

**POLICING RESPONSE
TO MODERN SLAVERY:
HOW HAS IT CHANGED IN THE LAST 10
YEARS?**

JULY 2025

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Acknowledgements and Context

This report was developed by Leapwise for the Independent Anti-Slavery Commissioner (IASC) to explore the policing response to modern slavery and human trafficking (MSHT) across the UK. We are grateful to the more than 100 individuals who contributed their time and insights, including System Leaders, Senior Police Leads, and Frontline Officers. Their insights have been instrumental in shaping this report.

The research focuses on institutional perspectives and does not include survivor voices. This decision was made to maintain a clear scope and avoid duplicating existing work. Survivor perspectives remain vital, and this report draws on research that have been centred on survivor experience.

We also recognise there are distinct legislative contexts across the UK's devolved administrations:

- England and Wales: Modern Slavery Act 2015
- Scotland: Human Trafficking and Exploitation (Scotland) Act 2015
- Northern Ireland: Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015

Interviews with Police Scotland and the Police Service of Northern Ireland (PSNI), along with a focus group in Wales, ensured these perspectives were incorporated.

With thanks to:

Home Office, National Crime Agency (NCA), Tackling Organised Exploitation (TOEX) programme, Crown Prosecution Service (CPS), Gangmasters and Labour Abuse Authority (GLAA), College of Policing, National Police Chiefs Council (NPCC), Justice & Care, Human Trafficking Foundation, Unseen, Modern Slavery and Organised Immigration Crime Unit (MSOICU), University of Hull, University of Nottingham, University of Liverpool, Expert Advisors

We also extend our thanks to officers from police forces across the UK who contributed through interviews, surveys and focus groups, whose insights were invaluable to this report.



Foreword by Eleanor Lyons, the Independent Anti-Slavery Commissioner

Every year, the number of people exploited in the UK continues to rise. More women and girls are being trafficked for sex. Children are being groomed and used by criminal gangs. And vulnerable people are being coerced into forced labour with false promises of decent work.

The signs of worsening abuse are clear. Last year alone in the UK, over 19,000 potential victims of modern slavery were identified, an 80% increase in the last 5 years. Against this troubling backdrop and with law enforcement under strain, the policing response to modern slavery is deteriorating. In the past two years, the number of live investigations has fallen by 18%, and prosecution rates remain alarmingly low.

A decade ago, the landscape looked very different. The introduction of the Modern Slavery Act in 2015 marked a turning point, giving law enforcement the powers to pursue perpetrators and protect victims. Specialist teams were established, political and policing leadership was robust, and investigations surged.

Today, those powers exist, but the leadership and coordinated action that once drove progress have faded. The policing structures built to tackle modern slavery are being dismantled, leaving hard working officers ill-equipped to tackle modern slavery and its victims without justice.

That is why this report is important now. It draws on interviews with frontline officers and police forces across the country to understand what progress has been made tackling modern slavery, what is working, what is broken, and where we have lost ground to the perpetrators. It is also a diagnosis of the current state of policing modern slavery, and a blueprint for change.

From speaking to frontline police officers across the country, it is clear they are passionate about tackling exploitation. It is also clear that they are facing daily pressures with increasing workloads. I have met many who go above and beyond to protect victims and punish perpetrators, working tirelessly to address modern slavery in our communities.

However, they lack the dedicated coordination, resourcing and leadership they once had to tackle modern slavery. Whitehall's rhetoric has shifted away from a focus on rescuing and supporting victims of modern slavery, increasingly conflating human trafficking with people smuggling and Organised Immigration Crime (OIC) - despite British nationals being the largest group of identified victims.

This shift is reflected in operational priorities: funding for modern slavery policing has been slashed, and more than half of the remaining Modern Slavery Leads in

police forces now also carry OIC responsibilities, with the latter taking precedence. The Modern Slavery Transformation Programme became the Modern Slavery and Organised Immigration Crime Unit in 2020/21 resulting in modern slavery receiving just 30% of the annual funding it had in the five years preceding 2021.

Activity has not just stalled, it is regressing. Teams are being dismantled and merged, leadership roles have been downgraded, and modern slavery is being removed from police control strategies - in one region 50% of forces removed it from their strategies. There has been a drop in live investigations and weakened cohesion, drive and strategic focus behind the policing response. Modern slavery crime is no longer sufficiently seen as an issue of exploitation and the economic crime that it is. Perpetrators using horrendous means to profit off innocent lives are walking free, while their victims are stripped of all freedoms.

This must be a Prime Minister and Home Secretary priority, as it once was. If the Government is to meet its commitments to tackling Violence Against Women and Girls, child exploitation and enforcing effective and fair labour standards – the policing response to modern slavery must be revitalised.

It is unacceptable that we are failing these victims. This must change. Tackling modern slavery must be at the heart of policing's response to exploitation, regardless of the political climate and priorities. It has been before, and it can be again. It must be. This report makes clear: the tools can be rebuilt. The public will support it. The law exists. It is time to use it.

To turn the tide, we must urgently restore modern slavery and human trafficking to the centre of our public protection mission. As survivors of modern slavery have explained recently: police "should be engaged with survivors where they are – not reliant on survivors going to them." There needs to be a new national strategy on modern slavery, led by the Home Office, with proper funding and oversight. There needs to be clear leadership within Government and within policing, with modern slavery restored as a strategic priority.

We must ringfence resources and be more efficient and collaborative with the resources that do exist. We need to embed specialist teams, improve coordination and use of technology, and empower officers through meaningful training and national standards. The legal and strategic value of the Modern Slavery Act must be asserted to make charging under it the norm, not the exception.

Most of all, we must stop asking our frontline officers to fight modern slavery and protect the public with one hand tied behind their backs.

Executive Summary

This report provides a timely and critical assessment of how the policing response to modern slavery and human trafficking (MSHT) in the UK has evolved since the introduction of the Modern Slavery Act (MSA) in 2015. A decade after the Modern Slavery Act promised a step-change in how the UK tackles exploitation, this report reveals a stark truth: the policing response is faltering. Drawing on insights from over 100 Frontline Officers, Police Leads, and System Leaders, it charts how early momentum has given way to fragmentation, under-resourcing, and declining prioritisation - leaving victims unprotected and perpetrators unchallenged.

Significant improvements in the police response to modern slavery from 2015 to the early 2020s

In the years following the MSA's introduction, policing made significant progress. Awareness and capacity grew, specialist teams were established and recorded modern slavery crimes rose by 776% by 2019/20 following concerted efforts to improve the recording system as well as increased policing activity. Live police operations grew from 188 in 2016 to 1,479 in 2019 (a 687% increase) reflecting a system-wide mobilisation.¹

This early momentum was underpinned by strong national leadership. The Home Office, led by then-Home Secretary Theresa May, set a clear direction that was echoed across government and was further solidified when May became Prime Minister. This political commitment translated into funding, coordination, and a shared sense of purpose that helped embed modern slavery as a policing priority.

The MSA itself had clear and immediate impacts. For example, the creation of the duty for statutory bodies to notify the Home Office regarding suspected MSHT led to the increase in National Referral Mechanism (NRM) referrals and Duty to Notify submissions (DtNs). The Home Office established funding streams dedicated to improving the response to modern slavery in policing and partners. The Home Office also developed an active communications strategy to raise awareness of modern slavery across government and within policing.²

Sustained political attention required policing to appoint senior, credible leads at the Chief Constable level and enabled the provision of targeted Home Office funding to tackle modern slavery. The Association of Police and Crime Commissioners (APCC) had a national lead for modern slavery, the PCC for West Yorkshire, who played a significant leadership role in integrating responses to modern slavery across police forces in the UK. The National Police Chiefs' Council (NPCC) established the Modern Slavery Transformation Programme, while the College of Policing set new professional standards and training, and a network of dedicated modern slavery Regional Organised Crime Unit (ROCU) coordinators was established.

¹ Home Office (2019). [How the Government is tackling modern slavery](#)

² HM Government (2017). [UK Annual Report on Modern Slavery](#)

Local forces mirrored national priorities, embedding MSHT in control strategies, resourcing dedicated teams, and empowering leads to drive operational and cultural change, with each force appointing a tactical and strategic MSHT lead.

Stalling progress in the police response

This momentum has not been sustained. Since 2019/20, progress has stalled. While NRM referrals continue to rise, growth in crime recorded plateaued and the number of live police operations declined by 18% since 2022. This indicates a loss of momentum and activity at a time when the scale of exploitation remains high.³

A key factor behind this decline in activity is the erosion of national prioritisation. The absence of a new Modern Slavery Strategy since 2014, and a 20-month vacancy in the role of Independent Anti-Slavery Commissioner, have left a leadership vacuum. Without clear direction, the system has struggled to maintain focus.

This has been compounded by a shift in political and operational focus toward Organised Immigration Crime (OIC). Despite British nationals being the largest group of modern slavery victims. The shift in political focus to OIC, especially following the Illegal Migration Act 2023, and the rhetoric leading up to this, has conflated smuggling with trafficking and diverted resources away from MSHT.

National policing has mirrored this political shift, with a downgrading of policing modern slavery leadership roles (NPCC's Modern Slavery Lead is now an Assistant Chief Constable rather than a Chief Constable), the removal of MSHT from local control strategies in several forces, and where MSHT efforts do remain they have largely been merged with OIC activity. This is exemplified by the Modern Slavery Transformation Programme evolving into the Modern Slavery and Organised Immigration Crime Unit (MSOICU), and the subsequent redistribution of resources from MSHT to OIC. This shift has occurred despite MSHT involving crimes of exploitation that extend far beyond immigration-related offences, and British Nationals being the largest group identified.

Despite progress across policing since 2015, and a steady increase in the number of victims of MSHT identified, frontline understanding and identification of MSHT remains limited. Only 27% of MS Leads for English and Welsh police forces and just 9% of frontline officers believe MSHT is widely understood in policing.⁴ Training is inconsistent, and many officers are unaware of available specialist support and how to access it. This reflects the challenge of upskilling and maintaining knowledge for nearly 150,000 police officers across England and Wales on a complex crime type. It also underscores the reality that specialisation will always remain an essential component for an effective police response to complex crime.

³ NPCC (2024). [Modern Slavery & Organised Immigration Crime Programme Annual Report 2023/24](#)

⁴ Focus groups with frontline officers (n=44)

The current fragmented response

At present, the policing response to modern slavery is fragmented and inconsistent and reliant on individuals to drive forward initiatives in the absence of any central direction. Only 24% out of 37 MS Leads surveyed think MSHT is adequately prioritised by the government.⁵ Many forces have dropped MSHT from their control strategies in recent years, and now only 55% of police forces in England and Wales have dedicated teams, which vary in size from two to 14 officers, and differ in function. Furthermore, only 19% of the MS Leads surveyed are solely dedicated to MSHT, while 51% are also responsible for OIC.

