



The Rt Hon Shabana Mahmood MP
Home Secretary
Home Office
2 Marsham Street
London
SW1P 4DF
Via email: [REDACTED]

9 September 2025

Dear Home Secretary,

Re: Congratulations on your appointment

Congratulations on your appointment as Home Secretary. I wish you every success as you take on this critical role at a time when the UK faces serious challenges in protecting vulnerable individuals from exploitation.

As Independent Anti-Slavery Commissioner (IASC), my statutory role under the Modern Slavery Act 2015 is to promote good practice and make recommendations on the prevention, detection, investigation, and prosecution of modern slavery, and the identification of victims - whose numbers continue to rise year-on-year.

As IASC I have focused on rebuilding the Commissioner's office and delivering a Strategic Plan which was shaped by the anti-slavery sector, law enforcement, and survivors, with whom I meet regularly. The Strategy is built around three pillars: prevention, protection, and prosecution, and is underpinned by survivor engagement and improving research and understanding of modern slavery.

Modern slavery is not remote - it is happening in our communities, affecting children, UK nationals, and women and girls. Last year saw record referrals to the National Referral Mechanism (NRM), including a sharp rise in child victims, alarmingly prosecution rates in England and Wales remain very low.

The NRM identification system is also under severe strain, and despite rising numbers, the number of First Responder Organisations has remained unchanged since the NRM's launch in 2008. Your department's Identification of Victims of Modern Slavery: Call for Evidence, is an encouraging step forward. My office is working closely with the sector to support this consultation and ensure it leads to meaningful reform. Alongside this work with the Home Office, I am working on the following areas:



Embedding Survivor Voice in Policy. Survivors must shape the UK's response to modern slavery. I have shared proposals with your officials to establish a UK Survivor Advisory Council, ensuring lived experience informs trauma-informed policymaking. I would welcome your support in this.

Tackling Gendered Exploitation and Digital Harms. Modern slavery and sexual exploitation victims must be central to the Violence Against Women and Girls Strategy. My office is leading research on the role of adult service websites (ASWs), which have been identified by the National Crime Agency as trafficking enablers. I am also working with survivors to explore options for stronger regulation or banning of ASWs to protect victims.

Assessing Emerging and Future Threats in Trafficking. Criminals are finding new ruthless ways to exploit vulnerable victims, including forced pregnancy, surrogacy, and online-enabled scams. I am working with partners in Government to identify these threats and shape our policy response to prevent further harm occurring to victims.

Updating the UK's Strategic Response. The UK's last cross-government Modern Slavery Strategy was published in 2014. I continue to call for a new, coordinated strategy to give law enforcement the direction and resources needed to prevent exploitation, support victims.

A UK-Wide Forced Labour Framework. I am developing proposals for a UK-wide forced labour regulatory framework to ensure enforceable, consistent standards for business and the public sector. This includes working closely with FTSE 100 companies, conducting interviews with business leaders and international partners, and exploring alignment with international best practice.

I welcome the opportunity to meet with you to discuss how the Government can ensure modern slavery remains a national priority - placing survivors at the centre of its response - and how, in my independent role, I can support progress towards that goal.

Yours sincerely,

Eleanor Lyons
Independent Anti-Slavery Commissioner