child's wellbeing should contact their local authority social work department or Police Scotland without delay if they believe a child or young person is at risk of harm.

As part of the Scottish Government's Child Protection Improvement Plan, the approach to Significant Case Reviews was revised in 2021 and replaced by Learning Reviews, taking account of Care Inspectorate analysis, UK and international findings. Learning Reviews ensure that essential recommendations translate into effective learning to prevent recurrence of the most serious child protection events. National guidance for child protection committees undertaking learning reviews was published in September 2021, and updated in June 2024.

The National Guidance for Child Protection includes a section on learning and development for professionals. This makes clear that single- and multi-agency training should be available to promote the knowledge, skills and values needed to support effective child protection work. Local Child Protection Committees (CPCs) are responsible for overseeing training needs within their areas and should have mechanisms in place for the delivery and evaluation of local training. Recognising that there are different levels of awareness and specificity in training needs within the workforce,

the Scottish Government first published a National Framework for Child Protection Learning and Development¹⁷ in 2012. The Framework was updated in 2024.

In Scotland, teachers engage in professional learning to stimulate their thinking and professional knowledge. A minimum of 35 hours of continuing professional development per year is required for teachers in Scotland. In the SNCT Handbook, which sets out the aspects of teachers' terms and conditions that have been negotiated nationally by the tripartite SNCT, professional learning is the responsibility of the individual - the duties of teachers are to maintain and develop knowledge and skills and contribute to the professional development of colleagues including probationary and student teachers. Education Scotland contains resources aimed at staff who working in all education sectors in Scotland. This professional learning aims to help staff support children and young people in relation to criminal exploitation. In June 2023 Scotland also published its Criminal Exploitation: Practitioner Guidance¹⁸ to support a shared understanding of criminal exploitation, and to help assist practitioners with early identification of those at risk from serious organised crime.

The GIRFEC national policy framework in Scotland aims to improve outcomes and supports the wellbeing of children and young people. The framework embeds the principles of the UNCRC into practice and promotes a rights-based approach. The UNCRC (Incorporation) (Scotland) Act 2024¹⁹ (the UNCRC Act) incorporates the rights and obligations of the UNCRC into Scots Law. This means that Scottish public authorities, including health and education services, must uphold the rights of all children set out in the schedule to the UNCRC Act when carrying out devolved functions, without discrimination of any kind, including on the basis of nationality, race or migration status.

Scottish Local Authorities have a duty to safeguard and promote the wellbeing of children who are "looked after"¹, regardless of the child's immigration status. All Unaccompanied Asylum-Seeking (UAS) children and young people in Scotland are considered to be 'looked after' within the care system and therefore have the same rights and entitlements as any looked after child (LAC). UAS children are also supported to access the full range of health care and education opportunities available to other children living in the UK.

The Scottish approach to inclusion affords all children and young people the opportunity to be a part of a community, boosting their mental health, emotional wellbeing, aiding the development of social skills and enabling young people to learn, thrive and feel engaged. Scotland's inclusive approach celebrates diversity and allows all children and young people to develop an understanding and recognition of differences, contributing to the development of an increasingly inclusive, empathetic and more just society. The Scottish Government wants all children and young people to get the support that they need to reach their full learning potential.

The joint Scottish Government and COSLA Action Plan, Improving the Lives of Scotland's Gypsy/Travellers: 2019-2021, aimed to improve outcomes for Scotland's Gypsy/Travellers in the key areas of accommodation, education and health. The actions in the Plan were developed with members of the Gypsy/Traveller community. The Plan was extended until spring 2023 due to the effects of the Covid pandemic. It was then refreshed for the period June to September 2023, to ensure it remained relevant to the needs of Gypsy/Traveller communities. We are currently gathering data on successes and challenges with policy colleagues across the Scottish Government to review progress against the previous Action Plan. In partnership with COSLA, we are also currently undertaking a listening exercise with Gypsy/Traveller communities to inform the development of a new Action Plan. Partner organisations receive funding to support young people

¹⁷ [Child protection learning and development 2024: national framework - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/national-framework-for-child-protection-learning-and-development-2024/pages/introduction/)

¹⁸ [Criminal exploitation: practitioner guidance - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/criminal-exploitation-practitioner-guidance/pages/introduction/)

¹⁹ [United Nations Convention on the Rights of the Child \(Incorporation\) \(Scotland\) Act 2024 \(legislation.gov.uk\)](https://legislation.gov.uk/ukpga/2024/10/section/1)

in education, celebrate the culture of Gypsy/Travellers and support the Scottish Government in its decision-making processes to meet the needs of the Gypsy/Traveller community.

In Scotland, births need to be registered within 21 days. This legal requirement applies to all children born in Scotland (or treated as born in Scotland in terms of the legislation where the birth takes place in the course of a journey), ensuring that every child's birth is officially registered. Local authorities have designated registrars and accessible registration services to assist parents and other persons who, depending on the circumstances, may be qualified to provide the particulars of a birth.

Northern Ireland (NI)

DoJ engage regularly with partners in Health & Social Care (HSC) Trusts and the Department of Health (DoH) Strategic Planning and Performance Group (SPPG) through the Organised Crime Task Force (OCTF) MSHT Sub-group and Regional Practitioners Forum. DoJ and partners work to ensure that training and awareness sessions are provided to social workers and other operational partners working with children to protect vulnerable individuals and spot the signs of MSHT. SPPG ensure that vulnerable young people, including separated and unaccompanied asylum-seeking children (S/UASC), receive appropriate care, support, and safe accommodation.

The DoH *Co-operating to Safeguard Children and Young People in Northern Ireland* policy provides the overarching policy framework for safeguarding children and young people in the statutory, private, independent, community, voluntary and faith sectors. It outlines how communities, organisations and individuals must work both individually and in partnership to ensure children and young people are safeguarded as effectively as possible.

Partners in the Northern Ireland Education Authority (EA) engage with DoJ, SPPG and other operational partners via the OCTF MSHT Sub-group and Regional Practitioners Forum. The Northern Ireland Executive *Children & Young People's Strategy*, a cross-departmental strategy led by the Department of Education, sets out the actions by which the Northern Ireland Executive seeks to protect children's and young people's well-being, as defined by the Children's Services Co-operation Act (Northern Ireland) 2015.

On arrival S/UASC are given access to a GP and initial medicals and screening as required. Support is also given to access a dentist, optician and mental health support. The issue of health for each individual is reviewed and reassessed at each looked after child review and is an essential component of their care plan and from the age of 16-21+ a component of their Pathway Plan.

Children arriving of compulsory school age are referred for a school placement and guidance from the EA regarding application has recently been issued. Older young people are referred to a range of ESOL courses to improve their English, offered through a range of regional further education institutions and this can lead onto a pathway for further education. Some of the young people arriving as S/UASC in recent years have gone on to achieve Higher Educational placements and are supported by HSC Trusts in these courses.

3. What measures are taken in your country to address vulnerabilities related to the gender dimension of human trafficking?

England and Wales

In 2024, of the 19,125 potential victims referred, 74% (14,157) were male and 26% (4,937) were female. Referrals for both male and female potential victims have reached their highest annual number since the NRM began. The proportion of male referrals received in each year had been gradually increasing since the NRM began, although it has fallen slightly since 2023. For adult

potential victims, 72% (9,459) were male and 28% (3,626) were female; whilst for children, 78% (4,677) were male and 22% (1,306) were female.

Exploitation types typically have gendered patterns. For example, in 2024, males most often reported labour exploitation (39%; 5,462), whereas females most often reported sexual exploitation (31%; 1,546). In 2024, 8% (1,546) of referrals to the NRM were females reporting sexual exploitation.

Tackling violence against women and girls is a top priority for this Government and our manifesto included the mission to halve violence against women and girls in a decade.

The trafficking of women and girls for sexual exploitation is a truly horrific crime. We are determined to safeguard victims and bring the ruthless perpetrators of this crime to justice. We must use every tool available to catch these criminals and support victims to recover from this horrendous abuse.

Through the Government funded Modern Slavery Victim Care Contract (MSVCC) victims are provided with tailored support that reflects their unique experiences, vulnerabilities and recovery needs. This includes gender sensitive support that can shape an individual's journey to recovery. Under the MSVCC, individuals will be entitled to single sex safehouse accommodation to ensure victims feel physically safe and secure, reducing the risk of re-traumatisation. Additionally, victims are also entitled to request a same sex support worker. The importance of which is to ensure that victims are comfortable, empowering their engagement with the support provided. A support worker will be able to advocate on behalf of the victim, ensuring gender sensitive support is extended to other services such as interpreters, NHS, legal support to ensure support is responsive to the needs of the victim. We are working closely with law enforcement partners to tackle the drivers that can facilitate human trafficking for the purposes of sexual exploitation through a range of activity. To help support victims, the Home Office is providing £1.36m over three years to Changing Lives for their Net-Reach project, which provides early intervention and targeted support for women and girls at high-risk of commercial online exploitation and the risk on online sexual harm.

The Gangmasters and Labour Abuse Authority (GLAA) are currently conducting research into the additional vulnerabilities that women and girls are often exposed to that could lead to labour exploitation. This research will combine both existing research on this topic alongside analysis of GLAA data to assist in both strategic and operational decision making, and future data collection.

Scotland

The Human Trafficking and Exploitation (Scotland) Act 2015²⁰ (The Act) serves as the foundational legal framework for addressing human trafficking and exploitation in Scotland. This legislation places significant emphasis on victim protection and support. Even prior to the enactment of this legislation, Scotland had already adopted a gender-sensitive approach to providing support to victims of trafficking, specifically through its sponsorship of the Trafficking Awareness Raising Alliance (TARA).

The TARA Service provides support to adult females trafficked for commercial sexual exploitation (CSE). Their crisis accommodation is woman only and is a mixture of shared and single self contained apartments within communities. The staff team are all female (all posts have been assessed as having a genuine occupation requirement to be female only). Thorough risk assessments and safety plans informed by women's systemic and individual experiences of violence and inequality (past and present) and protected characteristics are routine.

The service advocates for female interpreters, police officers (when requested) and other professionals when women are disclosing their experiences of sexual violence and make efforts to

²⁰ [Human Trafficking and Exploitation \(Scotland\) Act 2015 \(legislation.gov.uk\)](https://legislation.gov.uk)

minimise women having to repeat their experiences. TARA link with their local Sexual Assault and Referral Centre, Archway Glasgow, as required. It is not uncommon for late disclosures to be caused by male professionals undertaking an initial assessment, as women can feel significant shame, stigma or fear around disclosures of male violence and their commercial sexual exploitation and are frequently unable to voice their experiences. (A cultural and religious lens is also applied by the service to ensure that appropriate language is used when assessing and understanding women's experiences.)

The service is also mindful of issues such as ante/post-natal health, childcare and women's experiences of parenting, including separation from their children due to migration and how this impacts on their ability to leave situations of exploitation. Again, the presence of women's children during interviews can also prevent disclosure as women seek to protect their children.

Women's experiences of poverty, homelessness/destitution and the asylum process/supports are also regularly considered by the specialist TARA service with many remaining within TARA crisis accommodation until women only asylum accommodation can be accessed within Glasgow (or specific safety planning for single room but mixed sex local hotel accommodation can be reasonably implemented). This approach also ensures women retain their TARA support and that their other local support networks, both formal and informal, are maintained.

Within Migrant Help's Trafficking and Exploitation Survivors Service (TESS), where a particular gender of caseworker is preferred by a client, MH staffing is diverse enough that they are able to provide this. Some clients prefer a female caseworker, and vice versa, though in most cases, there tends not to be a strong preference. Referrals on behalf of clients link clients in with a wide range of gender-specific services across especially the 'central belt' of Scotland.

Scotland's Strategy for preventing violence against women and girls, Equally Safe²¹, recognises Commercial Sexual Exploitation (CSE) and Trafficking as forms of violence against women and girls. The Scottish Government supports a range of projects supporting women with experience of CSE, from crisis support through to support, when ready, to exit from prostitution sustainably. This includes through our Delivering Equally Safe Fund (DES). A report in March 2023 gave an overview of the DES projects with a specific focus on CSE.

In February 2024 the Scottish Government published the strategic Approach to Challenging and Deterring Men's Demand for Prostitution²². This Strategy sets out the Scottish Government's collective approach, working with stakeholders across the wider public and third sector, to challenge and deter men's demand for prostitution and support those with experience of it.

Northern Ireland (NI)

Training in trauma informed practices is delivered to a range of operational and frontline partners. DoJ oversees the provision of MSHT support services, in partnership with NGO organisations Migrant Help and Belfast & Lisburn Women's Aid. Support provision for victims and potential victims is tailored to the specific needs and vulnerabilities of each individual. As a commitment within the three-year MSHT Strategy, DoJ will seek to review provision of support services for individuals with complex needs.

²¹ [Equally Safe strategy - Violence against women and girls \(VAWG\) - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/equally-safe-2022/pages/1-2-introduction.aspx)

²² [Prostitution - challenging and deterring men's demand: strategic approach - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/prostitution-challenging-and-deterring-mens-demand/pages/1-2-introduction.aspx)

4. What specific measures are taken to reduce the vulnerability to trafficking of persons from disadvantaged minorities? Please provide information on policies and measures in the following areas:

- a. research;
- b. information, awareness-raising and education campaigns;
- c. socio-economic initiatives targeting underlying and structural causes;
- d. education, vocational training and job placement programmes.

England and Wales

The Modern Slavery and Human Rights Policy and Evidence Centre (PEC) has generated a significant volume of new published evidence and research on the topic of modern slavery prevention. The PEC was created by the investment of public funding to enhance understanding of modern slavery and transform the effectiveness of law and policies designed to address it. The PEC funds and co-creates high quality research with a focus on policy impact, and brings together academics, policymakers, businesses, civil society and survivors. The Modern Slavery PEC is publicly funded by the Arts and Humanities Research Council on behalf of UK Research and Innovation.

Examples of Modern Slavery PEC research projects focused on prevention include:

- [Prevention of adult sexual and labour exploitation in the UK: What does or could work?](#)²³
- [Prevention and identification of children and young adults experiencing, or at risk of, modern slavery in the UK.](#)²⁴
- [Cultural competency in UK response to modern slavery.](#)²⁵
- [Overcoming cultural barriers to prevention of modern slavery and protection of survivors.](#)²⁶
- [Trafficking risks for unaccompanied children in Home Office hotels.](#)²⁷
- [Improving early identification of children with SEND at risk of modern slavery.](#)²⁸
- [Prevention of child trafficking in PEC-funded research.](#)²⁹
- [The prevention of adult exploitation and trafficking.](#)³⁰

Following a September 2024 [funding call](#), the Modern Slavery PEC is funding two projects exploring the effectiveness of prevention interventions before modern slavery occurs, or at an early stage, and the prevention of re-exploitation or re-trafficking:

- [Evaluating the Effectiveness of the Sophie Hayes Foundation Employability Programme in Preventing Re-Exploitation.](#)³¹
- [Evaluating the effectiveness of the Employer Pays Principle \(EPP\) in preventing modern slavery in healthcare supply chains.](#)³²

²³ [Modern Slavery PEC | Prevention of adult sexual and labour...](#)

²⁴ [Modern Slavery PEC | Prevention and identification of children...](#)

²⁵ [Modern Slavery PEC | Cultural competency in UK responses to modern...](#)

²⁶ [Modern Slavery PEC | Overcoming cultural barriers to prevention of...](#)

²⁷ [Modern Slavery PEC | Trafficking risks for unaccompanied children in...](#)

²⁸ [Modern Slavery PEC | Improving early identification of children with...](#)

²⁹ [Modern Slavery PEC | Prevention of child trafficking in PEC-funded...](#)

³⁰ [Modern Slavery PEC | The prevention of adult exploitation and...](#)

³¹ [Modern Slavery PEC | Readiness to work as prevention of re-trafficking](#)

³² [Modern Slavery PEC | Preventing debt bondage in healthcare supply...](#)

The Modern Slavery PEC regularly engages with policy officials from governments across the UK to discuss the findings and recommendations of the prevention research, to inform the policy response.

Referrals to the NRM may be flagged as county lines cases by decision makers, which is most commonly a subset of criminal exploitation. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. County lines is the most violent model of drug supply and a harmful form of child criminal exploitation. Gangs exploit children and vulnerable adults to move and store drugs and money, often using coercion, intimidation, violence - including sexual violence - and weapons to ensure compliance. It is strongly linked to violent offending, including knife crime and violence against women and girls.

In 2024, 1,845 county lines referrals were flagged, accounting for 10% of all referrals received. The majority (76%; 1,396) of these referrals were for male children (at age of referral).

The Government is committed to preventing young people being lured into crime, drugs and criminal gangs. The National County Lines Co-ordination Centre (NCLCC) disseminates guidance and delivers training to upskill the understanding of child criminal exploitation and is currently rolling out an online application to forces to provide frontline officers with quick access to information on county lines and child criminal exploitation and the appropriate tools and tactics to tackle these issues.

We are driving targeted action to respond to exploitation through the Home Office-funded Prevention Programme, delivered by The Children’s Society. The Prevention Programme works with a range of partners to tackle and prevent child sexual abuse and exploitation, child criminal exploitation, and modern slavery and human trafficking on a regional and national basis.

As part of the Prevention Programme, we also fund The Children’s Society to deliver the award winning #LookCloser campaign, which launched nationally in September 2020 with the partnership of the NCLCC and the British Transport Police. The 2023-25 campaign focus is on improving public and business sector awareness of exploitation and abuse that may be visible in public spaces and their role in spotting and reporting concerns by working alongside partners such as community groups and businesses to display and share the campaign messaging in the public spaces where young people spend their time. #LookCloser has reached over 278,556 people and worked with 35 police force areas since the programme was set up.

The Forced Marriage Unit has an extensive outreach programme which is delivered to professionals, non-government organisations (NGOs) and others to raise awareness of forced marriage and how best to support victims. In 2023, this training was delivered to over 3600 professionals. In 2023, the Tackling Child Exploitation Support programme (funded by the Department for Education) published a set of multi-agency practice principles to help local areas respond to exploitation and extra-familial harm. The principles include a focus on helping local partnerships, leaders, managers and front-line practitioners to recognise and challenge inequalities, exclusion and discrimination, including building an awareness of disproportionality. The principles have been used to inform updates to statutory guidance, Working Together to Safeguard Children (2023) and Outcome 3 (children and young people are safe in and outside of their homes) of the Children’s Social Care National Framework, also published in 2023.³³ Working Together (2023) is clear that practitioners should be sensitive to factors, including ethnicity, which can impact children and families’ lives and that ethnicity, religion, or having a particular protected characteristic, can be potential barriers in seeking and accessing help and support. The Children Act 1989 promotes the view that all children and their parents should be considered as individuals and that family structures, culture, religion, ethnic origins, and other characteristics should be respected.

³³ [Children's social care: national framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/children-social-care-national-framework)

Local authorities (LA) have a duty to make arrangements to identify and support into education all children of compulsory school age who are not registered at a school or receiving suitable education otherwise. DfE issued 'Children missing education: Statutory Guidance for Local Authorities' setting out that local authorities are expected to focus their resources effectively in intervening early in the lives of vulnerable children to help prevent poor outcomes as a result of becoming Children Missing Education (CME). The guidance also sets out LA responsibilities to certain children who are at increased risk of becoming CME, including those at risk of abuse and/or neglect, as well as runaway children who are more vulnerable to crime, abduction and/or sexual exploitation. The guidance makes clear that: where there is concern for a child's welfare, this should be referred to local authority children's social care; if there is reason to suspect a crime has been committed, the police should also be involved; and that where there is a concern that a child's safety or wellbeing is at risk, it is essential that local authorities take action without delay. In Wales, local authorities have a duty to determine whether children living in their areas are in receipt of a suitable education. Children of statutory school age who are not in receipt of a suitable education are 'children missing education', or 'CME' and the [statutory CME guidance](#) will apply.

Scotland

The Scottish Government engages regularly with academics across the UK to stay abreast of latest research and findings on trafficking and vulnerabilities. Regular meetings are held with the Modern Slavery Policy and Evidence Centre who have highlighted research into a number of important topics. Recently their work has highlighted exploitation linked to the agriculture and care sector³⁴. Researchers from the British Institute of Comparative Law have also recently been approached by the Scottish Government to discuss their report on identifying adults with lived experience of modern slavery in the UK³⁵. Furthermore, the Scottish Government's internal Justice Analytical Service (JAS) is undertaking a literature review in order to help shape the Scottish Government's refreshed Human Trafficking and Exploitation Strategy, specifically focussing a preventative approach.

The Worker Support Centre (WSC) works on behalf of the Scottish Government to provide information to individuals employed on Seasonal Worker Visas (SWV) within Scotland. They raise awareness of the signs of THB, and provide advice on how to respond to and report activity which may be considered Human Trafficking. This information is provided in a variety of formats, including:

- Leaflets provided in a variety of languages to meet the diverse needs of the Seasonal Worker workforce
- Online advice directly from the WSC website.
- Online correspondence (via email, whatsapp, and other channels) with WSC employees
- A telephone contact service with WSC employees.

The Worker Support Centre uses its experience of liaising with seasonal workers to shape policy change proposals; one example is addressing concerns in the standard of accommodation provided to migrant seasonal workers.

Part funded through Scottish Government grants, the charity Survivors of Human Trafficking in Scotland (SOHTIS) engages in prevention activities targeted towards those considered to be a higher risk of THB. This includes awareness raising of recruitment techniques used by perpetrators

³⁴ [Modern Slavery PEC | UK agriculture and care visas: worker...](#)

³⁵ [Modern Slavery PEC | Identifying adults with lived experience of...](#)

and 'red flags'. It also, where appropriate, includes education regarding basic employment rights reducing the risk of labour exploitation.

The Scottish Government is committed to ensuring all children and young people receive high quality relationships, sexual health and parenthood (RSHP) education, which is an integral part of the health and wellbeing area of the curriculum. Curriculum for Excellence³⁶ is the national approach to learning and teaching for young people aged 3 to 18 in Scotland and is underpinned by the values of wisdom, justice, compassion and integrity. The curriculum is not statutory and therefore it is for teachers, head teachers and other professional educational practitioners to decide the development and implementation of the curriculum within the overall framework. We are specific about the need for children and young people to gain knowledge appropriate to their age and stage of education. RSHP education is intended to help children and young people build positive relationships as they grow older and should present facts in an objective, balanced and sensitive manner within the framework of curricular values and an awareness of the law. RSHP education should be viewed both as part of a proactive approach to keeping children and young people safe from harm as well as part of their education and overall wellbeing.

The Child Poverty (Scotland) Act³⁷ 2017 sets in statute ambitious targets to reduce levels of child poverty by 2030. The Act requires Scottish Ministers to publish delivery plans in 2018, 2022 and 2026, and to report annually on progress made in delivering the actions and against the targets.

The Scottish Government's second Tackling Child Poverty Delivery Plan (*Best Start, Bright Futures*)³⁸ was published in March 2022 and sets out bold action to drive progress to tackle child poverty, focused on increasing incomes, reducing the cost of living, improving the wellbeing and outcomes of families and helping children to thrive. We are focusing the impact of all interventions on the six priority family types we have identified as being at highest risk of poverty - which includes minority ethnic families – as well as lone parent families, larger families, and families with a disabled adult or child, a younger mother, or a child under one.