Major challenges persist in cross-regional case ownership, multi-agency collaboration, and an over-reliance on victim testimony and engagement to drive investigations.

Insufficient charging of MSHT offences is also a critical concern. Police and the Crown Prosecution Service (CPS) often favour charges that are deemed 'easier to prove' and more likely to secure a guilty plea from defendants, resulting in less proportionate sentences to the harm inflicted. When the MSA is not being utilised there is a risk that victims do not get access to statutory defence, are wrongly identified as perpetrators, ostracised by communities, and unable to access much-needed specialist support. Reasons for undercharging are extremely complex and are discussed in further detail in this report. They include:

- The real difficulty of proving coercion to legal standards.
- Inconsistent knowledge of charging options. For example, some MS Leads and Counsel thought it impossible to secure an evidence-led prosecution for modern slavery offences that did not involve sexual exploitation. However, this report includes a case study of a successful evidence-led prosecution for criminal exploitation by the British Transport Police (BTP).
- A perception among some officers that judges rarely increase sentences significantly based on the addition of modern slavery to charge sheets that already include other serious offences.
- Resourcing challenges, which, while formally not meant to affect charging decisions, are clearly in police officers' (and prosecutors') minds when considering which charges to pursue to secure efficient guilty verdicts and proportionate punishments.

While these challenges persist, the foundations laid following the introduction of the MSA offer a vital platform from which to rebuild and strengthen the national response. This work must begin urgently before institutional knowledge and specialist expertise are lost.

⁵ MS Leads survey (n=37)

Recommendations for strengthening the police response

To address ongoing weaknesses and the drift in focus on MSHT in recent years, both government and policing will need to redouble efforts. This report suggests a range of changes, which are summarised below – some of these are already being discussed and driven forward by Project Turnstone and others.

To signal prioritisation and build understanding across the system:

1. **Develop a new Home Office-led national Modern Slavery Strategy** to ensure prioritisation and effective coordination of the response to modern slavery and human trafficking.
2. **Communicate the significant economic impact** of MSHT and the positive financial impact on the wider economy from reducing these offences to build support for a more prevention-oriented response.
3. **Demarcate the narrative** between modern slavery & human trafficking (MSHT) and Organised Immigration Crime (OIC)
4. **Continue using the umbrella term "modern slavery"** for continuous tracking of current and emerging forms of exploitation for financial gain.

To improve the police operational response:

5. **Identify and promote the most effective police operating models** for tackling MSHT, including key components identified as effective in this resource that work e.g. dedicated resource, use of covert tactics.
6. **Address cross-regional ownership issues** by establishing clear and transparent decision-making processes outlining the criteria for determining which region and consequently which force within that region should be assigned a cross-regional case. Additionally, ensure all forces provide support to the lead force for cases that fall within their jurisdiction.
7. **Embed Victim Navigators⁶ nationally**, identifying and securing sustainable funding to support police and victim engagement.
8. **Encourage replication of best practice models** for partnership arrangements and multi-agency intelligence sharing e.g. Humberside Police and West Yorkshire Police
9. **Strengthen, simplify, and reinforce the frontline model** for recognising and responding to exploitation and vulnerability.

To ensure effective police liaison and work with the wider criminal justice system:

10. **Identify and widely share case examples of evidence-led prosecution strategies** for modern slavery cases other than sexual exploitation to ensure knowledge of best practices for a broader range of MSHT cases is embedded across the country.

⁶ A Victim Navigator is a specialist embedded in police forces to provide support and build trust for victims of modern slavery and improve engagement with investigations. Justice & Care (2022) [Victim Navigator Pilot Final Evaluation](#)

11. **Draw on lived experience panels to apply a more victim-centred approach** to justice, focusing on outcomes that benefit both victims and the public.
12. **Enhance CPS-police collaboration** to improve early advice and promote a consistent charging approach.
13. **Integrate CPS and police data** to enhance understanding of which investigations result in successful charges and convictions.

Introduction and Method in Brief

This report by Leapwise, commissioned by the Independent Anti-Slavery Commissioner (IASC), aims to illustrate how the police response has evolved since the introduction of the MSA. Leapwise was tasked with answering the following questions:

- What does the current police response to modern slavery look like and how has this changed since 2015?
- How do the police interpret the legislation and what offences they apply it to?
- How does the police action in relation to modern slavery intersect with adjacent crimes?
- How could the police response to modern slavery crime be improved?

To answer these questions, between February to April 2025, this research employed a mixed-methods approach using semi-structured interviews with experts and leaders within the system (n=40), a survey with MS Leads in policing (n=37), focus groups with frontline officers (n=48) and a literature review.

The examination utilised a research framework to ensure a comprehensive review of the policing response. See the methodology section in the appendix for more details.

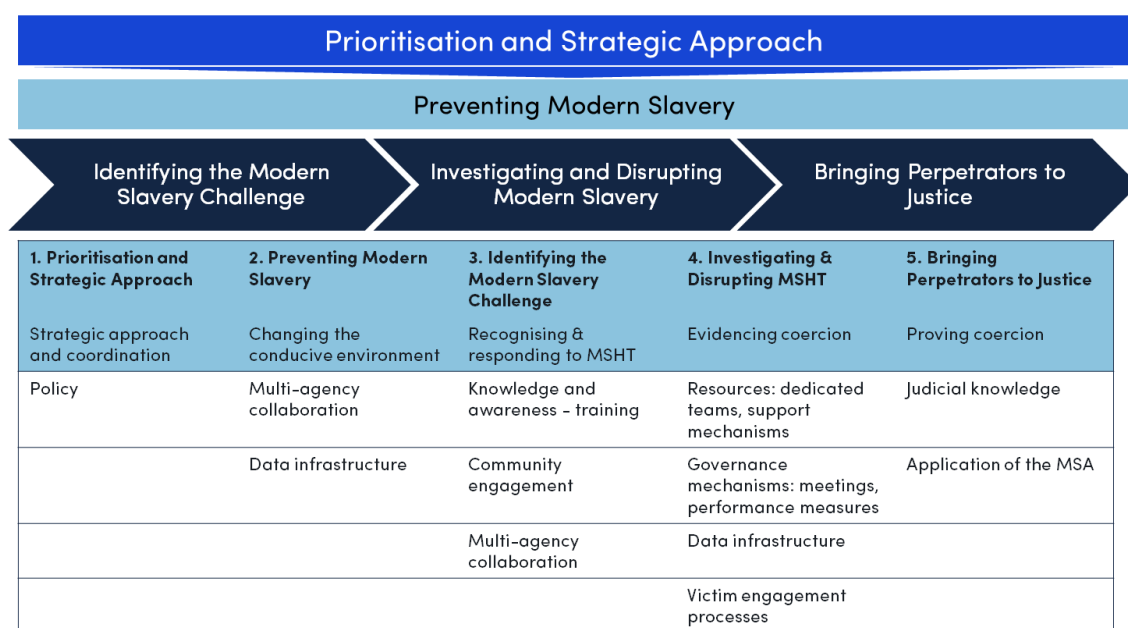


Figure 1: Leapwise research framework for analysing the policing response to MSHT

Structure of the Report and Sources of Insight

In each of the sections, this report articulates findings from the research. Where views of System Leaders are identified, these correspond to the expert interviews. Where views from MS Leads are identified, these correspond to survey results. Where views from the frontline are noted, these correspond to focus groups. Where other data sources have been used, they are identified separately. Some specific facts presented were raised through, for example, expert interviews, and sense checked separately (for example, prevalence of MSHT in Force Control Strategies). If the direct source is not acknowledged, it is for the purposes of anonymity to maintain openness and accuracy overall.

The table below details research questions asked by the Independent Anti-Slavery Commissioner (IASC) and the sections in which these are answered.

Research question	Questions
What does the current police response to modern slavery look like and how has this changed since 2015?	<ul style="list-style-type: none">➤ Prioritisation and strategic approach➤ Identifying the modern slavery challenge➤ Investigating, and disrupting modern slavery
How do the police interpret the legislation and what offences they apply it to?	<ul style="list-style-type: none">➤ Bringing perpetrators to justice
How does the police action in relation to modern slavery intersect with adjacent crimes?	<ul style="list-style-type: none">➤ Investigating, and disrupting modern slavery➤ Bringing perpetrators to justice
How could the police response to modern slavery crime be improved?	<ul style="list-style-type: none">➤ How could the response to modern slavery be improved?

Background of the Modern Slavery Act (2015)

In 2015 the MSA was introduced to support an enhanced response to combatting the crime in the UK.⁷ Key points of the Act include:

- Consolidation of previous laws bringing together slavery, servitude, forced and compulsory labour and trafficking offences under one piece of legislation.
- Increased the maximum sentence available from 14 years to life imprisonment.
- Introduced Slavery and Trafficking Prevent Orders (STPOs) and Slavery and Trafficking Risk Orders (STROs) to restrict the activity of those who pose a risk and those convicted of MSHT offences to prevent further harm.
- Established the Independent Anti-Slavery Commissioner role to promote good practice in preventing MSHT and identifying victims.
- Introduced supply chain transparency requiring businesses to disclose how they are ensuring their supply chains are free from slavery.
- Established a legal duty to report potential victims of trafficking to the Home Office.
- Provided mechanisms for seizing perpetrator's assets and using them to compensate victims.

At its inception, the MSA was hailed as a world-leading piece of legislation, fostering a more effective international and national multi-agency response to identifying and supporting victims and bringing perpetrators to justice.

As of the time of writing, it is the ten-year anniversary of the MSA. While the research period coincides with parliamentary debates and other activities related to this anniversary, this report does not reference or consider their content in any detail. This is because the scope of research and our methodology is focussed solely on the realities of the current policing response.

⁷ HM Government (2015). [Modern Slavery Act](#)

Prioritisation and Strategic Approach

At a Glance: Key Themes & Findings

Indicators of Increased Prioritisation: Following the introduction of the MSA, MSHT was a top government priority, supported by performance monitoring and priority setting through Government annual reports between 2017 and 2021. Significant Home Office funding was dedicated to enhancing the policing response to MSHT.

Indicators of Declining Prioritisation: However, since Prime Minister Theresa May's departure from office, there appears to be a decline in prioritisation. This is evidenced by reduced HO funding, and a reduction in the seniority of the national police lead for MS from Chief Constable to Assistant Chief Constable.

