

Independent Anti-Slavery Commissioner

ANNUAL  
REPORT

2025 - 2026



June 2026

Independent  
**Anti-Slavery**  
Commissioner

Independent Anti-Slavery Commissioner

**Annual Report 2025-2026**

Presented to Parliament pursuant to Section 42 (10) (b) of the  
Modern Slavery Act 2015

June 2026

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

Exploitation in the UK is widespread, evolving, and devastating in its impact. Behind every case is a person – someone whose life has been shaped by coercion, control, and abuse, often hidden in plain sight.

Last year saw a record number of potential victims of modern slavery identified in the UK. Too many people are still being exploited, and too many are not receiving the support they need. We must do more.

While frontline professionals work tirelessly to protect victims they are doing so under growing pressure. There remains no Government Modern Slavery Strategy, limited focus on prevention, police funding cuts to modern slavery teams, and an inaccurate conflation between human-trafficking and immigration.

This is incredibly concerning and has real-world consequences on survivors. Sustained inaction creates the conditions in which exploitation can take hold and flourish. That is why elevating survivor voice has never been more important. Systems can only protect people effectively when they reflect the realities of those they are designed to serve.

This year, I have continued to place survivor expertise at the centre of my work. A significant milestone was the first Anti-Slavery Lived Experience Advisory Panels Summit, where survivors directly shaped national thinking on identification, safeguarding, and reform. Their insights – practical, challenging, and forward-looking – will continue to guide my priorities.

As this Annual Report sets out, my office continues to deliver targeted research to drive practical, evidence-based progress across prevention, victim protection, prosecutions, and our collective understanding of exploitation. This work is helping to strengthen how the system responds to victims, improve the consistency and quality of support, and prevent harm before it occurs.

There are positive developments across the devolved nations. Wales continues to demonstrate a strong, rights-based approach; Scotland has strengthened its focus on prevention and public health; and Northern Ireland's work on child criminal exploitation highlights the value of early intervention. These are important steps. However, gaps remain, particularly in areas that are not devolved, reinforcing the need for strong central leadership across all nations.

Together with partners across the UK, we have shown that improvement is possible – in prevention, identification, safeguarding, and enforcement. The solutions exist. What is needed now is the political will to deliver them at the scale required.

I will continue to press for meaningful reform, for a cross-government strategy with clear accountability, and for a system that does not lose sight of those it is meant to protect. Survivors' voices will remain at the heart of this work—because only by listening to them can we build a response that truly works.

**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
- Rt Reverend Dr Alastair Redfern

### **Devolved Administrations**

- Welsh Government and Anti-Slavery Wales Forum Members
- Scottish Government, Justice Directorate, and Trafficking and Exploitation Strategy Action Area Members
- Northern Ireland Executive, Department of Justice (Northern Ireland)

### **Partners, Organisations and Agencies**

Anti-Trafficking Monitoring Group

Anti-Slavery International

ATLEU

BASNET

BAWSO

Border Force

British Services Association

Causeway

CEASE

College of Policing

CPS

Deputy Mayor for Policing in London

ECPAT UK

Embassy of the United States of America

Focus on Labour Exploitation (FLEX)

Forward Global

Freshfields LLP

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

It's a Penalty

Justice and Care

Kalayaan

Local Government Association

Medaille Trust

Metropolitan Police

Migrant Help

Migration Advisory Committee

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!

Office of the Director of Market Labour Enforcement

Omnia Strategy LLP

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

Police and Crime Commissioner for North Wales

Domestic Abuse Commissioner

Police Scotland National Human Trafficking Unit

Police Foundation

Rights Lab (University of Nottingham)

Slave Free International

Sophie Hayes Foundation

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

The Voice of Domestic Workers

Raising Alliance (TARA) Service

Victims Commissioner

UK Feminista

UNODC

Unseen

US Trafficking in Persons Ambassador

Women at the Well

# 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 to encourage ‘good practice sharing’ in the prevention, detection, investigation and prosecution of modern slavery, and support for victims. In exercising this function, the Commissioner should hold the Government to account on their performance in tackling modern slavery and provide recommendations on how to improve. The Commissioner works across the UK with public authorities, the sector, businesses, and law enforcement to pursue these goals. Eleanor Lyons was appointed as Commissioner in December 2023.

[The IASC’s Strategic Plan 2024 -2026](#) was developed through extensive engagement with frontline organisations, statutory partners, law enforcement and people with lived experience, was submitted to the Home Secretary in April 2024 and laid before Parliament in January 2025. It sets out three core objectives: preventing exploitation, protecting victims, and prosecuting offenders. These objectives are supported by cross-cutting priorities to embed lived experience into modern slavery policy making and strengthen the modern slavery evidence base.



This is the Commissioner’s second Annual Report. The 2024-2025 Annual Report can be found [here](#). As required under the MSA, this report sets out the extent to which the Commissioner’s objectives and priorities, as set out in the Strategic Plan, have been progressed to date; and the activities the Commissioner has undertaken throughout the year in the exercise of their functions.

# Executive Summary

Over the past year, the IASC has made significant progress in advancing the UK's response to modern slavery across the three pillars of her Strategic Plan: Prevention, Protection and Prosecution. Two cross-cutting priorities of including survivor voice and improving knowledge and understanding have shaped all areas of this work.

First, the IASC has strengthened the national evidence base through a programme of primary research that has informed policy development, illuminated emerging risks, and supported more effective operational responses. Second, survivor engagement has been central to the IASC's work, including hosting the first ever Anti-Slavery Lived Experience Advisory Panels Summit made up of 13 representatives from Lived Experience Advisory Panels (LEAPs) across the UK. While pressing the Government to establish a coherent, sustainable mechanism for meaningful survivor engagement, survivor voice has shaped the research design, policy recommendations, and strategic advocacy of IASC's work ensuring it remains grounded in the realities of exploitation. Together, these cross-cutting commitments have strengthened the evidence, partnerships and survivor-centered principles that has delivered the IASC's work over the three pillars.

## Prevention

The IASC has driven progress in strengthening the UK's approach to preventing modern slavery by embedding prevention across national policy, local systems, and frontline practice. This includes influencing key Government strategies, strengthening recognition of modern slavery within wider safeguarding agendas, and building capability among frontline professionals. Alongside this, the IASC has advanced longer term prevention efforts through new research on prevalence estimation and on emerging trends, uncertainties, and risks across all forms of exploitation and victim demographics to inform and shape preventative strategies.

A significant area of policy focus has been strengthening legislative and regulatory frameworks to prevent exploitation. The IASC has published the comprehensive *Strengthening the UK's Forced Labour and Human Rights Regulatory Framework* to tackle forced labour in global value chains. These proposals were developed through extensive engagement with businesses, survivor groups and international partners. This work has increased parliamentary scrutiny of existing legislation and set a clear direction for future reform.

Building on this, the IASC's work on online platforms has exposed how gaps in regulation and enforcement are enabling exploitation to persist. Through the first UK wide, survivor informed review of sexual exploitation and trafficking through adult services websites in the report *Behind the Profile*, the IASC identified widespread indicators of trafficking in online advertising and a lack of effective oversight. This has brought greater attention to the role of digital platforms in facilitating harm and has informed proposals for stronger safeguards, improved enforcement, and a more coherent national response to online enabled exploitation. Coverage of the review spanned print, radio and TV news, and it is estimated that around six million people saw or heard the story across major national broadcasters. Parliamentarians across the devolved nations are using this research to push for change.

## Protection

The IASC has worked to strengthen the UK's protection system by improving how victims are identified, supported and safeguarded through the NRM and beyond. The IASC has championed early-identification pathways by setting out the national case for expanding Modern Slavery Coordinators in local authorities, strengthening guidance, and supporting a major cross-sector revision of the [Slavery and Trafficking Survivor Care Standards](#). These improvements promote more consistent, trauma-informed support for victims across statutory and non-statutory services.

This year also marked a significant expansion of the evidence base that underpins victim protection. The [More Than Words](#) report clarified definitional gaps that undermine child safeguarding, while the [Refusal to Consent](#) study provided the first comprehensive insight into why potential victims decline entry into the NRM.

Alongside this, the IASC has worked to improve consistency and effectiveness across the identification and support landscape by shaping national and devolved approaches, promoting safer pathways that reduce vulnerability to exploitation, and strengthening advocacy provision for victims. This has supported more joined up practice, improved access to support, and greater ability for victims to navigate complex systems and participate in justice outcomes.

## Prosecution

The IASC has consistently raised concerns of the UK's criminal justice response to modern slavery with reduced specialist policing capacity and shifting national priorities. The IASC's landmark [Policing Response to Modern Slavery: 10 Years On](#) report provided the first comprehensive assessment of policing practice since the Modern Slavery Act 2015, revealing a reduction in prioritisation, inconsistent investigative standards and systemic gaps that hinder prosecutions. The report has reset the national debate and created a clear blueprint for rebuilding capability, strengthening investigative standards and improving alignment between policing and prosecution.

Complementing this national analysis, the IASC has engaged directly with operational teams including Border Force, prisons and frontline policing to understand what works in practice and to champion improved victim identification, intelligence gathering and partnership working. Alongside this, the Commissioner has driven improvements across the prosecution pathway by addressing barriers to effective case building, supporting stronger evidential approaches, and promoting survivor engagement. The IASC has championed specialist victim support roles that enable victims to navigate complex systems and participate safely in justice processes.

Together, this activity has ensured that operational insight and evidence are shaping the criminal justice response, contributing to stronger investigations, improved prosecution outcomes, and a more effective system for holding perpetrators to account.

# SNAPSHOT: IN THE NEWS

APRIL 2025



JUNE

3rd June  
[The Independent](#)

**The Independent**  
Farmers could foot foreign workers' upfront costs to travel to UK

23rd June  
[Big Issue](#)

**BIG ISSUE**  
If we want to prevent modern slavery, we must start with preventing homelessness

AUGUST

7th August  
[The Standard](#)

**The Standard**  
Potential victims of modern slavery at record high, latest figures show

30th August  
[Sky News](#)

**sky NEWS**  
Anti-slavery commissioner launches investigation into 'pimping websites'  
Eleanor Lyons tells Sky News she wants to find the "hotbeds of exploitation" among the hundreds of adult services websites operating in the UK.

OCTOBER

16th October  
[Talk TV](#)

**TALK**  
Ian Collins: Government solar farm approval risks being built on exploitation



DECEMBER

16th December  
[LBC](#)

**LBC**  
Britain is a 'dumping ground' for £20bn in Christmas items made by modern slaves  
The government's Independent Slavery Commissioner is calling on ministers to look at new laws to bring the UK in line with the US and EU, and to help give struggling British firms a boost too.

