

# **Independent Anti-Slavery Commissioner Annual Report 2024-2025**

May 2025



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of the Modern Slavery Act 2015

May 2025



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# Foreword by Eleanor Lyons, the Independent Anti-Slavery Commissioner



This year, we stand at a pivotal moment—marking ten years since the passing of the Modern Slavery Act. While it was a landmark achievement, it is important to recognise that our work is far from finished.

In these ten years, we have seen some progress: increased awareness, strengthened legal frameworks, and empowered more victims to speak out. But modern slavery is still with us. It lurks in the shadows, hidden in industries, supply chains, and even in our neighbourhoods. The victims, in rural communities as well as big cities, continue to suffer in silence.

The challenges are real. The systems that perpetuate exploitation are often complex and deeply ingrained. Many survivors still face barriers to justice, and many perpetrators go unpunished. The fight against modern slavery requires more than just legislation; it requires a

collective, unwavering commitment from all sectors of society—government, businesses, law enforcement, and each of us as individuals. That is why the cornerstone of my first year in office has been to make ‘Tackling Modern Slavery Everyone’s Business’.

Prior to the start of my tenure, the role of the Independent Anti-Slavery Commissioner (IASC) was unfulfilled for a staggering 20 months. During that time, cross-government resolve and engagement between departments and the anti-slavery support and advocacy sector declined. The government’s ministerial strategy groups—once critical to tackling modern slavery—had long been disbanded. Meanwhile this happened against a backdrop of a nearly five-fold increase in referrals to the NRM, the framework used to identify victims of modern slavery here in the UK.

It was clear change was needed. My Strategic Plan was one of the first things that I focused on when I came into the role. I wanted to ensure its development was as inclusive and consultative as possible so that it shaped priorities and objectives that were achievable, and most importantly represented the needs and realities of victims and survivors today. I conducted a series of visits across the UK, attended Lived Experience Advisory Panels, and carried out a survey consultation. My Plan, completed alongside rebuilding my team and my office, is rightly ambitious but needed to be to reflect the common theme from those I consulted, that the UK response to modern slavery had been largely stagnating.



A year into my Plan and there has been progress. I worked to have victims of modern slavery recognised in the Victims and Prisoners Act. After hearing the impact on victims of the damaging rhetoric post the Illegal Migration Act, I worked with parliamentarians to clarify the difference between smuggling and trafficking and called for the provisions within the Act to be repealed – this has now been partly committed to. I also called for a Single Enforcement Body to be created and worked with officials and ODLME on what this should look like. This is now being created in the form of a Fair Work Agency. Following my nationwide visits to law enforcement agencies that highlighted the pressing need for action, I called for cuckooing to be recognized as a serious offence. I am pleased to see this is now being taken forward in the Crime and Policing Bill.

But it is not just about legislative changes. This year, my office, through working and collaborating with partners, has grown an evidence base and examples of effective strategies and practices happening up and down the country that can be replicated nationwide. I want to take the opportunity in this report to commend all the organisations I have worked with over the past year, particularly those that have been working so tirelessly to support victims and continue to advocate for and uphold the most basic of human rights – the right to freedom and dignity.

It has been over ten years since the government published the last Modern Slavery Strategy for England and Wales. There is an urgent need for this

to be refreshed to reflect the changing landscape of modern slavery and trafficking in the UK today. I have stated this a lot over the last year, particularly in my evidence to Parliamentary Select Committees, but it is crucial. A Strategy is needed that requires every part of government, and every part of the UK, to act and play its part. It must empower and listen to the frontline organisations that support and advocate for victims and survivors, and importantly, underpin a system that empowers victims and survivors themselves. I welcome that Northern Ireland published a strategy last summer, and that Scotland are soon to publish their strategy, that I have been feeding into, and now has survivor engagement integrated throughout.

Over the last year, I have not wavered in my conviction that the government must establish the long overdue Survivor Advisory Council to achieve this.

Listening to survivor voices and looking to the future is critical in this anniversary year of the Modern Slavery Act. We need to look at the next decade and ask – where do we want to be in 10 years' time and how are we going to get there? In the year ahead I will be taking on this challenge and will continue to engage with partners and government on these ideas and drive action. Everyone has a role to play in ending slavery, but it is the united effort of all these roles that makes us more powerful, it can deliver the change that victims and survivors have said they want to see.

*Eleanor Lyons.*

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**Eleanor Lyons**

Independent Anti-Slavery Commissioner

**With thanks to all** the organisations and individuals that worked with the IASC over this reporting period:

### **IASC Expert Advisory Panel**

- Bronagh Andrew, Trafficking Awareness Raising Alliance
- Mick Clarke, The Passage
- Shaun Sawyer, former NPCC lead for Modern Slavery
- Professor Zoe Trodd, Rights Lab, University of Nottingham

### **Devolved Administrations**

- Welsh Government and Anti-Slavery Wales Forum Members
- Scottish Government and Trafficking and Exploitation Strategy Action Area Members
- Department of Justice for Northern Ireland

## **Partners, Organisations and Agencies**

After Exploitation

Anti-Trafficking Monitoring Group

Anti-Slavery International

Arise

Association of Police and Crime Commissioners

ATLEU

BASNET

BAWSO

Border Force

British Services Association

Car Wash Association

Caritas Bakhita House

Causeway

CEASE

Chief Medical Officer

Church of England

College of Policing

CPS

Deputy Mayor for Policing in London

Deputy Police and Crime Commissioner for Merseyside

ECPAT UK

Embassy of the United States of America

Focus on Labour Exploitation (FLEX)

Gangmasters & Labour Abuse Authority (GLAA)

Global Commission on Modern Slavery and Human Trafficking

Helen Bamber Foundation

Hestia

HM Prison and Probation Service (HMPPS)

Hope for Justice

Human Trafficking Foundation

International Justice Mission

Justice and Care

Kalayaan

Local Government Association

Medaille Trust

Metropolitan Police

Migrant Help

Modern Slavery and Human Rights Policy and Evidence Centre (MSPEC)

Modern Slavery Intelligence Network

MSOICU

Modern Slavery Unit, Home Office

National Crime Agency

Nordic Model Now!

North Kent Police

Office of the Director of Market Labour Enforcement

OSCE Special Representative and Co-ordinator for  
Combating Trafficking in Human Beings

Police and Crime Commissioner for Lancashire

Police and Crime Commissioner for Leicester

Police and Crime Commissioner for North Wales

Police Scotland National Human Trafficking Unit

Police Foundation

Public Health Wales

Rights Lab (University of Nottingham)

Royal College of Nurses

Royal College of GPs

Slave Free International

Sophie Hayes Foundation

South Yorkshire Police

Stronger Together

Survivors of Human Trafficking in Scotland (SOHTIS)

TOEX

The Anti-Slavery Collective

The Passage

The Salvation Army (TSA)

The Snowdrop Project

Trafficking Awareness Raising Alliance (TARA) Service

Victims Commissioner

UK Feminista

UK Modern Slavery Envoy

University of Manchester

UNODC

US Trafficking in Persons Ambassador

West Yorkshire Combined Authority

West Yorkshire Police and West Yorkshire and Humber  
Regional Organised Unit

Women at the Well

Youth Endowment Fund



# Introduction

The role of the Independent Anti-Slavery Commissioner (IASC), its functions and powers were established in the landmark Modern Slavery Act 2015 (MSA). This charges the Commissioner with ‘encouraging good practice sharing’ in the prevention, detection, investigation and prosecution of modern slavery, and support for victims. They also support the carrying out of research to improve our understanding of modern slavery and how it can best be tackled. The Commissioner works across the UK with public authorities, the sector, businesses, and law enforcement to pursue these goals.

This Annual Report covers the period from the Commissioner’s appointment in December 2023 to March 2025. Prior to November 2023, the position of IASC was unfilled for 20 months and the supporting office was dormant. In the first months on taking up their appointment, the IASC rebuilt the office structure, recruiting and establishing a small team, negotiating a new Memorandum of Understanding (MOU) with the sponsoring Department, the Home Office, and developing the Strategic Plan for their tenure.

To inform and shape the development of the Strategic Plan the IASC visited over 30 organisations across England, Wales, and Scotland, held over 85 meetings, and spoke with more than 150 individuals at the start of 2024. A consultation survey was also held between February and March 2024, to which 60 organisations

responded, from a range of stakeholders across local authorities, the NHS, anti-slavery sector charities, organisations and law enforcement. The IASC also conducted a series of roundtables with those with lived experience. Alongside this, the IASC spoke to officials and Ministers in Whitehall, Scotland, Wales and Northern Ireland. Alongside international partners and counterparts.

The IASC submitted the Strategic Plan to the Home Secretary in April 2024. Since its submission the IASC has been working to deliver against all pillars of the Plan as outlined in this Annual Report. The Home Office laid the IASC's Strategic Plan before Parliament in January 2025.

This is the Commissioner's first Annual Report. As required under the MSA, it sets out the extent to which the Commissioner's objectives and priorities, as set out in the Strategic Plan, have been met to date; and the activities the Commissioner has undertaken throughout the year in the exercise of their functions.

## Snapshot: Timeline

The IASC meets international partners including OSCE Special Representative, US Ambassador-at-Large and Australian Anti-Slavery Commissioner

### FEBRUARY

The IASC visits Gatwick to see the frontline work of Border Force's Safeguarding & Modern Slavery Officers.

The IASC gives evidence to the **Home Affairs Select Committee** on priorities for her tenure.



The IASC supports Baroness Young's Private Members Bill which would place a duty on businesses to undertake human rights due diligence.

### APRIL

The IASC **Strategic Plan** submitted to the Home Office

### AUGUST

The IASC visits North Kent Police

**UK Anti-Slavery Day:** The IASC speaks at the Stronger Together Conference, the Slave Free Alliance Conference, Sandwell's Modern Slavery Summit and the Anti-Slavery Wales Conference.



The IASC hosts Research Roundtable with US Trafficking in Persons Ambassador Cindy Dyer

### FEBRUARY

**Child criminal exploitation** and **cuckooing** to be criminal offences in the Crime and Policing Bill

### JANUARY 2024

The IASC visits: **Wales** to meet with Welsh Government, Public Health Wales, Barnardo's and BAWSO; **Scotland** to meet with Scottish Government, SOHTIS, TARA and Police Scotland; the Rights Lab in **Nottingham**; and **Sheffield** to meet with South Yorkshire Police, Snowdrop & ATLEU.

The IASC visits the Medaille Trust, BAKHITA Centre and Hestia



### MARCH

The IASC gives evidence to the **House of Lords Modern Slavery Act 2015 Committee**.

### JULY

The IASC visits West Yorkshire Police and West Yorkshire & Humber ROCU

The IASC issues a **call to action to all 650 MPs** to make tackling modern slavery a priority.

### SEPTEMBER

The IASC hosts its inaugural Expert Advisory Panel

Memorandum of Understanding between the IASC and the Home Office agreed and published.