Current Inadequate Prioritisation: Currently, MSHT overall is not perceived as adequately prioritised. Only 38% of MS Leads⁸ surveyed agreed that MSHT is adequately prioritised by their organisation, and an even smaller percentage (24%) felt it is adequately prioritised by the government. 59% of MS Leads confirmed MSHT features in their force control strategies, and while 81% stated their organisation holds governance meetings that monitor the response, only 54% confirmed their organisations had performance measures to track MSHT response.⁹

Varying Prioritisation of Sub-Threats: Prioritisation of MSHT varies with the specific sub-threats. There is heightened prioritisation of child criminal exploitation (CCE) and attention on sexual exploitation, but labour exploitation and domestic servitude are under-prioritised, despite labour exploitation making up the largest number of NRM referrals for adults. Prioritisation of CCE and SE due to overlaps with other threats such as county lines and VAWG puts these forms of exploitation at risk of being tackled through a lens that does not incorporate MSHT. For example, perpetrators may be charged with managing a brothel or drugs supply offences but not MSHT offences.

Impact on the Policing Response: The decline in national prioritisation appears to be negatively impacting the effectiveness of the police response, with 50% of forces in one region dropping MSHT from their control strategies. Despite perceived improvements since 2015, System Leaders rate the current effectiveness of the overall policing response at just five out of ten.

Re-Prioritising MSHT: Understanding MSHT as economic crimes with serious human rights violations may help gear prioritisation. With a conservative estimate of 100,000 victims¹⁰, MSHT costs the UK economy £41.8 billion¹¹ annually in lost outputs and emotional and physical harm and supports organised criminal groups through financial gain from turning human beings into commodities.

⁸ MS Leads survey (n=37)

⁹ MS Leads survey (n=37)

¹⁰ Home Affairs Committee [Human trafficking](#)

¹¹ [The economic and social costs of modern slavery](#) (2018) Home Office, adjusted with Bank of England Inflation Calculator

Indicators of Prioritisation

Most System Leaders¹² highlighted that a decade ago MSHT was a top national priority. Legislation was a key signal. The Modern Slavery Act strengthened policing powers and enhanced protections for victims. It introduced the Duty to Notify (DtN), ensuring victims of MSHT are identified and subsequently prioritised through National Referral Mechanism (NRM) referrals, should they consent to support. Additionally, the Act established a statutory basis for the role of the Independent Anti-Slavery Commissioner.

Prioritisation was further underscored by wider performance management and priority setting mechanisms nationally. MSHT was included in the group of national priority Serious Organised Crime (SOC) threats (strategic policing requirement). The UK Government also published annual reports on MSHT in the years following the MSA. These reports highlighted the emphasis placed on MSHT and documented the progress made to improving the policing response.¹³ The National Crime Agency (NCA), steered by the Home Office, elevated MSHT to a national priority for intelligence collection.¹⁴

Structural and resourcing shifts followed too. Then Prime Minister Theresa May established a dedicated Taskforce aimed at improving the operational response to MSHT. The Modern Slavery Transformation Programme, led by the NPCC, was established. By 2017, the UK Government had provided £8.5 million to the Programme,¹⁵ and by 2021, this amount had increased to £15 million.¹⁶

Our interviewees reported that national police leaders acted quickly to respond to national political and Home Office prioritisation. In addition to the establishment of programmes to benefit from new funding opportunities, steps included:

- Appointing a national Modern Slavery Lead for the Modern Slavery Transformation Programme at Chief Constable level.
- Inclusion of MSHT in force control strategies
- Establishment of dedicated MSHT teams with dedicated MS Leads, and, as part of the Modern Slavery Programme, a network of Modern Slavery Coordinators for each Regional Organised Crime Unit (ROCU)

Indicators of Declining Prioritisation

In the years following Theresa May's departure from office, there were indicators of declining national prioritisation of MSHT. There have been no published UK Annual Reports on Modern Slavery since 2021, and some System Leaders also cited the absence of a new National Government Strategy since 2014 as evidence for the

¹² Expert Interviews (n=37). See methodology for full list.

¹³ HM Government (2017). [UK Annual Report on Modern Slavery](#)

¹⁴ HMICFRS (2017). [Stolen freedom: the policing response to modern slavery and human trafficking](#)

¹⁵ HM Government (2017). [UK Annual Report on Modern Slavery](#)

¹⁶ HM Government (2021). [UK Annual Report on Modern Slavery](#)

declining prioritisation of MSHT. The statutory role of the Independent Anti-Slavery Commissioner was also vacant for 20 months between April 2022 and December 2023.

Data on exact Home Office spending on MSHT is difficult to analyse with confidence, but it has evidently decreased over the past ten years. Between 2016 and 2021, the Home Office dedicated £15 million to the Transformation Programme, averaging £3 million per year. However, between 2021 and 2024, the total Home Office spend only increased by a further £2.8 million, averaging at c.£900k per year for those three years. The total spend over the eight years equates to £17.8 million¹⁷. Additionally, in 2022, the seniority of the programme lead was reduced from Chief Constable to Assistant Chief Constable.

Some System Leaders¹⁸ noted that the political narrative around illegal immigration over the past five years has led to the conflation of MSHT with OIC, particularly resulting in the confusion between smuggling and trafficking which has led to the reallocation of resources from MSHT to OIC. For example, the NPCC Modern Slavery Transformation Programme became the Modern Slavery & Organised Immigration Crime Unit (MSOICU) in 2019, where OIC reportedly now receives the vast majority of the funds dedicated to the programme – in 2023/24 the programme secured £5 million for the response to OIC¹⁹. Additionally, when surveyed, 51% of MS Leads²⁰ indicated that their portfolio also included OIC (see Section 4 for more detail).

Prioritisation at the local level has also started to decline. In one region, 50% of the forces recently removed MSHT from their force control strategies. Additionally, some dedicated MSHT teams have been disbanded or reduced in size in recent years, further impacting the effectiveness of local responses to MSHT. Where proactive efforts to tackle MSHT exist, they heavily rely on individuals' initiative, creatively sourcing funding for short term local projects, such as the Durham PCC securing funding for Anti-Slavery Champions or the Greater Manchester Combined Authority providing partial funding for a Victim Navigator²¹ to support the Greater Manchester Police's Modern Slavery Coordination and Investigation Unit. The lack of a national strategy has led to a fragmented approach, that is not cohesive or sustainable and is not equipped to tackle a crime of the severity and scale of MSHT and adequately protect victims.

Paradoxically, MS Leads surveyed did not uniformly recognise that MSHT had been deprioritised, with 49% reporting that MSHT is more prioritised nationally than it used to be (vs 35% saying it was less prioritised).²² However, this might reflect

¹⁷ UK Parliament (2024). [Human Trafficking: Government Response to the Committee's First Report](#)

¹⁸ Expert Interviews (n=37). See methodology for full list.

¹⁹ NPCC (2024). [Modern Slavery & Organised Immigration Crime Programme Annual Report 2023/24](#)

²⁰ MS Leads survey (n=37)

²¹ Justice & Care (2022) [Victim Navigator Pilot Final Evaluation](#)

²² MS Leads survey (n=37)

variations in local prioritisation, different interpretations of questions or a type of bias. As MS Leads, they will have been receiving more information about MSHT than before being in these roles.

Current Picture

Despite potential paradoxes in the perceptions of declining national prioritisation, MS Leads were clear that MSHT is not adequately prioritised at present. Only 38% agreed MSHT is adequately prioritised by their organisation, and an even smaller percentage (24%) felt it is adequately prioritised by the government (Figure 2).²³ During focus groups, frontline officers also expressed that MSHT was not emphasised as a priority, with only 23% agreeing that their organisation emphasises the importance of tackling MSHT.²⁴

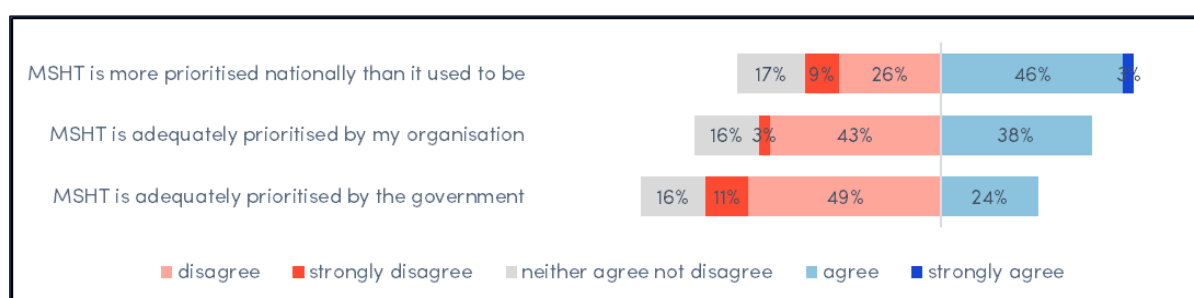


Figure 2: MS Leads' perceptions of the prioritisation of MSHT n=37

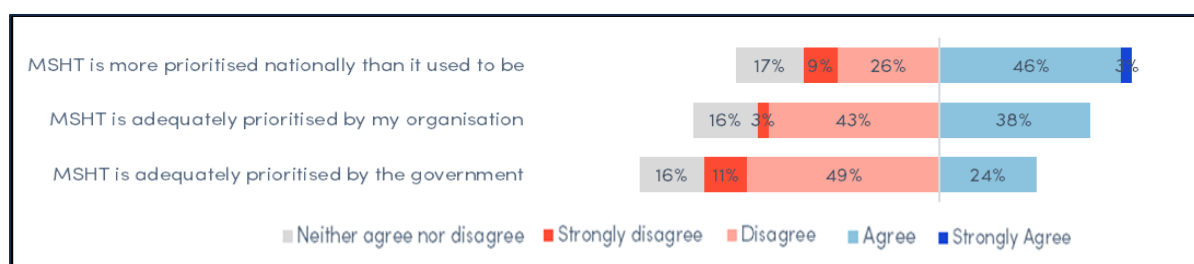


Figure 3: Frontline officers' perceptions of their organisation's prioritisation of MSHT n=44

A few System Leaders²⁵ reported that MSHT no longer needed to be a strategic priority as it had been absorbed into routine operations within organised crime models. However, there was minimal evidence that this was the case. Just three out of the 24 identified dedicated MSHT teams in England and Wales were situated within SOC. In forces without dedicated teams, MSHT cases are often handled by the Criminal Investigation Department (CID) (see Section 4 for more detail). This approach also overlooks areas of MSHT that do not fall under organised crime. Additionally, due to cultural legacies, SOC teams are traditionally less familiar with exploitation and working with victims. The perceived absorption of MSHT into routine operations has not achieved the desired outcomes, as prosecutions rates

²³ MS Leads survey (n=37)

²⁴ Focus groups with frontline officers (n=44)

²⁵ Expert Interviews (n=37). See methodology for full list.

remain low²⁶. Therefore, more strategic prioritisation may be necessary to improve the effectiveness of the response.