16th December  
[The Telegraph](#)

**The Telegraph**  
Cherie Blair and Eleanor Lyons  
Britain risks becoming a dumping ground for goods tainted by forced labour

FEBRUARY

3rd February  
[The Scotsman](#)

**THE SCOTSMAN**  
Exclusive: Nearly 80% of women and girls trafficked in Scotland suffered sexual exploitation

26th February  
[The Guardian](#)

**the guardian**  
UK anti-slavery watchdog calls for overhaul of adult sexual services sites

26th February  
[The Mirror](#)

**Mirror**  
Chilling warning that women are being sold 'like pizzas' on sex-for-sale websites

MAY

1st May  
[The Independent](#)

**The Independent**  
More women than men in contacts to anti-slavery charity helpline for first time

9th May  
[The Guardian](#)

**the guardian**  
Modern slavery victims opt to stay with exploiters for fear of deportation, research finds

JULY



**PIMPING WEBSITES** Anti-slavery commissioner launches investigation

SEPTEMBER

10th September  
[The Argus](#)

**The Argus**  
Independent Anti-Slavery Commissioner visits Gatwick Airport

18th September  
[The Guardian](#)

**the guardian**  
UK anti-slavery commissioner condemns Shabana Mahmood's asylum comments

18th September  
[BBC Radio 4](#)

**TODAY**  
"It's deeply concerning to suggest the system is being misused."  
Eleanor Lyons, Independent Anti-Slavery Commissioner, criticises the Home Office's appeal against a court ruling

NOVEMBER

6th November  
[The Independent](#)

**The Independent**  
New record high for modern slavery referrals as they rise by a third in a year

JANUARY 2026



**MODERN SLAVERY** Calls for tougher UK laws to protect victims

1st January  
[Daily Mail](#)

**Daily Mail**  
Net Zero backlash as campaigners warn slave labour must not be used to produce green technology

MARCH

2nd March  
[My London](#)

**MyLondon**  
Girls as young as 13 trafficked by grooming gangs for sex websites - London has most adverts listed

17th March  
[Daily Mail](#)

**Daily Mail**  
EXCLUSIVE How women are being tricked into selling sex online... then financially trapped with nowhere else to turn

# SNAPSHOT: PUBLICATIONS

APRIL 2025



MAY

1<sup>st</sup> May **Overlapping vulnerabilities**  
[Insight Briefing](#)



13<sup>th</sup> May **Victims not entering the NRM:**  
[Report](#)



Barriers to identification and

22nd May **IASC Annual Report 2024-25**  
[Annual Report](#)



JUNE

**Modern Slavery must be meaningfully included in the**



16<sup>th</sup> June [Policy Brief](#)

JULY

15<sup>th</sup> July **More potential victims identified, fewer prosecutions:**  
[Report](#)



**Housing insecurity drives exploitation:**  
Prevention must start with

23rd June [Report](#)

22<sup>nd</sup> July **Children left without support**  
[Report](#)

Inconsistent definitions of child



AUGUST



13<sup>th</sup> October [Report](#)

SEPTEMBER

7<sup>th</sup> Sept **VAWG strategy must address modern slavery**  
[Updated](#)



OCTOBER

**True scale of exploitation in the UK remains uncertain:**  
A more robust and unified approach urgently needed.



13<sup>th</sup> October [Report](#)

NOVEMBER

20<sup>th</sup> November **Human trafficking wrongly conflated with illegal immigration:**  
[Policy Brief](#)



DECEMBER

26<sup>th</sup> November **Mandatory human rights due diligence needed:**  
[Policy Brief](#)



Clear rules to protect workers



**Forced labour risks in UK supply chains:**  
New regulatory framework

16<sup>th</sup> December [Report](#)

JANUARY 2025



FEBRUARY

**Modern slavery in armed conflict:**

Recommendations for allied



5<sup>th</sup> February [Report](#)



**Sexual Exploitation and Trafficking through Adult**

26<sup>th</sup> February [Report](#)

MARCH

# Snapshot: In Parliament

## How the Commissioner's work shaped parliamentary scrutiny and debate

### CRIMINAL JUSTICE OVERSIGHT

“In May 2025, the CPS established a modern slavery national scrutiny panel, chaired by the Independent Anti-Slavery Commissioner, to examine its performance in modern slavery and human trafficking cases. Insights from the process are shared with the CPS network to strengthen decision making, case building and support for vulnerable victims.”

*Solicitor General*  
*Human Trafficking debate, House of Commons*  
5<sup>th</sup> February 2026

### VICTIM SUPPORT

“The Independent Anti-Slavery Commissioner produced an excellent report, which I strongly commend to your Lordships. I strongly urge those responsible in the Home Office to read it as obligatory reading. As she rightly says in her foreword:

“Tackling modern slavery is everyone's business”.”

*Lord Hacking*  
*Victims & Courts Bill, House of Lords*  
17<sup>th</sup> March 2026

### LEGAL PROTECTIONS FOR CHILDREN

“Evidence from the Independent Anti-Slavery Commissioner and ECPAT UK shows that police and prosecutors frequently struggle to apply the existing statutory defence to children exploited into criminal activity.”

*Lord Hanpton*  
*Crime & Policing Bill, House of Lords*  
19<sup>th</sup> November

### ENFORCEMENT AND LABOUR EXPLOITATION

“The Fair Work Agency will continue to work in close partnership with Eleanor Lyons, the Independent Anti-Slavery Commissioner, as the GLAA does now, to identify and disrupt patterns of exploitation across sectors such as agriculture, construction and adult social care. The Bill lays the foundation to build on that successful working relationship between the Commissioner and the GLAA.”

*Lord Katz*  
*Employment Rights Bill, House of Lords*  
18<sup>th</sup> June 2025

### VICTIM PROTECTION

“Secure reporting is understood to be very important, [...] the current anti-slavery commissioner has said:

“We need to be able to give these victims the confidence that if they do come forward, their perpetrators will be held to account and that they will continue to receive the support and care that they need.”

*Baroness Hamwee quotes the IASC*  
*Border Security, Asylum & Immigration Bill, House of Lords*  
10 July 2025

### STATUTORY AUTHORITY

“Let me make it absolutely clear: modern slavery remains one of the gravest human rights abuses of our time, and tackling it requires vigilance, clarity and effective enforcement. It is crucial that the agencies tasked with identifying and assisting survivors and with co-operating closely with the Independent Anti-Slavery Commissioner have clear mandates and necessary powers to act decisively.”

*Lord Hunt of Wirral*  
*Employment Rights Bill, House of Lords*  
18<sup>th</sup> June 2025

### SUPPLY CHAIN & BUSINESS ACCOUNTABILITY

“Current legislation on supply chain transparency lacks effectiveness. [...] Having met the Independent Anti-Slavery Commissioner, I am aware that they are pushing for mandatory human rights due diligence legislation in the UK.”

*Martin Rhodes MP*  
*Fairtrade Certification debate, House of Commons*  
11<sup>th</sup> December 2025

### ONLINE EXPLOITATION / WOMEN & GIRLS

“A report published just weeks ago by the Independent Anti-Slavery Commissioner shows how adult services websites do not just host exploited and trafficked women but provide the infrastructure to initiate, scale and normalise their abuse.”

*Tonia Antoniazzi MP*  
*International Women's Day debate, House of Commons*  
12<sup>th</sup> March 2026

# Modern Slavery Policy Developments in the UK 2025 – 2026: An Overview

The past year has seen the UK Government launch consultations and reviews aimed at strengthening aspects of its modern slavery response - most notably on tackling forced labour in supply chains through the Responsible Business Conduct Review, and on victim identification via the [Assessing Identification Methods \(AIM\) Consultation](#). These processes could strengthen specific areas of the system; however, they have taken place alongside policy signals and ministerial statements that risk weakening the UK's modern slavery response overall.

In September 2025, the Home Office announced a “rapid review of the modern slavery legislation has commenced to prevent its misuse”.<sup>1</sup> The review was presented as a response to alleged “misuse” of the NRM and the perceived impact of late-stage referrals on removals to France under the UK–France returns arrangements. Insufficient data has been presented of this alleged misuse and multiple Select Committees in the House of Commons and the House of Lords have failed to find any ‘misuse’.<sup>2</sup> This review has created significant uncertainty and concern across frontline services.

In November 2025, the Home Secretary published [Restoring Order and Control: A Statement on the Government's Asylum and Returns Policy](#), outlining proposals with significant implications for modern slavery victim protections. While the statement presents changes as measures to “restore confidence” in the system, the Commissioner is concerned that several proposals risk reducing confidence for victims and may weaken safeguards intended to protect them.

The proposed firmer stance on late disclosure - giving greater weight to early disclosure in credibility assessments - is particularly concerning. Long-established evidence demonstrates that delayed disclosure is often the result of coercion, control, fear, or trauma, and should not be interpreted as a marker of poor credibility.<sup>3</sup>

The Government's statements continue to place modern slavery within the same narrative as irregular migration. This rhetoric has increasingly blurred distinctions between trafficking victims and people arriving irregularly, and risks undermining the victim-centred intentions of the Modern Slavery Act 2015 and causing real-world harm to victims.

Against this backdrop, the Government did not take forward several recommendations it had commissioned from civil society, including a sector-drafted strategic vision for modern slavery and did not integrate modern slavery into core prevention frameworks and strategies, such as the [Freedom from Violence and Abuse Strategy](#) (Violence Against Women and Girls Strategy). Failure to meaningfully incorporate modern slavery, one of the most serious forms of VAWG,

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<sup>1</sup> Home Office (2025). [First small boat migrant returned under new UK-France agreement](#)

<sup>2</sup> Hansard (2025), House of Lords Debate Vol. 844. [Modern Slavery Act 2015 Committee Report](#)

<sup>3</sup> Helen Bamber Foundation (2018). [The Trauma-Informed Code of Conduct](#)

into the Strategy represents a significant missed opportunity and continues to expose women to heightened risk of serious abuse.

Last year, the Equality and Human Rights Commission's [Human Rights Tracker](#) highlighted continued gaps in the UK Government's compliance with international obligations on preventing and addressing human trafficking and modern slavery. The current Government has not yet taken forward several long-standing recommendations relating to trafficking prevention and victim protection, including aligning domestic definitions with international standards and strengthening measures to address trafficking of women and girls.<sup>4</sup>

Parliamentary scrutiny, however, on modern slavery has remained high, with Select Committees – including the [Business and Trade Select Committee](#), the [Joint Committee on Human Rights](#) and the [Home Affairs Select Committee](#) - all calling for legislative and policy improvements to the UK's modern slavery response. The IASC appeared in front of these Committees and has worked closely with parliamentarians and Government to ensure policy changes improve the efficacy of the UK's ability to prevent modern slavery, protect its victims, prevention efforts, protection of victims, and law enforcement's ability to prosecute modern slavery cases.

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<sup>4</sup> EHRC (2025). [Human Trafficking and Modern Slavery: UK Government Action](#).

## Preventing Modern Slavery

**The IASC's first strategic pillar is 'Prevention', aiming to shield people from exploitation.**

Preventing exploitation and preventing re-victimisation remains an underdeveloped part of the UK's modern slavery response. Rising NRM referrals, persistent pressure on local safeguarding systems, and reductions in international development and anti-slavery funding have intensified the need for a coherent and proactive approach to prevention. While the Home Office's [Modern Slavery Action Plan](#) signals some intent, it remains weak on prevention and falls short of the comprehensive, system-wide measures required to reduce vulnerability.

Despite pockets of progress, modern slavery has not been structurally embedded across major national prevention frameworks. Important flagship strategies – such as the VAWG Strategy – still only partially reflect trafficking and exploitation. Emerging and heightened risks linked to homelessness, restrictive visa routes, digital platforms and shifting labour markets continue to outpace current protections. These trends reaffirm the pressing need for a comprehensive modern slavery strategy that reduces vulnerability long before exploitation occurs.

Against this backdrop, the IASC has focused on integrating modern slavery prevention measures across various policy domains.

### Safeguarding Vulnerable Groups

#### **Strengthening Modern Slavery Prevention in the Government's National Plan to End Homelessness**

*The findings from IASC's joint research with 'The Passage' have informed the Government's National Plan to End Homelessness and has led to the Northern Ireland Housing Executive establishing new modern slavery awareness sessions.*

In 2025, the IASC partnered with The Passage to examine how housing insecurity heightens vulnerability to traffickers. Drawing on survivor testimony, frontline practitioners and representatives from all four UK administrations, the [joint report](#) showed that traffickers deliberately target people without stable housing and that prevention responses across the UK remain fragmented.