### JANUARY 2025

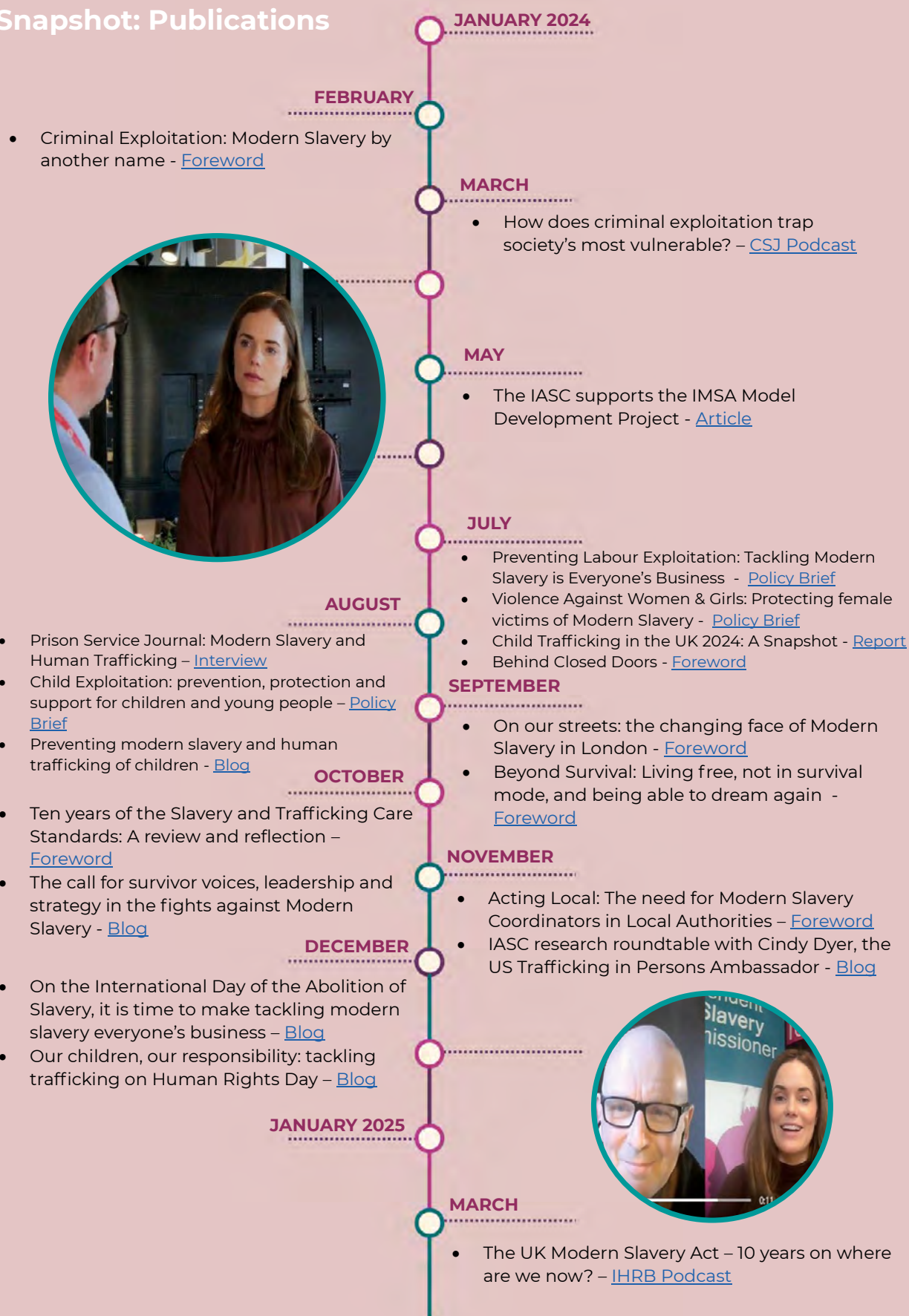
The IASC gives evidence to the **Business and Trade Select Committee** Inquiry session: **Make Work Pay: Employment Rights Bill**

The IASC **Strategic Plan** laid before Parliament

### MARCH

The IASC gives evidence to the **House of Commons Select Committee** non-inquiry session: **Modern Slavery Act: ten-year review**.

## Snapshot: Publications



## Snapshot: In the news

JANUARY 2024

INDEPENDENT

### Commissioner: Modern slavery no longer Home Office priority

Eleanor Lyons said her office's budget is being cut by 5% every year.

6 Feb: [The Independent](#)

INDEPENDENT

### Ukrainians granted sanctuary in Britain sent to live with suspected gangsters

13 Apr: [The Independent](#)

INDEPENDENT

### Record calls to slavery helpline include first suspected forced surrogacy cases

18 Apr: [The Independent](#)

Sun

### PERILOUS VOYAGE How surge in Vietnamese migrants smuggled in on small boats is fuelling Britain's cannabis and prostitution industries

19 Apr: [The Sun](#)

LEXOLOGY

### Exclusive: UK regulator calls on companies to uphold modern slavery laws as experts warn stricter enforcement looms

28 August: [Lexology](#)

Reuters

### Shein's silence on China cotton use leaves British lawmakers in the dark on supply chain

7 Jan: [Reuters](#)



Evening Standard

### Record high modern slavery referrals 'shows shocking scale' of issue in UK

6 Mar: [Evening Standard](#)

Modern slavery

### MPs could axe clause in bill banning forced labour in GB Energy supply chain

23 Mar: [The Guardian](#), [Daily Mail](#)

DECEMBER 2023

INDEPENDENT

### We must do more for child victims of modern slavery

26 Dec: [The Independent](#)

CHURCH TIMES

### The Rwanda Bill risks the safety of those caught up in modern slavery, says Vivienne Faulk and Eleanor Lyons

6 Mar: [The Church Times](#)



INDEPENDENT

### Trafficking victims being turned down for compensation in 'horrendous failing'

Data suggests that trafficking victims are unlikely to receive compensation through government scheme

23 July: [The Independent](#)

BBC NEWS

### Modern slavery backlog could be 'eradicated' in two years

18 Oct: [BBC](#)

JANUARY 2025

LBC News

### Tonight with Andrew Marr 30/01: Border Security, Asylum and Immigration Bill

30 Jan: [LBC](#)

Reuters

### UK's tougher immigration policy risks trapping victims in modern slavery

7 Feb: [Reuters](#)

The Observer

### Flawed UK visa scheme led to 'horrific' care worker abuse, says watchdog

16 Mar: [The Guardian](#)

Politics

### UK ministers vow to tackle forced labour in supply chains to mollify MPs

25 Mar: [The Guardian](#)



# The Strategic Plan

The IASC Strategic Plan outlines the priority areas for the IASC's work between 2024-2026 which is the term for which the Commissioner has been appointed. The Plan focuses on key contexts, priority areas, ways of working, and the IASC's strategy and approach to their role. To ensure it remains relevant and responsive throughout this period, the IASC reviews the Strategic Plan annually, to reflect changes to the legislative or policy context. However, the three core objectives set out in the Plan (under Prevention, Protection and Prosecution) reflect the pillars of the Commissioner's work throughout their tenure. These are underpinned by two cross-cutting objectives as summarised below:

<b>#1</b> <b>Preventing</b> modern slavery and re-victimisation.	<b>#2</b> <b>Protecting</b> victims: improving victim identification, the NRM, victim care and support.	<b>#3</b> <b>Prosecuting</b> offenders and supporting victims through the criminal justice system.
<b>#4</b> Integrating <b>lived experience</b> perspectives into anti-slavery policy and efforts.		
<b>#5</b> Improving our <b>knowledge and understanding</b> of modern slavery.		

The IASC represents the needs of **all victims** and remains flexible to respond to new and emerging threats. In delivery of the objectives, the IASC's approach is to be mindful of four areas of potential victims that have arisen

through consultation and the NRM statistics as priority areas. These are:



Children and  
young people



Women and girls



UK nationals



Those affected  
by recent  
immigration  
legislation

# Annual Report | Executive Summary

Over the past year, the IASC has re-established its office, delivered key priorities in the Strategic Plan, and built a solid foundation for future impact through strategic engagement, evidence-based advocacy, and policy reform. At the political level, the IASC engaged with ministers, Select Committees, and MPs to restore modern slavery to the political agenda. Operationally, the IASC collaborated with frontline organisations, law enforcement, survivors, and third-sector partners to overcome systemic challenges in victim identification, support, and prosecution of perpetrators.

Structured around the three pillars of prevention, protection, and prosecution, the report demonstrates how the IASC has driven forward its priorities across key areas, including priority vulnerable groups most at risk of exploitation.

**Prevention:** The IASC efforts have focused on understanding vulnerabilities, aligning definitions to improve early identification and bringing in more partners into the fight to make tackling modern slavery everyone's business - across government departments and local government to businesses and communities. The prevention section of the report details the IASC activity that has furthered understanding on overlapping multiple needs and their impact on vulnerability to modern slavery; research on the intersections between



homelessness and modern slavery; work on statutory definitions and legislative reform; and engagement with the private sector to tackle forced labour in supply chains.

**Protection:** The IASC's efforts have focused on improving victim identification and support and promoting trauma-informed approaches across frontline services. Activities include research into the National Referral Mechanism (NRM) refusal rates to understand why victims decline support, and collaboration with the Local Government Association (LGA) to advocate for funding Modern Slavery Coordinators. The IASC has also worked with First Responder Organisations (FROs) to improve referral processes, advocated for updates to statutory guidance, and partnered with Border Force and health professionals to enhance victim identification at key points of contact.

**Prosecution:** The IASC's efforts have focused on evaluating how policing responses to modern slavery have evolved, identifying best practices, and working to integrate these into law enforcement strategies. The section details the IASC's engagement with criminal justice partners to identify challenges in applying modern slavery legislation, promote evidence-led prosecutions that reduce reliance on victim testimony, and support initiatives that maintain victim engagement in the Criminal Justice System. This includes commissioning research into the evolution of police responses since the MSA, supporting initiatives like the CPS Modern Slavery Scrutiny & Involvement Panel, and advocating for enhanced intelligence-sharing through programmes like

the Tackling Organised Exploitation Programme (TOEX). These activities aim to hold perpetrators accountable while ensuring victims receive ongoing support.

The IASC's strategic plan is underpinned by two core themes:

1. The IASC's work to integrate **lived experience** perspectives has centred on ensuring they are embedded in all policy and legislation development through calling for the establishment of a Survivor Advisory Council, encouraging survivor inclusion in outreach and engagement in, and securing a commitment from government to put survivor voices at the front and centre of action plans.
2. The IASC's work to improve the **knowledge and understanding** of modern slavery has included commissioning a number of research reports:
  - **Overlapping Threats to Freedom:** This insight briefing examines the prevalence of vulnerabilities associated with modern slavery intersect and considers how multi-agency systems can be strengthened to address these overlapping vulnerabilities.
  - **Refusal to access government support via the NRM:** This research explores why some potential victims refuse to enter the NRM and proposes solutions to make sure potential victims feel confident they will receive the support they need.

- **Combating Modern Slavery in the Homelessness Sector:** This research looks at current prevention provisions in the homelessness sector, what is and is not working well and identifies successful strategies to enhance the prevention framework.
- **Advancing Modern Slavery Prevalence Estimates:** This research furthers our understanding of methodologies for calculating prevalence and proposes a research protocol to calculate a new UK estimate.
- **Policing and Modern Slavery:** This research looks at the evolution of the police response to modern slavery since the introduction of the MSA and what can be learnt from to inform future best practice.
- **Human Security and Human Trafficking:** This research explores the role of UK Defence can play in tackling human trafficking through its human security doctrine and training programmes.

The IASC represents all victim and survivors whilst recognising that certain groups have heightened vulnerabilities, therefore this report details activity that IASC has been carrying out focused on: children and young people; women and girls; UK Nationals; and those affected by immigration legislation. An overview of activity carried out related to these groups is detailed below.

# Children and Young People

The number of children referred to the NRM has more than doubled in five years, with 7,432 referrals in 2023 — 78% of which were British children.<sup>1</sup> Criminal exploitation remains the most common form, particularly affecting boys under 18.

To address this, the IASC has worked on joint reports with ECPAT UK, such as ‘Child Trafficking in the UK 2024: A Snapshot’<sup>2</sup> calling for expanded Independent Child Trafficking Guardians (ICTGs), safer accommodation for unaccompanied minors, and repeal of harmful migration legislation. The IASC also provided expert advice on drafting legal definitions for child criminal exploitation (CCE) to improve identification and prosecution. The IASC’s policy brief: ‘Child Exploitation: prevention, protection and support for children and young people’<sup>3</sup> details the IASC’s key priorities for children and young people. The IASC continues to push for child sexual exploitation (CSE) to be clearly defined by the government.

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- 1 Modern slavery: NRM and DtN statistics end of year summary 2023, [GOV.UK](#)
  - 2 Report: ‘Child Trafficking in the UK 2024: a snapshot’, [ECPAT and IASC](#), November 2024
  - 3 Policy Briefing: ‘Child Exploitation: prevention, protection and support for children and young people’, [IASC](#), August 2024

# Women and Girls

In 2024 alone there was a 13% increase in sexual exploitation on the previous year. In 2024 there were 990 women who were recorded in the NRM data as a potential victim of trafficking for “sexual” exploitation and 553 girls.<sup>1</sup>

The IASC has worked with government departments to ensure that modern slavery is recognised as violence against women and girls (VAWG) and convened meetings to ensure that it is included in the government’s upcoming VAWG strategy. The Scottish Government has set out a collective approach to challenge and deter men’s demand for prostitution and support those with experience of it within its strategy (2024)<sup>4</sup> and the IASC has been calling for this approach to be UK wide. The IASC’s policy brief: ‘Violence Against Women and Girls: protecting female victims of modern slavery’<sup>5</sup> details IASC’s key priorities for women and girls.

## UK Nationals

Over the last ten years there has been an increase in the numbers of UK nationals who are referred into the NRM. Overall, this has gone from 6% of all referrals in

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4 ‘Prostitution – challenging and deterring men’s demand: strategic approach’, Scottish Government

5 Policy Briefing: ‘Violence Against Women and Girls: protecting female victims of modern slavery’, IASC, July 2024

2015 to 23% of referrals in 2024. Of all UK referrals, the overwhelming majority (91 %) were reported in England, 7% in Wales, 2% in Scotland and only five referrals for UK nationals were made in Northern Ireland. The IASC is working to understand the disparity in identification of UK nationals across the four nations.

UK national boys under 18 are particularly targeted by exploiters through county lines and other criminal networks. The IASC successfully called for “cuckooing” to be recognised as a modern slavery offence in forthcoming legislation and provided advice to Ministers to ensure clear legal definitions of CCE. Advocacy has also focused on improving multi-agency responses to better protect UK nationals from exploitation.