Destitution can often be a driver for trafficking and exploitation. Restrictions on access to public funds and services based on immigration status heightens the risk of someone becoming destitute. The Scottish Government's Ending Destitution Together³⁹ strategy aims to support people with No Recourse to Public Funds (NRPF). The strategy is informed by powerful testimony from people with lived experience; knowledge of third sector organisations providing frontline support; and the expertise of local authorities, legal practitioners and public services. The strategy set out initial actions to deliver essential needs, enable access to specialist advice and advocacy and promote inclusive approaches, so that people can pursue their ambitions and be active members of our communities.

Curriculum for Excellence is the national approach to learning and teaching for young people aged 3 to 18 in Scotland and is underpinned by the values of wisdom, justice, compassion and integrity. The curriculum is not statutory and therefore it is for teachers, head teachers and other professional educational practitioners to decide the development and implementation of the curriculum within the overall framework. We are specific about the need for children and young people to gain knowledge appropriate to their age and stage of education.

Widening access to higher education for those from socio-economically disadvantaged backgrounds is a priority for the Scottish Government. A range of policies are in place to widen access for these

³⁶ [Curriculum for Excellence | Education Scotland](#)

³⁷ [Child Poverty \(Scotland\) Act 2017 \(legislation.gov.uk\)](#)

³⁸ [Best Start, Bright Futures: tackling child poverty delivery plan 2022 to 2026 - gov.scot \(www.gov.scot\)](#)

³⁹ [Ending destitution together: strategy - gov.scot \(www.gov.scot\)](#)

groups, including minimum entry criteria for admissions to university and outreach activities in schools. The Scottish Government continues to work with the further and higher education sectors and the Commissioner for Fair Access to support all learners, including those from deprived backgrounds, to participate and succeed in post-school education and to improve their life chances.

SOHTIS also provide long-term support for survivors of human trafficking supporting them to enter the tertiary education sector and employment as their immigration status allows. Reducing the risk of re-trafficking via the labour market is a key priority.

Northern Ireland (NI)

The three-year Strategy includes commitments to ensure operational partners and frontline professionals are equipped with the appropriate skills and knowledge to identify potential victims and recognise vulnerabilities to MSHT. This includes delivery of training and awareness sessions to health & social care staff, police officers, prison staff, primary care staff and DfC benefits and welfare staff.

5. What specific measures are taken to reduce the vulnerability to THB of persons with disabilities? Please provide information in the following areas:

- a. deinstitutionalisation, including community and family-based services for children and support for independent living;
- b. monitoring institutions and foster families accommodating persons with disabilities;
- c. procedure for the selection and appointment of legal guardians and monitoring of their work;
- d. access to adequate accommodation, education and work;
- e. access to information and reporting/complaints mechanisms which are accessible to persons with disabilities.

England and Wales

Various services and organisations are involved in supporting victims, including those with disabilities. Victims with disabilities may access local authority support, subject to their immigration status, unless there is an increased risk of abuse or neglect. Referrals to local authorities can be made under the Care Act 2014 or through existing child protection and adult safeguarding frameworks. This includes the provision of suitable accommodation, placement of children in appropriate foster care including the appointment of a responsible adult, and access to specialist services. Subject to immigration status, homeless disabled people have a priority need for local authority accommodation if they are determined to be vulnerable because of their disability.

Local authorities, along with regulatory bodies such as Ofsted and the Care Quality Commission, are responsible for monitoring the quality of accommodation and care. Additional information can be found on [Care and support statutory guidance - GOV.UK](#), [Ofsted - GOV.UK](#), [Care Quality Commission](#) and in Wales the Social Service and Well-being (Wales) Act 2014 and its associated Codes of Practice.

All consenting adult victims of THB in the National Referral Mechanism in England and Wales can access secure accommodation if necessary to prevent destitution and re-trafficking through the Modern Slavery Victim Care Contract (MSVCC). The MSVCC provides a range of accommodation, which includes catered accommodation if victims are not capable of preparing their own food due to

disability, debilitating illness or ongoing treatment for severe substance use and addiction, or if a primary carer is unable to prepare their meals. Victims are also given a support worker who provides information on the victim's rights and available services. This includes facilitating access to community-based care/support and wider state services, such as healthcare, legal advice, housing, employment, and education. All information is provided in a language the victim understands. This includes guidance on how to report issues or make complaints, in a manner that the information can be understood by the victim and in a language they understand through translation and interpretation services. This can also be provided in an accessible way for victims with accessibility issues arising from disabilities such as providing information using British Sign Language interpreters. Access to work and education opportunities is contingent on having an immigration status that permits work and/or study. Where victims have the necessary immigration status support workers help them get access to education and 'access to work' support provided by the Department for Work and Pensions, which supports individuals into employment, gives access to English classes and helps with CV writing and job interview tips. All children in the UK irrespective of immigration status are entitled to free primary and secondary education; MSVCC support workers help victims get their children into the education system.

For children who are supported through the Government-funded Independent Child Trafficking Guardianship (ICTG) service, support is tailored to the individual need of the child. This includes ensuring that children's disabilities and health needs are appropriately recognised and supported by professionals, so that the child can participate as fully as possible in the processes and decisions affecting them.

Scotland

Section 7 of the Children (Scotland) Act 1995⁴⁰ makes provision on a child's parent appointing a person to be guardian of the child in the event of the parent's death. Section 8 makes provision on the revocation of appointments. Section 11 of the 1995 Act also contains provision on applications being made to the courts in Scotland for a court order appointing or removing a person as guardian of the child.

Trafficking and exploitation may manifest through forced labour, or unsafe working conditions, with little or no recourse to representation for impacted workers through advocacy. Traffickers may try to exploit through social isolation, and inadequate access to fair work.

In the Scottish Government's A Fairer Scotland for Disabled People: Employment Action Plan (2018)⁴¹, there is a commitment to at least halve the Disability Employment Gap in Scotland by 2038 (based on the 2016 baseline of 37.4 percentage points). This commitment is incorporated into the 2022 Fair Work Action Plan⁴². Several actions have been taken forward to help realise this ambition, and are focussed on tackling the persistent structural barriers that disabled people face in accessing and progressing within employment. Informed by the lived experience of disabled people, this activity focusses on three key themes, namely: supporting employers to recruit and retain disabled people; supporting disabled people to enter and sustain fair work; and young people and transitions.

The Scottish Government's vision is for Scotland to be a leading Fair Work Nation by 2025, where fair work drives success, wellbeing and prosperity for individuals, businesses, organisations and society. Many employers in Scotland are already implementing fair work practices, but the Scottish

⁴⁰ [Children \(Scotland\) Act 1995 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/1995/11/section/7)

⁴¹ [A Fairer Scotland for Disabled People: employment action plan - gov.scot \(www.gov.scot\)](https://www.gov.scot/Resource/0045/0045_0001.pdf)

⁴² [Fair Work action plan: becoming a leading Fair Work nation by 2025 - gov.scot \(www.gov.scot\)](https://www.gov.scot/Resource/0045/0045_0001.pdf)

- a. provision of comprehensive and accessible information, in a range of relevant languages, on the rights of asylum seekers, indicators of THB, rights of victims of THB, and contacts of relevant organisations;
- b. access to legal assistance and representation;
- c. access to decent accommodation, health (including psychological) care, work and education.

England and Wales

Screening guidance is available for staff in UK Visas and Immigration, Immigration Enforcement and Border Force who register asylum claims and complete the screening process for asylum claimants. As part of the screening process, all asylum claimants must be provided with the leaflet 'Information about your asylum claim', known as the 'point of claim leaflet', which includes rights and responsibilities while claiming asylum, signposting to services, help finding legal representation, and modern slavery information. The point of claim leaflet is only provided in English, but 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. For ongoing support, there are discreet material options available with support contact details for the Modern Slavery helpline.

Screening officials should be mindful that individuals encountered may be individuals at risk and should look for any indicators of modern slavery, trafficking or any other potential risk. They must follow the Victims of modern slavery: guidance for frontline staff. They must also be aware of and follow the instructions victims of modern slavery: referrals, enforcement interviews, and identifying people at risk.

The screening process has some important functions including to establish, as far as possible, any health or medical concerns, disabilities, vulnerability indicators or other safeguarding concerns including if they may potentially pose a risk to themselves or others. These are to be noted along with any reasonable adjustments made for the claimant to access the asylum procedure including provision of suitable accommodation and any safeguarding actions undertaken, and to complete an initial contact and registration (screening) questionnaire (ASL.3211Main), which includes obtaining important health information as well as information about the claimant or their dependants that may have access needs, perceived vulnerabilities, safeguarding concerns or modern slavery indicators.

Individuals seeking asylum who are identified as potential victims of modern slavery are referred into the NRM. This means that some individuals may be both asylum seekers and victims of modern slavery. In such cases, the Modern Slavery Victim Care Contract (MSVCC) and the asylum support system work closely together to coordinate support, ensuring that individuals receive comprehensive and well-aligned assistance. Victims who fall under both systems can access support from each framework without duplication. For example, an individual might receive accommodation and financial assistance through the asylum system while also receiving outreach support through the MSVCC. This dual-access approach helps prevent gaps in support and ensures that victims are assisted in their recovery through a person-centred approach.

When considering the needs of unaccompanied asylum-seeking children, section 55 of the Borders, Citizenship and Immigration Act 2009 requires the Home Office to carry out its existing functions in a way that takes into account the need to safeguard and promote the welfare of children in the UK.

On arrival of an unaccompanied asylum-seeking child, one of the first interactions that takes place with the child is a welfare interview. This interview is primarily for a meaningful booking-in process and biometrics, identifying any welfare concerns, and identifying any trafficking concerns. The immediate welfare of a child is considered, safeguarded and promoted. Any modern slavery or urgent welfare concerns must be dealt with as a matter of priority involving senior managers and other agencies, such as local authority children's services or the police. Where there is a reason to suspect that an unaccompanied asylum-seeking child may be a potential victim of modern slavery, Home Office staff are required to follow the department's guidance on modern slavery which includes details on how to refer the child to the NRM.

There are existing provisions available for unaccompanied asylum-seeking children. Local authorities are the primary service provider for safeguarding children and there are already comprehensive statutory and policy safeguards in place for unaccompanied children in care. All children, irrespective of immigration status, are entitled to the same local authority support as any other looked after child.

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 UASCs in England.

Throughout the asylum process, the Home Office recognises that vulnerabilities can emerge or be identified at any stage through information later volunteered by the claimant/third parties. Furthermore, an individual's vulnerability is not necessarily constant but may vary at different stages of the immigration process. Staff responsible for processing asylum claims undertake mandatory safeguarding training to ensure they remain vigilant and promptly identify safeguarding concerns. All staff are responsible for escalating safeguarding concerns, whether dealing with a case or if they have identified a trend which is of concern.

Home Office staff are trained to also recognise that an individual can be vulnerable but not identify themselves as such for reasons such as lack of trust in authority, lack of understanding in the process or because they are experiencing exploitation. Additionally, across the caseworking function, there are dedicated safeguarding and modern slavery champions who are able to provide support/assistance to staff. Staff are also able to benefit from seeking guidance from the Asylum Safeguarding Hub as well as advice from Safeguarding Advice and Children's Champion.

If Home Office officials become concerned that a claimant may be in danger at the interview or any other stage of the asylum process, they will take immediate action to ensure their safety. In all circumstances a referral should be made to the Asylum Safeguarding Hub and advice sought on case progression.

Individuals are allocated to the National Asylum allocation team, and intake teams input details of any safeguarding concerns or alerts on the accessible shared database for their awareness and the hotel providers to provide appropriate accommodation. Referrals to the Asylum Safeguarding Hub are completed, where appropriate, to initiate support and any medical or wellbeing pathways needed.

Additionally, where a victim is seeking asylum, they are eligible to work in jobs on the Immigration Salary List if their asylum application has been outstanding for over a year through no fault of their own.

Permission to work will come to an end if their claim is refused and any appeals rights are exhausted. Those granted asylum or humanitarian protection have immediate and unrestricted access to the labour market and are able to access some provisions to facilitate their transition into work.

We encourage asylum seekers to undertake volunteering activities, so long as it does not amount to unpaid work. Volunteering provides a valuable contribution to their local community and may help

them to integrate into society if they ultimately qualify for protection. Further information about the permission to work policy is here: [working or volunteering in the UK while an asylum case is considered](#).

Scotland

The Scottish Government provides financial support to several key organisations involved in assisting victims of human trafficking, including the Trafficking Awareness Raising Alliance (TARA), Migrant Help (MH), and The Anchor Service, which is part of NHS Greater Glasgow and Clyde. The Anchor Service specialises in providing psychological support to individuals identified as victims of trafficking in Scotland. TARA and MH can provide accommodation to potential victims of THB where there are reasonable grounds that the individual is a victim. This can be provided for up to 90 days or longer in some circumstances (see answer to Q25 for more information).

When referred to MH, individuals are supported through the National Referral Mechanism (NRM) process, and their legal entitlements are explained to them using interpreters, either in person or over the phone, to ensure accessibility. MH has taken further steps to enhance accessibility by translating key documents, including client assessments and induction information, into the nine most common languages spoken by its service users. For languages not covered, the information is conveyed via an interpreter. Should a victim express interest in pursuing compensation, they are provided a leaflet about the Criminal Injuries Compensation Scheme (CICS), with the aid of an interpreter, and then referred to a solicitor for further legal advice and assistance.

TARA, similarly, employs interpreters to provide women with a comprehensive overview of their rights and entitlements, tailored to each individual's specific needs. TARA also supplies victims with a 'Recovery Book,' available in multiple languages such as Albanian, Mandarin, and Swahili. Where necessary, translations into other languages are arranged.

JustRight Scotland receives Scottish Government funding to provide legal support, including weekly legal surgeries where victims can receive advice on a variety of legal issues, such as immigration and compensation claims through the CICS. Additionally, the Crown Office and Procurator Fiscal Service's (COPFS) Victim Information and Advice (VIA) service offers victims vital information about their cases and the justice system, while also arranging special court measures to assist them when giving evidence.

Whilst TARA and MH can provide accommodation to potential victims of THB, the Scottish Government also provides funding for the charity Survivors of Human Trafficking in Scotland (SOHTIS), which is currently piloting Project Integrate. This initiative provides holistic, trauma-informed, long-term support for up to 80 survivors of trafficking in Scotland. The program emphasises empowerment, helping survivors transition from vulnerability to independent living, restoring a sense of agency and control over their future. This support includes one-on-one and group sessions delivered both in person and remotely, tailored to meet the specific needs of each survivor.

The Scottish Government also helps fund the NHS Greater Glasgow & Clyde Psychological Trauma Service (the Anchor), which offers early psychological assessment and evidence based psychological intervention to victims of trafficking in Scotland who are going through the National Referral Mechanism (NRM). This allows the service to assess and respond to the mental health needs of victims of trafficking at an early point ensuring that their care is trauma informed and recovery focused. This is a specialist mental health trauma service and staff consists of Clinical and Counselling Psychologists as well as CBT Therapist, Mental Health Practitioner, Occupational Therapist and Art Psychotherapist. The service is embedded within the National Health Service and can refer on to other services where indicated. They have also delivered trauma enhanced level training to partner agencies and broader awareness training nationally.

UAS children

All UAS children and young people in Scotland are likely to be considered 'looked after' within the care system and therefore have the same rights and entitlements as any looked after child (LAC). Local authorities accommodate and support children in need in their area up to age 18, regardless of their immigration status.

As noted in response to Question 1, national child protection procedures should be followed where it is suspected that an asylum-seeking child may be a victim of trafficking.

As part of the Scottish Government's commitment to ensure the safety and wellbeing of UAS children and young people, we fund a statutory Independent Child Trafficking Guardian (ICTG) service in accordance with section 11 of the Human Trafficking and Exploitation (Scotland) Act 2015. The service provides Guardians for every child who is a victim or who is vulnerable to becoming a victim, which includes UAS children arriving in Scotland. These Guardians play a crucial role in supporting and advocating for the children, guiding them through various legal processes.

7. What specific measures are taken to reduce the vulnerability to THB of migrant workers (including seasonal workers, seconded/posted workers, domestic workers, diplomatic household employees)? Please provide information on policies and measures in the following areas:

- a. provision of comprehensive and accessible information, in a range of relevant languages, on migration and labour laws, worker protection and contacts of relevant organisations;
- b. provision of clear employment contracts;
- c. access to decent work and housing, health care, social services and education;
- d. possibility to change employers;
- e. access to confidential complaints mechanisms;
- f. right to join trade unions and to engage in collective bargaining;
- g. legal avenues for regularising their stay in the country.

England and Wales

Workers from overseas may be restricted in the work they are permitted to do. Within those restrictions, however, they have the same protections and rights under employment law as British and settled workers, and all employers are expected to comply with UK employment law including the National Minimum Wage.

The Gangmasters and Labour Abuse Authority (GLAA), Employment Agency Standards (EAS) Inspectorate and HMRC's National Minimum Wage (NMW) enforcement team collaborate to ensure that workers are aware of their rights. The GLAA, for instance, offers Workers' Rights Leaflets in multiple languages, outlining key employment protections such as fair pay, working hours, holiday entitlements and the right to a safe working environment.

The Government's immigration employment routes enable workers to change employer, either through making a new visa application, or by requesting a move of employer through their licenced sponsor – under schemes such as the Seasonal Workers Agricultural Scheme.

Overseas Domestic Workers are a distinctly vulnerable cohort at risk of modern slavery and are therefore able to change their employer without notifying the Home Office. This means that those who need to escape unsuitable conditions can do so quickly and without additional administration. Workers who find themselves a victim of modern slavery are protected by the NRM and may be eligible to apply for permission to stay as a Domestic Worker who is a Victim of Modern Slavery.

The sponsorship licensing system holds employers to the highest standards. All sponsors are already required to comply with wider UK law, including employment laws and broad powers exist to prevent organisations breaching those laws from holding a licence, providing an appropriate regulator has successfully pursued action for those breaches. Further, any licenced sponsor who a regulator successfully takes action against will face action from the Home Office up to and including the revocation of their sponsor licence.

Scotland

The Worker Support Centre (WSC), founded in 2022, is an independent organisation which receives funding to carry out its duties from the Scottish Government. Through the (WSC), workers on the Skilled Workers Visa (SWV) are provided with information on their employment rights whilst in the UK through a variety of forms, including information leaflets in the workers' home language, and dedicated, multi-language support through WSC employees if a worker makes contact. The WSC website offers advice and assistance on a variety of topics which are pertinent to Migrant Workers, including information on:

- The obligation of employers to provide a contract in both English and the workers first language
- Detailed payslips
- Further information on rights whilst working in the UK on a SWV
- Access to healthcare
- Changing Employer whilst working on the SWV
- Support for victims or suspected victims of Human Trafficking

The Worker Support Centre and NGOs provide information on labour laws, anti-trafficking protections, and worker rights in several languages, making it easier for migrant workers to access resources regardless of language barriers. This information includes where and how to report trafficking and abuse, legal support contacts, and emergency support resources.

Both Fair Work and New Scots strategies offer rights information to migrants in Scotland. Fair Work First guidelines encourage employers to share these resources with their workers, and New Scots provides workshops, community support, and contacts to NGOs for those in the refugee and migrant community, improving awareness of protections against trafficking.

Under the Fair Work First framework, the Scottish Government encourages employers to provide transparent employment contracts and to abide by fair work practices. For example, the Fair Work First policy asks recipients of public sector grants and public contracts to commit to not using exploitative zero hours contracts. Fair Work First criteria is encouraged in as many public contracts as possible. The Scottish Government also promotes the Living Hours Accreditation Scheme for

Scots focuses on enabling social and economic integration for migrants, advocating for labour mobility as part of supporting individuals in finding stable and fair employment.

Confidential mechanisms for reporting THB are provided by organisations such as Crimestoppers and the Modern Slavery Helpline. NGOs like Migrant Help and TARA can also provide additional safe reporting channels.

It is the Scottish Government's belief that a progressive approach to industrial relations and an effective voice for workers is at the heart of a fairer, more successful society. Integral to this is taking action to improve access to information and reporting procedures that all people can use without any hinderance. Through our Fair Work Action Plan, which brings together our original Fair Work, Gender Pay Gap and Disabled People's Employment action plans, along with our new anti-racist employment strategy, actions being taken forward by the Scottish Government and various public bodies, including to:

- o encourage employers to offer appropriate effective voice channels; and
- o support strong trade unions and promote collective bargaining.

Immigration and Asylum matters are reserved to the UK Government. However, if identified as trafficking victims through the NRM Migrant Help, TARA can assist migrant workers with immigration status issues, including referrals to legal services and detailed guidance on accessing pathways to regularisation.

Northern Ireland (NI)

Immigration and asylum are reserved matters in Northern Ireland.

Gangmasters and Labour Abuse Authority (GLAA) operate in Northern Ireland to tackle worker exploitation and health and safety negligence. DoJ engage regularly with GLAA alongside other operational partners including the Police Service of Northern Ireland (PSNI), Border Force Northern Ireland, Public Prosecution Service (PPS) and NGO partners to provide operational updates, threat assessments and awareness training. GLAA inspection authority in Northern Ireland extends to high-risk sectors such as agriculture, horticulture, shellfish gathering and associated processing/packaging.

The Department for the Economy (DfE) Employment Agency Inspectorate (EAI) is responsible for the regulation of the private recruitment sector in Northern Ireland. EAI can investigate complaints against agencies/businesses located in Northern Ireland and have the power to enter and inspect premises and records.

8. Do labour inspectorates and other authorities checking workplace conditions possess a comprehensive mandate, and adequate human, financial and technical resources, to conduct regular, proactive workplace inspections in all economic sectors, with a particular emphasis on high-risk sectors prone to exploitation? How do labour inspectors co-operate with other authorities and trade unions? Is there a separation between labour inspection and immigration control functions?

England and Wales

The independent Director of Labour Market Enforcement continues to set strategic direction for the state's three labour market enforcement bodies, the GLAA, the EAS Inspectorate and the HMRC NMW team by producing an 'annual strategy' with shared recommendations for all three. This ensures efficient coordination, with the three enforcement bodies regularly working together.

The GLAA operates a national licensing scheme in certain high-risk sectors to protect vulnerable workers from exploitation. These regulated sectors are agriculture, horticulture, shellfish gathering, and associated food processing and packaging. Labour providers must hold a licence to legally operate in these sectors and are subject to ongoing checks and inspections to ensure compliance.

Since 2016, the GLAA has had specially trained officers with police-style powers to prevent, detect and investigate serious labour exploitation across the entire economy in England and Wales.

The GLAA produce a strategic assessment and control strategy which is an overview of significant risk, threat and harm issues impacting on the labour market.

There are formal agreements in place to share information with some overseas governments involved in the Seasonal Workers Scheme and the GLAA have also developed a strong stakeholder network so that bodies, such as Trade Unions, can share information. Although information is shared to aid identification of exploitation, there is a separation between labour inspection and immigration control.

To further our commitment to ensuring fair treatment for all workers, the Government is creating a single enforcement body, the Fair Work Agency (FWA), to tackle non-compliance and protect vulnerable workers. This body will bring together existing enforcement agencies to improve oversight and coordination in addressing issues such as labour exploitation, ensuring that no worker is left behind. The FWA will support our aims to ensure exploitative employers are held accountable and to better protect vulnerable workers, particularly in sectors prone to exploitation.

Northern Ireland (NI)

GLAA inspection authority in Northern Ireland extends to high-risk sectors such as agriculture, horticulture, shellfish gathering and associated processing/packaging. EAI is responsible for the regulation of the private recruitment sector in Northern Ireland. EAI can investigate complaints against agencies/businesses located in Northern Ireland and have the power to enter and inspect premises and records. DoJ and other operational partners engage with GLAA and EAI via the OCTF MSHT Sub-group.