The report's central recommendations – stronger prevention services, clearer local authority guidance, and improved local infrastructure, including Modern Slavery Coordinators – are now reflected in the Government's [National Plan to End Homelessness](#). The devolved administrations have taken forward the insights: Northern Ireland has strengthened joint working across justice, housing and community departments; Scotland's new prevention duties under the Housing (Scotland) Act 2025 support earlier identification of those at risk; and Wales is updating its Code of Guidance to provide clearer safeguards for people vulnerable to exploitation.

*Advocating for Stronger Modern Slavery Prevention in Homelessness Systems*

The IASC used evidence from the report to shape engagement with Ministers and senior officials across the Ministry of Housing, Communities and Local Government and the Home Office. Through sustained cross-departmental discussions, the IASC ensured the report's recommendations were clearly understood and actionable. The report was launched at a webinar attended by over 200 professionals, supported by lived-experience testimony and frontline insight, strengthening sector awareness and credibility.

The IASC continues to work with the UK Government and devolved administrations to embed these recommendations across homelessness systems, advocating for consistent prevention pathways, clearer accountability and earlier identification of those at risk. This work keeps survivor voices central and promotes consistent implementation of strengthened prevention duties, improved local authority guidance and enhanced local infrastructure, including access to Modern Slavery Coordinators.

**Building Local Authority Capacity to Tackle Modern Slavery with Shelter**

*Through its partnership with Shelter and The Passage, the IASC has delivered targeted training to frontline homelessness and local authority staff, improving early identification of modern slavery risks and strengthening local responses to exploitation.*

In February 2026, the IASC delivered a national training session for frontline homelessness staff, developed in partnership with The Passage and Shelter through the MHCLG-funded Supporting Homeless Migrants (SHM) programme.

The training was co-designed with sector partners and informed by lived experience, including direct contribution from a survivor. This ensured credible, practice-focused guidance for local authorities, charities, volunteers, and community groups. This initiative improved frontline capacity to identify indicators of exploitation and respond safely, strengthening local safeguarding practice across the UK.

*Turning Evidence into Action for Safer Local Responses*

Building on this work, the IASC continued to press Government and local authorities to embed the training's recommendations – calling for clearer referral pathways, stronger coordination between housing and modern slavery leads, and sustained investment in frontline services.

## **Influencing Government Policy on VAWG**

*IASC published a briefing on the need to include modern slavery prevention in the Government's VAWG Strategy and raised concerns about the lack of inclusion of modern slavery survivors and the sector in its development. IASC has secured a commitment that the anti-slavery sector will be included in engagement around the implementation of the VAWG Strategy and the subsequent Action Plan now includes greater reference to Modern Slavery.*

Women and girls represent a significant proportion of potential modern slavery victims, with sexual exploitation one of the most common and most severe forms of violence against women and girls. Between 2020 and 2025, NRM referrals of women have increased with an 86% rise, while referrals for girls have increased with a 61% rise.

Given this clear overlap, the IASC engaged early – beginning a year before publication of the VAWG Strategy 2025 – 2035 to highlight the specific needs of victims of modern slavery and the importance of recognising these forms of exploitation within the wider VAWG framework.

In June 2025, the IASC submitted [\*Integrating Modern Slavery into the Violence Against Women and Girls Strategy 2025-2035\*](#) to the Home Office, setting out the case for embedding modern slavery across the Strategy. The report - developed with frontline expertise and survivor voice – also called for victims of modern slavery to be included in the Strategy's baseline figures, warning that excluding them would undermine efforts to halve VAWG by 2035. Throughout the drafting period, the IASC engaged Ministers, senior officials and cross-Government working groups to ensure these issues were fully considered.

Despite extensive engagement and the clear evidence calling for modern slavery and particularly sexual exploitation, domestic servitude and the trafficking of women and girls to be recognised as a core form of VAWG, the [\*Freedom from Violence and Abuse Strategy\*](#) did not meaningfully incorporate modern slavery within its definition, nor long-term framework.

During finalisation of the Strategy, the IASC raised repeated concerns about the exclusion of the anti-slavery sector from consultations. This led to commitments from the Home Office to ensure modern slavery and human trafficking were properly reflected in Strategy implementation. The subsequent [\*Action Plan\*](#), includes targeted commitments on human trafficking linked to pornography, strengthened modern slavery investigations, improved victim identification and the national expansion of child trafficking guardianship - all areas the IASC has consistently championed.

### *Influencing Policy Change on VAWG*

Through sustained engagement, formal submissions, and targeted intervention prior to publication, the IASC strengthened Government understanding of the relationship between modern slavery and VAWG, ensured modern slavery and human trafficking was included in the VAWG action plan, and secured a role for IASC in future engagement mechanisms.

## Tackling Demand for Exploitation

### Behind the Profile: A Review into the Prevention of Trafficking via Adult Services Websites (ASWs)

*The IASC launched a review into the prevention of trafficking via ASWs in response to growing concerns about the role of online platforms in enabling modern slavery.*

The rapid growth of digital platforms has reshaped the commercial sex market, with ASWs becoming key spaces for advertising sexual services. While these platforms offer visibility and access, they also create environments where exploitation, coercion, and trafficking can be facilitated and concealed. Addressing this emerging risk is critical to preventing harm and dismantling trafficking networks.

The IASC conducted a review to provide the first UK-wide, survivor-informed assessment of how ASWs can enable exploitation. The [project](#) used a rigorous multi-methodology approach. Large-scale data analysis provided a national picture of how ASWs operate in practice. The IASC analysed 63,000 adverts which were available on twelve of the most popular sites on one single day, these sites received almost 42 million visits in a month. The IASC found that 59% of adverts contained three or more recognised trafficking indicators. These signals occurred across every region of the UK, showing that the risks are systemic rather than isolated. A legal and regulatory review identified significant gaps and found that current legislation and regulatory guidance are not preventing harm.

The review highlighted the need for stronger protections around ASWs and clearer accountability across the system. It calls for Government action to consider whether these sites should operate at all, alongside strengthened age assurance, tighter Online Safety Act duties and survivor-informed platform policies. A national, trauma-informed support offer is needed, including independent advocates and the Government forming a National Survivor Council to shape future policy. The report also recommends introducing a Modern Slavery Strategy that reflects digital forms of exploitation, better coordination between police and prosecutors, improved training on digital coercion and expanded digital investigative capacity.

#### *Public and Parliamentary Interest in the ASWs Report*

Coverage of the review spanned print, radio and TV news, and it is estimated that around six million people saw or heard the story across major national broadcasters. Following the review, parliamentarians tabled amendments to the Crime and Policing Bill 2026 based on the report's recommendations. The Chair of the All-Party Parliamentary Group on Commercial Sexual Exploitation raised ASWs as an urgent area of concern in the House of Commons on International Women's Day.<sup>5</sup>

Following publication of the ASWs review in February 2026, the IASC has been pressing the Government and regulators to progress the reforms set out in her ASW review.

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<sup>5</sup> Hansard (2026) 2025), House of Commons Debate Vol. 782. [International Women's Day](#).

## **Developing a UK Prevention Toolkit for Major Events - It's a Penalty**

*Working with It's a Penalty, the IASC is developing a UK Prevention Toolkit for Major Events to bring modern slavery risk-mitigation into the planning of the Glasgow 2026 Commonwealth Games and establish a model for future events nationwide.*

The IASC has initiated a significant new prevention partnership with the charity It's a Penalty to develop a Prevention Toolkit for Major Events, addressing the heightened risks of labour and sexual exploitation linked to large-scale events.

The project will bring together input from Government, industry and civil society to co-design a practical, action-oriented toolkit – which will provide a set of recommendations for organisers to ensure events can be managed responsibly and sustainably within the framework of the UN Global Compact and international human rights expectations.

A key achievement this year has been securing agreement with the Glasgow 2026 Commonwealth Games Organising Committee to pilot the toolkit, embedding modern slavery risk mitigation into event planning and delivery.

### *From Pilot to Policy: Securing a UK Standard for Safer Major Events*

This pilot will create an important legacy opportunity, generating evidence to inform future events and support the development of a consistent UK standard. The IASC will be working with Government partners to ensure the toolkit can be embedded across major events nationwide.

## Making Tackling Modern Slavery Everyone’s Business

### Strengthening the UK’s Forced Labour and Supply Chains Legislative Framework

*Building on the Global Commission on Modern Slavery and Human Trafficking’s [No Country is Immune](#) report recommendations, the IASC published comprehensive model legislation which would place a duty on businesses to prevent forced labour in global supply chains.*

Recognising that the UK’s outdated forced labour regulations do not adequately protect workers or responsible British businesses, the IASC began a structured programme of engagement and research to inform the development of the Framework. IASC wrote to all FTSE100 CEOs, conducted in-depth interviews with senior leaders across sectors, held co-hosted roundtables with business, investors and trade bodies, incorporated survivor feedback and ran a national poll of 3,006 UK adults to understand the public’s expectations of businesses.

This led to the development of a [Forced Labour and Human Rights Regulatory Framework](#) written in partnership with the law firm Omnia Strategy LLP and the NGO Unseen. The report provides a practical blueprint for Government and model legislation that includes: a failure to prevent duty (with a reasonable due diligence defence), civil and criminal liability for egregious harm, a market access regime to ban forced labour products, and a modernised disclosure requirement replacing Section 54 of the Modern Slavery Act 2015. It is designed to be UK wide, interoperable with international regulations, and proportionate for SMEs. This report and Draft Model Legislation was submitted to the Department for Business and Trade as the IASC calls for it to be included in this Government’s future King’s Speech.

#### *Advocacy for Stronger Supply Chains Legislation*

Throughout the first half of the year, the IASC gave evidence to multiple parliamentary Select Committees, setting out the limitations of the UK’s transparency-based model and why the UK needs new legislation to prevent the UK from becoming a dumping ground for goods made by forced labour. IASC also submitted evidence to the Business and Trade Committee’s “Make Work Pay” inquiry, where IASC emphasised the need for MHRDD to support workers’ rights in the UK. The Commissioner attended a CEO-level Responsible Business and Trade roundtable, chaired by Minister Chris Bryant, to contribute to discussions on strengthening the UK’s approach to responsible business conduct. The Commissioner also co-hosted a roundtable with Dame Karen Bradley to gather input from businesses and Parliamentarians on the Draft Model Legislation.

At the roundtable, the Commissioner provided input on the role of government and business in preventing modern slavery, including the importance of effective due diligence, supply chain transparency, and proportionate regulation. Her engagement ensured that modern slavery considerations were reflected in wider discussions on responsible business practices, while supporting efforts to align prevention with economic and trade priorities.

To promote international harmonisation in supply chains legislation and ensure the Framework was interoperable internationally, the IASC engaged heavily with international

partners. IASC held meetings with key partner countries and multilateral organisations and forums including the UN Business and Human Rights Forum, Organisation for Security and Cooperation in Europe and the UN Global Compact.

Since publication of the Framework, the IASC has been engaging with a wide range of stakeholders to support the proposals, including parliamentarians, businesses and civil society. IASC has called on the Government to adopt the Framework as part of the Department for Business and Trade’s Responsible Business Conduct policy review.

## **Strengthening Public Procurement Mechanisms to Eliminate Forced Labour from Government Supply Chains**

*IASC worked to secure an amendment to the Great British Energy Act that places greater obligations on Government to ensure supply chains are free from labour and contributed to the Department of Health and Social Care’s new public procurement regulation on modern slavery.*

The IASC continued to drive forward the legislative and policy agenda on modern slavery in public procurement, with a key focus on ensuring that the UK’s energy transition does not embed forced labour in critical supply chains. Building on sustained engagement with parliamentarians and officials, the IASC supported cross-party efforts to secure amendments to the *Great British Energy Act 2025* which provide Great British Energy the powers to ensure that “slavery and human trafficking is not taking place” in its operations or supply chains, making ethical supply chain stewardship a statutory objective of the organisation.