## **Those Affected by Immigration Legislation**

Immigration policies and legislation including the Nationality and Borders Act 2022, and Illegal Migration Act 2023 had created barriers for victims of modern slavery. The damaging rhetoric that accompanied these legislative changes that conflate illegal migration and modern slavery has heightened risks of detention, deportation of victims of modern slavery and discourages victims from engaging with authorities in fear of deportation.

The IASC has consistently called for the repeal of harmful provisions in this legislation that undermine victim protections. Some of the harmful provisions of the

Illegal Migration Act are being repealed in the Border Security, Asylum and Immigration Bill, but there is more to do. The confusion and fear persist among victims about whether they will be supported. Advocacy efforts include urging cross-departmental collaboration to ensure safe accommodation for vulnerable asylum seekers and lobbying for legislative reforms to restore protections for victims of trafficking. Reports such as ‘Child Trafficking in the UK 2024: A Snapshot’<sup>2</sup> have highlighted these impacts on child victims specifically.

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The Annual Report concludes with a forward look, outlining the IASC’s priorities for the year ahead. In the coming year, the IASC will provide robust legislative scrutiny, press for a new cross-government modern slavery strategy, champion the establishment of a Survivor Advisory Council, and push for mandatory human rights due diligence (MHRDD) to be introduced. Alongside these overarching goals, the IASC will be listening to the live challenges of survivors and frontline workers and pressing for the immediate changes and fixes needed to the modern slavery response system to ensure that it works for them.

# Preventing modern slavery and victimisation

The first pillar of the Strategic Plan focuses on ‘Prevention’ and what can be done to protect people from facing exploitation. Over the last year, efforts have been focused on identifying and addressing the root causes of vulnerability, improving early identification through clearer definitions, and strengthening partnerships across government, business, and civil society.

## Protecting the vulnerable from exploitation

Modern slavery and human trafficking (MSHT) is a complex and evolving crime, affecting people from a wide range of backgrounds and circumstances—each with their own vulnerabilities that traffickers are quick to exploit. Recognising this, the IASC commissioned the research briefing: ‘Overlapping Threats to Freedom: Understanding Vulnerability to Modern Slavery’<sup>6</sup> to map out how different vulnerabilities — such as irregular immigration status, financial hardship, family breakdown, and homelessness — can heighten the risk of people being trafficked and exploited in the UK.

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6 Insight Briefing: ‘Overlapping threats to freedom: understanding vulnerability to modern slavery’, IASC, March 2025



The ‘Overlapping Threats to Freedom’ briefing found that many potential victims present with several intersecting vulnerabilities, while current frameworks tend to be siloed and struggle to provide holistic protection. These findings reinforce the need for a coordinated multi-agency approach to identifying and managing cases of modern slavery to be able to provide holistic and tailored support provision to potential victims that reflects the complexity of their needs.

The IASC has been raising the profile of the need for a broader cross government prevention strategy that would address some of these findings and has speaking publicly and with officials to drive coordinated action. This includes raising the issue at the political level with Ministers, at the working level with local authorities who have a critical role to play, and on the CSJ podcast, ‘Betraying Our People: How Does Criminal Exploitation Trap Society’s Most Vulnerable, and What Can We Do About It?’<sup>7</sup> alongside Sir Iain Duncan Smith, Action Homeless Leicester, and former and current law enforcement officers.

## **Homelessness and unsafe accommodation**

Homelessness can be both a driver and a consequence of exploitation. Throughout 2024, the IASC prioritised

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7 Podcast: ‘Betraying Our People: How Does Criminal Exploitation Trap Society’s Most Vulnerable, and What Can We Do About It?’ CSJ, [Link](#) , February 2024

building the evidence base on the links between housing instability and modern slavery, particularly for groups at heightened risk. In May 2024, the IASC visited Stop the Traffik to discuss findings from a joint project with Commonweal Housing, which examined the relationship between homelessness and exploitation among Albanian and Romanian nationals in London. The research<sup>8</sup> found that the exploitation experienced by these groups was closely tied to their housing situation—demonstrating that access to secure accommodation significantly reduces the risk of re-exploitation, while homelessness exacerbates vulnerability.

To raise awareness of these findings and their implications for policy, the IASC spoke at a joint webinar in March 2024 with The Passage — a leading homelessness charity in London — and the University of Nottingham. The discussion focused on the need for housing policy and survivor accommodation guidance that directly addresses the risks posed by insecure accommodation, and the importance of cross-sector collaboration to break cycles of exploitation.

Recognising the need for further evidence, the IASC has also partnered with The Passage to research the effectiveness of prevention frameworks within the homelessness sector. This ongoing project is examining

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8 Report: ‘Exploitation and its links to Housing and Homelessness: The experience of Romanian and Albanian national in London’, Commonweal Housing, May 2024

how victims and survivors can be better supported into safe housing when they escape exploitation or exit the NRM. The IASC has raised these issues in correspondence with the Secretary of State for Housing, Communities and Local Government, and Deputy Prime Minister Angela Rayner MP, to advocate for stronger survivor accommodation policies.

There is a clear correlation between homelessness or unstable accommodation and increased risk of exploitation for both adults and children. However, more work is needed to identify effective prevention measures and ensure that support is tailored to the needs of those at risk. The IASC's ongoing research with The Passage will report findings in early summer 2025, with further details available in the 'Priority Research Areas' section of this report.

## **How this work aligns with the Strategic Plan**

- ✓ The IASC will work with organizations that help homeless people, government, and researchers to raise the profile of the risk of homeless people being exploited.

## **Preventing children from being exploited**

The number of victims reporting exploitation as children has more than doubled over the last five years. No one, regardless of age, should be exposed to the harms of modern slavery and it is particularly worrying to see a

rising number of children being exploited. As highlighted by the IASC in *The Independent* in early 2024<sup>9</sup>, these figures are deeply concerning and demonstrate that much more needs to be done to protect children from exploitation. Many survivors have shared with the IASC that their exploitation began in childhood, emphasising the need for professionals and communities to be better equipped to identify and respond to child exploitation.

Research continues to show that policy and practice gaps put children at risk. The report: ‘Behind Closed Doors’<sup>10</sup>, produced by UCL and ECPAT UK that the IASC contributed to, demonstrated that the use of Home Office hotel accommodation for unaccompanied children seeking asylum increases the risk of trafficking, exploitation, and re-trafficking. In this report, the IASC raised significant concerns about the risks faced by unaccompanied children, particularly those who have gone missing from hotels or have been incorrectly assessed as adults by the Home Office — placing them at further risk of trauma, abuse, and exploitation in adult accommodation.

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9 Editorial: ‘We must do more for child victims of modern slavery’, [The Independent](#), December 2023

10 Report: ‘Behind Closed Doors: A Storytelling Legal and Empirical Analysis of Human Trafficking Risks in Home Office Hotels Compared to Other Accommodation for Unaccompanied Children and Young People Seeking Asylum in the UK’, [ECPAT UK](#)

Ensuring all children are in safe, stable accommodation is a critical protection mechanism. In August 2024, the IASC highlighted this need in the policy brief ‘Child Exploitation: Prevention, Protection and Support for Children and Young People’<sup>3</sup>, calling on the government to prioritise cross-departmental collaboration and robust protections to prevent unaccompanied children from being housed in hotels or going missing. The brief also stressed the need for long-term investment in strategies to tackle child exploitation.

The IASC has continued to press for legislative and policy reform. In December 2024, the IASC and ECPAT UK published ‘Child Trafficking in the UK 2024: A Snapshot’, which called for the repeal of harmful provisions in the Nationality and Borders Act 2022 and Illegal Migration Act 2023 that are preventing child victims from being identified and protected. Despite under-identification, analysis of 2023 NRM data showed a 138% rise in identified child trafficking cases since 2018, with British children accounting for 78% of child referrals to the NRM in 2023 — evidence that the UK is failing to protect trafficked children.<sup>11</sup> The IASC and ECPAT UK also called for ring-fenced funding for local authority children’s services, the expansion of the NRM devolved decision-making pilot, and a commitment to make ICTGs available across England and Wales.

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11 Statistical bulletin: Modern Slavery: NRM and DtN statistics, end of year summary 2024, [GOV.UK](https://gov.uk), March 2025

Progress against these areas is included in the 'Protection' and 'Prosecution' sections of this report.

## **How this aligns with the Strategic Plan**

- ✓ The IASC will work across stakeholders to focus efforts on providing more support for children to prevent them from being exploited and call for all children in care to be in appropriate loving environments and not housed by the Home Office

# **Tackling demand for exploitation**

## **Criminal Exploitation & Cuckooing**

Approximately 14,500 children were identified as at risk or involved in CCE in 2023–24<sup>12</sup> and the true figure is likely higher. NRM data consistently shows that UK national boys under 18 are most affected, with 57% of all UK boys referred in 2024 as potential victims of criminal exploitation, either as a sole or combined exploitation type.

Despite the scale of the problem, prosecutions for those exploiting children for criminal activity remain low. The IASC strongly supported the CSJ February 2024 report 'Criminal Exploitation: Modern Slavery by

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12 [Gov.uk](https://www.gov.uk/government/statistics/criminal-exploitation-modern-slavery-by-age-and-nationality), 22 Feb 2025

Another Name'<sup>13</sup>, calling for a tougher response to those exploiting young people and for clearer legal definitions of CCE to aid professionals in identification and response.

Throughout the year, the IASC provided expert advice to Minister Dame Diana Johnson and the Home Office Drugs and County Lines team during the drafting of the CCE Offence. The IASC emphasised the need for clear, precise legal definitions to ensure consistency in identification, prosecution, and support for victims—reinforcing that children cannot legally or meaningfully consent to their own exploitation and must always be treated as victims, not offenders.

In February 2024, the IASC gave evidence to the Home Affairs Select Committee, highlighting ‘cuckooing’ — where criminals take over a victim’s home to commit crimes — as a form of modern slavery that should be recognised in law. Although the initial Criminal Justice Bill was not taken forward due to the dissolution of Parliament in May 2024, the offence of ‘cuckooing’ was included in the Crime and Policing Bill introduced in February 2025. The IASC continues to work with the Home Office to ensure the legislation will be supported by statutory guidance that protects the most vulnerable, which is not currently planned and something IASC is pushing for.

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13 Report: ‘Criminal Exploitation: Modern Slavery by another name’, CSJ, February 2024

## How this work aligns with the Strategic Plan

- ✓ The IASC will work with policymakers and law enforcement to encourage a focus on preventing and tackling criminal exploitation, which disproportionately affects children.

## Labour Exploitation

For ten years labour exploitation has been the most reported form of adult exploitation in the UK. The NRM 2024 annual data showed that nearly one third (32%) of the 19,125 potential victims were referred for solely labour exploitation. This was a 32% increase from 2023 and equated to 6,153 referrals. Labour exploitation was the most reported type of exploitation for adults at 41%.<sup>1</sup> The number of potential victims who reported labour exploitation only in 2024 was the highest since the NRM began.

Labour market governance has been fragmented, under-resourced and failing against international labour inspection standards leading to criminals and unscrupulous individuals exploiting people's hopes of an honest wage. Labour market enforcement efforts need to be streamlined and target high-risk sectors and monitor how these sectors evolve. Recently, there has been a sharp rise in the exploitation of workers in the adult social care sector, this is worrying for both the victims of exploitation and patient care of some of the most



vulnerable in society. In response to this the IASC worked with the NCA, OLDME and the Gangmaster and Labour Abuse Authority (GLAA) on identifying and preventing this exploitation occurring. The IASC also worked across Department of Health and Social Care (DHSC), DBT and the Home Office on protecting those in the adult social care sector. IASC has also written to Trade Unions on this issue and is exploring the greater role, unions can play in tackling labour exploitation in high-risk sectors. The issues in adult social care highlight the importance of visas being designed in a manner which protects workers and does not place additional burdens on high-risk sectors, an issue the IASC has raised in Select Committees and worked with partners such as Focus on Labour Exploitation (FLEX) on.

In July 2024, the IASC set out her plan for a coordinated response to tackle this crime in the policy brief: 'Preventing Labour Exploitation: Tackling Modern is Everyone's Business'.<sup>14</sup> This included a call for a new Single Enforcement Body (Fair Work Agency) for workers, that would protect workers' rights, introduce secure pathways for workers to report abuses and have the power to proactively crack down on all forms of labour exploitation. IASC raised this directly in her letter to Jonathan Reynolds MP, Secretary of State for Business and Trade in July 2024, and stressed the importance of

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14 Policy Briefing: 'Preventing Labour Exploitation: Tackling Modern Slavery is Everyone's Business', IASC, July 2024

protections from exploitation for workers and individuals being included in any future trade deals.