Immigration control functions are a reserved matter. GLAA and EAI operate independently of immigration control functions within Northern Ireland.

9. How are employment and recruitment agencies regulated and monitored? Are all stages of the recruitment process, including advertisements, selection, transport, and placement, subject to regulation? Are recruitment fees and related costs prohibited from being borne by workers or jobseekers?

England, Wales and Scotland

Employment and recruitment agencies are regulated through the Employment Agencies Act 1973 and the associated Conduct of Employment Agencies and Employment Businesses Regulations 2003 (both as amended). Employment law is devolved to Northern Ireland but with a few small differences, it mirrors our legislation. If the agencies work in horticulture, agriculture and/or shellfish sectors, then they may fall within the remit of the Gangmaster and Labour Abuse Authority and be subject to their legislation, which includes a licensing requirement.

All stages of the recruitment process are covered by the above legislation, and it applies to both temporary and permanent placements. The Act above makes it a criminal offence to breach the legislation. It is illegal, except in specific specified circumstances, for an employment agency or

employment business to charge a work-seeker a fee for finding them work. It is however, permissible to charge them for non-work-finding services, such as writing a CV, helping them open a bank account, training, accommodation, transport, etc but the work-seeker must have details about the service and fee set out in writing before the goods or services are used and paid for. An employment agency or employment business cannot make the paid for additional service conditional upon the work-seeker being found work by the employment agency or employment business.

Northern Ireland (NI)

EAI is responsible for the regulation of the private recruitment sector in Northern Ireland. EAI can investigate complaints against agencies/businesses located in Northern Ireland. EAI can investigate complaints regulated by the Employment (Miscellaneous Provisions) (Northern Ireland) Order 1981 and the Conduct of Employment Agencies and Employment Business Regulations (Northern Ireland) 2005. Recruitment fees and related costs are prohibited from being borne by workers or jobseekers.

10. How do you prevent and sanction abuses of legal constructions such as self-employment, letter-box companies, sub-contracting, and posting of workers, which may be used to commit THB?

England and Wales

The Government is strengthening efforts to tackle illegal working and labour exploitation in the food delivery sector. The Home Office and Department for Business and Trade met with major delivery firms and pledged to strengthen security checks to tackle illegal working. Deliveroo, Uber Eats and Just Eat have committed to increasing the number of daily facial recognition checks riders are required to take to verify their identity. Illegal working is linked to exploitation, with teams often encountering squalid living conditions, people receiving little to no pay and inhumane working hours. In the worst instances, these individuals may be victims of modern slavery.

Immigration Enforcement take a number of steps to spot the signs of individuals who are potentially being exploited and, where appropriate, will refer people to the National Referral Mechanism so they can access support. They also work closely with crucial partners like the Gangmasters Labour Abuse Authority, to share insights and strengthen the approach to tackling labour exploitation.

Scotland

Police Scotland use powers available under the Proceeds of Crime Act⁴⁵ and work in conjunction with COPFS to commence designated money laundering investigations, which can involve freezing assets and cash sums in bank accounts. Police Scotland further collaborate with partners in HMRC, DWP and the Home Office to address any concerns raised surrounding legal constructions with a view to implementing intervention on a multi-agency basis in order to reduce threat, risk and harm.

Northern Ireland (NI)

DoJ, PSNI and other operational and NGO partners undertake awareness raising campaigns and 'Days of Action' to raise awareness among the general public of MSHT issues and to provide information on how to identify the signs of MSHT in the community.

⁴⁵ [Proceeds of Crime \(Scotland\) Act 1995 \(legislation.gov.uk\)](https://legislation.gov.uk)

The Scottish Government supported the development of Scotland Against Modern Slavery (SAMS) alongside Shan Saba, a director with Brightwork Recruitment. SAMS continues to inform and share best practice to prevent human trafficking and exploitation throughout the business community in Scotland.

SAMS has hosted a number of regular online roundtables including, amongst others:

- In partnership with Scottish Care - sharing best practice standards and experiences around the international recruitment of staff
- Migrant Workers, Sponsor Visas, and the worker's story
- Changes to EU Settlement Scheme
- Police Scotland National Human Trafficking Unit– of Policing and Prevention from Police Scotland
- Complex global supply chains

In addition, a podcast series commenced in March 2024 with Police Scotland's National Human Trafficking Unit lead Detective Superintendent, where he provided an insight into the role of the Police in preventing and disrupting exploitation in Scotland. Other notable events included one in 2023 hosted by Moray Chamber of Commerce, where presentations were delivered by Police Scotland, Johnsons of Elgin, Harper MacLeod, and the Scottish Government.

The Scottish Government consulted on an extension of transparency in supply chain requirements to Scottish public bodies between June and August 2022⁴⁸. An analysis of the consultation responses was published in December 2022. The Scottish Government will look to engage constructively with the new UK Government to progress this key preventative approach.

The approach to public procurement remains a key tool in preventing human trafficking and exploitation. The Scottish Government published an updated Procurement Policy Handbook⁴⁹ in May 2024 which provides guidance on the rules and policies relevant to public procurement activity in Scotland. It is applicable to all Scottish public bodies and includes a refreshed section on Human rights.

Furthermore, the 'Strategic approach to challenging and deterring men's demand for prostitution and supporting the recovery and sustainable exit of those involved in prostitution' sets out the current legal position regarding prostitution. This Strategy sets out the Scottish Government's collective approach, working with stakeholders across the wider public and third sector, to challenge and deter men's demand for prostitution and support those with experience of it. It is underpinned by policy principles which aim to improve policy cohesion across the government and wider public sector- the principles reinforcing that prostitution and wider CSE are a form of violence against women and girls

The Strategy recognises the links to wider forms of CSE and the implementation of its approach is informed by a multi-agency group on CSE which was established in March 2024. The Strategic Approach outlines the next steps the Scottish Government will take, working across government and with stakeholders to implement its aims. This includes developing an improved pathway of support for those with experience of CSE through a hub approach, strengthening the links between mainstream and specialist services. Also please see the answer to question 3.

Northern Ireland (NI)

⁴⁸ [Transparency in supply chains - inclusion of Scottish public bodies: consultation analysis - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/transparency-in-supply-chains-inclusion-of-scottish-public-bodies-consultation-analysis/pages/12.aspx)

⁴⁹ [Supporting documents - Scottish procurement policy handbook - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/supporting-documents-scottish-procurement-policy-handbook/pages/1.aspx)

Section 15 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 prohibits the payment for sexual services of a person in Northern Ireland. Part 5 of the Sexual Offences (Northern Ireland) Order 2008 prohibits incitement of prostitution for gain, controlling prostitution and the keeping of brothels used for prostitution.

13. How do your country's legislation and practice ensure that there is an individual assessment of protection needs at the borders prior to any refusals of entry or expulsions?

United Kingdom

Under the National Referral Mechanism, Border Force is a designated 'first responder'. It also has duties to safeguard and promote the welfare of children under section 55 of the Borders, Citizenship and Immigration Act 2009.

Border Force has a network of specially trained Safeguarding and Modern Slavery officers. It works closely with other law enforcement agencies, including the National Crime Agency and the Police as well as making appropriate referrals to Social Services to ensure individual assessments of protection are made prior to any refusal where appropriate and necessary.

14. What measures are taken to prevent THB in sports? What sectors and categories/groups of people have been identified as being at risk?

England and Wales

The Government is committed to combatting modern slavery in all sectors. This requires assessing work with survivors and the third sector, to improve the evidence about the nature and scale of modern slavery to inform our response to preventing modern slavery.

Scotland

The National Guidance for Child Protection includes a section on sports organisations and clubs. This makes clear that as in other activities and contexts, abuse of trust can occur in sport of all kinds and at all levels. Those responsible for the organisation of activities, regulated or otherwise, should ensure that safeguarding is integral to practice in recruitment, training and oversight of staff and volunteers; and that children know how and with whom they can voice questions and concern.

The Child Wellbeing and Protection in Sport service (CWPS) is a partnership between Children 1st and Sport Scotland. It supports sports organisations and individuals across Scotland (including sports governing bodies, sports clubs, Leisure Trusts, local authorities and parents and carers) in keeping children safe in and through sport by providing advice, consultancy, training and support. Organisations and community groups involved in sport activities should familiarise themselves with the Standards for Child Wellbeing and Protection in Sport and have policies and procedures to safeguard children in sport. They should adopt a rights-based, child centred culture and encourage children, parents and carers to raise any concerns and to ask questions about safeguarding procedures.

The Scottish Government's National Guidance for Child Protection includes a section on learning and development for professionals. This makes clear that single- and multi-agency training should be available to promote the knowledge, skills and values needed to support effective child protection

work. Local CPCs are responsible for overseeing training needs within their areas and should have mechanisms in place for the delivery and evaluation of local training.

15. Have you identified online practices that may increase the risk of becoming a victim of THB for different forms of exploitation? What mechanisms have been developed to prevent the misuse of information and communication technology for THB purposes? What is the practical effect of their implementation?

United Kingdom

Social media is used to recruit victims. This most often occurs as fraudulent and misleading job adverts, which are posted on social media and classified advertising platforms. These are often aligned with nationality groups. After initial contact is created by a victim responding to one of these adverts, contact primarily occurs through closed channels including messaging apps. This methodology is primarily used for sexual exploitation and labour exploitation.

Conversely, online recruitment for exploitation in criminal activity is initiated by offenders portraying a lifestyle to attract vulnerable persons, including through displays of wealth, designer goods and quantities of cash.

Victims of commercial sexual exploitation continue to be advertised on adult services websites (ASWs), with traffickers using the same marketplaces used by self-determined sex workers. There is no evidence of traffickers establishing or infiltrating ASWs. In recent years, ASW moderators have increasingly provided information to sex buyers on indicators and means of reporting, and some platforms have also embedded policy changes to prevent traffickers using their services, such as use of third-party ID verification services, and preventing a single payment card purchasing advertising space for multiple profiles.

It is likely that services of victims in labour exploitation are also advertised online, although this is unlikely to have significantly altered the feasibility, scalability or nature of offending models.

The NCA lead a multi-agency online enabler working group, which currently acts as the interface between the OSA regulator Ofcom and the law enforcement system to ensure the legislation is effectively implemented for modern slavery and human trafficking (MSHT) and exploitation. As the OSA 2023 becomes embedded in the response to trafficking threats, Ofcom, the appointed regulator, will seek to engage industry in improving standards to become compliant with the legislation, and will take action when moderation and risk management standards fall into negligence or complicity.

The NCA regularly monitors online platforms for the risk of MSHT, which feeds into both law enforcement's strategic and operational response. As leader of the "Online enablers of THB" Operational action under the European Multidisciplinary Platform against Criminal Threats, the NCA influence proactive activity across Europe in this space and act as a key international leader in this area.

Police forces across the UK use specialised web crawlers to detect organised provision of sexual services, aiding the development of existing cases, and the detection of proactive leads.

16. What measures are taken to raise awareness of the risks of technology-facilitated THB, including among children, parents, teachers, child care professionals and social workers? What technology-based initiatives exist in your country to disseminate information to groups/communities at risk of THB?

England and Wales

A range of measures and initiatives are in place to raise awareness of the risks of technology-facilitated modern slavery and human trafficking.

As outlined in Q2 and Q4, we are introducing new measures to strengthen multi-agency working to keep children safe, through the Children's Wellbeing and Schools Bill. This includes better information sharing between agencies, requiring the establishment of multi-agency child protection teams in every area and a new duty on safeguarding partners to automatically include education and childcare settings in their multi-agency safeguarding arrangements so that opportunities to keep children safe are not missed.

The Independent Child Trafficking Guardianship service, as well as supporting children directly, engages regularly with a wide range of professionals such as social workers to raise awareness of all types of exploitation, including online harms. The service aims to increase professionals' knowledge and understanding of the experiences that children may face, identifying barriers and promoting systematic change by supporting professionals to work differently.

Through our County Lines Programme, NCLCC disseminates guidance and delivers training to upskill the understanding of child criminal exploitation and is currently rolling out an online application to forces to provide frontline officers with quick access to information on county lines and child criminal exploitation and the appropriate tools and tactics to tackle these issues.

The Prevention Programme works with a range of partners to tackle and prevent child sexual abuse and exploitation, child criminal exploitation, and modern slavery and human trafficking on a regional and national basis.

Scotland

The Act also creates an offence, that extends to Scotland to communicate encouragement or assistance to someone else to serious self-harm.

While internet services are a reserved matter, the Scottish Government continues to monitor the UK Government's implementation of the Online Safety Act 2023 and will continue to work with law enforcement, Ofcom and third sector partners on the implications of this important legislation for Scotland.

Protecting children online is a key priority for the Scottish Government and are continuing to work with our partners through the Police Scotland Multi-Agency Preventing Online Child Sexual Abuse and Exploitation Group to inform our approach to enforcement to keep children safe online.

The Scottish Government ran a national public awareness campaign in February and March 2022 to support parents and carers to help keep their children safer online. This linked to the Scottish Government's Parent Club website and newly created Online Safety Hub and Child Sexual Abuse and Exploitation Hub. In October 2023, the Scottish Government launched resources for parents and carers of younger children on the Parent Club website. These provide tips on how to help younger children to stay safe online as well as signposting to age-appropriate online resources for children.

The Scottish Government provides funding to Barnardo's Scotland and NSPCC (Childline) through its Children, Young People and Families Early Intervention Fund. The organisations provide resources on how to stay safe online, as well as hotlines where children, parents or professionals can report online safety or exploitation concerns. Experiences and Outcomes for the Technologies area of the Curriculum for Excellence (CfE) including internet safety and cyber resilience can assist in developing children and young people's life skills (including media literacy and online safety skills), knowledge

and participation. There are clear links between internet safety and Personal and Social Education (PSE)/health and wellbeing and these statements will help teachers plan learning. Children and young people can learn about the safe and responsible use of different technologies, including the internet and social media, as part of their broad general education under CfE.

In March 2024, the Minister for Children, Young People and the Promise attended the launch of the 'You Are Not Alone' resource developed by I Am Me Scotland and Police Scotland which is aimed at raising awareness amongst S1-S3 pupils about the risks of exploitation and where to get help when they need it.

Northern Ireland (NI)

Awareness raising around use of digital tools by exploiters is incorporated into training and awareness raising sessions delivered by DoJ, operational and NGO partners.

17. How do you cooperate with ICT companies and Internet service providers, including content hosts and social media, in preventing THB?

United Kingdom

The Government recognises that traffickers are increasingly using online tools and platforms, including social media, to recruit victims.

Online platforms are a significant enabler of sexual exploitation. They must be responsible and held accountable for content on their sites, including taking proactive steps to prevent their sites being used by criminals. The Online Safety Act 2023 sets out priority offences, including sexual exploitation and human trafficking offences.

Online platforms have a duty to assess the risk of illegal harms on their services and need to take safety measures to protect users from illegal content, such as those set out in Ofcom's codes of practice, or face significant penalties.

Law enforcement is also running an adult service website referral pilot where adverts are referred to the Tackling Organised Exploitation capability (housed in Regional Organised Crime Units) which has a remit to gather intelligence to identify organised crime activity to support operational activity.

18. How are policies and practices aimed at preventing THB informed by the experiences of victims and at-risk individuals?

England and Wales

Embedding the voices of people with lived experience in policymaking is imperative to achieving better outcomes. The Government is committed to engaging survivors in a safe and effective way.

We continue to involve survivors in policy development through specific projects. In 2024, we worked with NGO partners to provide the opportunity for survivors to input into the future adult victim support policy model to prioritise our commitment to deliver effective support that is conducive to victim recovery.

Since 2022, the Home Office Modern Slavery Fund, our UK Aid programme to tackle modern slavery overseas, has required all project partners to draw on survivor voices to inform the design, implementation and review of interventions. The last phase of the Fund has delivered projects with a

strong focus on survivor empowerment, including the introduction of peer-led aftercare models, the deployment of survivor-centred case management systems, and a groundbreaking approach to including people with lived experience in anti-trafficking research and advocacy.

As outlined above, the Modern Slavery Victim Care Contract provides specialist support to adult victims of exploitation and trafficking who have been identified through the NRM in England and Wales. This will be replaced by the new Support for Victims of Modern Slavery (SVMS) contract when the MSVCC ends.

We are continuing to explore further options for engaging with survivors and people with lived experience of modern slavery in the work we do, including through engagement with existing sector-led Lived Experience Advisory Panels.

The Welsh Government has engaged the Human Trafficking Foundation's Lived Experience Advisory Panel in the ongoing development of Anti-Slavery Wales Online Learning.

Scotland

Both Migrant Help (MH) and the Trafficking Awareness Raising Alliance (TARA) ensure that their operational policies and service provision are shaped by the lived experiences of survivors. This is achieved through their respective advisory groups: MH has the Lived Experience Advisory Panel (LEAP), while TARA operates the TARA Advisory Group (TAG). These internal panels provide a platform for survivors of human trafficking to share their insights and inform the development of support strategies. The Scottish Government has actively involved these advisory groups at various stages in the evolution of Scotland's Human Trafficking and Exploitation Strategy.

For example, MH's LEAP contributed to the Scottish Government's review of the Human Trafficking and Exploitation Strategy, which led to the decision that the strategy needed to be refreshed. TAG, similarly, participated in workshops at the beginning of the strategy refresh process, during which they presented their experiences and perspectives to the Minister for Victims and Community Safety and key stakeholders. As the Scottish Government continues to refresh its strategy, it remains committed to ensuring that those with lived experience play an integral role in shaping a trauma-informed, victim-centred approach.

Children

All policies and practices aimed at preventing trafficking and exploitation of children should be underpinned by the core principles of GIRFEC. GIRFEC principles ensure that policies and practices are informed by the experiences of victims and at-risk individuals by prioritising a child-centred, participatory approach, focusing on early intervention, multi-agency collaboration, and regular review of individual needs. These principles make sure that the voices of vulnerable children are central in shaping protective environments and responsive policies.

The SHANARRI well-being indicators (Safe, Healthy, Achieving, Nurtured, Active, Respected, Responsible, Included) are central to GIRFEC. These indicators help professionals assess the needs and vulnerabilities of children. By focusing on these aspects, policies are shaped to address specific well-being issues that victims of trafficking and exploitation experience, ensuring that their recovery and protection are based on their actual experiences.

As well as the support services provided by our local authorities, the Scottish Government funds the statutory ICTG service (in accordance with section 11 of the Human Trafficking and Exploitation (Scotland) Act 2015). The service provides Guardians for every child who is a victim or who is

vulnerable to becoming a victim, which includes UAS children arriving in Scotland. The service gathers insights from the people they support, helping to inform guardianship practices and wider child protection policies. Guardians also serve as advocates, ensuring that the children's voices are heard at policy forums, contributing to national conversations about trafficking prevention and support.

Northern Ireland (NI)

The three-year Strategy was developed in consultation with operational and NGO partners, with specific commitments aimed at understanding the experiences of adult and child victims and survivors. DoJ engage regularly with victim support providers Migrant Help and Belfast & Lisburn Women's Aid to better understand the specific needs and circumstances of victims of MSHT. Research produced by Dr Colm Walsh and published by DoJ explored the perceptions and experiences of CCE in Northern Ireland, the learnings of which were used in the development of the 2-year CCE action plan.

II. IDENTIFICATION OF VICTIMS AND PROTECTION OF THEIR RIGHTS (Articles 10, 11, 12, 14 and 16)

19. Among the victims of THB identified, were any subjected to exploitation on the basis of their sexual orientation and/or gender identity (LGBTI+: lesbian, gay, bisexual, transgender or intersex), especially teenagers and young adults? If yes, did any of them report on police misconduct?

United Kingdom

The NRM doesn't collect information on sexual orientation or gender identity.

20. What specific measures are taken to ensure that trafficked persons who are migrant workers, including in an irregular situation, are identified as victims of THB and have access to the rights provided for in the Convention? Is there cooperation with specialised NGOs, trade unions, and employers to enhance the identification and protection of potential victims within these at-risk groups?

England and Wales

The National Referral Mechanism identifies and supports all consenting adult potential and confirmed victims of modern slavery, and all child potential and confirmed victims, including both British and foreign nationals. Individuals referred into the National Referral Mechanism and identified as a potential victim of modern slavery are entitled to support under the Modern Slavery Victim Care Contract which is designed to meet our obligations under ECAT – regardless of their nationality and where their modern slavery experience has occurred, unless the public order or bad faith disqualifications apply. Article 14 of ECAT, issuing renewable residence permits to victims, is fulfilled by the UK by granting a form of temporary permission to stay for victims of human trafficking or slavery (VTS) in the circumstances described in Article 14(1)(b) as mirrored in section 65(2)(c) of the Nationality and Borders Act (NABA) 2022. Permission to stay may be granted for this purpose for a period not exceeding 30 months across all applications. The UK also grants VTS in compliance with section 65(2)(a) and 65(2)(b) of NABA, not because this is required by ECAT but because the Secretary of State has been bound to do so by Parliament as a matter of domestic law.

First Responder Organisations are specified public authorities and Non-Governmental Organisations, who have a responsibility to identify all (regardless of nationality) potential victims and refer cases to the competent authorities in the first instance.

In England, Wales, Scotland & Northern Ireland law enforcement (police, NCA, Gangmasters and Labour Abuse Authority), Local Authorities and certain parts of the Home Office (Border Force, UKVI and Immigration Enforcement) are public authorities designated as First Responder Organisations. There are a number of organisations that are not public authorities but are also First Responder Organisations in England and Wales including The Salvation Army, Barnardo's, Migrant Help and Refugee Council.

It is for the First Responder Organisation to decide how it will discharge its functions as a First Responder Organisation, which are to:

- Identify potential victims of modern slavery and recognise the indicators of modern slavery,
- Gather information in order to understand what has happened to them,
- Refer victims into the NRM (in England and Wales this includes notifying the Home Office if an adult victim doesn't consent to being referred), and,
- Provide a point of contact for the competent authorities to assist with the Reasonable Grounds and Conclusive Grounds decisions or to request a reconsideration.

To assist First Responder Organisations (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 of modern slavery. The child victim support module covers child-specific indicators of modern slavery, forms of exploitation that are particularly prevalent and safeguarding.

Scotland

Asylum and Immigration matters are reserved to the UK Government. However, if identified as trafficking victims through the NRM, Migrant Help and TARA can assist migrant workers with immigration status issues by referring survivors onwards to legal services and guidance on pathways to regularisation.

Please also see answers to Q 4b and 7a above.

Northern Ireland (NI)

DoJ oversees the provision of MSHT support services, in partnership with NGO organisations Migrant Help and Belfast & Lisburn Women's Aid. Support provision for victims and potential victims is tailored to specific needs and vulnerabilities of each individual. Support for victims and potential victims identified through NRM referral includes, but is not limited to: appropriate and safe accommodation; material assistance, including financial assistance; assistance in obtaining healthcare services, including counselling; appropriate information on any matter of relevance or potential relevance to the particular circumstances of the person; translation and interpretation services; assistance in obtaining legal advice or representation; and, assistance with repatriation.

Victim support providers offer specialised support to individuals trafficked from overseas including, but not limited to: access to language coaching; support around integration; access to legal representation to navigate immigration and asylum applications; and support for accessing employment and education.

21. What measures are in place to encourage victims of THB to report their situation to the authorities and/or civil society organisations?