The IASC supported the Department of Health and Social Care in developing and steering new modern slavery procurement regulations through Commons and Lords scrutiny, providing expert advice on due diligence and supplier exclusion. This support strengthened parliamentary understanding and backing for the regulations. The IASC also supported DHSC develop [statutory guidance](#) associated with the regulations, which will help ensure the NHS conduct stronger due diligence measures. The IASC will continue to encourage the Government to adopt these measures across all procurements, not just for the NHS.

### *Higher Standards Across Public Procurement*

This work contributed to strengthening safeguards against modern slavery in public procurement by supporting legislative and regulatory changes that embed stronger due diligence and accountability in government supply chains.

The IASC will continue to call for a universal approach across all public procurement to prevent a two-tier system where protections vary, as set out in the [Forced Labour and Human Rights Regulatory Framework](#).

## **Strengthening the Evidence Base on Modern Slavery Prevalence in the UK**

*The IASC's work to strengthen modern slavery prevalence data has laid the foundations for clearer insight into the scale of exploitation in the UK, supporting more targeted, evidence-led prevention.*

In 2025, the IASC commissioned the Rights' Lab to undertake a comprehensive scoping review of methods for estimating the prevalence of modern slavery in the UK. This work responds directly to a longstanding gap in the national evidence base and supports the IASC's commitment to improving the data foundations that underpin prevention, policy, and survivor support. The [report](#) brings together international best practice, assesses the UK's existing data landscape, and identifies the most reliable and cost-effective approaches for estimating the scale of modern slavery across the country.

Drawing on 46 studies published between 2010 and 2025, along with a stakeholder survey, workshops, and a review of 57 UK data sources, the report highlights the complexity of measuring a hidden and seldom heard population. It shows that while previous UK estimates have varied greatly, this variation is primarily due to differences in definitions, data sources, and analytical methods. Importantly, the review identifies Multiple Systems Estimation as the most robust method for producing an overall national estimate, sets out how complementary methods, including targeted surveys, Network Scale-Up approaches, Natural Language Processing, and machine learning, can estimate prevalence for specific offences or subgroups and support more detailed risk analysis across local areas.

### *Better Insight into Prevalence*

This report strengthened the UK's evidence base on modern slavery by setting out robust, practical approaches to estimating prevalence and better understanding the scale and nature of exploitation.

The IASC will use this research to press for a strengthened, coordinated national approach to prevalence estimation. This includes advocating for revisions to NRM data systems, supporting the development of a cross-Government data warehouse, and encouraging the adoption of regular prevalence assessments on a three-year cycle. The IASC will also work closely with academic partners and Government departments to ensure this research translates into practical steps that improve the UK's ability to identify victims, understand patterns of risk, and respond proactively to emerging threats.

## **Strategic Foresight: Anticipating Emerging Patterns of Exploitation**

*The IASC's [Strategic Foresight](#) project is strengthening the UK's ability to anticipate emerging patterns of exploitation and ensure that modern slavery prevention keeps pace with evolving risks across supply chains, digital platforms, labour markets and criminal networks.*

Modern slavery is a dynamic threat, with new forms of exploitation driven by shifts in technology, global instability, economic pressures and changes in migration. In 2025, the IASC launched a Strategic Foresight initiative - co-funded by the Government Office for Science – to identify future vulnerabilities and generate actionable insights for policymakers, law enforcement, businesses and frontline services. Using horizon scanning, expert engagement and scenario planning, the project examines how exploitation may evolve over the next decade and what preventative measures Government and partners will need to put in place.

*Progress on project*

As of March 2026, the IASC has completed an extensive evidence-gathering phase, convened expert roundtables, and produced early foresight insights to support cross-Government planning. The [report](#) was published in May 2026 and examines the emerging threats shaping modern slavery in the UK, showing how exploitation is becoming more complex, more digital and harder to detect, and outlining the urgent action needed to strengthen prevention, protection and enforcement.

# Protecting Victims – Improving Identification, Victim Care and Support Through the NRM and Beyond

**The second pillar of the Strategic Plan focuses on Protection and what can be done to improve the identification of victims and ensure they receive appropriate support in their recovery journey.**

Over the past year, reforms to the asylum and protection system, shifting Home Office priorities, have overshadowed and created uncertainty around efforts made under the Home Office ‘Assessing Identifications Methods’ Consultation launched to improve the UK’s National Referral Mechanism. While early engagement on the consultation appeared constructive, later policy signals, particularly through the [Restoring Order and Control](#) agenda, have raised concerns about a narrowing focus on credibility of survivor claims, compressed disclosure timelines, and the growing conflation of modern slavery with immigration control.

In this environment, the IASC has focused on strengthening identification pathways, improving frontline safeguarding, and reinforcing the evidence base for a fair and trauma-informed protection system.

## Strengthening Identification and Support

### The Slavery and Trafficking Survivor Care Standards

*The IASC’s support for the sector-wide revision of the Slavery and Trafficking Survivor Care Standards helped deliver a strengthened, survivor-centred national framework that improves the quality and consistency of support provided to victims across the UK.*

Clear, consistent support for survivors of modern slavery is essential to safeguarding and recovery, yet provision across the UK has historically varied. A revised national framework was needed to ensure services are survivor-centred, trauma-informed and aligned with best practice.

The IASC supported the sector-wide revision of the [Slavery and Trafficking Survivor Care Standards](#), led by the Human Trafficking Foundation and shaped by more than 150 contributors, including frontline professionals and survivors. Through grant funding and close engagement with the project team, the IASC helped ensure the Standards align with best practice and the IASC’s priorities on safeguarding and trauma-informed care.

The updated Standards provide a strengthened national benchmark for statutory and non-statutory services, reducing variation and improving the quality and consistency of support for survivors. Their development represents a major cross-sector achievement, bringing together expertise from across the anti-slavery, safeguarding and victim-support landscape to deliver a unified, survivor-centred framework.

*Next Steps: Embedding Survivor Care Standards Nationwide*

The IASC will continue to champion widespread adoption of the Standards, promote consistency across services and work with providers and survivors to ensure they drive meaningful, rights-based improvements in care nationwide.

**Influencing the Home Office ‘Assessing Identification Methods Consultation’**

*The IASC has been engaging with the Home Office and the anti-slavery sector on the design and the input of the AIM consultation and working to ensure that the consultation meaningfully includes survivors.*

Clear and consistent identification of victims is fundamental to effective protection. The Home Office’s [Assessing Identification Methods \(AIM\) consultation](#) represented a significant opportunity to shape national decision-making, but concerns across the anti-slavery sector, especially from survivors with lived experience of the National Referral Mechanism, highlighted the need for meaningful trauma-informed engagement.

Throughout the year, the IASC worked with the Home Office and the anti-slavery sector to influence the design and direction of the AIM consultation, including calling for clearer framing and phrasing of the written consultation and encouraging the Home Office to run consultation sessions with survivors. In October, the Commissioner submitted a detailed response drawing on evidence and practitioner insight, raising concerns about the consultation’s limited scope, the risk of a two-tier identification system, unequal treatment of victims based on nationality or exploitation type, and the persistent conflation of safeguarding with immigration control. The IASC also wrote to Ministers to reinforce these issues, which were echoed widely across the sector.

The Home Office acknowledged that the consultation sought to refine trauma-informed identification questions, though it did not fully address the systemic concerns raised by the IASC and the wider sector.

Following extensive feedback and engagement with the IASC office on the best mechanism to engage survivors, the Home Office held consultation sessions in March 2025 with seven LEAP groups - an important, if late, step towards ensuring lived experience informs future reforms.

*Shaping the Outcome of the Assessing Identification Methods Consultation*

The IASC will work to secure an identification system that is trauma-informed, survivor-centred, and aligned with safeguarding first principles – clearly separated from immigration enforcement functions. As policy develops, the IASC will engage with the Home Office and stakeholders to ensure reforms strengthen protection, reduce inconsistency, and reflect lived experience.

## **Independent Modern Slavery Advocates (ISMAs)**

*The IASC has worked throughout the year to elevate the role of ISMAs and support their inclusion in the Victim Support (Specified Roles) Regulations 2025. ISMAs work alongside survivors to help them understand their rights and to navigate the complex systems and support services available in the UK.*

Throughout the year, the IASC encouraged consideration of ISMAs within the *Victim Support (Specified Roles) Regulations 2025*, including through formal correspondence to the Ministry of Justice. The Commissioner wrote to the Ministry of Justice and highlighted the evidence behind the model and the inconsistent support survivors experience across the UK, noting that ISMAs help individuals navigate complex systems in a trauma-informed way. This was supported by a business case co-designed by more than 90 organisations, including NGOs and lived experience experts.

The IASC also engaged Ministers, officials, parliamentarians and sector partners to present evaluation findings showing how ISMAs improve survivor engagement, access to services and participation in lengthy criminal processes. Case studies from organisations such as the [Snowdrop Project](#) and [Hope for Justice](#) further demonstrated how independent advocacy provides continuity for survivors moving between time-limited or fragmented services.

### *Supporting Advocacy for Survivors*

These contributions have helped increase understanding of the IMSA model across Government. While decisions on statutory recognition rest with Ministers, ISMAs are now being considered within wider victim support discussions. With an established national model, accredited training and active pilot programmes, the IASC will continue to support consideration of ISMAs as a proportionate way to strengthen survivor support and reduce re-exploitation.

## **Independent Child Trafficking Guardians**

*The IASC has continued to advocate for strengthened protections for child victims of modern slavery, including the national rollout and effective implementation of Independent Child Trafficking Guardians (ICTGs).*

The IASC has consistently emphasised the importance of ICTGs in providing specialist, independent support to children, helping them navigate complex systems, safeguarding their welfare, and reducing the risk of re-exploitation. The Commissioner spoke at a national ICTG Conference, highlighting the critical role guardians play in ensuring that child victims are identified early and receive consistent, trauma-informed support and reinforced the need for a

coordinated, multi-agency response. The IASC called for ICTGs to be fully embedded across all areas to ensure no child falls through gaps in provision.

### *Supporting Specialist Advocacy for Children*

The ICTG service currently operates in around two thirds of local authorities in England and Wales. The Government has now committed, in the Modern Slavery Action Plan, to a full national rollout of the service, informed by evaluation and stakeholder input. This is being progressed through a new contracted model, with procurement launched in 2025 and the national service expected to be fully operational from 2027.

## **Promoting Employment as a Pathway to Recovery and Prevention**

*The IASC has continued to highlight the critical role of employment in supporting recovery from modern slavery and reducing the risk of re-trafficking.*

IASC was a member of the project steering panel for the Readiness to Work as Prevention of Re-trafficking evaluation, led by the Sophie Hayes Foundation. The IASC has contributed to research that examines how tailored employability programmes can support survivors into safe and sustainable work, and how this in turn reduces vulnerability to further exploitation. Through her involvement, the Commissioner has supported the development of a stronger evidence base on the link between employment, recovery, and prevention. The IASC also attended the Sophie Hayes Foundation graduate ceremony to speak on a panel and recognise survivors.

The Commissioner has also engaged directly with employers to promote inclusive labour market opportunities for survivors speaking at an event hosted by The Salvation Army to launch the Employer Partnership Pledge, an initiative encouraging businesses to provide meaningful employment opportunities for individuals facing barriers to work, including survivors of modern slavery. The event brought together over 200 UK employers and showcased the impact of employment in enabling survivors to rebuild their lives and achieve long-term independence. The Commissioner emphasised that access to secure and sustainable employment is a key factor in preventing re-exploitation. She highlighted the importance of employer engagement, responsible business practices, and tailored support in creating pathways to independence for survivors.

### *Employment as a Pathway to Recovery for Survivors*

This work has strengthened recognition of employment as a key pillar of recovery and prevention in the UK's response to modern slavery. By contributing to the evidence base, the IASC has helped demonstrate how access to safe and sustainable work reduces vulnerability to re-trafficking and supports long-term independence for survivors.