## **Employment Rights Bill and a Single Enforcement Body**

In October 2024, the Employment Rights Bill began its passage through Parliament. The Bill aims to modernise the UK's employment laws, enhance worker protections, and promote fair working conditions. If enacted, it will establish a Single Enforcement Body, to be known as the Fair Work Agency, that would unify and replace the Gangmasters and Labour Abuse Authority (GLAA), HM Revenue and Customs (HMRC) National Minimum Wage enforcement team, and the Employment Agency Standards Inspectorate (EAS), consolidating these enforcement bodies into a single agency with expanded powers to enforce employment rights.

The IASC gave both oral and written evidence to the Business and Trade Select Committee on the Bill, calling for the Fair Work Agency to be adequately resourced, independent and empowered to address labour violations across the spectrum, including specialist teams dedicated to tackling modern slavery and strong partnerships. The IASC emphasised the need for the Agency to systematically address both serious and lower-level labour violations, to prevent abuse from escalating to modern slavery, and to identify underlying risks and structural causes of exploitation. These recommendations were set out in detail in the IASC's policy brief on labour exploitation.<sup>14</sup>

## **ODLME Strategy**

In November 2024, the Department for Labour Market Enforcement issued its call for evidence for the 2025/26 Strategy, with a particular focus on the transition to the establishment of the Fair Work Agency. In its response, the IASC stressed the need for mapping offences used for lower-level crime to prevent violations escalating to modern slavery and, adopting agreed definitions that are understood across partners. The IASC submission also put a strong focus on the need for the Fair Work Agency to build a strong brand from the start and an effective communication function so that it is recognised as a single point of contact for workers seeking redress. The IASC also reiterated the need for enforcement that was informed by real-time intelligence in high-risk areas.

### **How this work aligns with the Strategic Plan**

- ✓ The IASC will work with the GLAA, the Office of the Director of Labour Market Enforcement and any future Single Enforcement Body across government and the charity sector, to ensure migrant workers are informed of and can exercise their rights.

## **Sexual Exploitation**

Sexual exploitation is the most common form of exploitation experienced by women. According to 2024 NRM data<sup>1</sup> sexual exploitation as a sole exploitation type

made up 10% of all referrals – a 13% increase in the number of referrals from the previous year. However, the proportion was much higher for women and girls (30% of female referrals) and higher still for UK women and girls (42% of female referrals). When looking at exploitation type by age of exploitation, sexual exploitation was reported for 60% of girls under 18 (as sole exploitation type or in combination) and 48% of referrals for women. The IASC has worked across government departments with officials and Ministers to push for clarity on CSE definitions which are currently unclear and varied across government. This must be rectified so that professionals are equipped to identify victims and so they can get access to the support they need and deserve.

In June 2024, the IASC visited Women at the Well, a charity that helps women who are affected by or at risk of sexual exploitation in London, to learn about the charity's advocacy and support services, and to discuss their views on how the demand for sexual exploitation should be addressed. The IASC also partnered with CEASE and UK Feminista in raising awareness of how pornography, prostitution, and human trafficking are interconnected through the 'Not for Sale' campaign launched at the Labour Party Conference in September 2024.

The IASC has explored international models for tackling sexual exploitation from organisations such as Nordic Model Now, international partners; and held discussions with the Domestic Abuse Commissioner on strategies for preventing re-victimisation -- such as increased support for victims of sexual exploitation currently in prisons. The

IASC will be continuing to work with the Domestic Abuse Commissioner's Office on mapping victim services/ interactions with professionals so effective interventions can be designed.

## **Pornography Review**

The IASC has been clear that more must be done to protect women and girls online, with the internet is acting as a facilitator of trafficking for sexual exploitation, and to ensure that the modern slavery offence established in the Online Safety Act 2023 is used to full effect. Recognising the role of the internet in facilitating trafficking, the IASC contributed to a roundtable on the Pornography Review, chaired by Baroness Bertin in February 2024. The IASC highlighted the pathways between online pornography and modern slavery, urging the review to examine recruitment methods, perpetrator tactics, and prevention strategies. Following the IASC's input, the Review underscored the links between pornography, sexual and violent offending, and trafficking. The government has since committed to working with law enforcement to address these crimes more effectively.<sup>15</sup>

The IASC has also repeatedly urged OFCOM to take a strong position to tackle modern slavery as a regulator of video sharing platforms within the UK. IASC office has been working with OFCOM as they develop their policy stance and operational response to modern slavery, and

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15 Letter to Baroness Bertin: government response to the Independent Pornography, DSIT, HO, MoJ, [GOV.UK](#), February 2025

to design a range of events to engage the sector and key players to support their efforts to operationalise the modern slavery offence.

## **Violence Against Women and Girls (VAWG)**

Modern slavery and human trafficking is one of the most severe forms of VAWG. Women and girls continue to be trafficked into sexual exploitation, with organised criminal groups profiting from a culture of impunity. In July 2024, the IASC published the policy brief: 'Violence Against Women and Girls: Protecting Female Victims of Modern Slavery',<sup>5</sup> calling for robust action against criminal gangs and for modern slavery to be addressed as serious and organised crime within the VAWG framework. The IASC also raised with the Minister for Women and Equalities and highlighted it at events such as part of the VAWG Conference at Oxford Brookes University in November 2024.

The IASC's in house analysis of 2024 NRM statistics showed a 19% increase in referrals for UK girls being sexually exploited, rising to 423 referrals, with a growing number of cases among girls under 15. Over a quarter (27%) of referrals for UK girls were for those under 15 at the time of referral, and 76% of these involved sexual exploitation as a sole or combined exploitation type.

The IASC continues to advocate that any government VAWG Strategy must include specific measures for victims of modern slavery, with a focus on prevention, protection, and recovery support and has held meetings with working level officials drafting the strategy, senior

Home Office officials, and ministerial meetings on this issue.

## **How this work aligns with the Strategic Plan**

- ✓ The IASC will work with parliamentarians and government departments on how to best tackle demand for sexual exploitation.
- ✓ The IASC will work with government and key stakeholders (such as Ofcom, the National Crime Agency's Child Exploitation and Online Protection, and the National Police Chiefs' Council Lead for Child Protection and Abuse Investigations) to press for greater efforts to tackle demand for child sexual exploitation.

# Making prevention everyone's business

The IASC has prioritised the prevention of modern slavery by highlighting the crucial role that individuals and communities across the UK can play in identifying and supporting victims. Despite the severity of these crimes, the true scale and impact of modern slavery often goes unrecognised. The Hestia report: 'On Our Streets: The Changing Face of Modern Slavery in London'<sup>16</sup> — for which the IASC wrote the foreword — revealed that only a quarter of the British public believe modern slavery is an issue in their area. There remains a significant lack of awareness about the victims of modern slavery, with criminals exploiting vulnerable individuals from all backgrounds, including UK nationals. In the foreword, the IASC stressed the importance of improving knowledge and understanding of modern slavery across all sectors of society to enhance victim identification and ensure that tackling modern slavery becomes everyone's responsibility.

## Convening and coordinating

Throughout 2024–2025, the IASC has taken a leadership role in convening stakeholders and the anti-slavery sector to raise awareness, share best practice, and encourage collective action. Key activities include:

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16 Report: 'On our streets: the changing face of modern slavery in London, Hestia, September 2024



- **Faith groups:** The IASC has engaged with major faith organisations—including the Muslim Council of Britain, the Catholic Church, and Lambeth Palace — encouraging them to leverage their networks as trusted sources of support for victims and survivors. In 2024, the IASC met with Peers representing faith communities and spoke at events such as the Diocesan Synod, chaired by the Bishop of Norwich, to highlight the challenge of modern slavery and the role of local communities in addressing it.
- **Researchers:** In October 2024, the IASC convened a meeting of UK modern slavery researchers and US Trafficking-in-Persons (TIP) Ambassador Cindy Dyer to discuss progress, funding gaps, and the relationship between research and policy change. Earlier in the year the IASC fed into the TIP Report. The IASC has advocated for robust funding mechanisms, integration of lived experience into research, and ensuring that research findings are visible and actionable. The IASC’s Research Advisory Group, established this year, brings together academics to share priorities and explore collaboration.
- **Local government:** In March 2025, the IASC, the Human Trafficking Foundation and the LGA convened a roundtable discussion with a range of Modern Slavery Coordinators, and officials from the Ministry of Housing, Communities and Local Government (MHCLG) and the Home Office Modern Slavery Unit to discuss the critical role that local authorities play in the national response to modern slavery, providing

essential support to victims and working with law enforcement to bring offenders to justice.

## **How this works aligns with the Strategic Plan**

- ✓ The IASC will convene and coordinate across all stakeholders who have a role to play in preventing modern slavery to make prevention everyone's business.

## **Private Sector**

The IASC has prioritised high-level engagement with government and industry to strengthen the private sector's response to modern slavery. Throughout this engagement IASC has made campaigning for robust MHRDD a central priority to strengthen the UK's response to forced labour and exploitation in business supply chains.

## **Mandatory Human Rights Due Diligence**

The IASC used appearances before the Business and Trade Select Committee (January 2025) and the Home Affairs Select Committee (March 2025) to call for the urgent passage of MHRDD legislation, which would require businesses to identify and address forced labour and exploitation in their operations and supply chains. The IASC also wrote to all MPs, outlining the urgency and necessity of such legislation to tackle forced labour and align with international best practice, and has been

speaking with government Officials and Ministers in DBT to raise the urgency of the issue. In the same vein in spring 2024, the IASC backed Baroness Young's Private Members Bill to introduce mandatory human rights and environmental due diligence.

Although the Bill did not progress, the IASC has continued to work with the private sector to adopt due diligence frameworks, mainly businesses are leading the way in this area. This has been a central theme in speeches to the Slave Free Alliance — whose members include over 15 FTSE 100 companies — and at the Stronger Together Conference, attended by major UK supermarkets and international partners.

The IASC has worked across Government on MHRDD and Import Bans. Discussing how these could be designed to protect workers and reduce forced labour in supply chains. As part of this work the IASC supported an amendment to the Great British Energy Bill to reduce the risk of public procurement of goods that were made with forced labour.<sup>17</sup>

## **Section 54 of the Modern Slavery Act**

To maintain momentum, the IASC has consistently called for the re-establishment of the 'Businesses Against Slavery' forum. This was raised with the Department for Business and Trade Minister Ghani and in correspondence with Jonathan Reynolds MP, Secretary of State for Business and Trade. The Home Office then

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17 Hansard, 21 March 2025.

launched the Forced Labour Forum, providing a platform for business feedback on updated Home Office guidance on Transparency in Supply Chains (TISC).

This guidance, published in March 2025, was drafted with the aim of helping business better comply with Section 54 of the MSA which requires companies operating in the UK with a turnover of £36 million or more to produce an annual slavery and human trafficking statement. IASC chaired a panel at the launch of the Home Office's new TISC guidance. This panel, with Minh Dang, Survivor Alliance, Sophie Desalis, British Retail Consortium, Andrew Crane, University of Bath and Louise Gleich, Justice and Care, explored how businesses can be encouraged to adopt the guidance and address harmful practices in their supply chain.

The IASC also marked the launch of this guidance, speaking on a podcast on and how we can make addressing modern slavery a business-critical issue again in the Institute for Human Rights and Business Podcast: 'The UK Modern Slavery Act – 10 years on where are we now?' that was released to coincide with the guidance launch.<sup>18</sup>

While the Act was a global first in introducing supply chain transparency, its voluntary nature, lack of enforcement mechanisms, and exclusion of public procurement have limited its effectiveness. Few

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18 IHRB Podcast: The UK Modern Slavery Act – 10 years on where are we now? – [Link, March 2025](#)

companies take their obligations seriously and publish meaningful statements. The IASC has made clear further legislation is needed. In August 2024, the IASC publicly criticised major car manufacturers—including Nissan, Kia, Hyundai, and Mercedes-Benz—for outdated or non-compliant statements, underlining the urgent need for reform.

## **Financial Conduct Authority and the London Stock Exchange.**

In June 2024, the IASC wrote to the Department for Business and Trade and the Financial Conduct Authority to raise concerns about the potential listing of Shein on the London Stock Exchange, highlighting risks of exploitation in their supply chain. This intervention prompted national media coverage and led to Shein being called to appear before the Department for Business and Trade Select Committee, where the IASC further raised concerns about supply chain transparency and accountability.

### **How this work aligns with the Strategic Plan**

- ✓ The IASC will: encourage a strengthening of the UK's policy response to forced labour in domestic and global supply chains; push for MHRDD legislation in the UK; work with businesses to improve compliance with provisions in the MSA and promote best practice.

## Public Sector

Section 47 of the Health and Care Act 2022 requires the Secretary of State for Health and Social Care to assess the potential risks of MSHT within NHS supply chains. In 2023, a review identified 21% of NHS suppliers as high risk, noted the reliance on supplier submissions and commented on the need for greater transparency in supply chains.