Governance and Performance Monitoring

Some System Leaders highlighted how governance and performance monitoring are essential prioritisation mechanisms that enable MSHT specialists to access analytical support and other resources necessary for effective investigations. Force control strategies are one example mechanism that enable governance and performance monitoring to continue driving the response to MSHT. When MSHT is removed from the force control strategies, these mechanisms are lost, leading to a weakened response.

- When surveyed, 59% of the MS Leads confirmed MSHT features in their force control strategy, 27% said it did not, 14% were unsure.²⁷

Governance meetings within the different forces varied in frequency and scope. They ranged from weekly operational meetings to monthly departmental meetings, and even whole force-wide meetings on issues such as vulnerability, where MSHT would be one of the portfolios. However, a few MS Leads reported that they did not have governance meetings at the force level, and only participated in regional meetings.²⁸

- 81% of the MS Leads surveyed stated that their organisation holds governance meetings to monitor the response to MSHT. However, 14% reported that they do not have these meetings, and 5% were uncertain.
- 54% confirmed that their organisation has performance measures in place to track the response to MSHT. However, 35% indicated that they do not have such measures, and 11% were unsure.

Nationally, there is a structure for standardised governance across the country. Each region has a MSHT tactical delivery group that feeds into the regional governance group. These regional groups, in turn, feed into the national MSHT strategic delivery group, chaired by the NCA.

Changing Police Landscape

Some System Leaders noted that it's difficult to prioritise MSHT due to the growing number of public protection issues police forces must manage.²⁹ They pointed out that policing in the 21st century has evolved, with a stronger focus on safeguarding and increasing demand across a wide range of areas. As a result, MSHT often competes with other high-profile issues for attention and resources, leading to fragmented and inconsistent responses. Furthermore, some System Leaders highlighted that prioritising MSHT amidst competing issues within the public

²⁶ University of Hull (2023). Prosecutions under the Modern Slavery Act

²⁷ MS Leads survey (n=37)

²⁸ MS Leads survey (n=37)

²⁹ Expert Interviews (n=37). See methodology for full list.

protection space is challenging. A few System Leaders highlighted how the policing landscape has changed substantially within the 21st century, with an increased focus on safeguarding, leading to higher demand and a shifting perception of policing's role. This creates a complex environment in which MSHT is just one of many issues police forces must address. Consequently, the response to MSHT can become fragmented and inconsistent, as it competes for attention and resources with other high-profile public protection issues.

"I know of one officer who had 46 live cases – that would have been unheard of not that long ago."

System Leader

"There is high competition with other crime types for resources such as serious violence"

MS Lead

When asked what the top three public protection themes prioritised by their chief officer groups, MS Leads identified the following:

1. Child protection: child abuse, child sexual exploitation
2. Domestic and sexual abuse: Violence Against Women and Girls (VAWG)
3. Violent Crime: Homicide gangs and youth violence, gun crime, knife crime

Varying Prioritisation of MSHT Sub-Threats

MSHT is an umbrella term encompassing different forms of exploitation for financial gain, including labour exploitation, criminal exploitation, sexual exploitation, domestic servitude and organ harvesting. As discussed above, while there are indicators of declining prioritisation for MSHT overall, there are differences in how sub-threats are prioritised and resourced. There is stark evidence that certain sub-threats have been drawn out and focused on separately.

Certain sub-threats of MSHT that have gained political and public attention, attract more policing resources and operational focus. For example, Child Criminal Exploitation (CCE), particularly in the context of county lines and drug supply, has received increased recognition and targeted government investment. Similarly, VAWG, and sexual exploitation, particularly Child Sexual Exploitation (CSE) has received sustained media coverage, prompting high-level policy reviews and the promise of new legislation. This pattern is evident in police and crime plans, where CCE, CSE and VAWG are increasingly prioritised with specialist teams and taskforces.

The MSA introduced the Section 45 defence which provides a legal defence for individuals coerced into committing a crime as a result of being a victim of MSHT.³⁰ This has led to an increased understanding and identification of criminal exploitation, particularly the prevalence of CCE in county lines and drugs supply issues. Consequently, there has been a rise in NRM referrals, prompting government action. In 2021/22, the UK Government invested £40 million to tackle drugs misuse, county lines and supply. Additionally, CCE is prioritised in PCC plans such as London Mayor's Police and Crime Plan 2025-2029³¹ and Greater Manchester's Police and Crime Plan 2024-2029³², unlike MSHT overall. The increasing recognition of this modern slavery sub-threat has led to the promise of new legislation aimed at better addressing CCE. This legislation includes the creation of a specific offence that establishes a statutory definition for child exploitation³³ and aims to facilitate prosecutions for perpetrators of CCE.

Similarly, sexual exploitation, particularly CSE, has received significant media attention and political focus. Earlier this year, Home Secretary Yvette Cooper announced a national review on grooming gangs. However, charities, campaigners and experts argue that CSE needs more prioritisation, as child protection and children services have been reduced in recent years³⁴, and there is evidence of failures by police and social services in this space³⁵.

There is minimal evidence that labour exploitation or domestic servitude are receiving the same level of prioritisation as CCE or attention as CSE. Labour exploitation constitutes the largest percentage of NRM referrals for adults at 41% in 2024³⁶. Domestic servitude, which also overlaps with the VAWG agenda, is likely significantly underreported and perceived as difficult to address, hindering the response.

Distinguishing prioritisation and response by MSHT sub-threat can hinder the effectiveness of the response. When these sub-threats are subsumed into other areas, the MSHT lens may be lost. For example, perpetrators may be charged with managing a brothel but not MSHT offences. Additionally, there are still instances where potential victims of MSHT are prosecuted for offences such as cannabis cultivation. This is likely because, when CE is subsumed into areas such as county lines, exploitation may not be as easily recognised if the MSHT perspective is dropped.

The distinctions between the different forms of exploitation for financial gain, how they are identified and what this means for policing is discussed in further detail in

³⁰ YJLC (n.d.). [Statutory defence for child victims of trafficking and slavery – section 45 Modern Slavery Act 2015](#)

³¹ MOPAC (2025). London Police and Crime Plan 2025-29

³² Greater Manchester (2024). Police and Crime Plan 2024-2029

³³ The Labour Party (2024). Take back our streets

³⁴ Guardian (2025). [Starmer urged to prioritise child sexual exploitation victims](#)

³⁵ Channel 4 (2025). Groomed: [A National Scandal](#)

³⁶ Home Office (2025). [Modern slavery: National Referral Mechanism and Duty to Notify Statistics UK, end of year summary 2024](#)

Section 3 on Identifying the Modern Slavery challenge and Section 4 on Investigating Modern Slavery.

The Impact of National Prioritisation on Policing

Systems leaders' perceptions of the effectiveness of the police response clearly shows that national prioritisation impacts policing efficacy. While the overall effectiveness of the police response is perceived to have improved since 2015, the recent decline in prioritisation has reportedly hindered the necessary improvements in policing and potentially weakened the response. Although there have been pockets of excellence where police forces are tackling MSHT effectively, the overall perceived effectiveness of the response remains low:

While 68% of System Leaders believe the police response to MSHT has improved over the last decade, nearly one-third disagreed, citing stagnation or decline due to reduced resourcing and workforce turnover.

- 68% System Leaders said the police response has improved over the last ten years.
- 14% said it improved and then got worse, citing reasons such as the recent conflation with OIC and the resulting reduction in resources.
- 18% said it stayed the same, in part due to high turnover and experienced officers being replaced with a younger workforce.

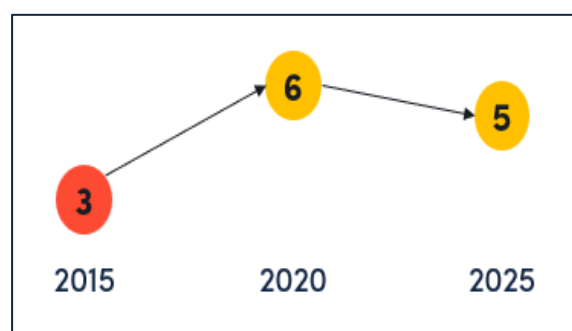


Figure 4: System leaders' perceived effectiveness of the policing response to MSHT over the last decade (rated 1 to 10, 10 being most effective) (n=22, not all interviewees presented a quantitative score)

The rest of this report examines different aspects of the policing response, including the identification of MSHT, investigating MSHT, and bringing perpetrators to justice. These sections illustrate how the response has evolved over the past ten years and where the current response stands, noting that organisational memory loss, caused by high turnover and insufficient institutional continuity, makes a comprehensive assessments of long-term change challenging.

The following sections highlight that while there have been improvements, the overall response is currently fragmented response across the country. Frontline officers are not confident in their ability to identify MSHT (see Section 3). There is a lack of clear understanding of best practices, and a disjointed multi-agency response with no standardised methods for information sharing or ownership in cases that cross regional boundaries (see Section 4). Modern slavery offences under the MSA are undercharged for several reasons, including a lack of familiarity with the Act and some misconceptions about what prosecutions are possible (see Section 5).

A significant challenge lies in determining where the response to MSHT fits within the policing framework. With 43 different territorial police forces, each having their own approach, the effectiveness of handling MSHT cases is highly variable. The MSOICU's Project Turnstone is working to address this issue.

Reprioritising Modern Slavery

MSHT is fundamentally an economic crime involving serious human rights violations. Communicating the impact to the UK, including the exploitation of vulnerable individuals, involvement with organised crime and substantial economic damage, may help prioritise this issue. We set out a range of further actions that may further optimise focus in our recommendations (Section 7).

Identifying the Modern Slavery & Human Trafficking Challenge

At a Glance: Key Themes & Findings

Defining MSHT: MSHT is an umbrella term that encompasses different types of exploitation for financial gain, including domestic servitude, labour exploitation, criminal exploitation, sexual exploitation and organ harvesting.

Evolution in understanding and identification: Over the past decade, the system's understanding of MSHT has significantly evolved. When the MSA was introduced, sexual exploitation accounted for approximately 33% of NRM referrals, while labour exploitation made up around 36%. By 2024, the landscape had shifted. The NRM recorded exploitation in more granular detail, reporting where referrals involved several types of exploitation. In 2024, 17% of referrals mentioned sexual exploitation, while 51% mentioned labour exploitation, and 35% mentioned criminal exploitation, now categorised separately from labour exploitation. These proportions varied by gender and age (Figure 8).