## Support for Survivor Mothers

*The IASC has supported research to deliver more consistent, trauma-informed maternity care, representing an important step forward in supporting survivors and safeguarding vulnerable mothers and infants.*

The IASC has supported research, led by the University of Nottingham and partners, which explored how best to provide maternity care and support for women affected by modern slavery and their babies. The project examined the experiences and needs of survivor mothers, as well as those of statutory and non-statutory services, to identify gaps in current provision and develop practical, evidence-based guidance. Having spoken at the project's launch in July 2024, the IASC has welcomed its conclusion this year with the production of vital resources to improve awareness, training and care, marking a significant step forward in delivering more effective, trauma-informed maternity support.

### *Improving Care for Survivor Mothers*

This research has driven tangible improvements in how maternity services support survivors of modern slavery by translating lived experience into practical, system-wide change. It has influenced frontline practice and service design by identifying critical gaps and equipping healthcare providers, commissioners, and voluntary organisations with ready-to-use, trauma-informed guidance and tools. These resources are already supporting more consistent, coordinated, and survivor-centred care across pregnancy, birth, and the postnatal period.

## Improving Local Responses to Identification and Support

### **Making the Case for Modern Slavery Coordinators Within Local Authorities: Driving Better Outcomes**

*The IASC's work with the Local Government Association (LGA) and partners has strengthened national understanding of the critical role Modern Slavery Coordinators (MSCs) play in local safeguarding, resulting in a joint report that influenced central and local Government debate and set out a clear, evidence-based case for expanding MSC roles across England and Wales.*

Local authorities are central to a survivor's journey, yet only nine of the 339 authorities in England and Wales have a dedicated MSC.<sup>6</sup> Where they exist, these specialist roles integrate housing, safeguarding, social care and community services into a coherent local response, improving early identification of victims, reducing duplication across agencies, and securing better long-term outcomes. A clear national case was needed to expand these roles.

Building on the Human Trafficking Foundation's (HTF) [Acting Local](#) report, the IASC partnered with the LGA, the Association of Police and Crime Commissioners and HTF to establish an LGA-led Modern Slavery Taskforce. The Taskforce produced a briefing for the Government, setting out an evidence-based business case that MSCs strengthen frontline practice, improve safeguarding and deliver measurable cost efficiencies. The report significantly raised the profile of MSCs and informed debate across central and local Government.

#### *Integrating MSCs into Core Local Authority Structures*

This collaboration strengthened national understanding of the critical role MSCs play in local safeguarding, influencing discussions on prevention and protection across Government and local leadership. The work has established a clear and credible national evidence base demonstrating why MSCs are essential to effective local responses to modern slavery, providing councils with a practical framework to adopt or expand these roles.

The IASC joined a roundtable with LGA partners to champion the work and will continue to call for widespread adoption of MSCs, using the report's findings to press for policy change that embeds these roles within local authority structures and ensures survivors receive consistent, joined-up support wherever they live.

### **Strengthening Local Leadership Through Councillor Guidance**

*The IASC's collaboration with the Local Government Association (LGA) strengthened local leadership on modern slavery by ensuring that updated national councillor guidance reflects best practice and equips local elected members to identify, prevent and respond to exploitation within their communities.*

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<sup>6</sup> Human Trafficking Foundation (2025). [Acting Local: The Need for Modern Slavery Coordinators in Local Authorities](#).

Local councillors play a vital role in identifying exploitation, shaping local safeguarding responses and ensuring victims receive protection and support. Updated national guidance was needed to strengthen this leadership and improve consistency across local areas.

In July 2025, the IASC worked closely with the LGA to refine its [guidance for councillors](#) on tackling modern slavery and drafted the foreword, highlighting the vital role councillors play in recognising risk, driving local safeguarding responses, and championing victim protection. This partnership ensured the guidance was informed by frontline evidence, survivor-centred principles, and the latest understanding of exploitation across local areas.

*Building Confident, Informed Local Leadership on Modern Slavery*

This work strengthened national understanding of the vital role councillors play in preventing exploitation and improved the clarity and practical value of the guidance itself. Local elected members now have a clearer understanding of exploitation indicators; local authority responsibilities and the steps they can take to improve community-level responses. The IASC will continue to work with the LGA and local partners to embed this guidance into routine practice, ensuring councillors are equipped to champion effective safeguarding and support for victims.

## **Improving Care and Support for Child Victims**

### **More Than Words Report**

*The IASC's co-commissioning of the More Than Words report strengthened the national evidence base on child exploitation and successfully elevated the urgency of introducing clear, consistent definitions to improve identification and safeguarding for trafficked and exploited children across the UK.*

Improving the protection of children who have been trafficked or exploited is a core priority for the IASC. Across the UK, the absence of clear and consistent definitions has long undermined frontline responses, creating uncertainty for practitioners and leaving children at risk of inadequate protection. Planned Government work to review definitions ahead of the AIM consultation stalled, reinforcing the need for independent evidence to drive progress. To address this gap, the IASC co-commissioned the [More Than Words](#) report with the Modern Slavery and Human Rights Policy and Evidence Centre (MSPEC) at the University of Oxford, in partnership with ECPAT UK. The report examines how definitional ambiguity affects identification and support for child victims and sets out practical recommendations to strengthen protections - highlighting significant gaps in how child criminal exploitation (CCE) and child sexual exploitation (CSE) are currently recognised.

Ahead of publication, the IASC worked closely with MSPEC and ECPAT UK to engage Government departments and ensure the report's findings could directly influence policy development. This included convening a detailed policy workshop with the Home Office and other departments to discuss the evidence base and implications for national reform. The report

was well received, with officials demonstrating strong interest and a willingness to engage with its recommendations. To mark the launch, the IASC hosted a webinar with MSPEC and ECPAT UK, creating a platform for sector-wide discussion and signalling the report's importance for improving child safeguarding practice.

*Advocacy to Secure Clear Statutory Definitions of Child Exploitation*

The *More Than Words* report provided critical evidence for the sector's response to the Home Office's Assessing Identification Methods (AIM) consultation in October 2025, reinforcing the case for clearer, statutory definitions and stronger protections for children at risk of exploitation. The Commissioner will continue to press Government to embed clarity within statutory guidance and to secure a statutory definition of child sexual exploitation (CSE), now under consideration in the Crime and Policing Bill.

The IASC continues to push for devolved decision making for all child victims of modern slavery and for every victim to have advocacy in the form of Independent Child Trafficking Guardians.

**Prevention of exploitation among vulnerable children and young people**

*The IASC has continued to prioritise the prevention of exploitation among vulnerable children and young people, with a particular focus on early intervention, safeguarding, and strengthening support systems for those at risk.*

The Commissioner also contributed to a multi-phase research project led by Justice and Care in partnership with Sheffield Hallam University, aimed at strengthening early intervention to prevent the exploitation of vulnerable girls and young women, particularly those with care experience. The project sought to build the evidence base on effective early support, with a focus on preventing sexual exploitation among British nationals in care and care leavers. As part of this work, the Commissioner spoke at an expert roundtable under Phase 1, providing strategic insight on risk, prevention, and safeguarding.

In addition, the Commissioner spoke at the launch of [\*Avoiding a Cliff Edge\*](#), a report by Hope for Justice examining the transition from child to adult support for survivors of modern slavery. The report highlights gaps in continuity of care as young people turn 18, drawing on research led by consultants with lived experience and insights from affected young people. The Commissioner emphasised the importance of safeguarding during this critical transition period and called for more consistent, trauma-informed support to prevent young people from falling through gaps in provision.

*Supporting Children and Young People who are Victims of Modern Slavery*

This research has strengthened the evidence base and policy focus on preventing the exploitation of vulnerable children and young people, particularly those with care experience and driven greater recognition of the importance of early intervention, improved transition support, and trauma-informed approaches to reduce the risk of exploitation.

## Safe Reporting

### Secure Reporting for Victims: Collaboration with the Domestic Abuse Commissioner

*The IASC's partnership with the Domestic Abuse Commissioner strengthened national advocacy for a safe reporting mechanism, amplifying the call for a statutory data-sharing firewall to ensure victims of domestic abuse and modern slavery can seek help without fear of immigration enforcement.*

Victims of domestic abuse and modern slavery often avoid seeking help because they fear their information will be shared with Immigration Enforcement. This deterrent effect undermines safeguarding, enables exploitation to continue, and prevents victims from accessing protection. A clear, statutory safeguard is needed to give victims confidence to report abuse safely.

Throughout the year, the IASC worked closely with the Domestic Abuse Commissioner to strengthen national advocacy for a statutory safe-reporting firewall. Together, the Commissioners pressed Government to embed safe reporting in new legislation and to establish a clear separation between statutory services and Immigration Enforcement. Their joint approach drew on evidence of the overlap between domestic abuse, coercive control and modern slavery, and on survivor experiences showing how fear of immigration consequences prevents victims from coming forward.

#### *Ongoing Advocacy for Safe Reporting*

Following publication of the VAWG Strategy, the Government committed to requiring police to seek a domestic abuse victim's consent before sharing information with Immigration Enforcement. While a step forward, this falls short of a true firewall and excludes modern slavery survivors. Consent-based models also offer limited protection for victims experiencing coercion, trauma or language barriers, who may not fully understand the implications of information sharing.

The IASC will continue to press for safe reporting mechanisms that includes victims of modern slavery, ensuring all victims can report abuse safely and with confidence in statutory services. As Government begins shaping the policy detail and considering next steps, the IASC will engage closely with the Home Office and relevant stakeholders so that survivor experience and frontline evidence inform a workable, effective model.

### Addressing Exploitation Risks in UK Visa Routes

*The IASC strengthened scrutiny of exploitation risks within UK visa routes by highlighting how restrictive immigration frameworks - particularly where workers cannot safely change employer - create conditions that heighten vulnerability to modern slavery.*

Following publication of the Immigration White Paper, the Commissioner wrote to Government setting out concerns about poorly designed or overly restrictive visa routes that leave workers dependent on a single employer and unable to exit exploitation without risking

their immigration status. The IASC has longstanding concern about the risks of insecure immigration and consistently pressed for clear, lawful and genuinely workable pathways for workers to leave abusive situations, emphasising the importance of survivor experience and frontline insight in revealing risks that consultations and formal policy processes routinely overlook.

The IASC also urged Government to ensure that forthcoming visa reforms do not drive workers into irregularity or deepen dependency, including within the Overseas Domestic Worker (ODW) route. These concerns were set out in correspondence to the Migration Advisory Committee and were later reflected in its [2025 Annual Report](#). The IASC has maintained sustained engagement with officials and Ministers to advocate for visa frameworks that reduce vulnerability, protect workers' rights, and embed safeguards that prevent exploitation before it occurs.

Alongside this, the Commissioner has engaged extensively to ensure that the experiences of domestic workers inform policy discussions. This included visiting Kalayaan to hear directly from workers, and supporting the voices of affected communities through parliamentary and stakeholder engagement. During Anti-Slavery Week, the Commissioner supported a parliamentary event with Kalayaan and the Voice of Domestic Workers, and backed a proposed amendment from Baroness Hamwee to restore full rights to the visa route.

The Commissioner also engaged with the Migration Advisory Committee to raise concerns about the lack of clarity following the publication of the Immigration White Paper, including whether the visa route would be retained and what protections are needed to prevent exploitation. These concerns were formally submitted to inform a dedicated chapter in the Committee's annual report.