The IASC welcomed the draft National Health Service (Procurement, Slavery and Human Trafficking) Regulations 2024 as a positive step toward fulfilling this duty and setting corporate responsibility standards and has been worked with DHSC on the development of their consultation. In December 2024, the Department of Health and Social Care launched its consultation on the draft regulations and accompanying guidance which the IASC encouraged industry and the public sector to engage and respond to. In February 2025, the IASC also submitted their detailed assessment of the regulations and accompanying guidance as part of the consultation.

The IASC is now calling on the Cabinet Office to centralise these efforts and for all public sector organisations to follow suit to prevent the establishment of a two-tier procurement system and ensure that the whole of government is taking their responsibilities in tackling modern slavery seriously. The IASC office has been engaging with the Cabinet Office Public Procurement team, and at the political level, IASC has

provided briefs to MPs ahead of Ministerial meetings on public procurement.

## **How this work aligns with the Strategic Plan**

- ✓ The IASC will encourage public bodies to voluntarily emulate the transparency of supply chain provisions that modern slavery legislation across the UK requires of businesses.
- ✓ The IASC will work with the UK government, devolved administrations, and the NHS across the UK to support and monitor the delivery of key recommendations made in the December 2023 Review of risk of modern slavery and human trafficking in NHS supply chains.

## **Government**

In the Hestia report 'On our Streets' they found that 86% of MPs surveyed provided an incorrect estimate or said they 'don't know' roughly how many potential adult victims of modern slavery there were in the UK in 2022. Ten years on from the MSA and it clear that political momentum and knowledge of the scale of modern slavery in the UK has waned. This year, the IASC has focused on reigniting the urgency for a renewed cross-government strategy that reflects the changed landscape and nature of MSHT and addresses root causes and risks that can prevent MSHT occurring. In the absence of a strategy driving actions across government, IASC

has been directly engaging with key ministries, at the political level, and at the working level to ensure relevant departments take their responsibilities to tackle modern slavery. This includes work with the Ministry of Defence, MHCLG, Department for Business and Trade, the Department for Health and Social Care, Foreign Commonwealth and Development office.

This was a key theme in the IASC's evidence to the House of Commons's Home Affairs Select Committee and the House of Lords Modern Slavery Act 2015 Committee in March. Following the evidence session, the IASC wrote to the Committee to outline the key areas of her Strategic Plan: the prevention of exploitation of vulnerable people, improving identification and support of potential victims of modern slavery, increasing prosecutions for perpetrators, and improving our knowledge and understanding of modern slavery and human trafficking.

Following the General Election in July 2024 the IASC wrote to all MPs with a call to action asking for their support in bringing about change in these areas. This was complemented with a series of briefings in person to MPs and Peers to outline the key issues affecting victims of modern slavery.

To mark the ten-year anniversary of the MSA, IASC wrote to relevant Select Committees encouraging them to run a one-off session on modern slavery and human trafficking. The Home Affairs Select Committee consequently ran a one-off evidence session in March 2025 at which IASC gave oral evidence.



The IASC has engaged regularly with the government Ministers and the Home Office to urge it to set its commitment to tackling modern slavery by drafting a modern slavery strategy that includes a chapter on prevention. On Anti-Slavery Day in October 2024, the IASC spoke at Ministerial Roundtable to call for strategy that facilitated a more effective and coordinated approach. The IASC shared feedback on the Home Office Modern Slavery Units action plan and ensured that it included survivor engagement and clear governance structures and accountability. The IASC will be continuing to monitor and support its delivery over the coming year

## **Wales**

In January 2024, the IASC visited Wales to see first-hand how victim services are delivered and the approach to partnership between these organisations and law enforcement. During this visit, the IASC also met with the then Welsh Minister responsible its strategy to tackle modern slavery, the Cabinet Secretary for Culture and Social Justice, to discuss preventative approaches and how prosecutions across England and Wales. The IASC also met with Public Health Wales. The IASC has continued its close working relationship with officials and Ministers, sharing regular updates and information, consulting on policy briefs and materials and speaking at the Anti-Slavery Wales Forum and Anti-Slavery Wales Conference.

## **Scotland**

In January 2024, the IASC visited Scotland to meet with victim support organisations, the Children's Commissioner, the Trafficking Awareness Raising Alliance (TARA) and Survivors of Human Trafficking in Scotland (SOHTIS), Police Scotland's National Human Trafficking Unit and the Scottish Government and Ministers to find out about their work in increasing equity in access to support services and plans to improve advocacy and prevention.

In December 2024, the IASC contributed to Scotland's draft Vision Principles and Outcomes paper for the Trafficking and Exploitation Strategy refresh. The IASC welcomed the public health and preventative approach and recommended a stronger focus on data, evidence, and the central role of survivor voices. The IASC was pleased to see this incorporated and provided further advice and the impact of recent legislation (Nationality and Borders Act 2022, Illegal Migration Act 2023) and how these impacts can be mitigated. The IASC also welcomed Scotland's work on tackling sexual exploitation.

## **Northern Ireland**

The IASC has engaged with the Department of Justice, the Permanent Secretary and Minister on their executive programme across five departments in the Northern Ireland Government to address paramilitary groups and tackling exploitation. The programme looks to reframe the issue to focus on the gangs, rather than victim blame and

change the narrative to recognise that ‘recruitment’ into these groups is child abuse/child exploitation. They have developed a series of short films from different people’s perspectives, localised billboards and this new language has been infused through education and training programmes.

## **How this work aligns with the Strategic Plan**

- ✓ The IASC will: encourage the UK government to update its 2014 Modern Slavery Strategy for England and Wales; press for prevention to be prioritised in the development and implementation of all modern slavery strategies across the UK; and encourage close working across-government so that modern slavery is considered in the development of wider policies (e.g. safeguarding, poverty, migration).

## **International partnerships**

The IASC operates independently and is therefore not affected by government changes and can provide impartial analysis and recommendations. This independence is vital for fostering collaboration across stakeholders—both in the UK and internationally—and for objectively evaluating global responses to modern slavery.

To advance best practice and learn from global approaches, the IASC has engaged with partner

countries including the U.S, Australia, Canada, and New Zealand, as well as international organisations such as the United Nations Office on Drugs and Crime (UNODC) and The Organisation for Security and Co-operation in Europe (OSCE). These partnerships have helped IASC identify shared challenges, such as challenges in implementing non-punishment principle and to stay head of new and emerging forms of trafficking, such as forced surrogacy. By developing these relationships states can collectively improve their national response to modern slavery. IASC, was able to feed into Canada's upcoming modern slavery strategy at a roundtable with fellow OSCE member states that solicited international perspectives. IASC also contributed to the US Trafficking-in-Persons Report, submitting evidence on the state of play of the UK's efforts to tackle modern slavery.

In August 2024, the IASC addressed the Interparliamentary Taskforce on Human Trafficking — a consortium of parliamentarians, government leaders, and lived-experience experts—highlighting the need for statutory, independent anti-slavery commissioners to hold governments to account. The IASC's presentation, which aligned with the UNODC's campaign focus on child exploitation, was followed by an article for taskforce members to use in their advocacy.<sup>19</sup>

The IASC has also been working with international partners on how best to legislate and work with

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19 Interparliamentary Taskforce on Human Trafficking,  
August 2024

businesses to tackle slavery in supply chains. IASC contributed a chapter to the Commonwealth Parliamentary Association's *Tackling Modern Slavery in Supply Chains* e-handbook, providing guidance to parliamentarians on the importance of establishing Independent Anti-Slavery Commissioners with scrutiny and investigative powers in national legislation. Alongside this the IASC contributed to the Global Commission's on Modern Slavery and Human Trafficking's recent report looking at how forced labour can be addressed in supply chains.<sup>20</sup> IASC office also attended Wilton Park's conference on *Modern slavery, regulation and investment: finding a balanced approach to SDG8* with delegations, including trade ministers, from across Europe, Africa and Asia alongside businesses and civil society. This international engagement with regions where forced labour risks is high, is critical to ensure that legislation developed in the UK is applicable and achieves the desired consequences on the ground.

These international engagements reinforce the IASC's commitment to impartial oversight and to driving forward effective, evidence-based responses to modern slavery both in the UK and globally.

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20 Global Commission on Modern Slavery and Human Trafficking, April 2025.

## How this work aligns with the Strategic Plan

- ✓ The IASC will work with international partners to encourage and share best practice in preventing modern slavery and work with the UK government to encourage a co-ordinated focus on integrating modern slavery prevention into international policy and priorities.

# **Protecting victims – improving identification, victim care and support through the NRM and beyond**

The second pillar of the Strategic Plan focused on Protection and what can be done to improve the identification of victims and ensure they receive the right support in their recovery journey. Over the last year the IASC has looked at what can be done with FROs and how the NRM can be improved. The IASC has also looked at what steps can be taken to improve adult support and separately what can be done to help child victims of modern slavery.

## **Improving identification and the NRM**

### **First Responder Organisations (FROs') role in identifying victims**

Significant weaknesses persist in the UK's system for identifying victims of modern slavery and determining their status through the NRM. While the number of potential victims being identified continues to rise, the quality and consistency of their interactions with FROs vary greatly, as do the accuracy and timeliness of decisions. In 2024, the average wait time for a conclusive

ground's decision in the NRM reached 831 days<sup>1</sup> Moreover, 68% of negative conclusive grounds (CG) decisions that are challenged are ultimately overturned, highlighting serious flaws in the decision-making process.<sup>1</sup>

Disparities in outcomes are stark depending on the referring body. In 2024, 68% of referrals from non-statutory Non-Governmental Organisations (NGO) FROs resulted in positive CG decisions, compared to only 32% of those referred by Home Office agencies.<sup>1</sup> Inconsistent and poor decision-making by competent authorities retraumatizes victims and delays access to support. This problem is compounded by a lack of consistent training and guidance for FROs. Survivors have reported to the IASC that first responders often fail to fully explain the implications of the NRM or the length of the decision-making process, undermining meaningful consent and leaving victims uninformed about their rights and options.

In response, the IASC convened non-statutory FROs to build an understanding of live operational issues in the victim referral process to propose interim improvements to the Modern Slavery Unit. These included mandatory trauma-informed training for First Responders and targeted updates to Modern Slavery Statutory Guidance—such as streamlining Annex E into practical tools, clarifying pre-Reasonable Grounds extension procedures, and defining ‘exceptional circumstances’ for reconsideration—to enhance consistency, decision-making, and timely victim support.



The IASC has been advocating for stronger engagement with FROs from the Home Office and greater transparency from the Single Competent Authority (SCA). The Home Office confirmed the scheduling of an SCA stakeholder away day—prompted by the Commissioner’s persistent follow-up—and re-established the FRO forum to support more effective frontline collaboration and communication

## **Border Force**

Identifying and investigating cases of modern slavery is particularly complex for Border Force who are often able to identify a MSHT case prior to exploitation in the UK occurring. In February 2024 the IASC visited Gatwick Airport to see firsthand the challenges that Border Force and their Safeguarding and Modern Slavery (SAMS) Officers face in identifying trafficked victims in an environment where fear, trauma, and uncertainty can inhibit a victim’s ability and willingness to provide information.

To support frontline staff, the IASC contributed to a training film for SAMS, emphasising the importance of a trauma-informed approach in victim identification and care. The IASC also highlighted the critical role Border Force plays not only in protecting potential victims but also in disrupting organised criminal groups and preventing exploitation. This includes supporting operations such as Operation Hebwich and raising awareness through initiatives like Operation Karetu,

which targeted the risks of labour exploitation for those travelling to the Balearic Islands for seasonal work.

Recognising the evolving threat landscape, the Government appointed the UK's first Border Security Commander in September 2024. The IASC has engaged with this new team and will be working to ensure that strategies to combat illegal migration and criminal smuggling gangs do not compromise protections for victims of modern slavery and human trafficking.

## **Health**

A key theme to come out of the IASC's discussions with survivors has been the important role that health professionals can play in identifying and supporting victims. Often opportunities to spot the signs had been missed and they had experienced challenges accessing ongoing health care support. The IASC has been investigating this in further detail, meeting with the Chief Medical Officer to explore the barriers whether that be training, lack of awareness or where further research was needed.

The IASC has been working in partnership with the Royal College of Nursing (RCN) and Royal College of GPs (RCGP) to look at current training and resources and supporting with awareness raising communications to its members. The IASC will also be engaging with Integrated Care Boards and Integrated Care Partnerships on its nationally mandatory training through working with NHS England's Domestic Abuse and Sexual Violence team.

In July 2024, the IASC met with the CEO for NHS Wales/ Director-General for Health and Social Care who will be conducting an audit/mapping exercise with health colleagues in the Welsh Government to identify existing policy and practice on tackling modern slavery and exploitation in Wales. The Welsh Government will be sharing their findings once the audit is complete.