Police lack confidence in their understanding and identification of MSHT: Despite advancements in understanding and identifying MSHT over the past decade, police remain uncertain about their own grasp of the issue. This is particularly evident among frontline officers, with only 9% believing their peers have a sufficient understanding of MSHT.³⁷

Training quality and quantity is seen as inadequate: MSHT is often described as 'hidden in plain sight,' necessitating effective training that enables officers to look beneath the surface of presented situations. Current training standards are reportedly inadequate in both quantity and quality to meet this requirement. 22% of frontline officers reported having received no training on MSHT.³⁸

³⁷ Focus groups with frontline officers (n=44)

³⁸ Focus groups with frontline officers (n=41)

Defining Modern Slavery

MSHT encompasses various forms of exploitation for financial gain, including domestic servitude, sexual exploitation, criminal exploitation, labour exploitation and organ harvesting. Each of these forms requires a different response due to their unique characteristics and the specific challenges they present (Figure 5).














Type of MS	Perceived Prioritisation	Environment	Detection	Victim demographics	Overlap with other offences
Domestic Servitude		 Hidden, Overlaps with VAWG	Likely significantly underreported, relies on authorities & community		Kidnap, assault, threats to kill, immigration offences
Sexual exploitation		 Overlaps with VAWG, OCGs	Underreported, relies on law enforcement, local authorities, and NGOs		Sexual offences, controlling prostitution, managing a brothel
Criminal exploitation		 County lines, OCGs	Underreported, relies on law enforcement, NGOs & community – victims may not recognise victimhood		Drug offences, supply of drugs, cultivating cannabis
Labour exploitation		 Hidden, OCGs, industry	Underreported, relies on authorities, community – victims may not recognise victimhood		Kidnap, assault, threats to kill, minimum wage offences, immigration offences
Organ harvesting		Extremely hidden, OCGs	Underreported, relies on authorities, healthcare, community	Few victims identified	

Figure 5: Sub-threats of modern slavery & human trafficking

When surveyed, MS Leads were asked to identify other thematic responsibilities alongside their responsibility for MSHT. One MS Lead identified CCE and another three identified CSE as separate to their responsibility for modern slavery. This suggests that such forms of exploitation are perceived as distinct from modern slavery within the police.

There is an ongoing debate as to the usefulness of ‘modern slavery’ as an umbrella term. System Leaders and experts in policing have reported that ‘modern slavery’ is not always helpful, as it can obscure the specific needs and responses required for the different types of exploitation.³⁹ However, others contend that the term is both strategically and legally valuable. Framing these abuses under the modern slavery umbrella reinforces their shared underlying feature: exploitation for financial gain. This framing not only aligns with the legal definitions within the Modern Slavery Act (MSA), but also helps standardise investigative approaches across police forces. It allows for emerging forms of exploitation to be captured more readily under a common legislative and strategic framework. Moreover, System Leaders noted that clear reference to the MSA ensures consistent use of the appropriate legal tools, such as Slavery and Trafficking Prevention Orders, and supports the integration of financial investigation techniques, including proceeds of crime recovery. As such, the umbrella term can help unify fragmented responses, embeds economic crime thinking in exploitation cases, and enhances the visibility and coherence of national policing efforts.

³⁹ Expert Interviews (n=37). See methodology for full list.

Identification of Modern Slavery Victims

Over the last ten years there have been substantial improvements in the identification of MSHT victims with an increasing number of recorded crimes (Figure 6) and NRM referrals (Figure 7). By 2019/20, the number of recorded crimes had surged by 776%. However, since 2019/2020, there has been a relative plateau in the following years (Figure 6) with a notable decline by 19% from 2022/23 to 2023/24. This 10-year pattern is not mirrored in the overall recording of crime in England and Wales and therefore not likely to be due to lockdowns during Covid-19.⁴⁰ The number of NRM referrals has continued to increase over the 10 years.

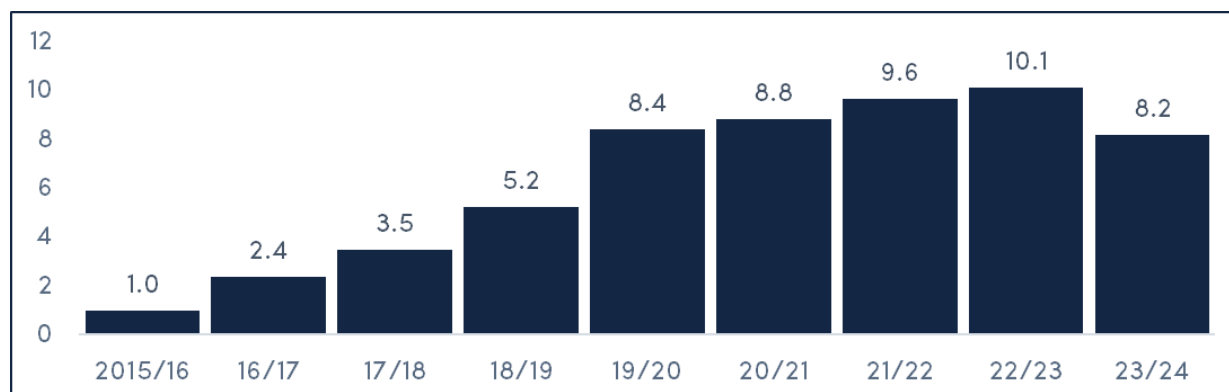


Figure 6: E&W Total Recorded Crimes of Modern Slavery and Trafficking for Sexual Exploitation (Thousands). Source: Home Office Recorded Crime Data Tables last updated 30 January 2025

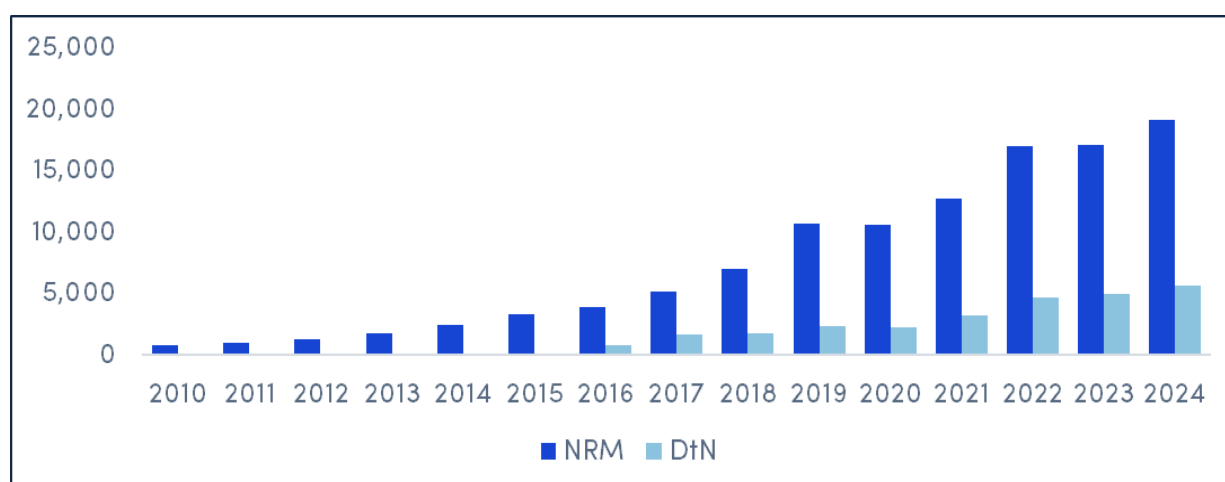


Figure 7: Total Number of NRM Referrals by competent authority and Duty to Notify Source: Home Office, Modern Slavery: National Referral Mechanism and Duty to Notify Statistics (Data Tables)

Figure 7 illustrates the changes in NRM referrals over the past decade. Criminal exploitation only became recognised as a separate category from labour exploitation in 2019. The chart highlights how the type of exploitation varies by victim demographics. Labour exploitation predominantly involves male adult victims, while criminal exploitation mainly affects male child victims. Sexual exploitation primarily involves both female adults and children, with a higher

⁴⁰ Gov.UK Justice Data (2025). [Criminal justice system crime statistics: Police recorded crime in England and Wales](#)

proportion of adult victims. NRM referrals for domestic servitude are mostly for female adults, but these remain low, likely due to the hidden nature of this type of exploitation.

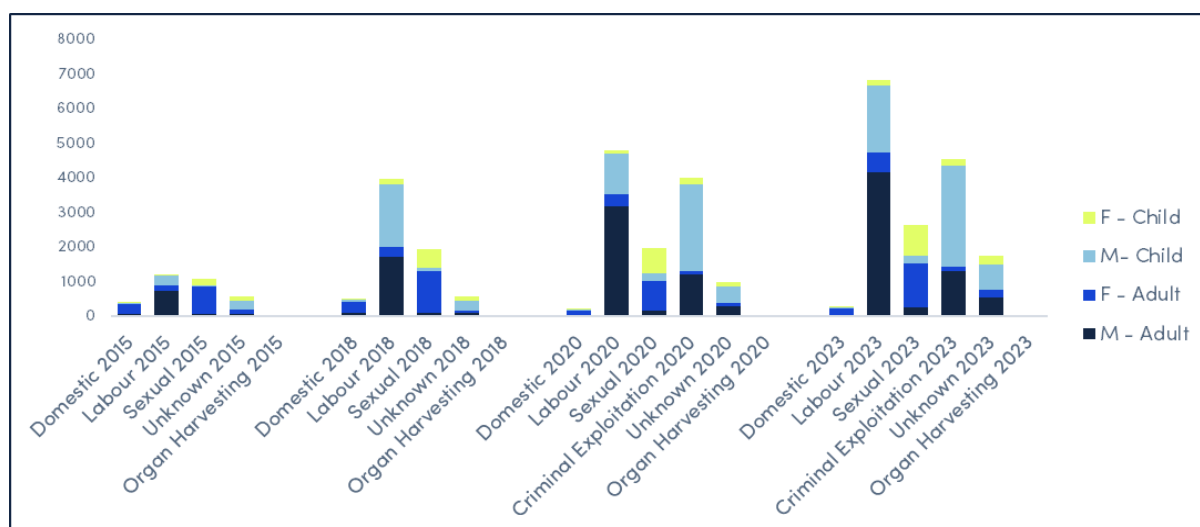


Figure 8: NRM Referrals by Exploitation Type & Year Broken Down by Age and Gender

In the most recent year (2024), NRM referrals increased by 13% compared to the previous year, reaching a record high of 19,125 referrals.⁴¹ Figures 9 and 10 below provide a breakdown of referrals by nationality. Most victims in 2024 were foreign nationals, accounting for 77% of referrals. However, 23% of victims were from the UK, the highest proportion of any singular nationality. This data also breaks down by age. Approximately 9% of adults referred to the NRM were from the UK, with higher numbers of adults referred from Albania, Eritrea and Vietnam. For child victims, 62% of NRM referrals were for UK nationals.