A growing concern for IASC is how the implementation of the 2025 White Paper on Immigration may impact temporary visas, including those of migrant fish workers in the UK. The changes presented in the White Paper could lead to misuse of the visa as a transit route to the UK and creates opportunity for underpayment, increased working hours and reduced freedom of movement. The IASC has worked collaboratively with FLEX on this issue and was pleased to join an event on 20 January sponsored by Lord Watson – “Unravelling the nets: An examination of the seafarer visa policies” - to bring the issue to the attention of Parliament.

*Ongoing Advocacy to Tackle Exploitation Risks in UK Visa Routes*

In May 2025, the Commissioner wrote to the Home Secretary to highlight risks arising from the Immigration White Paper, including the potential impact on vulnerable workers and the lack of consultation with individuals with lived experience. The subsequent response from the Minister for Migration and Citizenship confirmed that further engagement, including with survivors, is planned, alongside wider reforms to the sponsorship system and enforcement through a proposed Fair Work Agency. The Commissioner is also engaging with the new Enforcement Body.

In March 2026, the IASC attended an APPG on Migration to discuss the Government's asylum reforms and the importance of not conflating immigration policy with measures to modern slavery, as this risks eroding essential protections for victims.

## Adult Consent to be Referred into the NRM

### Refusal to Consent: Understanding NRM Refusals and Duty to Notify Patterns

*The IASC's Refusal to Consent report strengthened national understanding of why increasing numbers of potential victims decline entry into the NRM, providing the first comprehensive analysis of NRM refusals and Duty to Notify (DtN) trends and shaping cross-sector debate on how to rebuild trust in the UK's identification system*

There has been a sharp rise in adults identified as potential victims who refuse to enter the NRM, leaving them without statutory support and widening the gap between DtN reports and NRM referrals.

In response, the IASC commissioned the first comprehensive analysis of NRM refusals and DtN trends to understand the drivers of refusal and to inform reform. The [research](#) identified key drivers of non-consent: fear of immigration consequences, distrust of authorities, trauma and coercion, unclear explanations of the NRM, and perceptions of limited benefit. Ahead of publication, the IASC tested findings with sector partners and frontline services to ensure operational relevance and launched the report by bringing together practitioners, policymakers and researchers.

The report strengthened national understanding of refusals and DtN patterns, evidenced that DtNs are rising faster than NRM referrals, and reframed debate around rebuilding trust in identification. It highlighted the need for clearer consent processes and communication, and for consistently trauma-informed practice among First Responders, with safeguards that recognise fear, coercion and immigration pressures.

The IASC is using the [Refusal to Consent](#) report findings to challenge assumptions of "misuse" and to advance reforms that restore confidence and improve early identification: clear information at first contact, consistently trauma-informed practice, and protections that enable victims to access support without fear. The IASC will work with partners to translate these findings into practical improvements across the identification pathway.

#### *Duty to Notify Across the Devolved Administrations*

Although Duty to Notify provisions are established in England and Wales, they are not yet in force in Scotland or Northern Ireland - an absence that the IASC has highlighted consistently as part of her strategic commitment to improving national data, early identification and safeguarding.<sup>7</sup>

<sup>7</sup> Independent Anti-Slavery Commissioner (2025). [Strategic Plan](#), p34.

Building on the findings of the *Refusal to Consent report*, the IASC continued to advocate for consistent DtN mechanisms across all devolved administrations. In Scotland, officials confirmed that Section 38 of the Human Trafficking and Exploitation (Scotland) Act 2015 - paused following a 2019 consultation - has now re-started, with regulations laid in February 2026 and DtN commencement scheduled for February 2027, alongside guidance, training and awareness-raising for public bodies. In Northern Ireland, the Department of Justice reported that work to introduce DtN is progressing, with implementation anticipated before the end of 2026, subject to legislative approval.

## Prosecution

### **The third pillar of the Strategic Plan focused on Prosecution and what can be done to improve the criminal justice response to modern slavery**

Strengthening the investigation and prosecution of modern slavery remains a critical component of the UK's response. However, this year's progress has unfolded against a challenging backdrop of wider national policing reform, sustained resource pressures, and a strategic shift within law enforcement structures that has deprioritised modern slavery in favour of other national policing priorities. The withdrawal of dedicated MSHT funding streams to policing, including defunding the modern slavery arm of the Modern Slavery and Organised Immigration Crime Unit weakens the capacity to prosecute modern slavery and limits opportunities for proactive prevention opportunities through training and toolkits.

Despite these constraints, the IASC has focused on ensuring that the evidence base, operational insight, and national scrutiny required for an effective criminal justice response remain strong.

### **The Need for a Stronger Law Enforcement Response**

#### **Policing Response to Modern Slavery: 10 Years On**

*The IASC's Policing Response to Modern Slavery: How Has It Changed in the Last 10 Years? report provided the first comprehensive assessment of policing practice since the Modern Slavery Act 2015, revealing declining prioritisation, inconsistent approaches across forces, and systemic gaps that continue to hinder effective victim identification and prosecution.*

Only 22% of force leads felt modern slavery was widely understood in policing, and just 9% of frontline officers believed their colleagues had a solid understanding of MSHT indicators.<sup>8</sup> At the same time, specialist modern slavery units have been disbanded or downsized, funding has dropped sharply since 2020, and enforcement activity has fallen despite the rising number of NRM referrals.

In July 2025, the IASC published a [report](#) in collaboration with Leapwise to critically analyse the policing response. This was the first independent assessment of policing since the Modern Slavery Act 2015 was introduced. The research drew on interviews with over 70 policing professionals, structured analysis of policing trends, and qualitative insights from senior leaders and frontline officers and offers a clear call to action for Government and policing. It sets out recommendations to strengthen prioritisation, rebuild specialist capacity, improve investigative standards, and increase alignment between policing and prosecution pathways.

Ahead of publication, the IASC convened a national webinar with Leapwise, attended by policing leaders, the former NPCC lead on modern slavery, and partners from across criminal justice. The session highlighted critical gaps identified in the research, including

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<sup>8</sup> Independent Anti-Slavery Commissioner (2025). [Policing Response to Modern Slavery: How Has It Changed in the Last 10 Years?](#)

under-charging of offences, reduced investigative capacity, and poor join-up between policing and the CPS, and explored practical measures to rebuild capability.

*Holding Government to Account on the Decline in Policing Capability*

By providing an evidence-based diagnosis of a decade of change, and decline, in policing capability, the IASC's report has re-centred modern slavery within national policing debate and created a foundation for reforms aimed at improving victim outcomes and bringing more offenders to justice.

Despite the report making meaningful recommendations to Government to strengthen the police response, there have been further cuts to modern slavery services including in the MSOIC which undermine the specialist capability needed to respond effectively. The IASC will continue to raise the impact of these decisions on policing capability and outcomes. The IASC will also be engaging with Ministers on upcoming policing reforms to ensure that modern slavery becomes a greater priority and that specialist capacity is protected and strengthened as PCC responsibilities are transferred to new bodies.

## **Victim Navigators**

*The IASC worked throughout the year to support the role of Victim Navigators and the role they play supporting victims through the criminal justice system.*

The IASC has played a leading role in promoting the development of the accredited Victim Navigator Programme, delivered by Justice and Care, as a key mechanism for improving outcomes for victims of modern slavery within the criminal justice system. As Chair of the Programme's Accreditation Steering Group, the Commissioner has provided strategic leadership to support the development of a consistent and effective accreditation framework. Through this role, the Commissioner has supported collaboration, set direction, and promoted best practice across the system.

Alongside this, the Commissioner has engaged directly with Ministers to drive policy change. In a meeting with House of Lords Minister Levitt, the Commissioner advocated for an amendment to the Victims and Courts Bill to enable the national rollout of Victim Navigators across England and Wales. The Commissioner set out the strong evidence base demonstrating that Navigators improve victim engagement, support police investigations, and strengthen prosecution outcomes. This included highlighting the complex barriers victims face and the importance of trusted, independent support in enabling sustained participation in the justice process.

The Commissioner has also used external platforms to raise awareness of the role of Victim Navigators and the wider need for victim-centred responses. This included speaking at an event hosted at the Romanian Consulate, where she engaged business leaders, civil society, and diaspora communities on modern slavery risks and responses, including the importance of addressing forced labour and strengthening partnerships to prevent exploitation.

*Better Advocacy for Victims Navigating the Criminal Justice System*

This work has advanced the national development of the Victim Navigator Programme, helping to establish a consistent, accredited model and secure greater recognition of its role in improving victim engagement and prosecution outcomes. Through ministerial engagement and wider advocacy, the IASC has built momentum for national rollout and strengthened support for victim-centred approaches across the criminal justice system.

### **Better Labour Market Enforcement**

*The IASC has been engaging with Government departments, agencies and regulators to capitalise on the opportunities of the new Fair Work Agency and deliver more robust labour market enforcement.*

Building on evidence the IASC provided to the Business and Trade Committee, the Commissioner continued to call on the Government to ensure that the absorption of the Gangmasters and Labour Abuse Authority into the Fair Work Agency – a much larger organisation – does not lead to less focus on labour exploitation. The Commissioner has maintained regular engagement with the Director of Labour Market Enforcement to share updates on sectors at high risk of labour exploitation and modern slavery to improve the policy response. This has included exchanging insights on emerging risks, patterns of abuse, and the impact of labour market non-compliance on vulnerable workers as the Fair Work Agency has been developed.

The IASC continued to advocate for the Fair Work Agency to have a prevention focused approach that recognises the continuum of labour exploitation and the need to intervene before harm escalates. She emphasised the importance of clear safeguarding pathways and effective oversight so that the Agency strengthens protections for vulnerable workers and supports consistent identification of victims.

*Ongoing Engagement with the FWA*

In February, the Commissioner met with Matthew Taylor CBE, Chair of the Fair Work Agency, to highlight the importance of embedding strong modern slavery safeguards within the Agency’s early remit and operational design. The IASC will continue to engage with the FWA and partners to take a proactive and victim-centred approach to tackling labour exploitation.

## **Engagement with Operational Teams and Looking at Best Practice**

Over the past year, the IASC has engaged directly with frontline practitioners, operational leaders, and system partners to assess how effectively the UK is identifying victims, safeguarding those at risk, and bringing perpetrators of modern slavery to justice. Across border settings, prisons, and policing this work has focused on understanding what works in practice and where improvements are needed.

### *Border Force*

Borders are a critical point in the response to modern slavery. They are often the first place where exploitation can be identified, where safeguarding can begin, and where intelligence can be gathered to disrupt organised crime. Through visits to Gatwick and Portsmouth, the IASC has looked at how Border Force officers identify vulnerability in high pressure environments, from preventing forced marriage through Operation Limelight to detecting labour exploitation at sea.

At a strategic level, IASC's engagement with the newly formed Border Security Command has focused on ensuring that efforts to tackle organised immigration crime also account for victims of trafficking emphasising that border security and victim protection must work together. Effective identification at the border strengthens intelligence and supports action against perpetrators, while overly narrow enforcement risks missing victims and enabling exploitation to continue.

### *HMPPS*

Prisons and probation services play a key role in addressing modern slavery, as both victims and perpetrators come into contact with the criminal justice system. At the HMPPS Modern Slavery Conference, the IASC called for better identification of exploitation within offending, stronger data, and improved partnership working. This was following IASC's visit to HMP Bronzefield where the IASC heard that for some women, custody was the first place they experienced safety after exploitation, but risks remain on release which highlighted how important partnership working and strong transition planning was needed to prevent re-exploitation. IASC also welcomed HMPSS's new [guidance](#) promoting trauma informed, person centred approaches emphasising that prisons are not only as places of custody, but as important sites of protection and prevention.

### *Crown Prosecution Services*

As Chair of the Crown Prosecution Service National Scrutiny Panel on modern slavery, the Commissioner has provided critical oversight of how modern slavery cases are investigated and prosecuted, ensuring that learning from operational practice is translated into system-wide improvements. The Panel brings together prosecutors, police, and frontline organisations to examine live issues, identify barriers to effective prosecutions, and promote consistency in the use of modern slavery offences.