## **Prisons and Probation**

The prison and probation service also play an important role. The IASC worked with HMPPS on what can be done to support victims and reduce modern slavery in prisons. This was outlined in an interview for the Prison Service Journal.<sup>21</sup> HMPPS can identify potential victims in their care and make a difference through trauma-informed support that can prevent re-victimisation. This is part of wider work with the IASC has been doing with the HMPPS team to support the development of their modern slavery policy framework.

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21 Journal: Interview with Eleanor Lyons, Independent Anti-Slavery Commissioner, Pg 55 – 58, Prison Service Journal, September 2024

## How this work aligns with the Strategic Plan

- ✓ The IASC will push for trauma-informed, victim-centric training for all designated first responders and statutory services who may encounter potential victims and support the work of non-first responder organisations like the NHS and HM Prison and Probation Service in their efforts to identify potential victims.

## Immigration Detention

Established by Focus on Labour Exploitation (FLEX) in 2019, the Detention Taskforce is comprised of 13 expert organisations working with, or for, victims or survivors of trafficking. The Taskforce works to build a better system for survivors of trafficking in immigration detention. The IASC has been engaging with the Taskforce on their concerns regarding NRM referrals not being taken forward or not being accessed for those in detention with some potential victims in migration detention not even aware that there are in NRM. The IASC has ensured that these concerns are communicated to Immigration Enforcement Competent Authority (IECA)s and Home Office Minister, requesting greater transparency on the decision-making process.

## How this work aligns with the Strategic Plan

- ✓ The IASC will call for clear communication to FROs of the implications of recent legislative and policy changes for potential victims of modern slavery, to improve awareness and understanding.

## Improving adult victim care and support

### The Slavery and Trafficking Survivor Care Standards

The Slavery and Trafficking Survivor Care Standards, first published in 2014, were created to ensure that adult survivors of trafficking across the UK receive consistent, high-quality care. Since the Care Standards were initially introduced in 2014, the landscape has significantly changed with the introduction of legislation and statutory guidance impacting how and where victims and survivors seek help and support.

In the report ‘Ten years of the Slavery and Trafficking Care Standards’<sup>22</sup> the IASC supported the case for the care standards to be updated with a renewed focus on improving outcomes for victims and survivors and ensuring they receive the tailored and compassionate care they deserve. To ensure that the refreshed Care Standards are an anchor to good practice and

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22 Report: ‘Ten years of the Slavery and Trafficking Care Standards’ [Rights Lab](#), September 2024

crucially are based on lived and learnt experience from survivors. The IASC also contributed to the funding of the Human Trafficking Foundation to assist with the facilitation of the first working group meetings made up of those with lived experience and representatives from grassroots organisations. The IASC will be continuing its involvement as part of an advisory group for this project leading up their publication in October 2025.

## **Maternity Care**

The IASC spoke at the launch of the 'Building a safe space: optimising maternity care for survivors of modern slavery' project launch. The project led by the University of Nottingham and Causeway are looking at optimising maternity care for survivors of modern slavery. The outcomes of the study will be used to inform and create resources for women and professionals to improve health outcomes for mothers and children.

### **How this work aligns with the Strategic Plan**

- ✓ The IASC will work with government and devolved administrations to call for support services to be tailored to individual needs providing holistic, long-term, trauma-informed, and culturally competent interventions and developing trusted relationships between practitioners and survivors.

## Potential victim journey through the NRM

The IASC has repeatedly heard from survivors that the NRM, what it means, and its timelines were never fully explained to them. Currently victims' journeys through the NRM vary too much depending on their postcode, who referred them and whether they have access to advocacy support, and type of exploitation they have endured. IASC therefore notes the Home Office commitment to assessing identification methods and how these methods and definitions affect a victim's journey through the NRM and will be monitoring its progress. IASC will continue to engage with the Home Office Modern Slavery Unit as they develop a new work stream on reviewing definitions around modern slavery exploitation. The IASC's co-commissioned research with the Modern Slavery and Policy Evidence Centre on definitions of child exploitation and child trafficking will help shape this policy development.

### How this work aligns with the Strategic Plan

- ✓ The IASC will push for a review of the NRM and the decision-making process with a focus on ensuring that support is tailored to the individual needs of all potential victims and that timescales are reduced.



## Independent Advocacy

Victims and survivors of MSHT are required to navigate complex systems, services and legislation at a time when they are most isolated and vulnerable. The IASC has been a vocal advocate for the importance of access to an Independent Modern Slavery Advocate (IMSA). An IMSA is a trained expert who considers the survivor's social needs and legal rights together and works with the survivor to understand and navigate this landscape, while helping them to overcome barriers and empowering them to make informed decisions about their recovery. In January, the IASC supported the IMSA Model development project<sup>23</sup> - led by Hope for Justice, British Red Cross, The Snowdrop Project and the Bakhita Centre for Research Slavery, Exploitation and Abuse, together with consultants with lived experience of modern slavery, this initiative offers a national, accredited model of independent advocacy.

### How this aligns with the Strategic Plan

- ✓ The IASC will work with the government and the sector to push for victims of modern slavery to have independent advocates in their recovery journey to help them navigate complex systems.

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23 IMSA Model Development Project, 3 January 2024, [Link](#)



## **Victims and Prisoners Act**

The Victims and Prisoners Act 2024 is a comprehensive piece of legislation enacted to enhance support for victims of crime and reform aspects of the criminal justice that aimed to place victims at the centre of the justice system by enhancing their rights and the support they receive. This includes the appointment of independent advocates to assist victims during major incidents and ensuring that victims are no longer treated as bystanders but play a central role in the justice process.

During the passing of the Act, the IASC was successful at ensuring that the duty to collaborate guidance supporting the Act included modern slavery and that the IASC was named as a statutory consultee as part of this legislation. The IASC had also called for Independent IMSA to be put on the same footing as Independent Domestic Violence Advocates (IDVAs) and Independent Sexual Violence Advocates (ISVAs) in the guidance, but this was unable to come to fruition before the Act was passed in wash-up before the General Election in July 2024. The IASC will be continuing work with Ministry of Justice on getting the schedule to guidance amended.

## **Legal Aid and Compensation**

Many survivors that IASC consulted in the development of the Strategic Plan mentioned they had had issues accessing legal aid and getting legal representation (in particular, from immigration lawyers) to take on their cases. The cost of legal representation was referenced by survivors who could not afford their own solicitors.

They noted that the two-week window to appeal a negative decision could make a person more vulnerable to exploitation whilst trying to fund legal fees.

In July 2024 new data highlighted that only a small fraction of modern slavery survivors in the UK apply for compensation through the Criminal Injuries Compensation Authority (CICA), with a vast majority of victims denied an award.<sup>24</sup> The data showed that at least 32% of survivors who applied for CICA navigated the complex application process without legal representation with the leading reason (39%) for refusing trafficking victims CICA was that the exploitation was not deemed a 'crime of violence' under the scheme's rules. The IASC voiced her concerns at this and called for a more consistent access to legal aid that could help survivors navigate the complex processes and receive the compensation that they are rightly entitled to.<sup>25</sup>

In January 2025, the Government has launched a consultation on legal aid. The IASC will be working with frontline victim services to monitor and assess its impact.

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24 Modern slavery, human trafficking and compensation (CICA), 23 July 2024, [Link](#)

25 News: 'Trafficking victims being turned down for compensation in horrendous failing', [The Independent](#), July 2024

## How this aligns with the Strategic Plan

- ✓ The IASC will work with legal practitioners to identify how to improve access to expert legal advice for modern slavery survivors and will work with the government to encourage an increased level of legal aid support for survivors.

## Multi-agency partnerships

### Modern Slavery Coordinators

Local Authorities play a critical role in tackling modern slavery, providing victims with housing, support and collaborating with law enforcement to bring perpetrators to justice. Under the MSA, Local Authorities (Las) must notify the Secretary of State about all suspected victims however, they receive no dedicated funding for modern slavery from central government. Approximately 9 out of 339 local authority districts in England and Wales have specialist Modern Slavery Coordinators (MSCs), creating a damaging “postcode lottery,” where a modern slavery victim’s access to support depends entirely on their location - an unacceptable disparity.

In January 2025, the IASC underscored the critical role of LAs in addressing systemic gaps to combat modern slavery and joined the Human Trafficking Foundation and LGA in calling for consistent funding, clearer statutory guidance, and streamlined policies to empowering councils in the report: *Acting Local: The Need for Modern*

Slavery Coordinators in Local Authorities.<sup>26</sup> As referenced earlier, the IASC jointly convened a roundtable in March 2024, with the Human Trafficking Foundation and the LGA with a range of Modern Slavery Coordinators, and officials from MHCLG and the Home Office Modern Slavery Unit to discuss the critical role that local authorities play and the need for earmarked funding for coordinators to be in every part of the UK.

## **How this work aligns with the Strategic Plan**

- ✓ The IASC will work with multi-agency partnerships local and national anti-slavery actors to support and share best practice in tackling modern slavery and supporting victims.

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26 'Acting Local: The Need for Modern Slavery Coordinators in Local Authorities' Human Trafficking Foundation, January 2025

# Improving care and support for child victims

The IASC has been actively calling for the expansion of devolved decision-making pilots and the nationwide availability of ICTGs to better advocate for the needs of child victims of trafficking across the UK. ICTGs are designated professionals who provide critical support to child victims of trafficking, ensuring their voices are heard and their needs are met, especially in legal and welfare processes. The IASC's stresses that every child victim of trafficking should have an ICTG to represent their best interests and safeguard their rights, particularly given the complexities of child trafficking cases and the vulnerabilities involved. The IASC visited and met with some of the ICTGs to hear about their work and role, the Barnardo's team also hosted the IASC on a visit to the Welsh Government.

Alongside this, in December 2024, the IASC, in collaboration with ECPAT UK, highlighted these issues in the report 'Child Trafficking in the UK 2024: A Snapshot'<sup>2</sup>. The IASC specifically urged the expansion of the NRM devolved decision-making pilot programme, which gives local authorities greater autonomy to make decisions about the care and support of child trafficking victims. The IASC argued that rolling out this pilot nationwide would help ensure more localised, informed, and effective decision-making in the protection and support of these vulnerable children.

## Clarity on child trafficking definitions and guidance

The UK's devolved child protection framework and varying trafficking laws and definitions of types of exploitation are hindering the UK's efforts to prevent and tackle the demand for child trafficking. The IASC has co-commissioned a piece of research alongside the Modern Slavery and Human Rights Policy and Evidence Centre (MSPEC), that aims to clarify definitions of child trafficking, including child sexual abuse, CSE, and CCE<sup>27</sup>. The findings from this research will be published in early summer 2025.

### How this aligns with the Strategic Plan

- ✓ The IASC will call for devolved decision-making pilots to be rolled out for child victims across the country and for all children to have ICTGs to advocate for their needs.

## Adult consent to be referred into the NRM

Consent is required for an adult to be referred into the NRM; if a potential victim declines, first responders must complete a Duty to Notify (DtN) referral if they suspect exploitation has occurred. In 2024, the number of adults

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27 'Definitions of child exploitation', [MSPEC](#), March 2025

refusing NRM support reached a record high of 5,598 DtN reports. This trend is concerning, as those who decline NRM entry do not receive the support available through the Modern Slavery Victim Care Contract, and little is known about the reasons behind increasing refusal rate. To address this gap, the IASC commissioned exploratory qualitative research with the Rights Lab at the University of Nottingham to investigate why adult victims are choosing not to enter the NRM and to identify measures that could help reduce refusal rates. The full findings from this research and what this means for understanding prevalence and nature of modern slavery will be published in spring 2025.

## **How this aligns with the Strategic Plan**

- ✓ The IASC will work to better understand the reasons behind increases in DtN referrals in England and Wales and call on the government to collect and publish more detailed, granular DtN data. The IASC will also support work by the devolved administrations to implement a DtN.

# **Prosecuting offenders and supporting victims through the criminal justice system**

The third pillar of the Strategic Plan focused on Prosecution and what can be done to improve the criminal justice response to modern slavery. Over the last year IASC has been looking at how policing responses to modern slavery have evolved, identifying challenges in applying modern slavery legislation and promote processes that enhance evidence-led prosecutions that reduce reliance on victim testimony, and support initiatives that maintain victim engagement in the Criminal Justice System.

## **Law enforcement and improving prosecution rates**

Despite the growing number of NRM referrals, and positive CG decisions confirming thousands of victims of modern slavery, the number of prosecutions of perpetrators of modern slavery remain comparatively very low. Many perpetrators are not being held accountable for their crimes.

From 2018 to 2024, there have been 93,863 NRM referrals, 32,587 positive CG decisions but only 2,679 prosecutions. Although there was some impact on the criminal justice system because of the Covid pandemic,



prosecution numbers have not improved significantly since then.

The legislation is not being used as too often police believe that the evidence threshold is too challenging to meet and will charge on lesser offences. Failings in the support system, mean that victims struggle to remain engaged in the criminal justice system. This does not give survivors the justice they deserve.