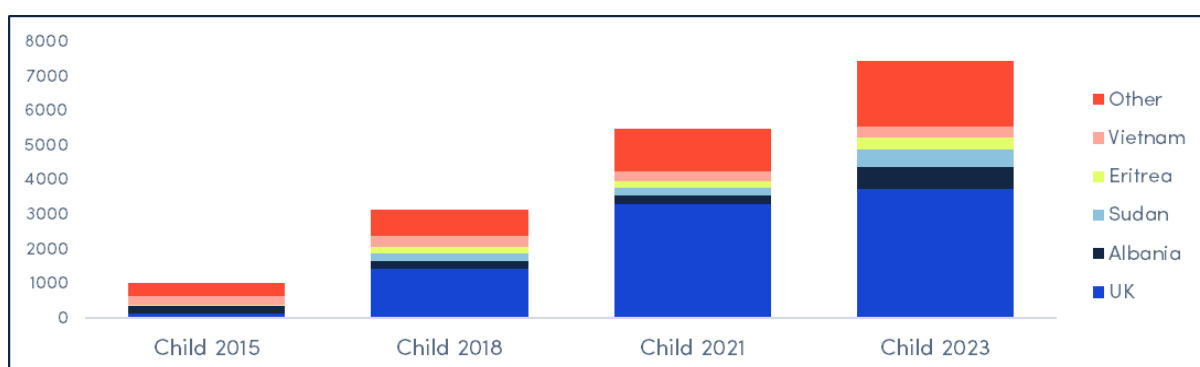


Figure 9: NRM Referrals for Victims Exploited as a Child by Nationality

⁴¹ Home Office Data Tables: Modern Slavery: National Referral Mechanism and Duty to Notify Statistics UK, 2024

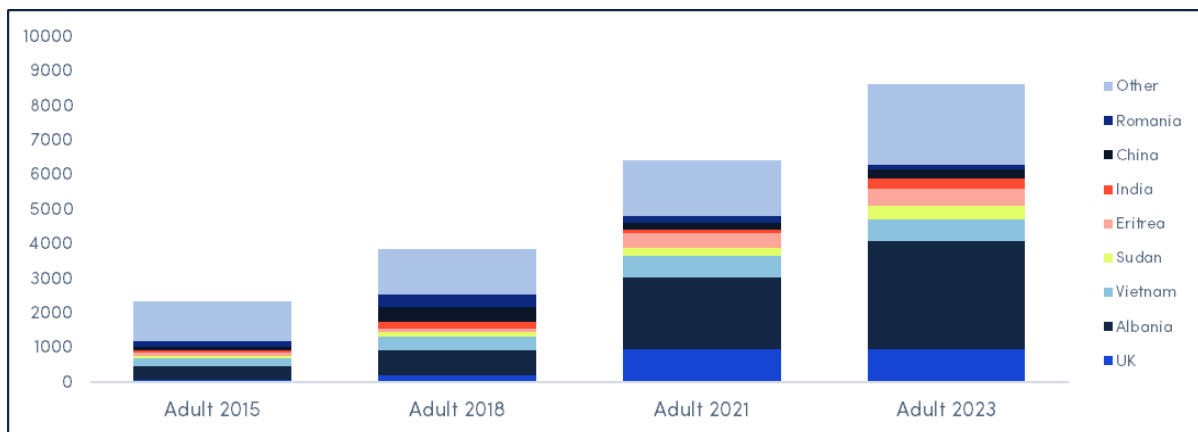


Figure 10: NRM Referrals for Victims Exploited as an Adult by Nationality

Most System Leaders⁴² and MS Leads⁴³ highlighted that while the NRM has helped raise awareness of MSHT, it is slow, bureaucratic and not fit for purpose.

Firstly, there is a substantial backlog. At the end of 2024, 17,168 individuals were awaiting a conclusive ground's decision, the final determination made by the Home Office on whether an individual is officially recognised as a victim of modern slavery. Currently, individuals must wait for a mean average of 831 days for the decision.⁴⁴ This delay is seen as a significant blocker for the CJS and complicates efforts for safeguarding. Notably, the NRM presents particular safeguarding problems for British nationals, who are also entitled to other accommodation rights through local authorities. However, it is not always safe for them to stay local, and MSHT is reportedly not perceived as a priority, causing them to join long housing waiting lists.

The Home Office has taken recent steps to try reduce this backlog by recruiting 200 new staff. However, some System Leaders have highlighted that this does not alleviate the burden on police forces. There is still a reported burden due to the time and resources required to complete NRM forms. The NRM and Duty to Notify (DtN) processes take up substantial amount of administrative time, and particularly the DtN is not seen as servicing any practical purpose. It was reported that the MPS had to complete a substantial number of DtNs and NRMs last year, which led to the need to pay officers for overtime to ensure the forms were completed. Additionally, the data collected through these processes is not utilised to support intelligence building or investigations.

Some MS Leads also reported that changing thresholds for reasonable grounds decisions are not communicated effectively to forces, leaving officers unable to allow victims to make informed choices.⁴⁵ The purpose of an NRM submission for a

⁴² Expert Interviews (n=37). See methodology for full list.

⁴³ MS Leads survey (n=37)

⁴⁴ Home Office (2025). [Modern slavery: National Referral Mechanism and Duty to Notify statistics UK end of year summary 2024](#)

⁴⁵ MS Leads survey (n=37)

child is unclear; other than gathering statistics; it is not perceived as serving any practical purpose either.

“The NRM function has changed significantly over the years, and the different aspects do not seem to be working in cohesion with all the other legal frameworks in existence.”

System Leader

Police Perceptions of MSHT Prevalence

MS Leads were more likely to agree that MSHT is prevalent, with 68% in agreement compared to only 33% of frontline officers.⁴⁶⁴⁷ This significant discrepancy between the perceptions of MSHT prevalence among these two roles suggests that frontline officers' may be less familiar with MSHT and therefore less equipped to identify MSHT. However, 65% of frontline officers did believe that MSHT had become more prevalent in the last five years (Figure 11).⁴⁸

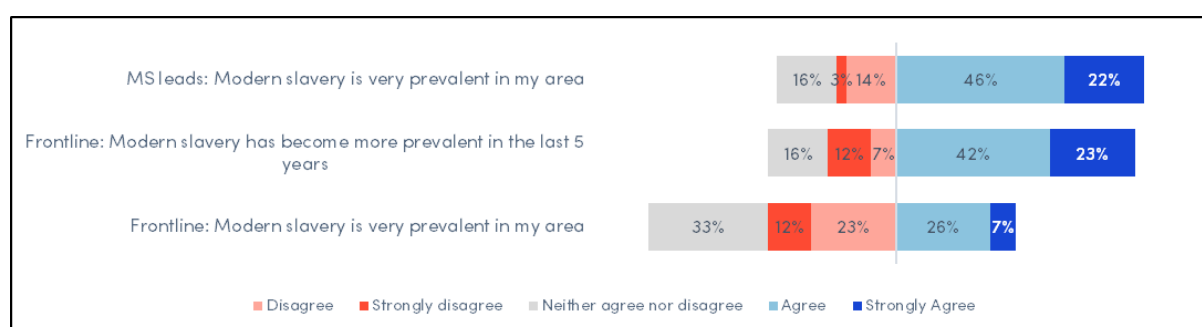


Figure 11: Perceptions of the prevalence of MSHT (MS Leads n=37, Frontline n=43)

Perceptions of the prevalence varied by the different MSHT sub-threats. MS Leads were asked whether they thought specific forms of exploitation had increased since they started in policing. With 92% of the MS Leads having over ten years policing experience, 80% agreed that the number of victims subjected to sexual exploitation had increased since they had joined policing. Similarly, 79% thought the same for criminal exploitation, and 74% agreed for labour exploitation (Figure 12).⁴⁹

However, confidence dropped significantly when it came to domestic servitude. Only 46% of MS Leads agreed that the number of victims had increased, while 30% were unsure or neither agreed nor disagreed about the increase in domestic servitude.⁵⁰ This uncertainty on the prevalence of domestic servitude may

⁴⁶ MS Leads survey (n=37)

⁴⁷ Focus groups with frontline officers (n=43)

⁴⁸ Focus groups with frontline officers (n=43)

⁴⁹ MS Leads survey (n=37)

⁵⁰ MS Leads survey (n=37)

influence the ability to identify this form of MSHT, which is already a very hidden crime.

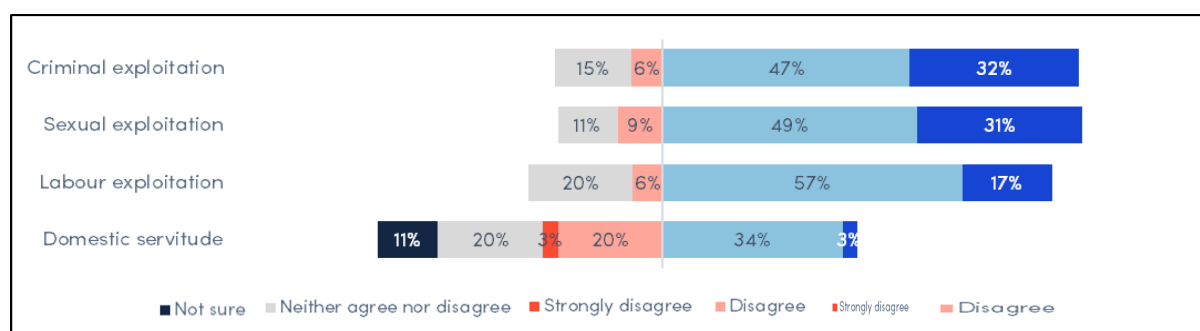


Figure 12: MS Leads' perceptions of the increase in prevalence of MSHT since joining policing n=37

Police Understanding of MSHT

Police currently do not feel confident in their understanding of MSHT. While 80% of the MS Leads agreed that MSHT is better understood in the police now than five years ago (Figure 13), only 27% of MS Leads agreed that MSHT is widely understood within policing today, with 59% disagreeing.⁵¹ Among frontline officers, only 9% agreed that modern slavery is widely understood by their peers, with 59% disagreeing.⁵² Most System Leaders⁵³ reported that understanding of MSHT in the police has improved since the MSA. Some noted that police understanding has been confused by the conflation with OIC and that the level of understanding varies depending on the force.

"Understanding went up then went down... there is confusion between trafficking and smuggling and the general public are even more confused."

MS Lead

"It's a postcode lottery, there are some excellent teams and there are some that lack the experience."