*Delivering Tangible Outcomes Through the Panel*

Through this forum, the Commissioner has supported improvements in case preparation, evidential pathways, and approaches to victim and witness engagement in complex cases. The Panel has also played an important role in shaping CPS training and guidance, ensuring that prosecutors are better equipped to understand the dynamics of modern slavery and build stronger cases.

In addition, the Panel has strengthened ongoing communication and collaboration between the CPS, police, and frontline agencies, helping to align investigative and prosecutorial approaches and embed a more coordinated, victim-centred response. This work complements the Commissioner's wider efforts to improve both single agency and multi-agency investigations, including advocating for the role of Victim Navigators and promoting best practice across the criminal justice system.

# Improving Knowledge and Understanding

## Advancing Strategic Objectives through Research

The Independent Anti-Slavery Commissioner (IASC) has a statutory mandate to drive systemic change in the UK's response to modern slavery. The complexity and adaptability of exploitation have highlighted the need for evidence-based strategies that go beyond reactive measures. To meet this challenge, the IASC has embedded primary research into its strategic objectives, ensuring that policy and practice are informed by robust, real-world insights.

Primary research enables the Commissioner to identify emerging risks, understand lived experiences, and evaluate the effectiveness of current interventions. By commissioning and conducting studies that combine qualitative and quantitative methods, the IASC is building a stronger evidence base to shape prevention, protection, and enforcement. This approach reflects a commitment to survivor-centred research, cross-sector collaboration, and innovation in tackling exploitation.

During this financial year, the IASC delivered a substantial programme of in-house and commissioned research to strengthen the UK's evidence base on modern slavery and human trafficking. Primary research included an in-depth study on sexual exploitation facilitated through adult services websites, published as [\*Behind the Profile: Sexual Exploitation and Trafficking Through Adult Services Websites\*](#). The IASC also undertook research with FTSE 100 companies as part of the work on [\*Strengthening the UK's Forced Labour and Human Rights Legislative Framework\*](#), examining corporate approaches to due diligence and worker protections.

Alongside this, the IASC published research commissioned from the University of Nottingham Rights Lab, [\*Modern Slavery Prevalence Estimation in the UK: A Scoping Review\*](#), enhancing national understanding of methodologies for estimating prevalence. The IASC further published [\*More Than Words: How Definitions Impact on the UK's Response to Child Trafficking and Exploitation\*](#), a study commissioned jointly with the Modern Slavery Policy and Evidence Centre at the University of Oxford and delivered by ECPAT UK, which explores the impact of differing definitions on policy and practice.

The IASC's programme of primary research also included [\*Policing Response to Modern Slavery: How has it Changed in the Last 10 Years?\*](#), examining the decline in investigations and prosecutions despite rising victimisation, based on interviews with frontline officers; [\*Enhancing Modern Slavery Prevention within the Homelessness Sector in the UK\*](#), was conducted in partnership with The Passage to understand vulnerabilities and prevention gaps; and [\*Refusal to Consent: Factors Influencing the Uptake of Modern Slavery Support in the National Referral Mechanism\*](#), analysed why increasing numbers of potential victims are choosing not to enter the NRM. In addition, the IASC commissioned external research examining emerging and future threats in modern slavery and human trafficking, co-funded with the Government Office for Science. Most recently, the IASC is working with enforcement authorities to scope an analysis project to determine the cost of modern slavery to the economy and the UK taxpayer.

Alongside this, the Data and Evidence Group, jointly led by the Home Office, STOP THE TRAFFIK, and the Independent Anti-Slavery Commissioner, continues to play a central role in strengthening the use of data to prevent modern slavery. Bringing together partners from across sectors, the group has worked to identify key evidence gaps, share both strategic and operational insights, and explore how different datasets can be combined to build a more comprehensive understanding of trafficking patterns. Its focus remains on practical collaboration, responsible data sharing, and generating actionable insight to support more effective prevention and policy development.

## **Integrating Lived Experience**

*Survivor Engagement has been a central IASC priority since coming into post. IASC has been working to integrate lived experience into their own activity, while also focusing on pushing the Government to establish its own coherent and sustainable mechanism to meaningfully engage survivors.*

### **IASC Efforts to Improve Government led Survivor Engagement**

*Holding the Government to account for its approach to survivor engagement and pressing for stronger, formalised mechanisms that safeguard and uphold survivors' interests.*

Strengthening survivor voice within national policymaking has remained a central priority for the IASC throughout the year. Despite broad consensus that lived experience is essential to effective and legitimate modern slavery policy, Government engagement mechanisms continue to lack coherence, safeguarding and strategic clarity. Survivors and sector partners have repeatedly raised concerns about inconsistent communication, limited transparency and the risk that engagement can feel superficial or unsafe. In this context, the IASC intensified scrutiny of the Home Office's approach and continued to advocate for an engagement model that is credible, coordinated and trauma-informed.

This year's work built on substantial engagement undertaken during FY24/25, when the Commissioner submitted a detailed [business case](#) for a single, safeguarded National Survivor Council. The proposal, co-designed with sector partners, was designed so as to avoid fragmented, ad hoc arrangements with a consistent structure through which survivor insight could meaningfully inform policy development. Recognising the urgency of establishing such a mechanism, the IASC offered budgetary support to accelerate progress. Despite early positive indications from officials, no substantive action followed and the Home Office confirmed that they would not be looking to establish such a mechanism.

In the absence of such a formal mechanism, over the last year several separate survivor-engagement initiatives were being run simultaneously across Government, each with different purposes, governance arrangements, safeguarding expectations and levels of transparency. Survivors, support organisations and frontline practitioners reported confusion about which panel they were being invited to, why invitations overlapped, and how their contributions would be used. The absence of a single, coherent structure meant that individuals were repeatedly asked to share traumatic experiences without clarity about protections,

escalation routes or the relationship between each engagement exercise. This duplication created unnecessary emotional burden, undermined trust, and risked traumatising.

The IASC has continued to raise concerns of survivors directly with Home Office Ministers and senior officials, calling for more sensitive, clear and coherent Government communication.

### **IASC Lived Experience Advisory Panels Summit: March 2026**

*The IASC established a dedicated forum for lived-experience expertise to ensure that the IASC's strategic and policy work is shaped by the insights of survivors.*

To strengthen the role of lived experience in setting national anti-slavery priorities, the IASC convened the first Anti-Slavery Lived Experience Advisory Panels Summit in March 2026, establishing a new mechanism that brings survivor perspectives into policy discussions in a more coordinated, representative and strategic way. Coordinated by the Human Trafficking Foundation, the Summit brought together representatives from thirteen lived-experience advisory panels operating across the anti-slavery sector. Each panel nominated a delegate to represent their wider group, ensuring that the insights shared reflected collective, peer-grounded experience rather than individual testimony.

The Summit created a dedicated and safeguarded space to identify system-wide priorities from a survivor-led perspective, and provided the Commissioner with direct, structured insight into the issues requiring urgent Government attention. This approach strengthened the IASC's engagement with policymakers, enhanced the legitimacy and grounding of policy recommendations, and further embedded survivor expertise at the heart of the Commissioner's strategic direction. The IASC intends to hold further Lived Experience Advisory Panels Summits in 2026 to ensure survivor expertise underpins IASC projects and policy positions.

### **Integration of Survivor Engagement Across IASC Projects**

Alongside the Summit, the IASC ensured that survivor voice was embedded across key IASC projects throughout the year. Lived experience informed research design, evidence gathering, and the development of recommendations across several thematic priorities, helping the IASC's work stay closely aligned with the experiences of those directly impacted.

In the IASC's [report](#) on preventing homelessness and modern slavery, survivors provided vital insight into the vulnerabilities created by unstable accommodation, particularly at transition points such as leaving the National Referral Mechanism or moving between support systems. This joint project with The Passage placed co-production at its core, recognising that people with lived experience of trafficking and homelessness offer unique expertise that can enhance prevention programmes. By working collaboratively with survivors, the IASC and The Passage co-produced nine practical recommendations grounded in the evidence of lived experience, to strengthen local authority and support-provider responses.

Survivor expertise also shaped the IASC review of Adult Service Websites (ASWs) which examined how ASWs are operating in the UK in practice, and how their design, governance, and regulatory treatment intersect with risks of sexual exploitation and modern slavery.

Survivors' accounts revealed clear and consistent patterns - grooming, third-party control, loss of autonomy, platform features that obscure risk, and the barriers people face when trying to seek help or exit exploitation. Their insight also pointed to practical measures for strengthening prevention and disruption online. This lived-experience evidence was fundamental to shaping the study's analytical focus and ensuring that the review's findings addressed the structural conditions that enable exploitation on digital platforms.

Survivor insight was also integral to the development of the report: *Strengthening the UK's Forced Labour and Human Rights Legislative Framework* – which sets out a model for UK-wide legislation to prevent forced labour and human rights harms in value chains. An Unseen survivor consultant authored the report's foreword, highlighting - through lived experience - the systemic gaps in oversight, due diligence and accountability that allow exploitation to take hold.

Survivor consultants were engaged throughout the drafting process, providing direct evidence on the failures that enable forced labour, and the safeguards needed to prevent harm and ensure meaningful access to remedy. Their input shaped key elements of the proposed framework, including strengthened prevention duties, clearer accountability mechanisms, and survivor-led approaches to redress.

To complement this lived-experience evidence, the IASC also carried out public polling and held interviews with businesses to understand operational realities and expectations for future legislation. Feedback from survivors, businesses and the public consistently highlighted the need for clearer legal duties and enforceable oversight. By embedding survivor voice alongside insights from industry and civil society, the IASC produced a set of practical, credible recommendations grounded firmly in real-world experience.

The IASC worked in partnership with Hope for Justice to convene a joint engagement event focused on survivor experiences within the criminal justice system, in the context of the Victims and Prisoners Act 2024 and the forthcoming Victims' Code.

The Commissioner secured funding from the Ministry of Justice to enable the meaningful participation of survivors, ensuring that experts by experience were at the centre of discussions. The event brought together individuals with lived experience of modern slavery to provide direct insight into how the system can better assess and meet victims' needs, engage with child victims, communicate case information, and support survivor participation in criminal proceedings.

Survivor perspectives were also integrated into the IASC's work on emerging threats [see page 20]. Through discussions at the Lived Experience Advisory Panels Summit, survivors highlighted evolving patterns of exploitation linked to technology, informal recruitment routes and shifting criminal models. Their observations on new tactics and early warning signs strengthened the IASC's forward-looking analysis and informed the advice provided to Government on future risks.

Survivor engagement enhanced the accuracy and impact of the IASC's work across all priority strands, ensuring the IASC's recommendations reflected the real-world experiences of those most affected.

## Engagement with Devolved Administrations

### Scotland

The IASC engaged extensively with Scottish Ministers and officials throughout the reporting period across key areas of trafficking and modern slavery, including violence against women and girls, victim identification and support, and wider UK level reforms with implications for Scotland. Engagement was constructive and forward-looking, while maintaining the IASC's independent role and focus on evidence based, outcome driven policy. This work also extended to wider themes such as forced labour regulations, and emerging threats.

In parallel with this broader engagement, the Commissioner continued to hold the Scottish Government to account on progress against the IASC and Passage [recommendations](#) on homelessness and modern slavery. Scottish officials confirmed that their Housing and Homelessness teams are working with stakeholders to prepare for implementation of the [homelessness prevention duties](#) introduced under the [Housing \(Scotland\) Act 2025](#), including through the development of guidance and further regulations. This includes named 'relevant bodies', including health boards and the police, to which new 'ask and act' duties will apply. These new duties, informed by the recommendations of those with lived experience of homelessness are expected to significantly strengthen protections for individuals who may be at risk of exploitation through focussed proactive prevention which will greatly increase the likelihood of early intervention in exploitation cases. The cross-sector involvement ensures that vulnerable people are more likely to be identified by trusted professionals who understand signs of exploitation.