United Kingdom

In the UK, any individual can report any concerns of modern slavery or exploitation to the modern slavery helpline, run by the NGO Unseen, or can [report it online](#). Potential victims can get information, advice and guidance from trained advisors who can signpost to support services and report cases into the NRM.

Victims are not able to self-refer into the NRM, but all First Responder Organisations (FROs) are trained by their respective organisations to identify indicators of modern slavery, including trafficking, and refer individuals into the NRM so that the individuals concerned can have their case considered by the expert decision makers in the Home Office Competent Authorities. Victims can self-refer to the FRO, who may on their behalf make an NRM referral.

Adult potential victims must consent to enter the NRM. First Responder Organisations have a Duty to Notify the Home Office if they encounter adults that they suspect to be victims, who do not consent to enter the NRM.

Scotland

Police Scotland adopt a victim-centred approach to investigations and deploy specialist Public Protection officers, and victim navigators (see answer to Q24f below) to potential victims of trafficking. Through a collaborative approach support agencies are brought in at the earliest stage in order to enhance the victim experience and maximise the engagement prospects for individuals to report their exploitative experiences to Police.

For children, key professionals, such as social workers, police officers, healthcare providers, teachers, and immigration officials, are trained to recognise the signs of trafficking and to support child victims in a trauma-informed, sensitive manner.

Practitioners involved in child protection must be trauma-informed in their approach. Early recognition of and response to the impact of trauma is required, alongside a collaborative response between adult and children's services when a multi-agency plan is needed to protect a child from significant harm. The [national trauma framework](#) and training plan is relevant across professional sectors.

UAS children and young people can be assigned Guardians under the statutory ICTG service. Guardians help children understand their rights, access support, and feel empowered to report their trafficking experience.

Children and young people can also approach civil society organisations, which provide a less formal entry point than directly approaching statutory services. As noted in response to Q 16, Barnardo's Scotland and NSPCC are examples of two organisations which offer practical and emotional support, and which receive Scottish Government funding.

SOHTIS also provide a second-tier support service for civil society organisations who engage with potential victims providing an easy access gateway for potential victims to disclose exploitation. This support can be provided via direct client advocacy or via the civils society organisation who is the initial point of contact, whichever is the preference of the potential victim. This reduces pressure on potential victims to speak with authorities and allows trust to be established.

22. What specific measures are taken in your country to detect/identify and refer to assistance possible victims of THB at the borders? What measures are taken in your

country to identify victims of THB during the examination of asylum applications and prior to the return of persons whose applications are rejected?

England and Wales

Under the NRM, Border Force is a designated 'first responder'. It also has duties to safeguard and promote the welfare of children under Section 55 of the Borders, Citizenship and Immigration Act, 2009. Consequently, in 2014, prior to the Modern Slavery Act 2015 and Modern Slavery Strategy, Border Force created a cadre of Safeguarding and Modern Slavery (SAMS) officers, covering all ports and airports. SAMS officers typically carry out frontline duties but are available to support colleagues with advice and practical assistance where they encounter an individual who may be at risk.

Scotland

SOHTIS has established a multi-agency partnership with Border Force, Police Scotland and Airport staff at Edinburgh Airport, assisting in the early detection of potential victims as they enter/leave the country. SOHTIS work alongside lawyers to advocate and provide evidence of risk associated with survivors of human trafficking being returned to a country of origin.

23. What measures are taken in your country to identify victims of THB in immigration detection centres and prisons?

England and Wales

All Home Office staff involved in immigration enforcement activity are provided with appropriate training and guidance for their roles. This includes, but is not limited to, training around Modern Slavery, the National Referral Mechanism process and the Adults at Risk in immigration detention policy: [Adults at risk: detention of potential or confirmed victims of modern slavery \(accessible version\) - GOV.UK.](#)

In 2022, His Majesty's Prison and Probation Service (HMPPS) began strengthening its approach to tackling modern slavery by issuing guidance to all prison staff in England and Wales. The guidance helped raise awareness of trafficking [Modern slavery guidance - GOV.UK \(www.gov.uk\)](#). HMPPS also introduced an alert system to identify trafficking adult and child victims, (including adults who do not seek to enter the National Referral Mechanism). To cement the progress made, in 2022 HMPPS established a dedicated team to provide ongoing support and guidance to prison staff. Modern Slavery Single Points of Contact were introduced in each of the 122 prisons across England and Wales in order to promote the identification of victims of trafficking and provide support. In 2024, a new senior level network was established within each prison regional office to oversee individual prisons in each region. HMPPS is now in the advanced stages of developing wider organisational guidance which includes all operational services within HMPPS (HM Prisons, The Probation Service and the Youth Custody Service in respect of children under the care and management of HMPPS). This new guidance focusses on:

- raising awareness of MSHT across HMPPS;
- how victim-survivors can be identified, supported to recover, and how the risk of future exploitation can be reduced;
- how we can work with MSHT perpetrators to reduce the risk of reoffending and protect the public.

Scotland

If, during admission, or at any point during an individual's stay in prison, a person is identified or has concerns in relation to exploitation or human trafficking then Scottish Prison Service staff make referrals to a first responder e.g. Police Scotland who would come and interview them in the first instance. SOHTIS also works with prison staff within four Scottish Prisons to improve the identification of potential victims within the Scottish prison estate. This includes triaging of cases of concern, providing advocacy for potential victims and support for survivors.

Northern Ireland (NI)

All new prison staff in Northern Ireland receive MSHT training and awareness sessions from NGO partners. Training includes information on how to spot the signs of MSHT and what to do when you suspect someone is a victim of MSHT.

24. What services are available in your country to provide specific assistance to particularly vulnerable victims, such as:

- a. persons with disabilities;
- b. LGBTI + persons;
- c. victims with children;
- d. victims with severe mental and physical trauma;
- e. homeless persons;
- f. Other.

England and Wales

The Modern Slavery Victim Care Contract (MSVCC) provides adult victims in the NRM with needs-based support to help them to begin to rebuild their lives. Support is tailored through a needs and risk assessment model, ensuring that assistance reflects individual needs and circumstances. Support is inclusive of all gender identities, all disabilities and is designed to reflect individual needs. Every adult victim has regular access to a dedicated support worker who provides information to victims on their rights and facilitates access to wider statutory support services. This support is tailored to the individual's modern slavery experience and can include gender specific services, such as assistance with accessing sexual health services as a result of sexual exploitation.

The regular access to a dedicated support worker is a central part of the victim's recovery journey because they help them secure essential services like:

- access to mainstream mental health support through the NHS or counselling, where required. Support providers work with local mental health and community services to facilitate access to appropriate psychological assistance to meet the needs of the individual victim and where required this includes access to substance dependency services and specialist counselling for victims with severe mental and physical trauma.
- Local authority housing and homelessness assistance.
- Access to education for children of victims.
- Financial support for child dependents.
- Support under the Care Act 2014 for victims with disabilities.

Where there are safety concerns or a risk of further exploitation, destitution or homelessness, safehouse accommodation is available through the MSVCC, such as single sex, mixed or family accommodation for victims with children, or via local authorities depending on the individual's immigration status. A multi-agency approach is encouraged to ensure individuals are protected and safeguarded which includes working in collaboration with other support services, local authorities and

the police. Details on how the MSVCC provides, and tailors support is explained in Annex F of the [modern slavery statutory guidance](#).

ICTGs work directly with children and advocate on their behalf to ensure their best interests are reflected in the decision-making of the public authorities involved in their care. ICTGs will tailor their support to the individual needs of each child, ensuring that vulnerable children's specific circumstances are fully considered. This personalised approach aims to protect children from further harm, prevent repeat victimisation, re-trafficking, or going missing, and support their recovery.

The Home Office are considering measures to improve child to adult transition rates to ensure that this cohort access support at this particularly vulnerable time in their lives. This includes considering options to improve awareness of the NRM and the consent process, producing information packs for professionals and children themselves to better understand the process, and considering how Home Office processes can be improved to this end. We will identify additional levers available to us to promote better rates of child to adult NRM transition, including through Statutory Guidance changes and in tandem with other Departments and agencies, where relevant.

Scotland

TARA's office space is fully accessible to those with physical disabilities. Where women's disabilities mean our accommodation is inaccessible, disabled access crisis hotel accommodation can be provided whilst they work with the local authority to provide appropriate accommodation as a vulnerable adult.

TARA routinely liaise with Health and Social Care colleagues on issues/concerns such as learning disabilities and severe, ongoing mental health concerns to ensure women access appropriate supports to meet their needs and their capacity to consent to various processes/procedures is assessed.

Clients with disabilities or mobility challenges are, where possible, given ground floor accommodation within Migrant Help's safehouse. They link such clients in with medical support and make bespoke referrals on their behalf to a range of stakeholder organisations. Their ClearVoice interpretation service can provide accessibility products for clients who need to access these. These can be Braille, Easy Read, and more. MH also have scope, where needed, to use grant funds to source particular items of importance for clients in this category, where in-kind provision cannot be made. MH will soon be developing a full inclusivity framework within their services, and will be looking in more detail at how they can more extensively support such clients.

TARA support is provided to women regardless of their sexuality and they signpost and/or encourage lesbian or bisexual women to access support groups/social networks in the city. A growing number of transgender women have been supported by the service. The team are able to inform them of their rights and protections as LGBTI+ women in Scotland and will advocate on their behalf where necessary.

Migrant Help clients in this category, again, will have bespoke referrals made on their behalf to suitable supporting agencies, and will be assigned a caseworker most suited to their individual needs. They will also be accommodated in a way (where accommodation is needed) that takes account of their needs.

Local Authorities, through social work departments, play a key role in assessing the needs of trafficking victims who have children. The Scottish Government's National Guidance for Child Protection provides advice if there are concerns about the child's well-being or safety. If a child victim of trafficking requires legal assistance, they are entitled to apply for legal aid in Scotland. This ensures that they receive professional legal representation and advice, regardless of their financial circumstances. Legal aid covers a range of services tailored to meet the specific needs of child victims,

including assistance with asylum and immigration matters, protection orders, or cases involving criminal proceedings against traffickers.

Health visitors and family nurses may also provide assistance to parents with young children, ensuring both the physical and emotional health needs of the children are met. They also play a key role in referring parents to specialised support services. Children of trafficking victims may themselves experience secondary trauma due to their parent's situation. Therefore, mental and emotional wellbeing should be addressed, applying the same principles of early intervention and prevention that underlie the GIRFEC approach to supporting a child's whole wellbeing. A range of services should be available locally to supplement specialist support that Child and Adolescent Mental Health Services (CAMHS) can provide. This could include counselling services in schools, and community wellbeing service support for children, young people and their families.

Whilst TARA are unable to provide access to crisis accommodation to women with children in their care, their full outreach service is available to them. Where women with care of their children present to our service as destitute, TARA advocates for them to access local authority support and provide a robust crisis outreach service, liaising and advocating with homelessness services or children and families' services on their behalf to ensure safe accommodation is provided regardless of immigration status. TARA's crisis accommodation is available to pregnant women with robust move on plans being in place to ensure women are settled prior giving to birth. They work closely with NHS GGC's specialist midwifery services and our colleagues within AMMA who provide a birth companion service. Many women have been separated from their children who remain in countries of origin with grandparents or extended families. The TARA service is mindful of how this impacts on women and their ability to engage with law enforcement responses. TARA have supported a small number of women who have been able to reunite with their children and are, again, mindful of the complexities for women and children in such cases. Access to appropriate childcare remains challenging for all services when trying to support women to disclose or during assessment processes.

The Scottish Government helps to fund the NHS Greater Glasgow & Clyde Psychological Trauma Service (The Anchor) which offers early psychological assessment and evidence based psychological intervention to victims of trafficking in Scotland who are going through the National Referral Mechanism (NRM). This allows the service to assess and respond to the mental health needs of victims of trafficking at an early point ensuring that their care is trauma informed and recovery focused. They are a specialist mental health trauma service whose staff consists of Clinical and Counselling Psychologists as well as CBT Therapist, Mental Health Practitioner, Occupational Therapist and Art Psychotherapist. The service is embedded within the National Health Service and can refer on to other services where indicated. They have also delivered trauma enhanced level training to partner agencies and broader awareness training nationally.

The TARA Service also works closely with Community Mental Health colleagues and other primary health care services to support women with severe mental health issues. They work with The Anchor to provide psychological assessment and treatment for women accessing our service. TARA meets monthly with the service to discuss cases causing concern, and have recently completed trauma training with the service enabling co-delivery of the Safe Place to Cope group to trafficked women. This is a treatment group equipping women with trauma to better manage their symptoms in their day to day lives. In cases where women have severe physical trauma TARA ensures immediate access to medical assistance, hospital visiting and will provide ongoing advocacy and liaison with health and social care services to ensure they continue to access appropriate treatment and support.

Unfortunately TARA has experience of supporting trafficked women with terminal and/or life limiting physical health issues and women who have required significant psychiatric input either to prevent

harm or in response to suicidal ideation and, sadly, attempts. All team members have undertaken suicide prevention training.

Through fulfilling the Scottish Government's statutory duty to support THB victims, accommodation is provided by Migrant Help for any victim who is destitute and lacking a safe accommodation option.

Survivors supported by Justice and Care often present multiple, overlapping vulnerabilities at case intake and their Victim Navigators are equipped to support them using a trauma-informed and victim-centred approach. Of the survivors with support plans to date, a wide variety of vulnerabilities have been identified including physical and mental health concerns, substance misuse, financial problems, lack of stable accommodation, and vulnerable immigration status.

Support plans created by the Victim Navigators aim to address these vulnerabilities in a sustainable and holistic manner, addressing the individual needs and aspirations of the survivor. Support provided by Victim Navigators in Scotland includes helping survivors to access immediate and follow up medical assistance, counselling services for survivors who are facing physical and mental health issues, accessing emergency housing for survivors who are homeless, helping them to apply for longer term housing solutions, helping survivors to access drug rehabilitation services to combat addiction issues, and access state benefits, and to apply for and maintain employment to improve their economic stability.

Scotland also has the Adult Support and Protection (Scotland) Act 2007⁵⁰ (ASP Act), which is designed to address vulnerabilities and protect adults aged 16 and over, and who meet all three of the following criteria:

- Unable to safeguard their own well-being, property, rights or other interests;
- at risk of harm; and
- that because they are affected by disability, mental disorder, illness or physical or mental infirmity they are more vulnerable to being harmed than adults who are not so affected.

In general terms, behaviours that constitute 'harm' to a person can be physical, sexual, psychological, financial, or a combination of these; human trafficking and exploitation are considered "harm," as per ASP criteria. The ASP Act places a duty on councils to make inquiries about a person's well-being, property or financial affairs if it knows or believes that the person is an adult at risk, and that it might need to intervene in order to protect the person's well-being, property or financial affairs. Public bodies are required to work together with local authorities to take steps to decide whether someone is an adult at risk of harm, balancing the need to intervene with an adult's right to live as independently as possible.

As part of the continuing support for survivors of trafficking and exploitation, SOHTIS provides long-term, holistic, trauma informed support and. These services are particularly tailored to each person's needs including all of the characteristics outlined in a-f above.

As part of the Scottish Government's commitment to ensure the safety and wellbeing of UAS children and young people, it funds a statutory ICTG service in accordance with section 11 of the Human Trafficking and Exploitation (Scotland) Act 2015. The service provides Guardians for every child who is a victim or who is vulnerable to becoming a victim, which includes UAS children arriving in Scotland. These Guardians play a crucial role in supporting and advocating for the children, guiding them through various legal processes.

⁵⁰ [Adult Support and Protection \(Scotland\) Act 2007 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2007/43/section/1)

Northern Ireland (NI)

DoJ managed and funded MSHT victim support contracts, delivered by NGO partners Migrant Help and Belfast & Lisburn Women's Aid, provide support tailored to specific needs of every victim and potential victim of MSHT.

25. How do you support the (re)integration of victims of THB? What processes are in place in your country to provide assistance to victims of THB exploited abroad after their return?

England and Wales

The Home Office invests in programmes overseas to strengthen national responses to modern slavery and human trafficking in countries from where high numbers of victims are trafficked to the UK. These include funding for long term and comprehensive reintegration support for survivors of trafficking in Albania and Vietnam, which is available to both domestic victims and returnees from overseas. Since 2024, the Home Office has funded a project that seeks to improve voluntary return and reintegration arrangements and outcomes for survivors of modern slavery. The project will strengthen the capacity of support providers in the UK and overseas to effectively assist with the return and reintegration of victims of human trafficking. In addition, the project will deliver research to deepen understanding of the experiences of survivors who voluntarily return from the UK.

Scotland

Integration into the community is at the heart of Migrant Help's work. A bespoke recovery package is built with each client, and a series of steps are taken, and activities engaged with, that support a client rewards integration into the community and reintegration into normal life. This can include physical and mental health referrals, ESOL referrals, community activity referrals, enrolment in college courses, and much more. Wherever possible, repatriations are approved once a clear and safe return home plan is agreed with a client, which may involve liaising with other NGOs in the home country, and potentially with law enforcement.

The TARA Service provides women with a holistic, woman centred and trauma informed human rights based approach. This includes support to attend social opportunities such as women's groups, religious worship or educational courses to reduce social isolation. Access to smart phones/laptop/tablets and internet data for 1 year to support digital inclusion and general accessibility. Opportunities via the TARA Advisory Group to participate in meaningful, survivor led consultation events. Dedicated Transitional support to assist with exiting TARA support services and ensure robust alternative supports are in place. Support can also include, following grants of leave to remain, access to housing, state benefits, relocaion elsewhere in the UK, employment etc. TARA's support as outlined above is provided for an average of 15 to 18 months and is dependent on mutually agreed and assessed needs. Women have been supported for a few days or weeks or for more than 4 years when required.

Furthermore, Justice and Care's Victim Navigators can support safe repatriations including, liaison with support services in the country of origin. They have a detailed repatriation procedure in place to ensure that survivors are safely repatriated with necessary safeguarding and support in place to reduce chances of re-trafficking.

Also supporting THB survivors on their integration journey is Survivors of Human Trafficking in Scotland (SOHTIS). SOHTIS provides long-term, holistic, trauma informed support the aim of which is to build independent living skills, assist in integration to community and reduce the risks of re-trafficking. This is delivered via SOHTIS' 12 Essentials to Thrive framework which includes: basic

needs, economic empowerment, education, employment, family connection, housing, legal empowerment, mental wellbeing, physical wellbeing, safety, social integration, self-actualisation.

26. If there is a provision in your country's law that provides for the possibility of issuing a residence permit owing to the victim's personal situation, how is this interpreted in practice? Please provide examples.

United Kingdom

As outlined in Q20, Article 14 of ECAT provides that signatory states can elect whether to grant renewable residence permits to victims in the circumstances described in Article 14(1)(a) or 14(1)(b) or both. The UK grants Temporary Permission to Stay for Victims of Trafficking or Slavery (VTS) in the circumstances described in Article 14(1)(b) as mirrored in section 65(2)(c) of the Nationality and Borders Act (NABA) 2022.

The UK also grants VTS in compliance with section 65 of NABA, not because this is required by ECAT but because the Secretary of State has been bound to do so by Parliament as a matter of domestic law. Section 65(2)(a) NABA provides that the Secretary of State must grant limited leave to remain if it is considered necessary for the purpose of 'assisting the person in their recovery from any physical or psychological harm arising from the relevant exploitation'. Detail of this provision is provided in the Immigration Rules 'Appendix Temporary Permission to Stay for Victims of Human Trafficking or Slavery' and the 'Temporary permission to stay for victims of human trafficking and slavery: caseworker guidance'.

"Physical or psychological harm" means harm of a type that results in physical trauma to the person; or psychological harm that causes mental or emotional trauma or that causes behavioural change or physical symptoms that require psychological or psychiatric care and where the physical or psychological harm arises from the "relevant exploitation". "Assisting the person in their recovery" for psychological or physical harm means that the applicant requires support either through the National Referral Mechanism or other services to assist in their recovery from their exploitation (this support does not need to accomplish recovery).

Permission to stay is not necessary for this purpose if the Secretary of State considers that the applicants need for assistance is capable of being met in a country or territory of which they are a national or citizen; or one to which they may be removed in accordance with an agreement between that country or territory and the UK. The consideration of whether the need for assistance is capable of being met comprises a 2-part assessment of both the availability and likely accessibility of treatment to the individual. Permission may be granted for this purpose for a period not exceeding 30 months across all applications.

Anyone who is granted permission to stay in the UK for more than 6 months is required to register for an account to access their eVisa, which is a digitised form of biometric immigration document. EVisas are replacing the biometric residence permits we issue to anyone who is allowed to stay in the UK for more than 6 months and the person can use it to evidence their status in the UK and for identification purposes.

27. What measures are in place to ensure that the identity, or details allowing the identification, of a child victim of trafficking are not made publicly known?

England and Wales

We protect the personal information of any individual, including children, referred into the NRM in the same way we would protect personal details for any other individual that accesses government support and services. We do that by having systems and policies in place to limit access to an individual's information and prevent unauthorised disclosure. Staff who access personal information must have appropriate security clearance and a business need for accessing the information, and their activity is subject to audit and review. If an individual is under the age of 18 their information will be shared with their Local Authority who have the responsibility to ensure that the individual is appropriately supported and safeguarded.

We adhere to the legal obligations as set out in the Data Protection Act 2018 and Guidance on the General Data Protection Regulation.

Additionally, there are specific data protection and data sharing clauses within the Grant Agreements for the Independent Child Trafficking Guardianship Service and the Devolved Decision-Making Pilots, ensuring that the partners who deliver services on behalf of the Home Office uphold high data protection standards. Grant Agreements make clear that partners must follow processes and procedures outlined in the Data Protection Act 2018 and the UK General Data Protection Regulation.

Scotland

The Data Protection Act 2018⁵¹ and UK GDPR set out strict requirements on the handling of personal data, including that of children. These laws ensure that children's personal information can only be collected, processed, or shared where it is lawful, proportionate and necessary to do so, and always in a way that protects their privacy. Organisations working with children, including schools and social services, must ensure they only share information where it is necessary and proportionate to do so. Key practice and data considerations applicable in all child protection processes are summarised in the Scottish Government's National Guidance for Child Protection.

Northern Ireland (NI)

All U/ASC are managed by NI Health and Social Care Trusts as looked after children and later as care leavers. within 'Looked After' Procedures and child protection procedures there are specific requirements that are maintained with regard to record keeping, confidentiality and sharing of information.

28. What measures are in place aimed at encouraging the media to protect the private life and identity of victims?

England and Wales

The Communications Act 2003 and Broadcasting Act 1996 require Ofcom to draw up a standards code for television and radio, covering standards in programmes, sponsorship, product placement in television programmes, fairness and privacy, known as the Broadcasting Code (The Code). The Code applies to all licensed TV and radio broadcast services, as well as the BBC. Ofcom has a range of regulatory tools at its disposal if it has concerns that a specific programme has not met the standards of the Code. These tools include powers of investigation, and enforcement action.

Section 8 of the Broadcasting Code requires that any infringement of privacy in programmes, or in connection with obtaining material included in programmes, must be warranted. This section of the Code contains a number of practices to be followed by broadcasters when dealing with individuals or

⁵¹ [Data protection: The Data Protection Act - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/legislation/the-data-protection-act-2018)

organisations participating or otherwise directly affected by programmes, or in the making of programmes. These include:

8.16: Broadcasters should not take or broadcast footage or audio of people caught up in emergencies, victims of accidents or those suffering a personal tragedy, even in a public place, where that results in an infringement of privacy, unless it is warranted or the people concerned have given consent.