## **Using the provisions of the Modern Slavery Act**

This year the IASC has been investigating the challenges in prosecuting perpetrators of modern slavery through engagement with stakeholders across law enforcement including the Director General of the NCA, the Crown Prosecution Service (CPS), Scotland's Crown Office and Procurator Fiscal Service (COPFS), His Majesty's Prison and Probation Service and colleagues from TOEX and the Modern Slavery and Organised Immigration Crime unit (MSOICU).

To gain a holistic view on how these challenges and approaches to application of the MSA have evolved and what this can reveal about best practice, the IASC commissioned research to understand the evolution of the police response to modern slavery crime since the introduction of the MSA in 2015. This report explores how the police understand modern slavery crime, how that understanding has changed over time, how the police response to modern slavery intersects with adjacent

crime types and, whether there is sufficient clarity and understanding as to what is and what is not modern slavery. It also works to understand why and when police officers and the CPS chose to charge under acts with lesser offences, as opposed to the MSA to identify barriers to its use.

Further information on this project can be found in the 'Priority Research Areas' section.

The IASC has been working with the CPS in their set up of the CPS Modern Slavery Scrutiny & Involvement Panel (MSNSP) which aims to ensure transparency and accountability in the CPS' approach to modern slavery and will act as Chair. This provides a forum for criminal justice partners to consult on issues related to modern slavery and human trafficking, offering case scrutiny, sharing best practices, and will help improve casework decisions and ensure greater consistency in CPs' case handling of modern slavery prosecutions.

## **How this aligns with the Strategic Plan**

- ✓ The IASC will work to understand further how provisions within the legislation in England and Wales, Scotland and Northern Ireland to tackle modern slavery and support law enforcement in prosecuting criminals are being applied, and work to improve implementation.

- ✓ The IASC will work with law enforcement across the UK to ensure the right training and teams are in place to increase prosecutions and promote best practice sharing.

# Supporting victims' journeys through the criminal justice system

Despite a growing number of victims being identified and receiving positive CG decisions, the UK continues to fall short in delivering justice for survivors of modern slavery. Prosecution rates remain unacceptably low, and the criminal justice system is often traumatising and difficult for victims to navigate. According to the latest CPS data (Q3 2023/24 to Q2 2024/25), there were only 450 completed prosecutions for modern slavery offences, with 335 resulting in convictions (74%), compared to 9,734 positive CG decisions in 2024. This stark disparity highlights the urgent need for a more victim-centred approach and greater accountability for perpetrators.

In September 2024, Hope for Justice published 'Beyond Survival: Living free, not in survival mode and being able to dream again'<sup>28</sup>, a report grounded in survivor consultation that highlights persistent failures in delivering justice for survivors of modern slavery. The report includes several recommendations about how the system can be changed to improve 'justice' outcomes for survivors and recognises that justice to survivors, does not always mean criminal justice outcomes.

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28 Report: 'Beyond Survival: Living free, not in survival mode, and being able to dream again' Access to justice in the UK's response to modern slavery, Hope for Justice, [Link](#), September 2024

The IASC's approach over the past year has reflected these survivor-informed findings and looking at access to justice more holistically than simply through criminal justice outcomes. This has meant focusing on legislative reform and definitions so that victims are identified correctly and referred to appropriate support and pushing for victim access to support workers and advocacy roles such as IMSAs that support victims in building agency, and crucially pushing for survivor voices to be integrated into Government policy design. It is through this work, and systems that work better for survivors, that access to justice is achieved and greater trust in the criminal justice system is then built.

### **How this aligns with the Strategic Plan**

- ✓ The IASC will seek to identify further measures that help strengthen modern slavery victims' engagement and trust in the criminal justice system.

## **Supporting the needs of victims**

When talking to survivors about their experience of the criminal justice system, many acknowledged that their experiences whilst being exploited made them distrustful of the police and authorities. When victims don't want to engage in the criminal justice system it is hard to secure prosecutions. Currently, one way that victims of modern slavery can be supported through the criminal justice system is by Victim Navigators. These Victim Navigators

are embedded in some police forces and the GLAA to provide support for victims and build trust with victims. The Scottish Government currently funds two Victim Navigators to work alongside Police Scotland's National Human Trafficking Unit.

The IASC raised the importance of this being integrated into the Government response across the four nations in front of the Home Affairs Select Committee, in Ministerial engagements and, has been working with the Modern Slavery Organised Immigration Crime Unit to map out different fundings streams that can fund victim advocate roles to help improve prosecutions across the UK.

Victim Navigators have also been able to advise the police on how to gather best evidence from their clients by approaching them in a trauma-informed way. Victim Navigators have provided strategic advice in over 1,000 investigations (to March 2024) and have increased victims' engagement with the police to 92%, providing police with key evidence to improve investigations and prosecution rates. Embedding a Navigator Hub in every Regional Organised Crime Unit (ROCU) will see every police force and survivor have access to the support provided by a Navigator. It will also allow ROCUs to utilise the resource to help improve investigations into modern slavery, and to increase victim identification and engagement.

## **Evidence-led prosecutions**

The IASC has also been supporting the TOEX to secure more stable funding, and for it to better integrated into

the policing response to MSHT, encouraging more police forces to use its services. TOEX enables enhanced data sharing and intelligence analysis across police forces, law enforcement agencies, and partners. This leads to, earlier identification of organised crime groups, better understanding of patterns, routes and methods used in MSHT, and linking seemingly isolated cases across different regions in the UK and internationally.

To improve prosecution rates, the Government needs to focus its efforts on supporting victims through the criminal justice system, and, at the same time build its capability to run investigations that are not solely reliant on victim testimony. This means, increasing the number of financial investigators dedicated to modern slavery, improving the way in which intelligence data is stored and shared across forces, and building social media auditing capability. IASC has been supporting the GLAA's work to better track online false advertising of jobs to migrant workers that trick people into exploitation and modern slavery, to both help prevent modern slavery but also identify rogue operators so that they can be held accountable.

The IASC has worked to unblock some of these barriers including: information sharing with the Department of work and Pensions (DWP) so law enforcement can access potential perpetrators information through DWP; working with the CPS on how law enforcement can engage earlier with CPS to lead to more evidence based prosecutions; and engaging HMRC and the Financial Conduct Authority (FCA) on how as regulators, they can

ensure financial services are doing their bit in helping law enforcement identify and target the organised gangs that have been using bank accounts of children and vulnerable adults to launder their illicit proceeds.

## **How this aligns with the Strategic Plan**

- ✓ The IASC will work with law enforcement across the UK to identify new approaches to training and guidance that could lead to more evidence-led prosecutions.
- ✓ The IASC will advocate for the rollout of Victim Navigators across the UK

## **Working in partnership**

In May 2024, IASC wrote to all newly elected and incumbent Police and Crime Commissioners (PCCs) following their election to the role to encourage all Commissioners to make tackling modern slavery a priority in the refreshed Police and Crime Plans.

This was followed by a series of meetings and visits with PCCs, Deputy PCCs, Deputy Mayors for Policing and Crime and senior Police Officers to discuss the challenges faced in improving prosecutions rates including:

- Police Scotland National Human Trafficking Unit
- South Yorkshire Police
- OPERATION Fort Investigation Lead



- TOEX
- MSOICU
- London Deputy Mayor for Policing
- Deputy Police and Crime Commissioner for Merseyside
- Met Police and Crime Commissioner
- Met Modern Slavery and Child Exploitation Unit
- Police and Crime Commissioner for North Wales
- Police and Crime Commissioner for Lancashire
- Policing Foundation
- West Yorkshire Police and West Yorkshire and Humber Regional Organised Unit
- North Kent Police

## **How this aligns with the Strategic Plan**

- ✓ The IASC will work with all law enforcement partners in their efforts to tackle MSHT in the UK and abroad to encourage cross-partnership working and to ensure it is a joint priority to tackle this horrific crime.

- ✓ The IASC will work with police forces across the UK, the Crown Prosecution Service in England and Wales, the Crown Office and Procurator Fiscal Service in Scotland, and Public Prosecution Service for Northern Ireland to encourage increased partnership between law enforcement and prosecutors to increasing the number of prosecutions of modern slavery cases.

# Integrating lived experience

A cross-cutting theme of the Strategic Plan is the importance of integrating lived experience into Government policy design. Championing the importance of incorporating lived experience into policy development has been a consistent and strong thread through all the IASC's work this year. In the development of the IASC's Strategic Plan, the Commissioner met with survivors in a series of roundtables, these included Hestia's Empowered Voices forum, and MSPEC's Panel, and the University of Nottingham Rights Lab's Lived Experience Advisory Panels. Alongside this, the IASC has visited safe houses across the UK and worked with survivors for events such as the curation panel for Hestia's 'Art is Freedom' exhibition.

In March 2024, IASC met with 'Empowered Voices' a group of female survivors supported by Hestia. This engagement provided a platform for survivors to share their experiences and inform the Commissioner's understanding of the challenges faced by women who have endured modern slavery. On publication of the Inquiry in sexual exploitation in Telford, the IASC paid testament to survivors that had bravely given evidence to the Inquiry and called for a national Survivors Council to be established. The importance of listening to survivors of

sexual exploitation to help to save children was promoted in local and national news outlets.<sup>29</sup>

## Survivors Advisory Council

At the start of the year, the IASC conducted extensive research and consultation, looking at advisory council models both at a national level (such as in the US) and in the third sector (such as LEAP, the Human Trafficking Foundation's Lived Experience Advisory Panel). The IASC spoke to international equivalents and partners to hear about how a Council should be created. This project resulted in a comprehensive business case for funding for the establishment of a Survivor Advisory Council that was submitted to the Home Office in April 2024. The IASC also convened the Home Office and the Foreign and Commonwealth Development Office (FCDO) to try and take this forward. The Home Office unfortunately decided not to take this business case up, citing funding challenges amid Spending Reviews. The IASC did offer to give some of the IASC budget from FY 24/25 towards running a pilot and/or to help get this started. The Home Office did not take up this offer.

In the absence of a government commitment currently for such a council, the IASC has continued to call for the incorporation of lived experience in government policy design. For example, the IASC office has repeatedly

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29 News: 'How listening to survivors of child sexual exploitation has helped save more children', [Link](#), July 2024

raised concerns about the lack of inclusion of survivor voices in Home Office action plan drafts and has requested that this is incorporated in the Home Office governance structures such as their Modern Slavery Engagement Forums. Particularly since IASC had secured an amendment to the wording of a pledge between members of civil society and the Home Office agreed upon on Anti-Slavery Day, that agreed to put survivor voices at the front and centre of policy design.

## **How this aligns with the Strategic Plan**

- ✓ The IASC will work with the UK anti-slavery sector and the government to establish a national Survivors Advisory Council consisting of those with lived experience of modern slavery, creating an empowered platform to help integrate survivors' perspectives into the work of the IASC, inform development of policy by the government and provision of improved support to victims.

# Improving knowledge and understanding

## Improving understanding

Modern Slavery research has made significant progress since 2015. From breakthroughs in technology – using satellite imagery to detect forced labour and machine learning to analyse online child exploitation – to innovation in tracking prevalence of modern slavery and evaluating the impact of interventions. Greater efforts have also been made to meaningfully incorporate survivor voices into research and policy design.

In October 2024, the IASC convened UK modern slavery researchers and US Trafficking-in-Persons Ambassador Cindy Dyer<sup>30</sup> to discuss progress in modern slavery research in the UK and how these challenges can be overcome – including how research can meaningfully contribute to fast-moving policy agendas, improving data collation and researchers access to it, and how short-term funding impacts the capacity for depth and longevity of studies.

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30 News: ‘IASC research roundtable with Cindy Dyer, the US Trafficking in Persons Ambassador’, [Link](#), October 2024

## **Researchers Expert Advisory Group**

The IASC committed to fostering collaboration between researchers, NGOs and government to ensure insights from the frontline, are analysed with academic rigour, and meaningfully influence policy. In January 2025, the IASC office hosted its first Researchers' Expert Advisory Group, inviting academics across research institutions to share their current research priorities and discuss potential collaboration. These roundtables will continue on a quarterly basis through the forthcoming year as part of the IASC's objective to building a system where evidence-based, survivor-centre policies are driving the UK's response to modern slavery.

In addition to the Researcher Expert Advisory Group, the IASC also has had regular meetings to discuss research and data priorities with experts across the sector. This has included the Nottingham Rights Lab, MSPEC, the Youth Endowment Foundation, Justice and Care and other leading academics at University of Birmingham, University of Hull and Royal Holloway, University of London.

## **Unlocking barriers to data sharing**

### **Data Experts Advisory Group**

To focus on the growing importance that data, data science and AI has on identifying and protection modern slavery victims, the IASC also convened a Data Advisory Group with the first meeting in early March 2025. The group consists of leading academics, government and

public sector analysts (including Home Office, Ministry of Justice and the National Crime Agency (NCA)).