System Leader

⁵¹ MS Leads survey (n=37)

⁵² Focus groups with frontline officers (n=44)

⁵³ Expert Interviews (n=37). See methodology for full list.

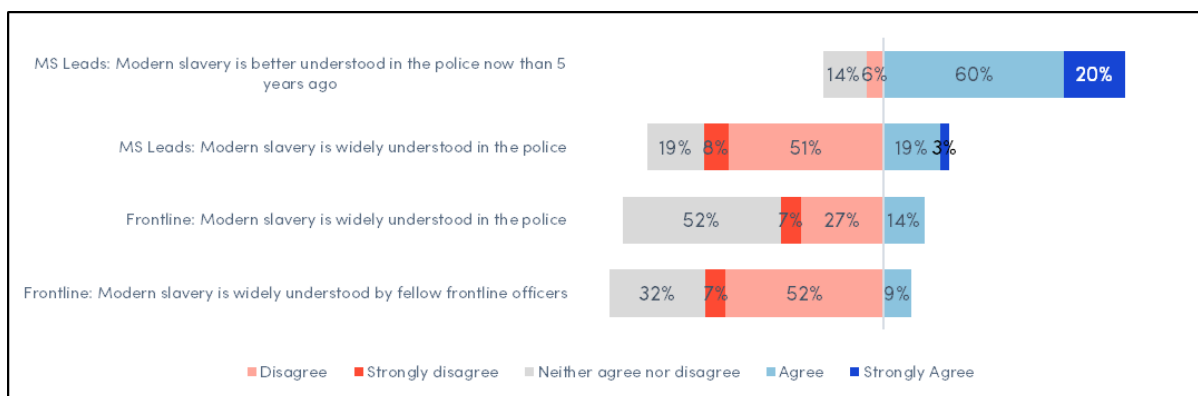


Figure 13: MS Leads and frontline officers' perceptions of MSHT understanding in the police (MS Leads n=37, Frontline n =44)

Despite the vast majority of frontline officers reporting that they lacked a comprehensive understanding of MSHT, they were still able to identify several signs of potential exploitation.⁵⁴

- 31% highlighted physical appearance and health. This included poor hygiene, malnourished, limited clothing or new expensive clothing, looking vulnerable and isolated
- 29% identified behaviour and communication: non-verbal, unable to speak English, nervous or reluctant to speak, frequently going missing, or using or selling drugs
- 33% identified living conditions, including: Squalid conditions, with limited access to food, unable to leave premises
- 31% highlighted aspects of control: Lack of access to finances, mobile phones, and possibly no ID or passport
- 16% identified social isolation: Distanced from family and friends with limited relationships, surrounded by others of the same background
- 10% identified work conditions: Working long hours, no control over their working hours, lack health and safety equipment
- And 16% highlighted fear and coercion: Victims may fear authorities or deportation and might be unwilling to speak out and be evasive towards questions.

This suggests that their lack of confidence may stem from their ability to identify MSHT in the field, rather than their ability to understand it and its signs.

⁵⁴ Focus groups with frontline officers (n=39)

Challenges with Identification

Contextual Factors

Victim identification has frequently been reported as a significant challenge in tackling MSHT, despite the increase in referrals into the NRM. System Leaders highlighted several challenges that contribute to MSHT being a hidden crime, which align with previous reports on this issue.⁵⁵

Immigration status is frequently used as a method to control victims. This is partly linked to the Illegal Migration Act 2023 (IMA).⁵⁶ Despite some sections being repealed, it remains a method used to coerce victims.

“Perpetrators tell victims that if they went to the authorities, they would be detained. This used to not be true, but right now because of the IMA, there is a real risk this could happen.”

System Leader

Victims do not always see themselves as victims.

“There was a case where someone was working in a factory with someone that they began to suspect was a victim of labour exploitation. They had to explain to that person what labour exploitation was before they realised it was happening to them.”

System Leader

There is a lack of trust in authority and fear of reprisals from perpetrators.

“Perpetrators have sometimes been released within 6 months and victims have ended up bumping into their perpetrators within their communities. There is a real risk of reprisals or re-victimisation that dissuades other victims from coming forward.”

System Leader

Training

MSHT is often described as ‘hidden in plain sight’, necessitating effective training and awareness to identify and address it. While most System Leaders highlighted that MSHT has improved, some identified that frontline training is inconsistent and often minimal, with 22% of frontline officers reported receiving no MSHT training;

⁵⁵ Expert Interviews (n=37). See methodology for full list.

⁵⁶ HM Government (2023). [Illegal Migration Act](#)

others cited outdated or insufficient sessions. Only 46% of MS Leads believe the right people are adequately trained.

Frontline officers' understanding is particularly inconsistent and a high turnover and a younger workforce exacerbate this inconsistency. Police training departments reportedly face capacity challenges, limiting their ability to deliver effective, up-to-date training on evolving exploitation. Consequently, opportunities are missed as officers reportedly prioritise drug supply issues or sexual offences over the deeper systemic crimes of exploitation.

"Only now, with the MSHT specialist knowledge I have now, do I realise that some of the sexual offences cases I worked on years ago likely involved exploitation as well."

System Leader

A few System Leaders highlighted frontline officers need continued (refreshed) training, as MSHT is not as frequently dealt with as other areas of criminality. Frontline officers reported that current training within forces has been insufficient for their professional development needs. One frontline officer mentioned receiving all their training for MSHT in around a 1-hour session. Another had not received any updated training in over ten years.

"I have only received one hour of training for modern slavery that was delivered in between loads of other subjects"

Frontline Officer

"I have not received any updated MSHT training in over 10 years."

Frontline Officer

"I joined this focus group because I was hoping to learn more about modern slavery."

Frontline Officer

In focus groups:

- 22% of frontline officers reported having had no training
- 49% reported having had some training
- 24% reported having received victim liaison officer training
- 5% were in dedicated roles.
- Additionally, 46% of MS Leads agreed that the right people in the organisation had received the right training, while 38% disagreed.⁵⁷

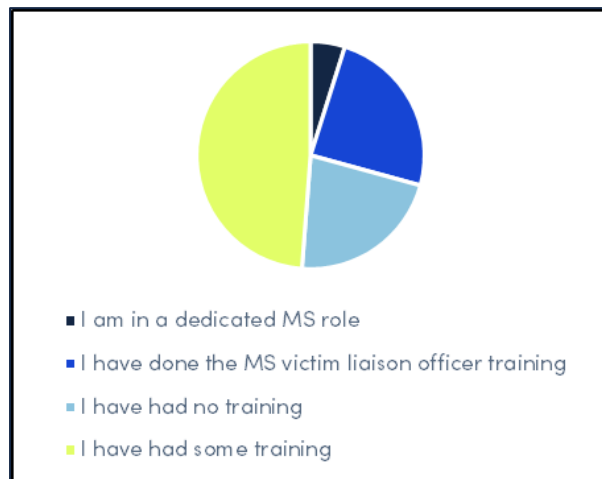


Figure 14: Frontline officers' perceptions of their level of training (n=41)

⁵⁷ MS Leads survey (n=37)

WEST YORKSHIRE POLICE'S TRAINING & PARTNERSHIP

West Yorkshire Police has a dedicated role for training and partnerships to ensure officers are up to date on MSHT. This approach is crucial for addressing the complex and constantly evolving nature of MSHT.

Roles and Responsibilities

- Coordination of training: Organises and delivers training programs internally, and offers free training sessions to first responders and partner agencies
- Partnership building: Attends partnership forums, liaises with partners, and builds relationships to improve intelligence sharing and collaboration

Resource

- Personnel: 1 dedicated full-time employee
- Budget: £5,000 p/a
- Facilities: Force training centre with Hydra capabilities

Impact

- Enhanced effectiveness: A more knowledgeable and effective workforce and partner network
- Improved collaboration: Better relationship building and information sharing with partner agencies, leading to more effective intelligence gathering

Requirements

- Skills & traits: Interpersonal skills, relationship-building, and a genuine passion for the issue

Challenges & Lessons Learned

- Role definition: Deciding whether the role should be filled by police personnel or staff. External hires can bring valuable perspectives that benefit the police but may be lacking knowledge of police scope
- Evolving nature of MSHT: The dynamic and complex nature of MSHT requires continuous updates and adaptations in training and strategies

Having a ring-fenced role is essential for maintaining current knowledge and partnerships. Without dedicated focus, efforts can quickly lose momentum leading to setbacks instead of progress. This dedicated role ensures that the fight against MSHT remains a priority, and that the response evolves alongside the crime.

Multi-Agency Collaboration

Expert interviews⁵⁸ highlighted the importance of multi-agency partnerships for recognising and tackling MSHT. For example, the increased recognition of criminal exploitation reportedly stemmed from collaboration with NGOs. There is a stated increasing reliance on third sector support for victim identification and engagement, and the need for multi-agency collaboration for safeguarding.

“There is no guidance for MS partnerships, while a number of forces have them there is no consistency between them... there are local authority task and finish boards and tactical delivery groups, but the work is often done in siloes.” –

System Leader

The landscape for partnerships has varied significantly over the last ten years with highlighted disbandment and reestablishment of different partnerships. When surveyed, 70% of the MS Leads confirmed the presence of some form of anti-slavery partnership in their area, while 8% said there were none and 22% were unsure.⁵⁹ However, interviews suggested that established partnerships were fewer in number: ROCU MSHT and OIC coordinators between them identified 20 partnerships in England and Wales. These varied in operation: two were identified as led by the PCC’s office, several were chaired by the local authority, and one was chaired by an expert from a local university. While there are pockets of good practice, the approach is not consistent, and there is no readily available guidance on how partnerships should be managed in this space.

When asked about their collaboration with Local Authority Leads, 41% of MS Leads said they often or always worked with the Local Authority Leads, and 16% reported occasional collaboration. Conversely, 19% mentioned they rarely or never collaborated, while 28% were uncertain. When asked about the impact of collaboration with their local authority lead, 40% agreed it was impactful. For 54% it was either not applicable or they were neutral, and only 5% disagreed.

⁵⁸ Expert Interviews (n=37). See methodology for full list.

⁵⁹ MS Leads survey (n=37)

HUMBERSIDE POLICE'S ANTI-SLAVERY PARTNERSHIP

Humberside's partnership arrangement is recognised as an exemplary model for strong intelligence sharing and a coordinated approach with partner agencies.

Structure

A Humberside-wide partnership, chaired by Hull University, oversees four local partnerships, each chaired by the local authority. Meetings are typically held quarterly.

Impact

The partnerships have created a strong network for information sharing and collaboration, helping to identify hidden forms of modern slavery. They have also enabled coordinated multi-agency responses and the development of effective action plans to address the complex nature of MSHT.