8.17: People in a state of distress should not be put under pressure to take part in a programme or provide interviews, unless it is warranted.

8.18: Broadcasters should take care not to reveal the identity of a person who has died or of victims of accidents or violent crimes, unless and until it is clear that the next of kin have been informed of the event or unless it is warranted.

8.19: Broadcasters should try to reduce the potential distress to victims and/or relatives when making or broadcasting programmes intended to examine past events that involve trauma to individuals (including crime) unless it is warranted to do otherwise. This applies to dramatic reconstructions and factual dramas, as well as factual programmes.

Further detail on how these practices should be followed can be found in the guidance for [Section 8 of the Code](#).

Scotland

While press regulation is a reserved matter, in Scotland The Victims, Witnesses, and Justice Reform Bill will enshrine into law an automatic lifelong right of anonymity for victims of sexual and certain other offences, including Human Trafficking. The anonymity protections provide privacy for victims at the earliest possible point with the right to anonymity taking effect from the moment a relevant offence is committed, with no positive action required by the victim, for example, reporting the matter to the police, or making a disclosure to a specialist support service. Instead, any third party publication of identifying information about a victim of a qualifying offence is prohibited during the lifetime of the victim, unless that third party has written consent or (in the case of children) court agreement. This includes publication by individuals on social media as well more traditional media outlets, such as newspapers and television programmes.

Northern Ireland (NI)

Victims and witness in criminal proceedings can apply under section 46 of the Youth Justice and Criminal Evidence Act 1999 to have their identity protected from reporting.

29. Have there been cases of diplomatic households (of your country's diplomats abroad and of foreign diplomats in your country) employing domestic staff in conditions which could be forced labour or human trafficking? If yes, how was the issue of diplomatic immunity addressed? How were the victims identified, assisted and protected?

United Kingdom

There have been no reported cases of forced labour or human trafficking by UK diplomats abroad. The FCDO Staff Safeguarding Policy sets out that FCDO has a zero-tolerance approach for staff contributing to exploitation, including forced labour and human trafficking. Staff are required to report any instances or concerns of modern slavery or human trafficking immediately through a

Whistleblowing process and reporting concerns mechanism. FCDO Standards of Conduct and Behaviour apply to everyone working in the organisation. These are underpinned by the Civil Service Code. UK Diplomats overseas must comply with local law and must report concerns or suspicions of forced labour or human trafficking by anyone they are in contact with including a partner or supplier.

All FCDO staff are required to complete mandatory training every two years on safeguarding against Sexual Exploitation and Abuse and Sexual Harassment (SEAH). The FCDO run a quarterly training offer (as part of a comprehensive capability plan) covering topics relating to safeguarding against SEAH to help ensure all staff are aware of their responsibilities. FCDO also provides dedicated training to Heads of Mission and Deputy Heads of Mission to help them to understand their responsibilities in relation to safeguarding against SEAH.

Instances of domestic staff in foreign missions in the UK alleging forced labour are rare, and we expect all diplomats, as per the 1961 Vienna Convention, to obey UK laws. When victims have come forward to the police, they have been referred to the National Referral Mechanism. For alleged offences involving individuals holding diplomatic immunity, we seek a waiver of their immunity when so requested by the police or other law enforcement agencies. In the most serious cases, we do not hesitate to expel diplomats who do not cooperate.

30. What specific steps are taken in your country to identify victims of THB amongst persons recruited and exploited by terrorist/armed groups?

England and Wales

The Modern Slavery Act 2015 introduced a new measure under section 45 to provide a statutory defence for victims of modern slavery to protect individuals from prosecution for crimes they have been compelled or forced to commit as a result of their exploitation.

The section 45 defence was designed to provide further encouragement to victims of slavery to come forward and give evidence without fear of being convicted for offences connected to their slavery or trafficking situation. It also enhanced the suite of measures available to the Crown Prosecution Service (CPS) under existing non-punishment principle rules.

The section 45 defence does not apply in certain cases where serious offences have been committed. Schedule 4 to the MSA 2015 sets out the offences that do not apply to the section 45 defence, which includes serious sexual, violent and some terrorism offences. This is to prevent those who have committed serious offences escaping justice. In cases where the defence does not apply or cannot be evidenced to the criminal standard, the CPS can still exercise its discretion and decide whether it is in the public interest to prosecute.

The CPS prosecution guidance addresses the non-punishment of identified victims, including the statutory section 45 defence, duress and the practical application of prosecutorial discretion, to ensure the UK's commitment to the internationally agreed obligations to identify and safeguard victims of modern slavery.

Training has been made available from March 2021 to train police officers on the section 45 defence including the need to consider from the outset of an investigation whether someone is a victim of modern slavery. The most recent CPS section 45 guidance was issued in October 2024.

Northern Ireland (NI)

DoJ in partnership with the Modern Slavery Policy and Evidence Centre (MSPEC) have commissioned research, to be delivered by Ulster University and the International Organisation for Migration, to

explore the barriers to the recognition and identification of victims of child criminal exploitation (CCE) in Northern Ireland, with cognisance to the continued presence of paramilitary gangs in Northern Ireland.

The Northern Ireland Executive's Programme on Paramilitarism and Organised Crime (EPPOC), includes a significant number of initiatives aimed specifically at supporting and increasing the resilience of, and protective factors around, individuals and young people who are most at risk of being coerced into becoming involved in paramilitary or criminal activity. EPPOC has been at the forefront in Northern Ireland of bringing about change in relation to the system-wide response to child criminal exploitation and its research has enabled the development of specific initiatives to support young people at the risk of harm from paramilitary groups, and driven a wider system response, now being led by the Department of Justice alongside the Department of Health.

31. Are there requirements in your country's legal framework for the detection and removal of THB-related Internet content, and what are the sanctions for non-compliance? Is there a code of conduct for providers? If a person is detected as a presumed victim of THB in the process, how is this person referred to assistance?

United Kingdom

Ofcom (the UK's online safety regulator for the Online Safety Act 2023) have published their codes of practice on illegal content and online platforms now have a duty to assess the risk of illegal harms on their services and put measures in place to address those harms.

For the priority offences set out in the legislation, which includes sexual exploitation and human trafficking offences, companies will need to adopt even stronger measures and put in place the necessary systems and processes to identify, assess and address these offences based on a risk assessment. This might mean more resource for content moderation or limiting algorithmic promotion of content.

Companies will need to remove and limit the spread of illegal content. This means less illegal content online and when it does appear it will be removed quicker.

Ofcom will have enforcement powers to take action against companies breaching their duties, including fines for companies of up to £18m or 10% of qualifying annual global turnover (whichever is higher), and business disruption measures.

III. INVESTIGATION, PROSECUTION, SANCTIONS AND MEASURES (Articles 4, 18, 19, 23, 24, 27, 28 and 30)

32. Is the abuse of a position of vulnerability part of the human trafficking offence in your country's law? How are the concepts of "vulnerability" and "abuse of a position of vulnerability" defined in law? Have they been subject to judicial interpretation? If yes, please provide relevant case-law.

United Kingdom

The UK law in respect of modern slavery and human trafficking recognises an abuse of a position of vulnerability as part of the trafficking offence under the Modern Slavery Act 2015 (MSA 2015), as well as through the system of support for victims. Under the MSA 2015, the offence of human trafficking involves arranging or facilitating the travel of another person with a view to that person being exploited (section 2).

Exploitation is defined in section 3 and at subsection (6) securing services etc from children and vulnerable persons. This is defined as using or attempting to use a vulnerable person to provide services of any kind, or to provide another person with benefits of any kind, or to enable another person to acquire benefits of any kind, having chosen the person for that purpose on the grounds that (among other listed attributes) he or she is mentally or physically ill or disabled, or has a family relationship with a particular person and an adult or person without those characteristics would be likely to refuse to be used for that purpose.

Section 1 of the MSA 2015 outlines that in determining whether a person is held in slavery or servitude or being required to carry out force or compulsory labour, regard may be had to, amongst other things, any of the persons personal circumstances (such as the person being a child, the person's family relationships, and any mental or physical illness) which may make the person more vulnerable than other persons.

The consent of a person (whether an adult or a child) to any of the acts alleged to constitute holding the person in slavery or servitude or requiring the person to perform forced or compulsory labour, does not preclude a determination that the person is being held in slavery or servitude, or required to perform forced or compulsory labour.

In *R v Rooney (Martin) and Others* [2019] EWCA Crim 681 the Court of Appeal explained at [46]: "The European Court of Human Rights has published a guide to Article 4 which notes that reference to forced labour brings to mind the idea of physical or mental constraint whilst compulsory does not extend to every form of legal compulsion or obligation. It is clear from the case law that the penalty which is threatened may go as far as physical violence or restraint but it can also take subtler forms of a psychological nature, such as threats to denounce to the authorities a worker whose employment status is illegal. The assessment of whether a service required to be performed falls within the definition of FCL must take into account all the circumstances of the case in the light of the underlying objectives of Article 4."

Section 45 of the MSA 2015 provides a defence to certain criminal conduct where an adult has been compelled to do an act, and the compulsion is attributable to slavery or relevant exploitation, and a reasonable person in the same situation having the persons relevant characteristics would have no realistic alternative to doing the act. In the case of a child, where the act was as a direct consequence of the person being victim of slavery or relevant exploitation, and a reasonable person in the same situation as the person and having the person's relevant characteristics would do that act. "Relevant characteristics" is defined as age, sex and any physical or mental illness or disability, providing protection from prosecution to vulnerable victims of modern slavery and human trafficking.

The Court of Appeal judgment in *R v K, W, A* [2018] EWCA Crim 1432 confirms that because the prosecution does not need to prove a lack of consent by an exploited person, it is not dependent on the ability to call the individual said to have been exploited as a witness.

Northern Ireland (NI)

The relevant legislation in Northern Ireland is contained within the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015. Sections 1(4)(a) and (b) provide that:

regard may be had to any of the victim's personal circumstances which may make them more vulnerable than other persons such as, for example –

- (a) that the victim is a child or a vulnerable adult; or
- (b) that the perpetrator is a member of the victim's family

The national definition of a vulnerable person is as follows:

"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".

Abuse of a position or vulnerability is defined in law as:

"It is abuse when someone misuses their power or control over another person causing harm or distress".

There has been no judicial interpretation of these definitions.

33. Is the special vulnerability of the victim considered as an aggravating factor for the offender's sentence?

England and Wales

Sentencing is a matter for the Court. The prosecutor's role is to draw the court's attention to the mitigating and aggravating factors, the sentencing guidelines and any statutory provisions relevant to the offender. The prosecutor is required to put the full facts to the court, enabling them to sentence appropriately.

Importantly, the prosecutor must ensure that the police have explained to the victim their right to provide a victim personal statement and to keep this updated at any time prior to sentence. Victims are entitled to have this read out to the court or to read it to the court themselves should they wish to. The contents of this statement may include aggravating factors.

Additionally, prosecutors will draw the court's attention to any other information available which may assist the court in understanding the specific impact of the offence on the victim or the wider community.

The sentencing guidelines for Modern Slavery⁵² state:

- An offence is more serious if the victim is vulnerable because of personal circumstances such as (but not limited to) age, illness or disability (unless the vulnerability of the victim is an element of the offence).
- Other factors such as the victim being isolated, incapacitated through drink or being in an unfamiliar situation may lead to a court considering that the offence is more serious.
- The extent to which any vulnerability may impact on the sentence is a matter for the court to weigh up in each case.
- Culpability will be increased if the offender targeted a victim because of an actual or perceived vulnerability.
- Culpability will be increased if the victim is made vulnerable by the actions of the offender (such as a victim who has been intimidated or isolated by the offender).

⁵² [Slavery, servitude and forced or compulsory labour/ Human trafficking](#)

- Culpability is increased if an offender persisted in the offending once it was obvious that the victim was vulnerable (for example continuing to attack an injured victim).
- The level of harm (physical, psychological or financial) is likely to be increased if the victim is vulnerable.

Scotland

Prosecutors do not have a role in the determination of the sentence imposed by the Court. Prosecutors advise the Court of relevant factors, which would include the vulnerability of the victim, which the Court may take into account when determining the appropriate sentence.

Northern Ireland (NI)

As per Section 6(1) of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015, the court must, when considering for the purposes of sentencing the seriousness of an offence, treat the following as aggravating factors –

- the offence was committed by a member of the family of the victim;
- the offence was committed by a person in a position of trust;
- the offence was committed against a child;
- the offence was committed against a vulnerable adult.

34. According to national case-law, what forms of vulnerability are mostly abused by offenders in human trafficking cases? Please provide specific examples that show how the concept of “abuse of a position of vulnerability” is used in practice. What are the challenges in its application? Is it sufficient to prove the existence of a position of vulnerability of the victim, or must it also be proven that the defendant knew or should have known of the victim’s vulnerability, and intentionally manipulated the victim on this basis?

England and Wales

Vulnerable victims regularly feature in prosecutions in England and Wales although we are not required to prove ‘abuse of position of vulnerability’ as an element of the offence of human trafficking. Under section 3 of the Modern Slavery Act 2015 victims are exploited if they are victims of slavery, servitude, forced or compulsory labour or organ removal; victims of serious sexual offending or indecent images of children; subject to forced threats or deception:

(6)... having chosen him or her for that purpose on the grounds that—

(a) he or she is a child, is mentally or physically ill or disabled, or has a family relationship with a particular person, and

(b) an adult, or a person without the illness, disability, or family relationship, would be likely to refuse to be used for that purpose.

Section 3(6) is often used where there are child victims or those who are vulnerable through mental or physical health. Prosecuting defendants for using children or adults with mental health challenges for supplying drugs falls under this section and is a feature of our human trafficking in county lines prosecutions. The leading case is *R v KWA* [2018] EWCA Crim 1432. The CPS publish guidance to prosecutors which can be found here: [Modern Slavery and human trafficking: offences and defences, including the section 45 defence | The Crown Prosecution Service](#)

Vulnerable victims who may have entered, or remain in, the UK illegally through the actions of

their traffickers are often central to prosecutions.

In the case of Obeta, Ekweremadu & Ekweremadu, 2023, a case of human trafficking for organ removal, the victim was exploited having been brought to the UK from Nigeria. The victim had grown up in poverty, in a village without electricity or running water; he had left school at 15 and, in Lagos, was working at a market earning approximately 3,500 Naira a day – equivalent to about £7. The victim did not speak English when he was brought to the UK; he was particularly vulnerable, not only through his economic status but also in terms of his isolation from family, friends and those around him with whom he could not communicate.

Similarly, in October 2024 members of a gang who trafficked 12 people from Eastern Europe whilst stealing their wages were prosecuted. The victims all faced vulnerability and isolation, speaking little to no English and were kept in substandard accommodation. The gang members arranged their victims travel to the UK, forced them to work in a range of often physically demanding roles and then, having already confiscated their identity documents and passports, withheld the victims' wages from the roles they were being forced to work.

There has also been a significant shift in the way that victims are recruited and exploited through online and digital devices, as well as a change in victim exploitation.

We are unable to disaggregate the exploitation types prosecuted without a manual review of all cases charged under the Modern Slavery Act 2015. However, through close working with law enforcement we ensure that prosecutors are updated about exploitation types and where there are new trends or exploitation methods.

Northern Ireland (NI)

Currently in Northern Ireland vulnerable female sex workers are those mostly abused in human trafficking cases locally. Many of these victims are addicted to either alcohol or heroin and have chaotic lifestyles, resorting to sex work to fund their addictions. In a recent case of R -v- Heaney the defendant preyed on vulnerable young sex workers who were alcoholics and living in hostels. He controlled these vulnerable young women, transporting them to various addresses in the local area to provide paid sexual services. He also advertised the young females online for the purposes of sexual exploitation and financially benefitted from this.

In another case, the defendant and his co-accused (who are awaiting trial), were sexually exploiting vulnerable young females, many of whom were heroin addicts, by providing heroin and cash in return for sexual services. They also forced these females to provide prostitution services to other men for cash, which the defendant benefitted from.

It was clear in both of these cases that the young female victims were vulnerable and that the defendants both knew this and exploited them on this basis. There was no further requirement to prove their vulnerability.

35. Is the concept of “abuse of a position of vulnerability” addressed in criminal justice training? Is there any specific guidance on applying this concept? Please provide copies of guidance and/or training materials that shed light on how this concept should be applied in practice.

England and Wales

Prosecutors are able to prosecute any crime, and they apply the Code for Crown Prosecutors when dealing with any case. The CPS is structured in such a way that means that cases with additional complexity and/or sensitivity are dealt with by their complex casework units or by specialist central casework divisions.

With regards to modern slavery, all CPS prosecutors receive training in non-punishment principles, so they are fully aware of the section 45 defence. Additionally, the CPS National Modern Slavery Lead chairs a forum of modern slavery CPS area leads which meets bi-monthly to understand new and emerging themes and discuss case studies to share best practice and disseminate learning.

CPS Modern slavery guidance was updated in December 2023 to make it even clearer that offending contrary to the MSA Act 2015 is, by its nature and understood in terms of culpability and harm, very serious. If the evidential stage of the Code for Crown Prosecutors test for prosecution is met, it is highly likely that a prosecution is required in the public interest.

The guidance says that given the seriousness of these charges, even where other offences are available, modern slavery charges are most likely to require prosecution. Applying section 6 of the Code for Crown Prosecutors, it is highly likely that these will reflect the seriousness and extent of the offending.

The selection of modern slavery charges also means that the court is enabled to impose appropriate ancillary orders including Slavery and Trafficking Reparation Orders and Slavery and Trafficking Prevention Orders. Additional serious charges should also be considered, particularly where they may attract a consecutive sentence: most obviously, where serious offences against the person, sexual offences or drug offences have been committed (in particular in county lines offending). The case of *Nixon* [2021] EWCA Crim 575 is illustrative. His sentence could have been expressed as consecutive or concurrent to reflect multiple counts relating to drugs offending and modern slavery. The former however meant the court could reflect the different criminality involved and to impose significant sentences on both, a sentence which the Court of Appeal increased.

Northern Ireland (NI)

The PPS published its [Policy for Prosecuting Cases of Modern Slavery and Human Trafficking](#) in May 2022 which contains its commitment to victims and witnesses. The [PPS Code for Prosecutors](#) contains details of the guidelines for conduct of criminal prosecutions, including the test for prosecution. Factors in favour of prosecution include the victim being vulnerable. The PPS [Victim and Witness Policy](#) provides guidance on the support available to victims of crime and confirmation of different types of vulnerabilities.

36. What procedures and measures exist in your country to take into account the specific needs of vulnerable victims at the different stages of criminal proceedings?

England and Wales

All adult victims supported by the MSVCC have access to a dedicated support worker who provides information and assistance throughout the criminal justice process. This includes explaining the victim's role, outlining the criminal justice process, assisting with legal aid applications and informing them of their entitlements in a language that the victim will understand.

Support workers also signpost and refer victims to services that can help them access legal aid, navigate the legal system and facilitate access to independent legal advice and representation. This includes facilitating access to Special Measures under the Victim's Code and liaising with relevant service to protect and safeguard the individual who choose to support a police investigation.

Local Authorities working with their police and health partners, and other statutory agencies are responsible for safeguarding and promoting the welfare of all children in their area, including child victims of modern slavery. Additionally, the Independent Child Trafficking Guardians (ICTGs), where available, provide support to children in the NRM. Where appropriate, and in the child's best interests, ICTGs can provide support navigating around the criminal justice system where they are a witness or defendant in a criminal trial or civil justice system, which is linked to the child's trafficking / exploitation experience, until the child's involvement in the processes has concluded or until the child reaches 18 years of age. This includes facilitating access to legal advice for criminal justice processes and instructing a legal representative to act on the child's behalf.

Additionally, children who meet the definition of a victim of slavery or human trafficking continue to have access to the section 45 defence, as they do now. Section 45 of the Modern Slavery Act 2015 provides a statutory defence against prosecution for victims of modern slavery for certain offences. In the case of children, it applies when offences are committed as a direct consequence of being a victim of modern slavery. Schedule 4 to the Modern Slavery Act 2015 contains a list of serious offences to which the section 45 defence does not apply including sexual offences and serious violence offences. The test in the section 45 defence is lower for children (those under 18 years) than it is for adults.

Scotland

The Victims and Witnesses (Scotland) Act 2014⁵³ (the 2014 Act) seeks to improve the support available to victims and witnesses throughout the justice system, putting victims' interests at the heart of ongoing improvements to that system and ensuring that witnesses are able to fulfil their public duty effectively. The Act puts in place a clear framework for the support and protection of victims and witnesses in criminal proceedings, starting with general principles.

The 2014 Act is designed to implement the EU Directive on the rights, support and protection of victims of crime (Directive 2012/29/EU), and to enhance existing provision for victims and witnesses in Scotland. The Act as a whole seeks to put in place a comprehensive framework to better enable all victims and witnesses to participate in the criminal justice system as well as putting in place particular support and protection for those who are vulnerable.

Section 2 of the 2014 Act requires COPFS, and other organisations, to set and publish standards of service for victims and witnesses. This can be accessed at Standards of Service for Victims and Witnesses 2023-2024. All of the standards are monitored, reviewed and reported on annually.

All cases involving THB are referred to the COPFS Victim Information and Advice (VIA) service. VIA is a dedicated service offered by COPFS to victims, witnesses and the bereaved relatives of those affected by certain crimes.

VIA's role includes providing information to victims and witnesses of human trafficking and exploitation offences about the progress of the cases in which they are involved and the criminal

⁵³ [Victims and Witnesses \(Scotland\) Act 2014 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2014/11/section/1)

justice system more widely, canvass views on their involvement in the criminal justice process, apply for special measures to assist the witness when giving evidence in court and to refer them to appropriate support agencies. VIA provides relevant information to child and vulnerable witnesses at every stage of the prosecution process until the case concludes.

Special measures to assist child and vulnerable witnesses to give evidence are detailed in section 271 of the Criminal Procedure (Scotland) Act 1995⁵⁴. Victims of the offence of human trafficking, detailed in section 1 of the Human Trafficking and Exploitation (Scotland) Act 2015 (and offences committed prior to 17 December 2016 under section 22 of the Criminal Justice (Scotland) Act 2003⁵⁵ and section 4 of the Asylum and Immigration (Treatment of Claimants etc) Act 2004⁵⁶, are 'deemed vulnerable witnesses' and thus have automatic entitlement to the use of certain special measures when giving evidence. These include the presence of a support person, the use of screens or the giving of evidence using a live television link from another location. Other special measures, including use of a prior witness statement as the witness' evidence in chief, pre-recording all or part of the witness' evidence and excluding the public from the courtroom during the witness's evidence are also available if the court deems that these are appropriate.

The Vulnerable Witnesses (Criminal Evidence) (Scotland) Act 2019⁵⁷ also created a rule requiring that the evidence of many child witnesses (those aged under 18 on the date of commencement of proceedings) in solemn cases should be recorded in advance of trial. This rule applies in cases involving offences in terms of section 1 and 4 of the Human Trafficking and Exploitation (Scotland) Act 2015. Where this rule applies, use of a prior witness statement as the witness' evidence in chief, pre-recording all or part of the witness' evidence and the use of a supporter are standard special measures.

VIA also refers all witnesses who are vulnerable in terms of the Criminal Procedure (Scotland) Act 1995 to Victim Support Scotland (VSS) who will arrange, where it is possible and should the witness wish, for them to look round a court before a trial, known as Court Familiarisation Visits or to arrange for a supporter from VSS to assist a witness when giving evidence.