A central feature of the IASC's engagement during the year was [Scotland's refreshed Trafficking and Exploitation Strategy](#), published in July 2025. The updated Strategy adopts a public health approach, strengthening the emphasis on prevention, early risk identification and coordinated action across services. This approach aligns closely with the priorities set out in the Commissioner's [Strategic Plan](#). Throughout the year, the IASC's constructive relationship with Scottish officials enabled the sharing of good practice, alongside frank, evidence-based challenge, helping to shape the refreshed Strategy.

Across successive drafts, the IASC encouraged a stronger focus on early identification and intervention, enabling frontline professionals to recognise signs of exploitation before escalation. The IASC also advocated for a broader prevention lens that addressed both demand and the vulnerabilities that drive exploitation, including homelessness and substance misuse. Elements of these recommendations are reflected in the final draft, particularly around prevention, the use of data, and the inclusion of survivor voices. The stronger emphasis on survivor involvement and the recognition of data as the foundation for evidence-based action were especially welcome.

The IASC's engagement continued through the Scottish Government's delivery plan workshop in Glasgow – a full day session bringing together statutory partners and stakeholders to shape how the refreshed Strategy will be implemented. The IASC contributed to discussions emphasising the need for practical, trauma informed action, as well as strong alignment between strategic ambition and frontline capability. Scottish officials subsequently reported

high levels of engagement across the delivery plan workshop series and the Scottish Government is now incorporating this feedback into the delivery plan, due for publication later in 2026.

### **Northern Ireland**

The IASC maintained a strong and constructive working relationship with Northern Ireland Ministers and officials throughout the reporting period, engaging regularly across a wide range of modern slavery and safeguarding priorities. This included improving coordination between homelessness and MSHT services in Northern Ireland, as part of the IASC's work to prevent both homelessness and exploitation.<sup>9</sup> The IASC also worked to ensure that emerging UK-wide reforms - including those related to data, referral pathways and frontline practice - reflect the distinct operational realities in Northern Ireland. These collaborative efforts have formed a core part of the IASC's commitment to driving coherent, effective and trauma-informed responses across the UK.

Tackling child exploitation was a key strand of the IASC's engagement with Northern Ireland officials and Ministers during the reporting period. The Commissioner continued to promote devolved decision making for children identified as potential victims of modern slavery, working closely with counterparts across Northern Ireland to strengthen child-centred safeguarding. At the June launch of new [research on child criminal exploitation](#) in Northern Ireland, hosted by Ulster University and IOM UK, together with the Department of Justice and the Modern Slavery and Human Rights Policy and Evidence Centre - the Commissioner highlighted the need for tailored NRM processes and the importance of local expertise in delivering timely, trauma-informed decisions for children at risk.

Against this backdrop, the Department of Justice, working in collaboration with the Department of Health, submitted a proposal to the Home Office for a Northern Ireland NRM Child Decision-Making Pilot. The bid was successful, reflecting long-standing concerns about historically low child-victim referral numbers and alignment with Northern Ireland's cross-Government [Child Criminal Exploitation Action Plan](#). While delivery of the pilot sits with the Northern Ireland departments and the Home Office, the IASC's independent scrutiny and her long-standing strategic commitment to devolved child decision making contributed to the broader policy environment that supported this progress.

The pilot commenced in January 2026 and the IASC continues to engage at official and ministerial level to ensure it strengthens identification, protection, and outcomes for children at risk of exploitation.

The IASC also engaged with Northern Ireland authorities on their response to child sexual exploitation, including meeting with the Criminal Justice Inspection Northern Ireland team ahead of its [follow-up review](#). The final report highlighted significant resourcing pressures within the police, particularly within the specialist CSE team - where reduced staffing was affecting the timeliness and quality of investigations.

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<sup>9</sup> Independent Anti-Slavery Commissioner (2025). [Enhancing Modern Slavery Prevention Within the Homelessness Sector in the UK](#), p48.

While the review clearly demonstrated the need for improvements, the introduction of the devolved NRM decision-making pilot offers an important opportunity to support earlier identification and more integrated multi-agency safeguarding. By reducing pressure on overstretched services and promoting a more coherent, child-centred approach to both criminal and sexual exploitation, the pilot represents meaningful progress within Northern Ireland's safeguarding landscape.

Alongside these areas of work, the Commissioner advanced UK-wide proposals for strengthened forced labour regulations and model legislation aligned with emerging mandatory human rights due diligence frameworks. To ensure the proposals reflect the UK's diverse regulatory landscape, Ministers and officials in Northern Ireland were invited to provide insights on relevant initiatives and priorities. Their contributions enabled the IASC to recognise ongoing devolved activity and ensure that reforms are responsive to the operational context in Northern Ireland. This collaborative approach supports the Commissioner's commitment to promoting coherent, evidence-based protections against forced labour across all nations.

The IASC addressed the Northern Ireland All-Party Group on Modern Slavery and Commercial Sexual Exploitation at an event in January 2026 marking the ten-year anniversary of the Human Trafficking and Exploitation Act (NI) 2015, highlighting the scale and evolving nature of online-enabled sexual exploitation and sharing early findings from the survivor-led review into Adult Services Websites. The IASC urged continued Northern Ireland leadership in strengthening regulation, accountability and protection for women and girls and welcomed its own inquiry into the regulation of websites advertising prostitution.

## **Wales**

The IASC maintained a close and constructive relationship with Welsh Ministers and officials throughout the reporting period, engaging regularly across a broad range of modern slavery and safeguarding priorities. This included sharing policy insights, providing feedback on emerging proposals, and contributing to national fora such as the Anti-Slavery Wales Forum and the Anti-Slavery Wales 2025 conference. In January 2026, the IASC also visited Baswo's head office and a Salvation Army safe house in Cardiff to understand local delivery of the Modern Slavery Victim Care Contract and to discuss trauma-informed support for survivors. The visit provided an opportunity for IASC and the Welsh Cabinet Secretary for Social Justice, Jane Hutt MS meet frontline partners, see specialist accommodation firsthand and hear directly from a survivor about their experience and the support they receive.

Running alongside our wider engagement, the IASC followed up on its joint Passage recommendations on homelessness and modern slavery. Wales reported that updates to the Welsh Code of [Guidance for Local Authorities on the Allocation of Accommodation and Homelessness](#) are being taken forward to reflect these recommendations, an important step toward more consistent prevention and stronger safeguards for people at heightened risk of exploitation. Embedding these changes in statutory guidance will help align local practice with national policy, improve referral pathways, and support earlier intervention across housing and safeguarding services.

A key area of the IASC's engagement with the Welsh Government focused on strengthening safeguarding and prevention measures across Wales. The Commissioner welcomed the

opportunity to contribute and reviewed the revised [All Wales Practical Guide](#) on safeguarding children from exploitation ahead of its wider circulation, providing detailed feedback to improve clarity, practitioner usability and the consistency of a trauma-informed approach. This included recommendations to centre children's experiences, promote sensitive and respectful language, and better reflect the complexities of exploitation in practice. Welsh Government officials described the Commissioner's contributions as extremely valuable, noting the impact they had on enhancing the clarity, coherence and trauma-informed focus of the revised guidance.

Alongside this work, during Anti-Slavery Week in October 2025 the Welsh Government launched new [free online learning on modern slavery](#) for use by people living and working in Wales. Hosted on the Learning@Wales platform, it is aimed at those working and volunteering in settings with high modern slavery risks, and those engaging with people who may be experiencing or have experienced exploitation. As part of wider prevention efforts, the IASC contributed to the three modules, ensuring the content reflects established best practice. The Welsh Government are working with partners to promote the online learning. While early feedback indicates that the training has been well received, uptake data is not yet available for reporting.

### **Delivering with Domestic and International Partners**

The IASC has maintained strong and consistent engagement with key expert and practitioner networks, including the Anti-Trafficking Monitoring Group, the Labour Exploitation Advisory Group, the Human Trafficking Foundation, and the Local Government Association. These forums provide critical insight into emerging risks, frontline pressures, and evolving patterns of exploitation. This ongoing dialogue ensures that lived experience and operational realities directly inform the Commissioner's scrutiny of government reforms, as well as her broader priorities on prevention, protection, and safeguarding.

The Commissioner has also deepened collaboration with international counterparts, strengthening the UK's contribution to a coordinated global response to modern slavery. In February, the Commissioner submitted her annual contribution to the U.S. State Department's Trafficking in Persons (TIP) Report and throughout the year has engaged with the Australian Anti-Slavery Commissioner, the Australian Ambassador to Counter Modern Slavery, People Smuggling and Human Trafficking, and the Australian High Commissioner, alongside the Canadian High Commissioner and Canada's Chief Advisor to Combat Human Trafficking. These discussions have focused on sharing best practice, comparing policy approaches, and identifying opportunities to strengthen prevention strategies and victim identification systems across jurisdictions.

In parallel, the Commissioner has continued to work closely with multilateral partners, including the UN Special Rapporteurs and the Organization for Security and Co-operation in Europe, as well as participation in international rapporteur forums, that support collective efforts to address trafficking through greater international coordination, knowledge sharing, and alignment of policy responses.

# Forward Look

## Driving Progress in the UK's Response to Modern Slavery

The IASC will continue to build on the progress already achieved as outlined in this Annual Report, focusing on deepening impact, strengthening national capability, and ensuring survivor voice is at the heart of the UK's response to modern slavery. With most actions in the Strategic Plan now underway or completed, the next phase is about translating work into tangible outcomes for those affected by exploitation.

A central priority for the year ahead is embedding the insights from the first Anti-Slavery Lived Experience Advisory Panels Summit. Survivors shared a unique, ground-level perspective on the challenges victims face, offering practical, forward-looking recommendations. These insights will directly shape the Commissioner's priorities. The Commissioner will also continue to press for the Government to form a formal National Survivor Council, providing a safeguarded mechanism to ensure survivors influence policy and decision-making at every stage.

**Prevention** remains a core focus. The Commissioner will advocate for a comprehensive, cross-government approach that reduces vulnerability before exploitation occurs, ensuring modern slavery considerations are integrated across related policy areas. Building on the Strategic Foresight programme, the IASC will expand efforts to anticipate emerging threats and prepare for future patterns of exploitation.

**Protection** will continue to be strengthened. This includes improving identification systems, supporting trauma-informed approaches, and ensuring consistent victim care across statutory and non-statutory services. The Commissioner will champion safe-reporting mechanisms and pathways that enable victims to access support without fear, building trust and resilience in the system.

**Prosecution** efforts will be enhanced by working closely with policing, the CPS, and wider justice partners. Building on findings from the national policing review, the IASC will push for better resourced, more effective criminal justice responses, strengthen victim participation, and promote victim advocacy to enable safer, more supportive engagement throughout the process.

Alongside these pillars, the IASC will expand research and evidence-sharing to ensure responses are grounded in robust data. By promoting clear, practical guidance, the Commissioner aims to help frontline professionals, policymakers, and the public spot exploitation earlier, respond more effectively, and contribute to a more informed national conversation on modern slavery.

Across all areas, the Commissioner will maintain a consistent, evidence-driven challenge to Government, advocating for policies that protect victims, tackle demand, and deliver coordinated, long-term leadership. The Commissioner will continue to shape legislation and work with Parliamentarians and devolved nations.

The achievements of the past year provide a strong foundation for the next phase: one where the UK's response to modern slavery is informed by evidence, strengthened by survivor expertise, and focused squarely on reducing exploitation wherever it occurs.