In the first meeting, hosted at the University of Birmingham, the group discussed the IASC's data priorities, such as modern slavery prevalence estimates; data challenges, such as data silos, data sharing, data gaps and developing a data strategy for the sector. These meetings will continue on a quarterly basis focusing on developing a data strategy for the sector to encourage more data access, data collection, data sharing and developing innovative methods. The group will also discuss and provide advice on the use of the IASC information collection powers to help to fill evidence gaps. This is crucial to informing strategy and policy development, and service delivery.

## **Data Sharing Agreements**

The IASC and the Home Office have a mutual data sharing agreement within their joint MOU. The IASC requested data from the Home Office in 2024 to inform a joint report with Every Child Protected Against Trafficking (ECPAT) on Child Trafficking in the UK<sup>2</sup>. The Home Office was unable to share data on immigration leave for children that was requested. The Home Office has worked with the IASC on transparency around how NRM and DtN data has been collated. The IASC continues to work with the Home Office research and analysis team, and the office sits on the IASC Data Experts Advisory Group.



# Priority research areas

## Estimating the prevalence and nature of modern slavery

### Prevalence

The estimation of UK modern slavery prevalence has varied between 10,000 and 136,000 with numbers produced using different methods and different data sources. The IASC has stressed that there is an urgent need for a new, robust UK prevalence estimate to provide much needed evidence for formulating modern slavery law and policy, made particularly pressing need for the government to develop a revised Modern Slavery Strategy (as recently recommended by the Home Affairs Committee<sup>31</sup> and US Department of State <sup>32</sup>).

In January 2025, the IASC part-funded the Rights Lab at the University of Nottingham to carry out a scoping review of all available data sources and methods of calculating modern slavery prevalence figures, with a view to propose a recommended approach of calculating an updated UK figure. This includes mapping all data sources and methodologies, assessing strengths and weaknesses of approach and surveying expert stakeholders on their recommendations.

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31 'Human Trafficking', House of Commons Home Affairs Committee, December 2023

32 2024 Trafficking in Persons Report, Office to Monitor and Combat Trafficking in Persons, June 2024

The final report, with an accompanying recommended research protocol and policy brief, will be published in summer 2025. The IASC will strongly support the use of this methodology to calculate a modern slavery prevalence estimate for the UK.

## **How this work aligns with the Strategic Plan**

- ✓ The IASC will continue to work closely with researchers to support work developing methodologies for UK prevalence estimation. The IASC will also look at what research needs to be done to improve the understanding of the prevalence and demographic nature of modern slavery in the UK.

## **Forecasting and mapping the risks of modern slavery**

### **Overlapping threats to freedom**

The IASC commissioned research on ‘Overlapping Threats to Freedom: Understanding Vulnerability to Modern Slavery’. This research, conducted by undergraduate students at the University of Nottingham between October and December 2024, examines the prevalence of vulnerabilities associated with modern slavery and how they intersect, to consider how multi-agency systems can be strengthened to address these overlapping vulnerabilities. Using a mixed-methods approach, the research drew on a rapid literature review,

data analysis, stakeholder interviews, and a preliminary exploration of current multi-agency frameworks such as the Slavery and Exploitation Risk Assessment Conference (SERAC) model developed by Nottingham City Council.

The findings from the research show that an increasing number of victims of modern slavery have more than one vulnerability that makes them more susceptible to exploitation. Some of the vulnerabilities examined include low-income status, unstable accommodation, Gender (female) and immigration status. Based on these findings, the IASC has made actionable recommendations for key stakeholders to improve understanding and the response to modern slavery, comprehensively taking multiple overlapping needs into account. These recommendations aim to improve the effectiveness of interventions and better safeguard those at risk of exploitation.

## **Homelessness**

Modern slavery is closely linked to homelessness, with homeless individuals particularly vulnerable to exploitation and trafficking. Many survivors experience homelessness both during and after recovery, underscoring the vital role of the homelessness sector in identifying, supporting, and preventing exploitation. Despite this, there is limited research on the effectiveness of modern slavery prevention initiatives within homelessness organisations and statutory agencies, and a lack of clear guidance on developing such projects.

To address these gaps, the IASC has partnered with The Passage, a London-based charity supporting people who are homeless or at risk of homelessness, to assess the current landscape, identify effective strategies, and strengthen prevention frameworks within the sector. Initial findings indicate that improving access to safe, affordable housing and offering comprehensive support services are key to reducing the risk of exploitation by addressing the root causes of housing instability. The final report from this research will be published in early summer 2025.

## **How this work aligns with the Strategic Plan**

- ✓ The IASC will support efforts by researchers and across the UK anti-slavery sector to identify new methods of forecasting and mapping the risks of modern slavery in the UK.

## **Understanding the changing forms of modern slavery**

### **Policing modern slavery crime: 10 years on since the Modern Slavery Act**

The MSA consolidated existing criminal legislation related to human trafficking into one piece of legislation and formally introduced the concept of modern slavery. However, a decade on both the political narrative and operational responses to modern slavery crime have evolved considerably. The nebulous nature of the

concept of modern slavery means it has always captured various forms of exploitation. Arguably over time the legislation has been applied in areas way beyond those for which it was originally conceived. For example, the police and the CPS now use modern slavery legislation to prosecute those involved in recruiting children into county lines activity. We have also seen an increased focus on Organised Immigration Crime which overlaps with tackling modern slavery in complex ways. Victims of modern slavery are thus likely to receive highly variable responses in terms of investigation and victim care.

To better understand how the law enforcement response has evolved and whether changes are required to improve outcomes for victims, the IASC commissioned new research in January 2025 to seek to understand the evolution of the police response to modern slavery crime since the introduction of the Act. Through conducting an evidence review, interviews and focus groups with modern slavery leads and experts and by surveying frontline police officers, it will ask how the police understand modern slavery crime and how that understanding has changed over time. It will also investigate how the police response to modern slavery intersects with adjacent crime types and whether there is sufficient clarity and understanding as to what is and what is not modern slavery. The final report including what this means for law enforcement and government strategies will be published in late spring 2025.

## How this work aligns with the Strategic Plan

- ✓ The IASC will work with the UK anti-slavery sector, academia, and law enforcement to identify and prioritise research on why and how people are being exploited in new ways, including how technologies are being used both to enable and tackle exploitation.

## Testing new approaches to tackling modern slavery

### UK Defence

In July 2024, the Ministry of Defence policy “JSP 985: Human Security in Defence”<sup>33</sup> laid out the vision of “an analytical lens that ensures populations are factored in as a critical audience” and of UK Defence incorporating “Human Security considerations in all that it does, from strategic planning through to the activity performed at the operational and tactical levels to deliver more conflict sensitive and stable outcomes.”

The policy also explains that that training and guidance related to MSHT should be reflected in the appropriate courses at the Defence College of Logistics, Policing and Administration (DCPLA), and has a chapter on integrating human security into training and education - noting that

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33 ‘Human security in Defence (JSP 985)’, [GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/123456/jsp985.pdf)

a through-career Human Security (HS) education and training pathway needs to be implemented.

In response, the IASC commissioned research to scope and map the training material for the UK military on modern slavery and human trafficking. The report explores how allied defence organisations, including the UK Ministry of Defence (MOD), U.S. Department of Defence (DoD), NATO, and OSCE, address modern MSHT in training and operational contexts. It highlights gaps, best practices, and opportunities for collaboration. The findings from this research will be published in late spring 2025.

## **How this work aligns with the Strategic Plan**

- ✓ The IASC will work with researchers and other parts of the anti-slavery sector to identify innovations in anti-slavery response and how to share, learn from and scale success, as well as how to learn from areas that do not work effectively enough.



# Forward Look

The IASC has built a strong foundation for impact—re-establishing the office, forging a broad network of relationships across government, civil society, and business—and has already delivered against key priorities. Moving into the next stage of delivery against the Strategic Plan, the IASC will build on the foundations laid in 2024–25 to drive measurable progress across all pillars: Prevention, Protection, Prosecution, and the cross-cutting themes of integrating lived experience and expanding the modern slavery research and evidence base.

The IASC will be delivering against these core pillars amid a busy legislative year ahead, with the expected passage of the Employment Rights Bill 2024-25, the Border Security, Asylum and Immigration Bill 2024-25, and the Crime and Policing Bill 2025, Great British Energy Bill 2024-25 — all of which can have real-world impact on victims of modern slavery. The IASC will prioritise robust monitoring, scrutiny, and engagement — ensuring that accompanying policy is built on strong evidence and data and can be operationalised, that implementation is victim-centred, and that new laws deliver real improvements for survivors while making it harder for traffickers to operate.

Coordination and leadership from Government to tackle all forms of modern slavery remains limited, real and sustained political will needed if modern slavery survivors



are to get the justice they deserve. IASC will prioritise building this will, and securing buy-in for key top-level strategy, structural and legislative asks:

1. The Home Office must publish a cross-government Modern Slavery Strategy—the last one was in 2014. Without it, key departments lack direction, law enforcement cannot allocate resources effectively, and victims are failed. The IASC recognises the work the devolved administrations have done updating their Strategies recently.
2. Survivor voices must shape policy. IASC has submitted a business case to the Home Office to establish a Survivor Advisory Council and will continue to push for its establishment. Those with lived experience being heard shapes and improves policy outcomes.
3. Mandatory Human Rights Due Diligence is needed. The UK has fallen behind global partners in tackling forced labour. Businesses want stronger supply chain laws to ensure a fair playing field and civil society wants goods to be made free from forced labour.

Simultaneously, the IASC will work at the technical and operational levels to drive policy changes that make the frontline system work better for victims and workers, as detailed against the Strategic Plan pillars:

**Prevention:** While significant research and engagement have advanced understanding of the root causes and vulnerabilities that lead to modern slavery, current

prevention efforts remain fragmented and insufficient to stem exploitation at scale. Over the coming year, the IASC will be working to ensure that modern slavery prevention is adequately integrated into critical policies across such as the VAWG strategy, for example, and work to ensure that more departments in government are playing their part. Building on the IASC's recent research on overlapping vulnerabilities to modern slavery and homelessness, the IASC will prioritise engagement with departments such as MHCLG and DHSC who have a critical role to play but currently have limited engagement with tackling modern slavery.

The IASC will continue to work on preventing labour exploitation, building on existing work with DBT, ODLME and with parliamentarians on the establishment of the Fair Work Agency to encourage them to do all they can to protect victims of modern slavery. Building on the momentum shown internationally and by UK businesses themselves and anti-slavery sector, the IASC will continue to champion the need MHRDD legislation, the potential utility of Import Bans, and improved compliance with the MSA.

**Protection:** While recent legislative steps—such as repealing harmful laws and increasing NRM caseworker capacity—are welcome, they are only returning the protection system back to a weak baseline. To ensure that the protection system does work for survivors and those who support them, the IASC will be engaging with and closely monitoring the Home Office Assessing Identification Methods consultation, to ensure that sector

voices, especially those of survivors are adequately integrated. The IASC is also clear that there are immediate fixes that need to be made to the identification and protection system now alongside the consultation, namely mandatory FRO training being developed, and critical updates to statutory guidance and will be working to ensure that these steps are taken.

The IASC will also be working to ensure that the Home Office expands the use of ICTGs across the country and the expansion of the NRM devolved decision-making pilot.

**Prosecution:** Despite increasing victim identification, prosecution rates remain low, and offenders often escape justice. The IASC will be working on driving forward the recommendations from its report on the evolution of police responses since 2015, identify barriers to using the MSA, and advocate for reforms that enable more effective investigations and prosecutions. The IASC will be helping set up and chair CPS's first National Scrutiny Panel to improve the application of the MSA. The IASC will continue to support law enforcement in adopting evidence-led approaches, including the use of Victim Navigators and intelligence-sharing platforms like TOEX.

**Improving knowledge and understanding of modern slavery:** The IASC will build upon existing research undertaken this year by collaborating with academics and the UK anti-slavery sector to share and highlight recent and emerging findings and encourage prioritisation

of research into the changing nature of exploitation, including the role of technology.

Barriers to information sharing and transparency, continue to hinder efforts to better understand the scale of modern slavery, improve victim support, and enhance law enforcement effectiveness. Over the forthcoming year will be working towards unblocking these barriers and will use its powers under the MSA to compel cooperation on data sharing from specific agencies such as law enforcement, border security, local governments, and health authorities to improve understanding and response to the issue.

**Integrating lived experience perspectives into anti-slavery policy and efforts:** The IASC continues to maintain that a Home Office – or wider Government - funded and contracted Survivor Advisory Council is the most effective way to ensure ethical oversight and appropriate policies and frameworks for sustained and effective survivor engagement. The IASC will be continuing to advocate for this particularly as each Commissioner's term is only three years, the IASC wants the Council to be taken forward and maintained regardless of who is in post.



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