Northern Ireland (NI)

Needs assessments are carried out at different stages throughout the course of criminal proceedings. During the initial police investigation, a needs assessment is carried out with victims and any specific needs are communicated to PPS when the police file is submitted. Once a decision to prosecute has been taken a needs assessment form is sent to the victim from PPS along with the formal notification if the decision to prosecute. This allows the victim to provide details of any vulnerabilities that they may have. Once this is returned to PPS a prosecutor will consider which, if any, special measures are appropriate to assist the victim when giving evidence at court. The application for special measures can then be drafted and laid before the court. Enhanced needs assessments are carried out before trial and at any stage if the victim reports a change to their needs.

37. If you have criminalised the use of services of a victim of THB, how is this provision applied in practice? Please provide any relevant case-law.

⁵⁴ [Criminal Procedure \(Scotland\) Act 1995 \(legislation.gov.uk\)](https://legislation.gov.uk/ukpga/1995/271)

⁵⁵ [Criminal Justice \(Scotland\) Act 2003 \(legislation.gov.uk\)](https://legislation.gov.uk/ukpga/2003/22)

⁵⁶ [Asylum and Immigration \(Treatment of Claimants, etc.\) Act 2004 \(legislation.gov.uk\)](https://legislation.gov.uk/ukpga/2004/4)

⁵⁷ [Vulnerable Witnesses \(Criminal Evidence\) \(Scotland\) Act 2019 \(legislation.gov.uk\)](https://legislation.gov.uk/ukpga/2019/1)

England and Wales

The Modern Slavery Act 2015 allows us to prosecute people who exploit and traffic others. People who use the services of exploited people generally won't be aware of this, and as a result, will not be investigated by the authorities. However, law enforcement agencies receive training to spot the signs of exploitation so they can be more aware when, for example the police undertake a welfare visit to a brothel. If evidence is passed to the CPS and we can charge under the MSA 2015 then we will.

Section 53A Sexual Offences Act 2003 criminalises the payment for the sexual services of a sex worker who is forced, coerced or threatened. As this is a summary only offence, the police retain the discretion not to arrest or report those suspected of committing an offence, or they can charge the offence without reference to a prosecutor, regardless of whether the suspect intends to plead guilty or not guilty. CPS data will only capture the cases related to this offence where a prosecutor has been involved, and only captures cases finalised/completed within a year meaning that volumes may be inaccurate. According to our data, 3 offences have been charged by the police and reached a first hearing in the magistrates' court in the last 3 financial years.

There are also potentially significant challenges in enforcing the offence under section 53A of the Sexual Offences Act 2003 (payment for the sexual services of a sex worker who is forced, coerced or threatened), because of the evidential requirement that there must be proof that the suspect made or promised a payment and proof that a third party engaged in exploitative conduct such as force, threats or coercion have taken place. Direct evidence from the victim or an eyewitness to both elements would almost certainly be required, and often it is difficult to secure their co-operation with the judicial process.

Scotland

Scotland has not specifically criminalised the use of services of a victim of THB. However, other non-trafficking offences could apply in some circumstances.

Northern Ireland (NI)

This does not apply in Northern Ireland.

38. What technology-based tools and initiatives exist in your country to support investigations and enhance prosecution of THB cases? What training is provided to law enforcement officials, prosecutors and judges on THB facilitated by information and communication technology?

England and Wales

The National Police Chief's Council's (NPCC) Modern Slavery and Organised Immigration Crime (MSOIC) unit is funded by the Home Office to support the national policing response to modern slavery in England and Wales. The MSOIC Unit has produced bespoke centralised training for police officers. Some of the key training achievements include: a Modern Slavery and Human Trafficking (MSHT) 4-day investigator course, a MSHT general awareness course and a Victim Liaison officer course.

MSOIC have also provided a MSHT 'approved professional practice' to the College of Policing to provide further training to police officers. The training talks officers through the different approaches

to consider, to achieve best evidence, for example, through the use of independent Victim Navigators from the outset of an investigation, through the criminal justice system.

In addition, the network of MSOICU MSHT regional coordinators operating out of the Regional Organised Crime Units (ROCU) provide subject matter expertise on operational, investigative and safeguarding advice to police forces, and other law enforcement agencies to support the effective investigation of MSHT.

The NCA lead a multi-agency online enabler working group, which currently acts as the interface between the OSA regulator OFCOM and the law enforcement system to ensure the legislation is effectively implemented for MSHT and exploitation. As the OSA 2023 becomes embedded in the response to trafficking threats, Ofcom, the appointed regulator, will seek to engage industry in improving standards to become compliant with the legislation, and will take action when moderation and risk management standards fall into negligence or complicity.

The NCA regularly monitors online platforms for the risk of MSHT, which feeds into both law enforcement's strategic and operational response. As leader of the "Online enablers of THB" operational action under the European Multidisciplinary Platform against Criminal Threats, the NCA influence proactive activity across Europe in this space and act as a key international leader in this area.

Police forces across the UK use specialised web crawlers to detect organised provision of sexual services, aiding the development of existing cases, and the detection of proactive leads.

CPS prosecutors are highly experienced at ensuring appropriate support and special measures have been explained and offered, for example such as an intermediary, to ensure that everyone is able to give their best evidence. Under section 17(4) of the Youth Justice and Criminal Evidence Act 1999 (YJCEA) a victim of a sexual offence or victims of offences under section 1 and 2 of the Modern Slavery Act 2015 (victims of forced labour and trafficking for sexual and non-sexual exploitation) are automatically eligible for assistance unless they wish to opt out.

Under section 28 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) YJCEA. This can also be used alongside other special measures such as giving evidence over a live link, using privacy screens so 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.

CPS guidance on modern slavery already contains guidance to prosecutors on prosecuting cases without the testimony of the victim (sometimes called 'evidence-led'). This is a vital part of casework and the approach taken by the CPS was endorsed by the Court of Appeal in R v KWA [2018] EWCA Crim 1432. The CPS guidance that has recently been updated gives further emphasis to this.

The CPS has specially trained prosecutors around the country who are well equipped to respond effectively to support MSHT investigations, advise on charges and bring cases to a just outcome.

Following a recommendation from the 2023 HM CPS Inspectorate Inspection of the effectiveness of CPS policy and guidance for the handling of cases involving the National Referral Mechanism, the CPS

has introduced a consistency setting exercise with CPS Area modern slavery leads as an assurance that areas are taking a consistent approach in cases where the section 45 defence and other non-punishment principles are raised.

Scotland

Police Scotland are leading on the introduction of a Digital Evidence Sharing Capability across the Criminal Justice System and partners. This will be the first of its kind for Scotland and seeks to enable better transmission of ever-increasing digital evidence from Police to Prosecutor, to Court. Police Scotland are also rolling out Body Worn Video across all frontline officers which will enhance officer and public safety. Specifically with regards THB, this will provide best evidence from police respond to reports of THB within the communities of Scotland. Police Scotland continue to utilise trained Analysts to assess threat, risk and harm, as well as provide evidential products to support prosecutions.

The Vulnerable Witnesses (Criminal Evidence) (Scotland) Act 2019 introduced a rule mandating that the evidence of child witnesses in many solemn cases (including human trafficking offences) is recorded in advance of the trial. This removes the need for many child witnesses to attend court to give evidence in person.

To secure and enhance victim/witness engagement in prosecutions, technology may be used to capture the victim/witness's evidence either in advance of trial or during trial if the witness is out with the UK. This enables victims and witnesses to provide evidence in the case without requiring them to remain in the UK when they wish to return to their home country.

Taking 'Evidence by Commissioner' in terms of section 271I of the Criminal Procedure (Scotland) Act 1995 Act, means that the witness' evidence will be video-recorded in advance of the trial. The evidence will be played to the jury at the trial. If the witness' police statement is being used as their evidence in chief, in terms of section 271M, then the 'Evidence by Commissioner' hearing will be principally for the purposes of cross-examination by the defence and any re-examination by the prosecutor. However, if the witness' statement is not being used as their evidence in chief, then the 'Evidence by Commissioner' hearing will be for the purposes of examination-in-chief by the prosecutor, cross-examination by the defence and re-examination by the prosecutor.

Sections 272 and 273 of the 1995 Act provides provision for capturing the evidence of witnesses who resides outside of the UK. The COPFS have a dedicated International Cooperation Unit which deals with such applications. A live television link can be used in High Court or Sheriff Court proceedings to capture a witness's evidence from outside of the UK. In order for evidence to be heard by video link, the court must issue an International Letter of Request to the country where the witness is residing. Not all jurisdictions, however, allow for witnesses to provide evidence in foreign jurisdictions by means of a video link. This very much depends on the laws of the other jurisdiction and may also depend on the availability of relevant equipment within the other jurisdiction.

On joining COPFS, new prosecutors undergo a rigorous training programme at the specialist COPFS training facility in Glasgow, which covers a broad range of topics to equip them to become effective prosecutors. Part of that training focuses on meeting the needs of victims and witness including the use of technology-based tools. COPFS prosecutors have at their disposal a broad suite of guidance regarding every aspect of prosecution of trafficking and exploitation offences which is updated at regular intervals when required. COPFS provide two mandatory E-Learning modules which provide prosecutors with detailed training regarding the prosecution of perpetrators and the identification of victims of trafficking and exploitation offences. These modules have recently been revised to take account of the updates to the Lord Advocates Instructions, recent developments in the law and in

guidance and provide more specific and in-depth guidance relating to domestic trafficking and exploitation and child exploitation. All staff and prosecutors have been required to re-take the updated training.

Northern Ireland (NI)

PSNI use cyber tools such as Traffic Jam, Experian Investigator, Bin checks and Landweb to monitor digital activity and assist in investigation and intelligence gathering. PSNI monitor activity across escort service websites and forums to identify potential exploitation.

Human Trafficking specialist prosecutors have had training PSNI's Cyber Support Unit in relation to phones, social media, internet etc.

39. In what ways, if any, does your country utilise provisions from the Council of Europe Cybercrime Convention (Budapest Convention) to fight THB? If not, why is that the case?

United Kingdom

The Budapest Convention entered into force in the UK on 1 September 2011 by way of Command Paper. Sexual exploitation is a cyber-enabled crime, which is why the Online Safety Act 2023 set out priority offences, including sexual exploitation and human trafficking offences.

Ofcom published its codes of practice about how online platforms should deal with illegal online content. Online platforms now have a duty to assess the risk of illegal harms on their services, and need to take the safety measures set out in the codes of practice or use other effective measures to protect users from illegal content and activity.

Scotland

Police Scotland have not utilised provisions from the Council of Europe Cybercrime Convention to fight THB. Lack of knowledge about the Convention by investigation officers not from a specialist department, along with other procedures they use to tackle this issue, such as joint investigation working with other law enforcement agencies, are the reason for this. COPFS utilises the provisions provided under various international conventions, however these are all covered by domestic legislation.

Part II – Country-specific follow-up questions

40. Please provide information on measures taken in your country in respect to the following recommendations made in GRETA's previous reports:

- provide effective and timely access to legal assistance and free legal aid for victims of trafficking;

England and Wales

All potential victims of modern slavery with a positive Reasonable or Conclusive Grounds decision have access to the legal aid system. This includes access to legally aided representation in any criminal proceedings against them, as well as to civil legal aid for legal matters related to trafficking and exploitation, such as immigration advice; advice on an asylum claim; employment law advice (arising

in connection with the exploitation); and a civil claim for damages (arising in connection with the trafficking or exploitation). All applicants for legal aid must meet the relevant statutory criteria, which includes means and merits tests.

Victims of trafficking 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.

In private family proceedings, legal aid is available for matters such as child arrangements, financial remedy proceedings and divorce if the individual or their child is a victim of domestic abuse or child abuse, or at risk of being abused. Funding is subject to providing the required evidence of domestic abuse or child abuse and passing the means and merits tests.

Emergency representation is available for the purpose of obtaining urgent protection, such as non-molestation orders. We appreciate the importance of swift action in cases where court applications are needed for urgent protection. In order to facilitate this, an eligibility waiver is available for victims of domestic abuse applying for an injunction or other protective order, which means they can receive legal aid even if they would not otherwise pass the means test, though they may then have to pay a financial contribution towards their legal costs.

Legal aid is available in relation to various immigration matters including for asylum cases; for victims of domestic abuse, and victims of modern slavery; for separated migrant children; and where someone is challenging an immigration detention decision.

In all other immigration matters, where an issue falls outside the scope of legal aid, individuals can apply for Exceptional Case Funding where they can show that, without legal aid, there is a risk that their human rights or EU retained rights may be breached.

Criminal legal aid is not available for victims in criminal cases, as victims are not a party to criminal proceedings in England and Wales.

Scotland

The Scottish Government provides grant funding to JustRight Scotland to support the Scottish Anti-Trafficking and Exploitation Centre (SATEC), the only specialist legal project in Scotland that provides direct legal advice and representation to adult survivors of trafficking and exploitation regardless of nationality, gender, type of exploitation and geographical location. The funding is supporting free weekly outreach surgeries (in partnership with TARA and Migrant Help); pro bono legal representation across Scotland; professional training/support; awareness/information material and a peer support and mentoring programme.

Northern Ireland (NI)

Victims of trafficking have access to legal assistance and legal aid, facilitated by victims support providers Migrant Help and Belfast & Lisburn Women's Aid.

- enable all victims of trafficking, including undocumented migrants, to exercise their right to compensation, including state compensation;

England and Wales

The Sentencing Act 2020 enables courts to impose a compensation order on an offender requiring them to make financial reparation to the victim for any personal injury, loss or damage resulting from

the offence. Compensation orders, available for any criminal offence including human trafficking offences, must be considered in all eligible cases.

It is an obligation for courts to consider making a compensation order in all cases involving personal injury, loss or damage, and to give reasons where no such order is made.

There is no limit to the amount of compensation that can be imposed on an adult offender as part of a compensation order and, when determining the amount, the court must consider the financial means of the offender. The courts will do everything within their powers to trace those who do not pay and use a variety of means to ensure the recovery of criminal financial penalties, including compensation orders.

Under the Code of Practice for Victims of Crime, victims are entitled to be told about how to claim compensation for any loss, damage or injury caused as a result of crime. Victims injured by violent crime are entitled to be told by the police how to apply for compensation through the Criminal Injuries Compensation Scheme 2012 (the Scheme).

The Scheme compensates victims injured as a result of being a direct victim of a violent crime committed in Great Britain or another relevant place as defined in the Scheme. Victims of human trafficking may be eligible for compensation through the Scheme only if they have been conclusively identified as such by a competent authority. The Scheme makes specific provision for claims to be deferred pending the outcome of the competent authority's assessment. Victims are compensated for the injuries they have sustained rather than the nature of the incident (with the exception of sexual assault or abuse).

The Criminal Injuries Compensation Authority (CICA), which administers the Scheme, provides awareness sessions to stakeholders, including the police, who deliver frontline services to victims of violent crime. The CICA has also improved trauma-informed training for its staff in recent years, to make its processes more accessible and sensitive. The CICA has guidance which requires its officers to consider the psychological impact of crimes and how this may influence their application, for instance regarding any delay in applying to the Scheme or reporting the crime to the police (a prerequisite for applying for compensation), or cooperation in bringing the assailant to justice.

Individuals can apply direct to the CICA without instructing a solicitor. Legal aid may be available to challenge a final CICA decision by judicial review if a claimant is dissatisfied following an appeals process.

Civil claims may also be brought by people who have been subjected to trafficking or modern slavery, for damages under the common law and statutes such as the Human Rights Act 1998. For example, damages can be sought for torts of negligence and breach of statutory duty, and personal injury claims including psychological damage.

Section 65(2)(b) NABA provides that the Secretary of State must grant limited leave to remain if it is considered necessary for the purpose of 'enabling the person to seek compensation in respect of the relevant exploitation'. Detail of this provision is provided in the Immigration Rules 'Appendix Temporary Permission to Stay for Victims of Human Trafficking or Slavery' and the 'Temporary permission to stay for victims of human trafficking and slavery: caseworker guidance'.

"Seeking compensation" means that the person must have made an application for compensation in respect of the relevant exploitation. Permission to stay is not necessary for this purpose if the applicant is capable of seeking compensation from outside the UK, and it would be reasonable for

them to do so in the circumstances. Permission may be granted for this purpose for a period not exceeding 12 months across all applications.

[Temporary Permission to Stay for Victims of Human Trafficking and Slavery \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Scotland

When a victim of human trafficking expresses an interest in pursuing compensation, Migrant Help (MH) takes specific steps to ensure they are informed and supported throughout the process. MH provides the individual with the Criminal Injuries Compensation Scheme (CICS) leaflet for victims of trafficking, ensuring that the information is communicated clearly through the assistance of an interpreter. Following this, MH facilitates a referral to a solicitor who specialises in assisting victims with their compensation claims. If the victim does not already have legal representation, MH's advisors are responsible for referring the individual to an appropriate legal service or solicitor within 24 hours of completing their assessment.

In addition, the Trafficking Awareness Raising Alliance (TARA) provides victims with a 'Recovery Book,' which includes a detailed explanation of women's rights, including their eligibility for compensation under the CICS. TARA also collaborates with JustRight Scotland to offer a weekly legal surgery, enabling victims to access a broader range of legal advice beyond immigration, including assistance with CICS applications. This service ensures that women can receive long-term legal support, even after they are no longer directly receiving specialised services from TARA.

Scottish courts are also obligated to consider whether a compensation order is warranted in cases of human trafficking and exploitation. Once a compensation order is issued, the court is responsible for enforcing the payment, which can include measures such as deductions from the offender's earnings or benefits to ensure the victim is compensated. While prosecutors do not influence the court's determination of sentencing, they are responsible for presenting relevant factors for the court to consider, including the impact of the crime on the victim and the personal circumstances of the victim and other witnesses.

To be eligible for compensation through the CICS, victims must have been conclusively identified as victims of trafficking through the National Referral Mechanism (NRM). Provided the crime occurred within Great Britain, the individual may be entitled to compensation under the CICS, irrespective of their residency status or nationality, as long as they meet the other eligibility criteria set out in the Scheme.

Northern Ireland (NI)

Section 10 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 provides a power for the Crown Court to impose a slavery and trafficking reparation order under which an offender convicted of a slavery-like or human trafficking offence is required to pay reparation to his or her victim. Victims of trafficking can access compensation through the NI Criminal Injuries Compensation Scheme (2009) where appropriate.

- ensure compliance with the principle on the non-punishment of victims of trafficking for their involvement in unlawful activities, to the extent that they have been compelled to do so;

England and Wales

In England and Wales, section 45 of the Modern Slavery Act (MSA) 2015 provides a statutory defence for victims of modern slavery to protect individuals from prosecution for crimes they have been compelled to commit (in the case of an adult) or have committed as a direct consequence of being or having been a victim of slavery or relevant exploitation (in the case of a child).

The defence does not apply in certain cases where serious offences have been committed. Schedule 4 to the MSA 2015 sets out the offences to which the defence does not apply, which includes serious sexual or violent offences, to prevent those who have committed serious offences to escaping justice. In cases where the defence does not apply or cannot be evidenced to the criminal standard, the Crown Prosecution Service (CPS) can still exercise its discretion and decide whether it is in the public interest to prosecute.

The UK's aim is to identify victims of exploitation and modern slavery in the first instance, to prevent further re-traumatisation and wrongful prosecution – especially following the judgment of VCL (77587/12) and AN (74603/12) v UK 2021. However, the defence can be applied throughout the criminal justice process to ensure that victims can be identified at all stages. For the defence to be made out, there must be a nexus between the offence committed and the individual's slavery or trafficking situation. This ensures that those identified as a victim at some stage, do not go on to have immunity from prosecution for offences committed before or after they were identified as a victim of slavery or trafficking. Each case will be assessed on its own facts and merits.

The UK Government has taken action in light of the European Court of Human Rights ruling in 2021 in the case of VCL and AN v UK 2021, concerning two minors convicted for drugs offence but later found to be victims of modern slavery. This case found the UK to be in violation of the European Convention on Human Rights. In 2023, the UK Government submitted its action plan, setting out how it will implement the Court's ruling. An updated action plan was submitted in March 2024.

Relevant organisations, including police and prosecution services across the UK, have taken steps to disseminate the judgment and its implications through training and revised guidance to raise awareness amongst police and prosecutors of the changed approach. This should prevent wrongful prosecution of victims of modern slavery.

The defence as it relates to children provides that a person under the age of 18 at the time of an act which constitutes an offence is not guilty of that offence if they commit the offence as a direct result of their being a victim of slavery or relevant exploitation, and a reasonable person in the same situation and having the person's relevant characteristics (including their age) would do that act. The reasonable person threshold for children is lower than the test for persons over 18, which is that a reasonable person having the persons relevant characteristics would "have no realistic alternative to doing that act".

The lower threshold for meeting the reasonable person test and omission of the compulsion requirement is in recognition of the unique vulnerabilities of children. The relevant characteristics of the victim that will be considered for the purposes of the reasonable person test include "relevant exploitation", which is exploitation attributable to the person being or having been a victim of trafficking. This definition, and the inclusion of the "reasonable person" test, ensure that there is a lower threshold for children to rely on the defence, but also ensures that a link between the exploitation and the offence is maintained and balances the requirements of protecting victims of modern slavery with the need to not create an overly broad defence which could be open to misuse.

In relation to recommendations regarding judicial training, GRETA will be aware that the judiciary of England and Wales is independent of government. To preserve the independence of the judiciary, the Lady Chief Justice has statutory responsibility for the training of the courts' judiciary in England

and Wales under the Constitutional Reform Act 2005. These responsibilities are exercised through the Judicial College.

The Judicial College publishes an annual training prospectus. Issues relating to human trafficking are specifically addressed in the current training programme 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. Any significant matters in relation to human trafficking feature in these materials.

The Judicial College also publishes the Equal Treatment Bench Book (ETBB), which provides guidance to Judicial Office Holders. It aims to increase awareness and understanding of the different circumstances of people appearing in courts and tribunals and it helps enable effective communication and participation. The latest edition, published in February 2021 and revised in July 2024, includes a chapter on Modern Slavery, with specific references to the protections available to victims of trafficking, such as Slavery and Trafficking Reparation and Prevention Orders. It also provides practical tools for supporting victims with the court process and links to additional references and resources. The ETBB also refers to the availability of a statutory defence under section 45 of the Modern Slavery Act 2015 and the vulnerability of victims of modern slavery as witnesses, particularly during cross-examination.

HMPPS seeks to ensure that victim-survivors of MSHT in prisons in England and Wales are provided with the contact details to access legal aid within 5 calendar days of being identified as a victim of MSHT.

Scotland

Section 8 of the Human Trafficking and Exploitation (Scotland) Act 2015 requires the Lord Advocate to issue and publish instructions for prosecutors regarding the prosecution of victims of human trafficking or exploitation who are alleged to have committed criminal offences. The section further provides that the instructions must, in particular, include factors to be taken into account or steps to be taken by the prosecutor when deciding whether to prosecute a person who has been compelled to commit an offence and the compulsion is directly attributable to the person being or appearing to be a victim of trafficking or slavery servitude and forced or compulsory labour. Those instructions were published in May 2016 and continue to be applied by prosecutors as relevant cases arise.

The instructions cover the situation where any person is reported to COPFS for an allegation that they have committed any criminal offence, and during the investigation of that offence, throughout the prosecution process, or after the conclusion of any proceedings there is credible and reliable information provided from any source suggesting that the accused person committed the offence because they were the victim of human trafficking or exploitation.

As soon as prosecutors become aware that an accused person may be a victim of trafficking or exploitation, they instruct Police Scotland to promptly refer the accused person to the National Referral Mechanism (NRM), if that has not already been done.

The revised instructions (updated in January 2024) take into account, amongst other matters, recommendations made by the Department for the Execution of Judgements and the Organisation for Security and Co-operation in Europe (OSCE), the United Nations Convention on the Rights of the Child (UNCRC), and evolving trends in trafficking and exploitation. The revisions highlight evolving trends such as county lines offences, cuckooing and sexual exploitation online. In addition, to assist prosecutors in identifying those at risk of exploitation, reference to the Guidance on Criminal

Exploitation produced by the 'Divert 3' Sub-Group of the Serious Organised Crime Taskforce has been inserted into the Lord Advocates Instructions with relevant links to the guidance. The list of indicators to assist with identifying victims and examples illustrating the types of scenarios that could indicate an individual is being exploited, have also been inserted.

The revised instructions provide greater understanding and raise awareness of the different types of trafficking and exploitation that exist and highlight that such offending does not always, and often will not, have an international aspect. This will not only assist prosecutors in being alert to the possibility that an accused person is a victim of human trafficking or exploitation when dealing with reports received from the police in relation to any crime but also first responders and defence lawyers who can access the Instructions on the COPFS website.

The updated instructions make it clear that prosecutors must wait for the Conclusive Grounds Decision before making a final decision on whether to prosecute an accused person, but prosecutors can exercise their discretion to decide not to prosecute an accused person as soon as the evidence and/or public interest supports that decision without waiting for the Conclusive Grounds Decision. Prosecutors can, therefore, (after making appropriate further inquiries to ensure that all relevant information has been obtained, including the Reasonable Grounds Decision, and consideration of all relevant factors in accordance with the Prosecution Code), take no action or discontinue proceedings before the Conclusive Grounds Decision is received where it is in the public interest to do so in all of the circumstances of the particular case after receiving authority from the National Lead Prosecutor.

Northern Ireland (NI)

Section 22 of the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 provides a statutory defence to victims of trafficking for their involvement in forced criminality.

- 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;

United Kingdom

The Nationality and Borders Act 2022 established that confirmed victims of modern slavery are eligible for temporary permission to stay in the UK, this is supported by the introduction of, in the October 2022 Immigration Rules changes, the Appendix Temporary Permission to Stay for Victims of Human Trafficking or Slavery (VTS).

An individual who has been confirmed as a victim of trafficking or modern slavery through a positive Conclusive Grounds decision will be considered for temporary permission to stay automatically if they do not already have status in the UK. This decision is made by the relevant competent authority who will decide on the information available, and any information provided on request.

An individual may be given temporary permission to stay as a confirmed victim of trafficking or modern slavery (VTS) if it is considered necessary to; assist the person in their recovery from any physical or psychological harm; enable the person to seek compensation; or enable the person to cooperate with a public authority in connection with an investigation or criminal proceedings, in respect of the relevant exploitation. VTS is not considered necessary for assisting in recovery if it is assessed that the individual's need for assistance is capable of being met in their country of return. VTS is not

considered necessary for compensation purposes if the individual is capable of seeking compensation from outside the UK and it would be reasonable for the individual to do so in the circumstances.

VTS can be granted for up to 30 months across all applications for assisting with recovery needs or assisting public authorities. VTS can be granted for a maximum of 12 months across all applications for pursuing a compensation claim. Individuals can request extensions to their existing grant of leave before this expires, upon application, if the individual continues to meet the suitability and eligibility criteria under VTS.

The policy objective is to deliver a fair and effective permission to stay process in relation to confirmed victims of modern slavery, allowing those who are cooperating with public authorities in the investigation and/or prosecution of their exploiters to stay in the UK for that purpose. The policy also intends to deliver a needs-based approach to supporting victims of modern slavery. Grants of VTS are subject to the public order and bad faith disqualifications set out in section 63 of the Nationality and Borders Act 2022.

Where VTS is applied with respect to children, decisions will be made with consideration of the duty set out in section 55 of the Borders, Citizenship and Immigration Act 2009. As set out in [Immigration Rules - Immigration Rules Appendix Temporary Permission to Stay for Victims of Human Trafficking or Slavery - Guidance - GOV.UK](#) 6.1-6.8, dependent children are granted VTS in line with the victim.

- ensure that the return of victims of trafficking is conducted with due regard for the rights, safety and dignity of the victims, is preferably voluntary, and is preceded by a comprehensive risk assessment.

England and Wales

The Voluntary Returns Service (VRS) is a Home Office unit that offers practical support for people who are in the United Kingdom with no right to reside, as well as people who have or who are claiming asylum, and who have decided that they wish to return home. The Home Office recognises that there will be people who choose to return to their country of return, but who have no means of doing so, or who need some assistance, depending on their personal circumstances. It is the role of the VRS to provide practical support to assist those who wish to return. The level of support available depends on individual circumstances and can vary from financial support to assistance with travel documentation. Support can simply be the provision of a travel document which may be held in a Home Office location, or it can be as comprehensive as helping someone with a complex medical condition to travel safely.

Specifically, VRS will support anyone in the NRM process, or who has a confirmed victim status to depart the UK voluntarily, if they do not hold extant leave and they have confirmed they feel safe to return. VRS is responsible for the logistics of anyone who contacts them. The Salvation Army hold a Home Office contract to support those in the NRM process or after receiving a confirmed victim status, which can include risk assessment on return.

A voluntary return offers the individual a dignified return to their country of return. In certain circumstances, VRS provide a limited amount of reintegration support of up to £3000 to facilitate long term settlement in the country of return for people who choose a voluntary return. Voluntary returns are the Home Office's preferred return route, and we encourage people who have no right to reside in the United Kingdom to return voluntarily. VRS also work in partnership with the Home Office reintegration team, who can provide further in country support to returnees in 11 countries currently. VRS will provide details when someone applies.

For any individual under consideration for return, including enforced returns:

- All asylum and human rights claims are first carefully considered on their individual merits in accordance with our international obligations.
- Each individual assessment is made by considering any relevant extant caselaw and the latest available country information.
- This information is based on evidence taken from a wide range of reliable sources, including reputable media outlets; local, national and international organisations, including human rights organisations; and information from the Foreign, Commonwealth and Development Office.

We regularly monitor and review the situation in countries of origin, working closely with the Foreign, Commonwealth and Development Office. Our country policy and information notes are published on the gov.uk website. They are kept under constant review and updated periodically.

Scotland

Justice and Care Navigators support safe repatriations including liaison with support services in the country of origin. They have a detailed repatriation procedure in place to ensure that survivors are safely repatriated with necessary safeguarding and support in place to reduce chances of re-trafficking. In order to understand as best as possible the victim's intentions to return and to allow time for a proper risk assessment and safeguarding checks, it is estimated that 5 working days are needed before the flight, prior to the return. Avoiding fast repatriations allows a proper exchange of data between organizations working at both ends in order to share (where possible) whatever information is relevant on the case, such as flight risk, information on exploitation, info about serious medical issues, as well as on the legal aspects of the case. In cases where survivors have been supported with repatriations by Justice and Care, the safeguarding measures put in place reduced their exposure to the potential risk of re-trafficking, assisted with their recovery journeys, and allowed them to remain engaged with supporting UK-based police investigations and prosecutions.

SOHTIS also provide a safe repatriation service for potential victims wishing to return to a home country. This includes a partnership arrangement with a civil society organisation in the home country who is able to satisfy a risk assessment of the destination location and associates and agree to the provision of outreach support for the potential victim on their return. The repatriation involves arrangements for safe passage including airline support and accompanying on arrival and departure at each leg of the journey.

Migrant Help clients have the opportunity, through contact with their lawyer, to ensure that a return home is in their best interests. Safety is always paramount. While the service cannot stop an individual leaving support and returning home should they wish to do so, wherever possible, a plan is agreed with the client that will ensure the maximum chance of a safe return home (including ensuring a safe route, working with other NGOs, and sometimes with law enforcement). Migrant Help never forces clients to return home – from the service's perspective, this is always voluntary, and in all cases where a client has spent any time in service, the client will have been risk assessed, and this assessment will be taken into account as part of any planned return home.

TARA support women to return home only where they have requested our assistance to do so. If women state they wish to return home TARA explores their reasons for doing so and, especially where women have only recently been identified, TARA encourage them to reflect further before any arrangements are made. Where women continue to assert their desire to return they undertake a risk assessment which gathers information such as (but not limited to) their return address, telephone and email contacts, family supports (including if family or partners may be a risk), financial supports available, why she feels safe to return, if she is worried about traffickers, does she wish police contact

in her home country, does she wish to be linked to support services, employment opportunities and any other worries she may have about returning home. This risk assessment then informs delays to her return or travel arrangements, including escorts required at travel terminals such as airports, both in the UK and in her country of origin and support for her onward internal travel. The risk assessment may identify that TARA need to liaise with Police Scotland or her Embassy or Consulate (again consent based as appropriate) to mitigate identified risks.

Northern Ireland (NI)

Voluntary repatriation is coordinated in appropriate circumstances by MSHT victim support providers subject to risk assessment.

41. Please provide information on developments in your country since GRETA's third evaluation report concerning:

- emerging trends of trafficking in human beings;

England and Wales

There is no evidence of substantial change in the nature or scale of the threat from modern slavery and human trafficking (MSHT) in the UK since GRETA's third evaluation report. Although referrals of potential victims of exploitation through the National Referral Mechanism (NRM) has increased, from 12,727 in 2021 to 19,125 in 2024, factors such as improved awareness, identification and reporting of the threat, changes in reporting and decision-making processes, and the impact of COVID-19 restrictions and lockdowns have all contributed to fluctuations in reporting. The below table summarises reporting of different exploitation types reported via the NRM during the period.

Exploitation type	2021	2022	2023	2024
Domestic Servitude	200	232	300	342
Labour Exploitation	3,122	5,131	4,652	6,153
Organ Harvesting	3	6	5	6
Sexual Exploitation	1,266	1,644	1,678	1,898
Criminal Exploitation	4,135	4,657	4,709	4,548

This table does not include combinations of exploitation types or cases where the exploitation was unknown or not specified.

As identified in GRETA's third evaluation report, UK nationals remain at greatest risk of exploitation in the UK. County lines drug supply continues to drive exploitation of children, who are used to move drugs around the UK, and vulnerable adults, some of whom have their residences used by offenders as bases for drug supply activity. Exploitation in criminal activity was included as a separate category in the NRM from late 2019 and has since that time accounted for the highest proportion of potential exploitation identified in the UK.

In terms of non-UK populations vulnerable to exploitation in the UK, the greatest shift since the third evaluation report is in the proportion of EU nationals amongst identified potential victims of MSHT in the UK. Referrals of most EU nationalities have fallen both proportionately and in real terms since 2019, with only Romanian amongst the top ten nationalities identified as potential victims of exploitation with a UK nexus in 2023, in contrast to Bulgarian, Lithuanian and Polish having featured in previous years. It is almost certain that decreased EU migration to the UK and reductions in economic disparity are primary drivers of this change. Albanian, Chinese, Indian, Pakistani, Romanian

and Vietnamese nationals have been most frequently identified as potential victims of exploitation with a UK nexus across the reporting period.

The use of online platforms in recruitment and the facilitation of exploitation is highly likely to have increased since the third evaluation report. Although in-person, community-based recruitment is still frequently reported both in the UK and overseas, online platforms such as recruitment websites, messaging applications and social media are frequently identified both in recruiting potential victims and maintaining communication and control.

Northern Ireland (NI)

The OCTF Strategic Assessment of MSHT in Northern Ireland 2023 identified potential vulnerability caused by the cost-of-living crisis and use of the Common Travel Area as emerging themes around MSHT in Northern Ireland.

- the legislation and regulations relevant to action against THB;

England and Wales

The Online Safety Act 2023

The Online Safety Act received Royal Assent on 26 October 2023. It will require online platforms to proactively identify and remove content linked to priority offences, including controlling and inciting prostitution for gain and human trafficking. The following priority offences were set out in the legislation:

- Sections 52 and 53 of the Sexual Offences Act 2003, which covers causing or inciting prostitution for gain and controlling prostitution for gain.
- Section 2 of the Modern Slavery Act 2015, which covers human trafficking (legislation.gov.uk)

Companies will need systems and processes in place to remove and limit the spread of illegal content. This means less illegal content online and when it does appear it will be removed quicker. For the priority offences set out in the legislation, which includes sexual exploitation and human trafficking offences as set out above, companies will need to adopt even stronger measures and put in place the necessary systems and processes to identify, assess and address these offences based on a risk assessment. This might mean more resources for content moderation or limiting algorithmic promotion of content.

Ofcom, the regulatory body for the Online Safety Act 2023, has a tough suite of enforcement powers to use against companies who fail to fulfil their duties. This includes fines of up to £18million or 10 per cent of qualifying annual global turnover (whichever is greater).

Scotland

The Human Trafficking and Exploitation (Scotland) Act 2015 (The Act), which was passed unanimously by the Scottish Parliament, introduced two offences: human trafficking; and slavery, servitude, and forced or compulsory labour. Both of these offences carry the possibility of life imprisonment. There is broad cross-party political support for the legislative and policy framework aimed at addressing human trafficking and exploitation in Scotland.

Sections 9 & 10 of the 2015 Act requires Scottish Ministers to secure support and assistance for adult victims of human trafficking where there are reasonable grounds (as determined through the NRM)

to believe an adult is a victim of human trafficking and/or slavery, servitude and forced or compulsory labour. This support is discharged through grant funding arrangements with the Trafficking Awareness Raising Alliance (TARA) and Migrant Help.

Section 11 imposes a duty on Scottish Ministers to appoint an independent child trafficking guardian for unaccompanied asylum-seeking children who are either suspected of being, or at risk of being, trafficked. Following extensive consultation, the Independent Child Trafficking Guardians (ICTG) service was formally launched on 1 April 2023. The Scottish Government awarded the contract to deliver this vital service to a consortium consisting of Aberlour and the Scottish Refugee Council, under the name Guardianship Scotland.

Northern Ireland (NI)

The publication of the Modern Slavery and Human Trafficking Strategy 2024-27 includes commitments to introduce Slavery and Trafficking Risk Orders (STROs) and Duty to Notify (DtN) provisions, in line with England and Wales.

- the institutional and policy framework for action against THB (co-ordinating bodies, specialised entities, national rapporteur or equivalent mechanism, involvement of civil society, public-private partnerships);

England and Wales

Overall responsibility for modern slavery and human trafficking sits within the Home Office, mainly in the Modern Slavery Directorate with links to other teams working on exploitation such as Tackling Child Sexual Abuse and the Targeted Interventions Unit. The Minister responsible is the Minister for Safeguarding and Violence against Women and Girls (Jess Phillips MP).

Given the cross-cutting nature of MSHT, officials in the Home Office meet regularly with counterparts across government to discuss modern slavery and other safeguarding policies, and to ensure future policies consider all potential modern slavery impacts and risks. The Home Office also works closely with other public bodies including the National Crime Agency, law enforcement, criminal justice partners, and local authorities, to ensure a multiagency approach to tackling modern slavery. Officials also regularly engage with academic and Non-Government Organisations to gain valuable insight and views, better understand best practice, and build a robust evidence base.

The unique role of the Independent Anti-Slavery Commissioner (IASC) was established by the Modern Slavery Act 2015 and is independent of government. A new IASC was appointed to the role at the end of 2023. The role of the IASC is to encourage good practice in the prevention, detection, investigation and prosecution of slavery and human trafficking offences and the identification of victims. This is done collaboratively with the government and its partners to ensure modern slavery is effectively tackled in the UK, as well as working with international partners to promote best practice.

The current engagement approach by Home Office officials is split into two main areas of engagement, senior and working level.

On the working level, the Modern Slavery Engagement Forums (MSEFs) form part of the government's stakeholder engagement work on modern slavery policy, share research, evidence, expertise and best practice (where appropriate) between the Modern Slavery Unit and stakeholders, which helps to inform effective policy development.

The Modern Slavery Unit hold MSEFs on an ad hoc basis with tightened membership to allow for a more focused, productive, and in-depth discussion. The working-level stakeholder groups are focused on specific policy areas and chaired by Modern Slavery policy leads. The three working groups that are currently being held are the Data and Evidence Group (quarterly), forced labour forum and first responder forum (ad hoc).

At the most senior level of engagement, we will have bi-annual modern slavery roundtables, chaired by the Minister for Safeguarding and Violence Against Women and Girls.

The Government approach to working with international partners is led by the Foreign Commonwealth and Development Office (FCDO). The FCDO uses the strength of its global diplomatic network to work in partnership with states, international organisations, businesses, civil society and academia, to build international consensus and encourage joint action to prevent and combat modern slavery, including trafficking in persons. The FCDO works through multilateral fora including the Organization for Security and Cooperation in Europe and Alliance 8.7 to strengthen the global response to modern slavery.

The FCDO also engages regularly with civil society and chairs a quarterly meeting with UK-based Civil Society Organisations to discuss global policy, programming, research and evidence, and advocacy work.

In Wales, the Welsh Government organises the [Anti-Slavery Wales Forum](#). There are four thematic working groups on Victims and Survivors, Prevention, Training and Awareness, and Supply Chains and International. The membership comprises multi-agency partners, with meetings scheduled typically on a quarterly basis.

In addition, in 2023 and 2024, the Welsh Government worked with partners to organise Anti-Slavery Wales conferences to mark Anti-Slavery Day. The conferences were organised in partnership with Cardiff University and Aberystwyth University respectively.

Safeguarding children and adults at risk in Wales is devolved. Local authorities have the lead role. The local authorities and their key partners such as health and police must work together to safeguard children and adults at risk.

The Social Services and Wellbeing (Wales) Act 2014, Section 135(1) of the 2014 Act specifies the objectives of Regional Safeguarding Boards are to protect children in its area who are experiencing or are at risk of abuse, neglect or other harm and to prevent children in its area from becoming at risk of abuse, neglect or other harm and also to protect adults in its area who have needs for care and support and who are experiencing, or are at risk of, abuse or neglect, and also to prevent adults with needs for care and support from becoming at risk of abuse or neglect.

As part of its role Regional Safeguarding Boards deliver safeguarding training in their region on a variety of topics at a number of levels, depending on people's roles. This includes providing training on modern slavery, trafficking, child sexual exploitation and child criminal exploitation.

Welsh Government are developing a 10 year strategy and Delivery Plan for Preventing and Responding to Child Sexual Abuse. Child sexual exploitation, being a form of child sexual abuse, has been incorporated into the strategy and delivery plan and the 4 key objectives of the strategy are: Prevention; Protection; Support for children and families who are affected by sexual abuse; and; Support for adult survivors of childhood sexual abuse. The strategy and plan have been co-produced with statutory and voluntary partners and people who have lived experience. The strategy and plan will be out to public consultation early 2025.

Scotland

Scotland has a structured institutional framework to address human trafficking, with various coordinating bodies, specialised entities, and mechanisms in place for multi-sector cooperation. Human Trafficking and Exploitation (Scotland) Act 2015 is the primary legislation that defines human trafficking as a crime, establishes penalties, and outlines support mechanisms for victims. This Act also mandates a national strategy to prevent and tackle human trafficking.

Scotland's Trafficking and Exploitation Strategy, developed in response to the 2015 Act, sets out Scotland's action plan and priorities for tackling human trafficking. The Trafficking and Exploitation Strategy Implementation Group oversees the implementation of the strategy. It includes representatives from key stakeholders, including law enforcement, government departments, and civil society.

Police Scotland has a specialised National Human Trafficking Unit (NHTU), dedicated to investigating trafficking cases, raising awareness, and collaborating with agencies across the UK and internationally. Police Scotland works closely with Border Force, Social Services, and other organisations to combat trafficking. The Crown Office and Procurator Fiscal Service (COPFS) is Scotland's prosecution service who have specialised prosecutors trained to handle human trafficking cases, ensuring a focused and informed approach to prosecutions.

The Scottish Guardianship Service provides support to unaccompanied minors who may be victims of trafficking, helping to ensure they have an advocate for their welfare and rights.

Northern Ireland (NI)

DoJ facilitates regular engagement with operational and NGO partners across the MSHT sphere in Northern Ireland through the OCTF MSHT Sub-Group and NGO Engagement Forum.

- the current national strategy and/or action plan for combating trafficking in human beings (objectives, main activities, budget, bodies responsible for the implementation, monitoring and evaluation of results);

England and Wales

The NCA reviewed and redrafted the National Control Strategy for Serious and Organised Crime, and Strategic Action Plan (SAP) specific to Modern Slavery and Human Trafficking.

This plan builds on good practice established throughout 2023 and ensures that activity focuses not only on specific sub-threats (e.g. sexual exploitation; labour exploitation) but also considers cross-threat enablers, such as online recruitment tactics, money launderers, professional enablers (e.g. complicit legal representatives and accountants), criminal service providers (e.g. people smugglers) and other enablers (e.g. landlords). This is intended to ensure maximum impact in the prevention, detection and disruption of MSHT linked to serious and organised criminality

Scotland

The Trafficking and Exploitation Strategy was published in 2017 and outlines the actions needed to tackle human trafficking and exploitation, identify victims, provide support, and ensure the disruption and prosecution of offenders.

The Human Trafficking and Exploitation (Scotland) Act 2015 mandates the development, publication, and regular review of a Trafficking and Exploitation Strategy. The strategy must outline the actions needed to tackle human trafficking and exploitation, identify victims, provide support, and ensure the disruption and prosecution of offenders.

The Strategy centres on three action areas:

- Action Area 1 – identify victims and support them to safety and recovery.
- Action Area 2 – identify perpetrators and disrupt their activity.
- Action Area 3 – Address the conditions that foster trafficking and exploitation.

Each Action Area has formed an implementation group with membership ranging across Government, law enforcement, victim support, local authorities, business, NGOs and academia. Quarterly meetings are held to discuss progress and identify priorities, and opportunities for collaboration.

Following extensive engagement with partners and survivors of human trafficking a further review of the strategy was published on the 19 September 2023 which committed the Scottish Government to undertake a refresh of the Strategy. This work is presently underway, and involves engagement with Stakeholders, Policy Officials, Researchers and lived experience. The Scottish Government also produces annual reports on the Strategy and its three action areas. The fifth annual report is due for publication in the next few months.

Northern Ireland (NI)

The recently published three-year Strategy details the Department's strategic response and objectives to tackle Modern Slavery and Human Trafficking in Northern Ireland.

The Strategy includes commitments/actions for both statutory and non-statutory bodies relating to areas such as the development of new policy, awareness raising and training, and review of victim support. The Department will publish an annual report to monitor progress against the commitments/actions within the Strategy.

- recent case-law concerning THB for different forms of exploitation.

England and Wales

Prosecution guidance for modern slavery cases is kept up to date with relevant case-law. The last update to the guidance was made on 22 October 2024.

Northern Ireland (NI)

All cases relating to MSHT since 2021 in Northern Ireland concern sexual exploitation.

Part III - Statistics on THB

42. Please provide the following statistics, per year starting with 2021, where available disaggregated as indicated below:

- Number of presumed victims and identified victims of THB in the sense of having been recognised by a state institution or mandated NGO as bearers of rights to services provided for by the Convention (with breakdown by sex, age, nationality,

form of exploitation, internal or transnational trafficking, and body which identified them).

United Kingdom

Background

In 2024, 19,125 potential victims of modern slavery were referred to the Home Office, which represents a 13% increase in referrals compared to the previous year (16,990). There were 20,090 reasonable grounds and 17,304 conclusive grounds decisions made this year; of these, 53% of reasonable grounds and 56% of conclusive grounds decisions were positive. There are a number of organisations who are formally designated as 'First Responder Organisations' and can therefore refer potential victims of modern slavery into the National Referral Mechanism. This includes specialist Non-Governmental Organisations and public bodies such as the National Crime Agency and the police, the Home Office, the Gangmasters and Labour Abuse Authority and local authorities.

Gender	Number of NRM referrals			
	2021	2022	2023	2024
Female	2,921	3,628	4,087	4,937
Male	9,764	13,270	12,896	14,157
Transgender*	NA	NA	NA	NA

*Other genders are collected by the NRM, which was 10 in 2021, 13 in 2022, 12 in 2023 and 29 in 2024.

Age group at exploitation	2021	2022	2023	2024
Adult	6,401	8,840	8,613	9,920
Minor	5,443	7,001	7,428	7,887

Does not include cases where age at exploitation was unknown.

Exploitation type	2021	2022	2023	2024
Domestic Servitude	200	232	300	342
Labour Exploitation	3,122	5,131	4,652	6,153
Organ Harvesting	3	6	5	6
Sexual Exploitation	1,266	1,644	1,678	1,898
Criminal Exploitation	4,135	4,657	4,709	4,548

Does not include combinations of exploitation types or cases where the exploitation was unknown or not specified.

Country of Nationality	2021	2022	2023	2024
Own country nationals	3,942	4,159	4,292	4,441
Albanian	2,505	4,609	4,055	2,492
Vietnamese	987	763	991	2,153
Eritrean	714	1,173	897	1,702
Sudanese	504	850	940	1,175
Iranian	321	428	322	403

Country of Nationality	2021	2022	2023	2024
Romanian	290	262	301	237
Indian	143	302	342	425
Afghan	188	283	310	392
Somali	128	311	255	402
Chinese	188	152	294	344
Iraqi	194	217	192	212
Pakistani	155	168	194	254
Ethiopian	118	189	174	285
Nigerian	142	165	157	216
Syrian	64	160	190	346
Filipino	75	106	156	181
Egyptian	46	105	142	139
Polish	99	92	99	83
Bangladeshi	57	111	101	192
Brazilian	26	68	85	202
Ghanaian	45	56	63	92
Bulgarian	76	50	49	54
Lithuanian	64	60	52	324

Dual nationals are recorded as separate categories.

First responder type	2021	2022	2023	2024
Government Agency	4,666	8,333	8,240	10,137
Local Authority	3,218	3,661	3,934	4,206
NGO/Third Sector	978	1,031	875	950
Police	3,831	3,877	3,934	3,822

Does not include referrals where the first responder was unknown.

First responder type	First Responder Organisation	2021	2022	2023	2024
Government Agency	Total for Government agencies per year	4,666	8,333	8,240	9,201
	Gangmasters and Labour Abuse Authority	9	5	13	17
	Home Office Immigration Enforcement	1,714	3,346	2,757	2,632
	National Crime Agency	13	21	13	41
	UKBA (UK Border Agency – now absorbed into Border Force and UK Visas and Immigration)	<i>See UK Border Force</i>	<i>See UK Border Force</i>	<i>See UK Border Force</i>	<i>See UK Border Force</i>
	UK Border Force	178	219	240	1,290
	UK Visas and Immigration	2,752	4,742	5,217	5,221
Local Authority	Local Authorities	3,218	3,661	3,934	3,857

First responder type	First Responder Organisation	2021	2022	2023	2024
NGO/Third Sector	Total for NGO/ Third Sector per year	978	1,031	875	599
	Barnardo's	56	64	39	26
	BAWSO	28	19	12	2
	Belfast and Lisburn Women's Aid	0	26	15	14
	Kalayaan	15	24	24	
	Medaille Trust	38	32	51	45
	Migrant Help	266	309	281	141
	New Pathways	2	1	0	
	Refugee Council	1	2	2	3
	The Salvation Army	554	529	430	352
	Trafficking Awareness Raising Alliance TARA	14	17	8	2
	Unseen	4	8	12	7
	Youth Work Alliance	0	0	1	7
	Police	Total for the Police per year	3,831	3,877	3,934
Avon and Somerset Constabulary		92	62	85	81
Bedfordshire Police		33	62	39	58
British Transport Police		128	66	64	39
Cambridgeshire Constabulary		49	69	79	63
Cheshire Constabulary		64	38	56	58
City of London Police		6	5	10	12
Cleveland Police		35	68	49	33
Cumbria Constabulary		12	15	14	12
Derbyshire Constabulary		51	40	53	34
Devon & Cornwall Police		31	32	44	28
Dorset Police		38	43	30	41
Durham Constabulary		25	33	20	24
Dyfed-Powys Police		23	23	22	2
East Midlands Special Operations Unit		1	0	0	0
Eastern Region Special Operations Unit		0	1	0	0
Essex Police		184	177	168	143
Gloucestershire Constabulary		27	20	32	19
Greater Manchester Police		209	160	185	199
Gwent Police		48	53	48	2

First responder type	First Responder Organisation	2021	2022	2023	2024
	Hampshire Constabulary	66	69	60	56
	Hertfordshire Constabulary	52	52	42	33
	Humberside Police	50	57	51	48
	Kent Police	106	96	75	83
	Lancashire Constabulary	54	50	52	46
	Leicestershire Police	64	57	85	74
	Lincolnshire Police	29	29	49	40
	Merseyside Police	175	154	117	121
	Metropolitan Police Service	573	623	667	650
	Norfolk Constabulary	47	50	50	44
	North Wales Police	46	43	39	30
	North West Regional Organised Crime Unit	0	2	4	1
	North Yorkshire Police	23	62	54	40
	Northamptonshire Police	44	60	65	62
	Northumbria Police	42	34	42	53
	Nottinghamshire Police	70	46	58	72
	Police Scotland	141	184	240	13
	Police Service of Northern Ireland	24	29	19	15
	South East Regional Organised Crime Unit	0	0	0	2
	South Wales Police	68	61	90	3
	South West Regional Organised Crime Unit	0	1	1	0
	South Yorkshire Police	97	107	91	108
	Staffordshire Police	45	61	49	36
Suffolk Constabulary	59	68	46	51	
Surrey Police	74	80	74	47	
	Sussex Police	82	71	98	86
	Tarian ROCU	0	0	1	0
	Thames Valley Police	214	149	150	157
	Warwickshire Police	35	34	48	46
	West Mercia Police	54	67	62	31
	West Midlands Police	206	247	182	152
	West Midlands Regional Organised Crime Unit	0	6	3	1
	West Yorkshire Police	196	230	237	262
	Wiltshire Police	39	31	35	33

First responder type	First Responder Organisation	2021	2022	2023	2024
	Yorkshire and Humber Regional Organised Crime Unit	0	0	0	5

- Number of victims of THB identified as part of the asylum procedure (disaggregated by sex, age, nationality, form of exploitation).

United Kingdom

Data on the number of victims of THB identified as part of the asylum procedure is not routinely published.

Northern Ireland (NI)

Immigration and asylum are reserved matters in Northern Ireland, as such, DoJ do not hold specific information on the number of potential victims referred as part of the asylum procedure.

Of the 1,372 victims or potential victims referred in Northern Ireland between 2021 and 2023, 1,183 were referred by UK Government Agency. 838 were male, 345 were female, and 173 were children at the time of their exploitation.

- Number of victims of THB who received assistance (disaggregated by sex, age, nationality, form of exploitation, internal or transnational trafficking).

England and Wales

Data on the total number of victims of THB who have received assistance in England and Wales is not routinely published. However, some statistics are published which show adult potential victims referred for support as part of the Victim Care Contract and children referred as part of the Independent Child Trafficking Guardianship service.

	2020/21	2021/22	2022/23	2023/24
Adults entering Victim Care Contract support in England and Wales	2,662	3,068	3,533	2,741

	2021/22	2022/23	2023/24
Children referred to the Independent Child Trafficking Guardianship service in selected local authorities in England and Wales	2,588	2,674	2,478

Northern Ireland (NI)

From 2021 to 2023, 1,178 victims referred to the NRM in Northern Ireland were transferred to Migrant Help or Belfast & Lisburn Women's aid to receive support.

- Number of child victims of THB who were appointed legal guardians.

England and Wales

Data on guardians appointed to children is not collected or recorded by the DfE.

Scotland

Since 2021, the total number of unaccompanied children and young people appointed an ICTG is as follows:

Non-statutory service, co-funded by the Scottish Government, known as 'Scottish Guardianship Service'.

- 1 Jan 2021 – 31 March 2023: ~603

Statutory ICTG service, known as 'Guardianship Scotland'

- 1 April 2023 – 16 September 2024: ~625

Northern Ireland (NI)

Approximately 250 S/UASC have been referred to and accepted by the independent guardian service April 2021-Sep 2024 by NI Health and Social Care Trusts. Note that not all of these young people were/are victims of trafficking, but all S/UASC victims of trafficking were referred within this overall number.

- Number of victims of THB granted a recovery and reflection period (disaggregated by sex, age, nationality, form of exploitation).

United Kingdom

Potential victims who get a positive Reasonable Grounds decision in the NRM receive a recovery and reflection period, during which they are able to access support including accommodation, financial support, assistance in accessing health care including counselling, and access to legal support.

Section 63 of the NABA allows for the recovery and reflection period not to be observed where public order grounds prevent it or where it is found that victim status was claimed improperly, in line with Article 13(3) of ECAT.

In Northern Ireland, of the 1,372 victims and potential victims referred between 2021 and 2023, 1048 received a positive RG decision.

- Number of victims of THB granted a residence permit, with an indication of the type of the permit (for the purpose of co-operation in the

investigation/proceedings, on personal grounds, other) and its duration (disaggregated by sex, age, nationality, form of exploitation).

United Kingdom

This information is not centrally collected or recorded.

- Number of persons given refugee status or subsidiary/complementary protection on the grounds of being victims of THB (disaggregated by sex, age, nationality, form of exploitation).

United Kingdom

Available database systems do not disaggregate this data.

- Number of victims of THB who claimed compensation, who were granted compensation and who effectively received compensation (disaggregated by sex, age, nationality, form of exploitation, with an indication of whether the compensation was provided by the perpetrator or the State, and the amount awarded).

England, Wales and Scotland

This information is not centrally collected or collated. The Great Britain wide state-funded Criminal Injuries Compensation Scheme (CICS) awards compensation in respect of physical or mental injuries sustained as a direct result of a 'crime of violence', as defined by Annex B of the CICS. The crime of trafficking is not in itself defined as a 'crime of violence' and there is no requirement under the CICS for the Criminal Injuries Compensation Authority (CICA) that administers it to confirm whether an applicant is a victim of trafficking except in a very small number of cases. For that reason, the CICA does not hold comprehensive data concerning the number of applicants to the Scheme who are victims of human trafficking.

Northern Ireland (NI)

DoJ does not hold information of compensation claims relating to victims of MSHT.

- Number of victims of THB who received another form of financial support from the State, with the indication of the amount received.

England and Wales

Information on victims who received another form of financial support from the State is not collected or recorded centrally.

Scotland

No update available.

Northern Ireland (NI)

DoJ does not hold information on the total financial support package received by victims and potential victims, including allowances supplied by immigration and asylum support or general welfare services. Victims and potential victims receiving support through the NRM in Northern Ireland receive a welcome pack including food, clothing, toiletries, basic mobile phone with £10 credit and any other “reasonable items”. Victims and potential victims also receive a daily allowance of £10, appropriate accommodation and access to specialised support services.

- Number of victims of THB who received free legal aid.

England and Wales

Published statistics on legal aid provision are publicly available here: [Legal aid statistics: April to June 2024 data files - GOV.UK \(www.gov.uk\)](#). The Ministry of Justice and Legal Aid Agency are not able to isolate victims of THB in legal aid data and therefore cannot give a full picture of how many victims are in receipt of legal aid for civil or criminal matters. We can only show a partial picture of victims of THB in receipt of legal aid where the civil matter they are claiming legal aid for relates directly and solely to being a victim of human trafficking or modern slavery.

The table below shows volumes of completed work where victims of trafficking or modern slavery can claim legal aid under paragraphs 32 and 32A of Schedule 1 to the Legal Aid, Sentencing and Punishment of Offenders Act 2012. This table contains the volumes of completed work across legal help/controlled legal representation work and licensed representation work up to 2023-2024.

[Number of completed cases of legal aid advice and assistance, controlled legal representation claims or licensed representation certificates for work related to claims of compensation or employment law for victims of trafficking.](#)

Type of claim		2020-21	2021-22	2022-23	2023-24
Legal help/CLR	Civil Court damages claims for victims of trafficking	6	17	16	11
	Employment Tribunal cases for victims of trafficking	1	5	4	5
Civil representation	Damages - Human Trafficking		2	1	2
	Damages - Human Trafficking - Nuisance	2	3	3	7

Scotland

No update available.

	Sexual Exploitation		Labour Exploitation		Criminal		Domestic Servitude		Forced Marriage		Unknown/Other	
For Investigations live at December 2022	577	485	508	366	2183	1811	76	60	2	1	209	171
For Investigations live at December 2023	581	537	521	352	1946	1679	85	68	2	1	225	185
For Investigations live at December 2024	520	542	368	331	1621	1522	72	59	4	4	153	159

Please note that the above figures are for investigations live at the month/year provided, this can include investigations which have been started in previous years/month; this figure gives an indication of the volume of live investigations police have recorded via Police National Database (PND) direct data entry (DDE) for MSHT at the end of the respective calendar year.

Scotland

Police Scotland Investigations

Year	2021	2022	2023
HT CRIMES IN TOTAL	75	44	133
NON-SEXUAL CRIMES OF VIOLENCE	47	28	95
SEXUAL CRIMES	20	4	20
CRIMES AGAINST SOCIETY	2	9	12
MISCELLANEOUS OFFENCES	5	-	3
CHILD PROTECTION	-	1	3
CRIMES OF DISHONESTY	-	2	-
ANTI SOCIAL	1	-	-
HT VICTIMS	71	51	159

Northern Ireland (NI)

Since the beginning of 2021 to date, PSNI MSHTU have commissioned 14 “proactive” investigations into MSHT, with 13 of them being in relation to sexual exploitation, and 1 in relation to labour. These resulted in the identification of 83 PVOTs. Since 2021, 110 incidents were reported to or investigated by PSNI where a suspected crime of MSHT has occurred in NI.

- Number of prosecutions in THB cases (disaggregated by type of exploitation, with an indication of the number of victims and defendants concerned).

England and Wales

We are unable to disaggregate the exploitation types prosecuted without a manual review of all cases charged under the Modern Slavery Act 2015. The CPS publishes quarterly data, and we have provided data for 2021, 2022, 2023 and 2024.

Below we have provided the figures of the outcomes relating to cases where a case monitoring flag of ‘modern slavery’ has been applied in years 2021- 2024 within the CPS’s electronic Case Management System (CMS). CPS data is dependent upon lawyers and administrative staff identifying and correctly applying the monitoring ‘flags’ or case-markers to applicable cases.

Calendar Year	2021	2022	2023	2024
Total Completed Prosecutions	466	405	410	454

Scotland

The following data covers offences reported to COPFS under section 1 and 4 of the Human Trafficking and Exploitation (Scotland) Act 2015 and also *any* charges reported which contained a human trafficking aggravation.

Crown Office Procurator Fiscal Service (COPFS) data

	Number of CASES where a subject has human trafficking offences where the subject was marked for prosecution	Number of SUBJECTS in these cases who have human trafficking offences and were marked for prosecution	Indication of the type of exploitation - <i>(as this count is by CASE there may be other charges involved)</i>	Number of witnesses recorded as victims in the CASES
2021*	11	24	7 labour, 4 sexual	37
2022*	9	19	7 labour, 2 sexual	44
2023*	12	22	9 labour, 3 sexual	15

* The years listed above denote the year in which the case was marked by COPFS for prosecution regardless of the year when the case was reported by Police Scotland.

Northern Ireland (NI)

2021 – case 1 - 1 defendant, sexual exploitation, 11 victims.
case 2 - 2 defendants, sexual exploitation, 1 victim.

2022 – No prosecutions.

2023 - case 1 - 1 defendant, sexual exploitation, 2 victims.
case 2 - 3 defendants, sexual exploitation, 6 victims.

2024 - case 1 – 2 defendants, sexual exploitation, 2 victims.
case 2 - 1 defendant, sexual exploitation, 4 victims.
case 3 - 2 defendants, sexual exploitation, 1 victim.

- Number of convicted perpetrators of THB (disaggregated by sex, age, nationality, form of exploitation).

Crown Prosecution Service data:

Calendar Year	2021	2022	2023	2024
Convictions	332	282	311	353

Ministry of Justice – Outcomes by principle offence data:

Values	2017	2018	2019	2020	2021	2022	2023	2024
Proceeded against	142	91	73	103	103	76	78	142
Convicted	28	11	24	10	33	35	58	47
Sentenced	28	11	24	7	34	35	59	45

We are unable to disaggregate the data further without a manual review of all cases charged under the Modern Slavery Act 2015, which is not publicly available data.

Scotland

Crown Office Procurator Fiscal Service (COPFS) data

	Number of SUBJECTS marked for prosecution where one or more charge recorded as a conviction	Recorded gender of subjects
2021*	0	0

2022*	4	2 male, 2 female
2023*	3	3 male

* The years listed above denote the year in which the subject was convicted regardless of the year in which the case was reported to COPFS.

Northern Ireland (NI)

2021 – No convictions.

2022 – 1 male defendant aged 62 from Northern Ireland convicted of Human Trafficking relating to sexual exploitation.

2023 – 1 male defendant aged 43, a Romanian national residing in Northern Ireland, convicted of Human Trafficking relating to sexual exploitation.

2024 – 1 male defendant aged 38, a Romanian National residing in Northern Ireland, convicted of Human Trafficking relating to sexual exploitation.

2024 – 1 male defendant aged 73 from Northern Ireland convicted of Human Trafficking relating to sexual exploitation.

2024 – 1 male defendant aged 70 from Northern Ireland convicted of Human Trafficking relating to sexual exploitation.

2024 – 1 male defendant aged 61 from Northern Ireland convicted of Human Trafficking relating to sexual exploitation.

- Number of convictions for THB, with an indication of the form of exploitation, whether the victim was adult or child, the type and duration of the penalties, and whether they were effectively enforced or suspended.

England and Wales

Our published data sets out details on monitoring flags and which offences are included for MSHT. It wouldn't be possible to differentiate between trafficking for the purposes of sex or labour exploitation or any of the other types of exploitation set out in section 3 Modern Slavery Act 2015.

Scotland

	Number of SUBJECTS marked for prosecution	Indication of type of exploitation (as this count)	Number of witnesses recorded as victims aged	Number of subjects sentenced to imprisonment	Number of subjects sentenced to
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	where one or more charge recorded as conviction	is by SUBJECT there may be other charges involved)	18 and over the CASE**		Community Payback Order
2021*	0	0	0	0	0
2022*	4	0 labour, sexual	44	4	0
2023*	3	1 labour, sexual	29	2	1 – CPO of 200 hours

Crown Office Procurator Fiscal Service (COPFS) data

*The years listed above denote the year in which the subject was convicted regardless of the year in which the case was reported to COPFS.

Northern Ireland (NI)

6 defendants have been convicted of THB since 2021 and all of these offences were in the form of sexual exploitation. The victims were all female adults. The defendants received prison sentences ranging from 5 years imprisonment to 9 months imprisonment suspended for 2 years and one defendant received a Slavery and Trafficking Prevention Order for a period of 7 years.

- Number of judgments in THB cases resulting in the confiscation of assets.

The data available through the asset recovery statistical bulletin does not breakdown the data by the number of judgements. For further information: [Asset recovery statistical bulletin: financial years ending 2019 to 2024 - GOV.UK](#)

Table: Value and volumes of proceeds of crime restrained, obtained and recovered from restraint orders, confiscation order impositions, confiscation orders receipts and compensation paid to victims by criminal offence for financial years 2018 to 2019 until 2023 to 2024.

Offence Type	Time Period (FY)	Value of proceeds of crime restrained from restraint Orders (millions)	Number of restraint orders	Value of proceeds of crime imposed from confiscation order impositions (millions)	Number of confiscation order impositions	Value of proceeds of crime recovered from confiscation orders (millions)	Total value of compensation paid
Modern Slavery	2018-2019	£2.6	16	£1.6	51	£0.8	£0.0
Modern Slavery	2019-2020	£1.6	15	£1.5	48	£0.8	£0.1

Modern Slavery	2020-2021	£0.5	13	£0.8	21	£0.9	£0.1
Modern Slavery	2021-2022	£1.0	11	£0.7	27	£0.4	£0.1
Modern Slavery	2022-2023	£3.7	[..]	£1.0	19	£0.8	£0.1
Modern Slavery	2023-2024	£0.8	[..]	£1.6	14	£0.3	£0.2

Scotland

COPFS: 0

Northern Ireland (NI)

Since 2021 there has been a confiscation order resulting in the confiscation of assets in respect of 1 of the defendants convicted of Human Trafficking offences.

- Number of convictions of legal entities for THB.

Scotland

COPFS: 0

COPFS: Potential Victims of Trafficking Data*

Between 1 April 2021 and 31 March 2022:

- 54 cases involving 73 accused persons were reported to the National Lead Prosecutor for human trafficking for consideration of taking no action or discontinuing proceedings on the basis of the Lord Advocate's Instructions; and
- To date, no action or no further action was taken in respect of 45 of those accused persons on the basis that the test within the Lord Advocate's Instructions was met.
- Out of those 45 persons, 37 are adults (20 Vietnamese, 10 Albanian, 4 British, 1 Romanians, 1 Chinese and 1 Hungarian national) and 8 children (5 Vietnamese, 2 British and 1 Gambian national).

Between 1 April 2022 and 31 March 2023:

- 99 cases involving 140 accused persons were reported to the National Lead Prosecutor for human trafficking for consideration of taking no action or discontinuing proceedings on the basis of the Lord Advocate's Instructions; and
- To date, no action or no further action was taken in respect of 44 of those accused persons on the basis that the test within the Lord Advocate's Instructions was met.
- Out of those 44 persons, 31 are adults (4 British, 12 Vietnamese, 2 Chinese, 10 Albanian, 1 Greek and 1 Palestinian nationals) and 13 children (7 British, 2 Polish and 4 Vietnamese nationals).

Between 1 April 2023 and 31 March 2024:

- 98 cases involving 130 accused persons were reported to the National Lead Prosecutor for human trafficking for consideration of taking no action or discontinuing proceedings on the basis of the Lord Advocate's Instructions; and
- To date, no action or no further action was taken in respect of 24 of those accused persons on the basis that the test within the Lord Advocate's Instructions was met.
- Out of those 24 persons, 18 are adults (10 Vietnamese, 1 British, 1 Chinese, 3 Albanian and 3 Ghanian nationals) and 6 children (5 British and 1 Syrian national).

* *Caveats*

- *A decision to discontinue proceedings can be taken at any time during proceedings. Therefore, although the National Lead Prosecutor has not discontinued proceedings against an accused person that may not be the final decision. Should further information become available, such as a positive conclusive grounds decision, the National Lead Prosecutor may decide to discontinue proceedings on receipt of that information.*
- *The data is manually pulled out from the system and so whilst the data is as accurate as it can be, COPFS cannot guarantee full accuracy. The data changes constantly depending on when new information is received.*

Northern Ireland (NI)

There have been no convictions of legal entities for THB.