Importance of Partnerships in Addressing Modern Slavery

- Enhanced visibility: Modern slavery is difficult to detect. Intelligence often comes through adult or children's social care channels. Partnerships enhance the identification process
- Proactive focus on thematic areas: While Project AIDANT does not always align with Humberside's specific concerns, the forum provides a space to prioritise and tackle local issues

Lessons Learned

- Involve the right people: Ensure the appropriate representatives from relevant organisations are present
- Prioritise face to face communication: In-person interactions are essential for building strong relationships
- Set clear action expectations: Prevent meetings from becoming mere discussions by establishing actionable outcomes

Community Engagement

Some System Leaders perceive public understanding of MSHT to have declined since the MSA, particularly due to a lack of awareness campaigns focused on this issue.⁶⁰ This is supported by frontline officers, where 91% did not think modern slavery is widely understood by the public.⁶¹ This may be damaging the response, as it was reported neighbourhood officers often do not feel comfortable raising

⁶⁰ Expert Interviews (n=37). See methodology for full list.

⁶¹ Focus groups with frontline officers (n=44)

MSHT with local communities due to a perception that the public did not care about the issue or were not sympathetic to victims.⁶²

A few System Leaders also emphasised the need for increased public awareness of MSHT to improve identification, especially in places like nail bars, car washes and care homes. There is a reported complicity in turning a blind eye. Including victims' stories in soap operas or TV dramas has been an effective strategy to engage the public and raise awareness.

MS Leads and frontline officers frequently reported that most victims they encounter are foreign nationals, as reflected in the 77% referred to the NRM. Consequently, they emphasised the need for greater cultural awareness and language support to engage with different communities. Frontline officers from different forces shared varying opinions on the usefulness of the Language Line tool, a telephone and app-based interpreting service contracted by police forces, to provide real-time access to professional interpreters in over 200 languages. This indicates that the efficacy of support tools may vary based on geographical location.

Preventing Modern Slavery

Prevention is challenging to prioritise because its outcomes are difficult to evidence. Over the ten years since the MSA, efforts have been dedicated to prevention activities such as the Metropolitan Police Service's (MPS) Operation Makesafe, which involves improved training and awareness of child exploitation in businesses. However, as prioritisation and resource allocation to MSHT has diminished, the capacity for police forces to invest in prevention has also reduced.

A few System Leaders nonetheless highlighted that responsibility for modern slavery does not solely lie with the police. They stressed the need for a more coordinated approach involving partners across the system, which emphasises the importance of building resilience in communities and among victims to prevent re-victimisation or exploitation from occurring in the first place.

"What is frequently considered prevention, is more aligned with early intervention. True prevention needs to be taken outside the hands of policing and be driven by a multi-agency response to reduce vulnerability."

System Lead

⁶² HMICFRS (2017). [Stolen freedom: the policing response to modern slavery and human trafficking](#)

Investigating and Disrupting Modern Slavery & Human Trafficking

At a Glance: Key Themes & Findings

MSHT requires dedicated resources for an effective response: Anecdotal evidence suggests that dedicated teams refer more cases to CPS and achieve better outcomes. Following the introduction of the MSA several forces set up dedicated teams, though the exact number at the time is unclear.

Only 55% of police forces have dedicated MSHT teams: Currently, the response across the England and Wales is inconsistent. Approximately 55% of police forces, including the British Transport Police (BTP), have dedicated teams but these vary significantly in team size, structure, and capability.

Support mechanisms such as data and technological infrastructure vary widely with significant gaps in effectiveness: Gaps in the data infrastructure and unclear ownership of cross-regional investigations hinders the ability to identify and disrupt organised networks across the UK. The technological infrastructure is also inconsistent across the country; some forces have effective platforms for multi-agency intelligence sharing, while others struggle to collaborate with partners. Additionally, some forces possess capabilities that shorten data download times from weeks to days. This disparity highlights room for improvement.

Reliance on victim testimony emphasises the need for victim navigators to facilitate victim engagement: There is a significant reliance on victim engagement for investigations and prosecutions. However, maintaining victim engagement is also difficult. System Leaders stated that Victim Navigators are seen as essential support mechanisms for keeping victims engaged through the CJS process. They also play a crucial role in helping victims rebuild their lives, preventing re-victimisation. Therefore, there is a pressing need for funding to embed victim navigators across the UK.

Investigations

In 2016, police were running just 188 live operations related to modern slavery. By 2019, that number had surged to 1,479, a 687% increase driven largely by efforts to improve crime recording practices. The momentum peaked in 2022 with 4,322 live investigations. But by 2024, the figure had dropped to 3,552, a decline of 18% from the 2022 high and marking a 10% decrease from 2023. This reversal suggests that progress in tackling modern slavery may be stalling, not because the crime has diminished, but because the policing infrastructure is shrinking. With many dedicated teams disbanded or downsized, law enforcement's ability to investigate this complex and hidden crime appears to be under growing strain.

Resources

"Crime types disproportionately suffer the longer they take to investigate."

System Leader

Dedicated Teams

Most System Leaders⁶³ highlighted that investigating and disrupting MSHT is resource intensive and complex, with some investigations lasting five years. The significant time, capacity and budget to pursue multiple lines of investigation, which often cross regional and sometimes international borders and involve the analysis of vast amounts of data, are considerable challenges. Despite this, MS Leads felt that their organisations are better equipped to tackle MSHT compared to five years ago.⁶⁴ However, this progress is still not translating to positive CJS outcomes, and challenges with resourcing and competing priorities persist, as discussed below.

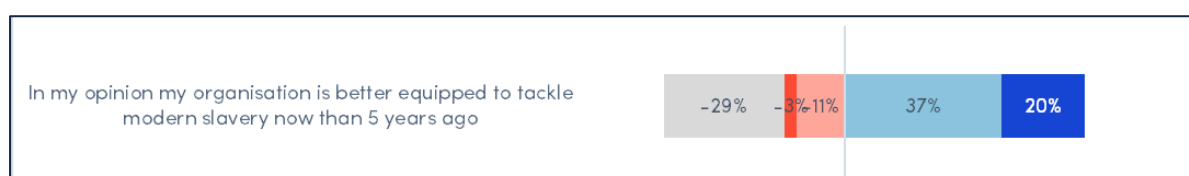


Figure 15: MS Leads' perceptions on their organisation's readiness to tackle modern slavery compared to five years ago

Dedicated teams are considered essential for effectively investigating and disrupting MSHT, as they provide both the necessary capabilities and the required capacity to handle these investigations. Additionally, dedicated teams reportedly make more referrals to the CPS.

"A lack of dedicated teams negatively impacts investigations."

System Leader

⁶³ Expert Interviews (n=37). See methodology for full list.

⁶⁴ MS Leads survey (n=37)

When asked about challenges or barriers in investigating modern slavery, most MS Leads emphasised the importance of dedicated teams and resources to tackle MSHT.⁶⁵

“There’s no dedicated resource, so they [MSHT enquiries] are investigated by relative amateurs who are already overloaded with other cases.”

MS Lead

However, a few System Leaders⁶⁶ highlighted that MSHT investigations are allocated to PIP2 investigators, ensuring they are conducted with the necessary expertise and resources. On the other hand, some MS Leads highlighted that the perceived complexity of MSHT can drive a lack of prioritisation.⁶⁷

“The perceived complexity of investigating/ proving slavery offences means they aren’t prioritised against other cases that feel more likely to get a positive outcome.”

MS Lead

“There is a general fear amongst the workforce across all ranks about this crime type.”

MS Lead

The need for operational support from ROCU, MSHT & OIC coordinators to ensure that investigations start off on the right foot remains. Some Systems Leaders reported that the built-in processes for tackling MSHT investigations vary with some forces still struggling.

“Ideally my role should be providing tactical and strategic advice, but I still get drawn in to providing operational advice... I end up needing to make sure they are applying all the right things from the get-go.”

System Leader

Interviews with ROCU coordinators revealed the number of forces with dedicated teams across England and Wales. Out of 44 forces across England and Wales, including the BTP:

⁶⁵ MS Leads survey (n=37)

⁶⁶ Expert Interviews (n=37). See methodology for full list.

⁶⁷ MS Leads survey (n=37)

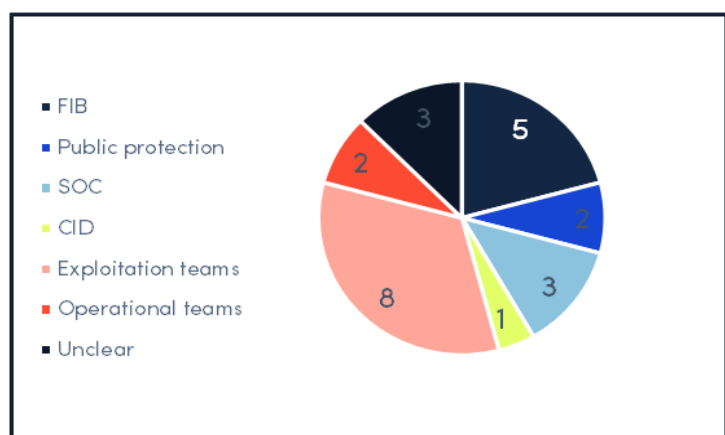
- 24 forces were identified as having dedicated teams, equating to 55%.
- The teams varied in size ranging from two officers to 14+ (where they would also include a DCI, DIs and DSs).
- Of those with dedicated teams, it was reported that, five sat in the Force Intelligence Bureau (FIB), two sat in safeguarding/vulnerabilities teams, three sat in SOC, eight were dedicated exploitation teams, one sat in CID, and two were embedded in operational teams. Three were unclear.

ROCU coordinators highlighted how a team's function impacts its capabilities:

- Teams sitting in Force Intelligence Bureaus (FIBs) lack investigative capabilities and need to coordinate with other teams to encourage them to pick up investigations – which is challenging amongst competing priorities.
- Teams sitting in SOC can lack the cultural support to focus on victim engagement (while improving, SOC teams can be more used to driving investigative outcomes, and more used to dealing with physical commodities such as guns and drugs).
- Public protection teams do not have the ability to conduct covert tactics and so lack the capabilities to pursue more evidenced-led investigations.
- In forces where there were no dedicated teams, the response was often dispersed in CID, SOC or public protection units. Investigators in these units have to manage significant caseloads, making it difficult to find the time and resources to investigate MSHT without dedicated teams.
- Additionally, when asked about the other specialisations of dedicated teams, MS Leads reported that 55% of these teams had additional specialisms.⁶⁸ 38% of the dedicated teams also focused on OIC.

Where MS Leads reported not having dedicated teams, they indicated that these responsibilities were primarily distributed across the criminal investigation department (CID), serious organised crime (SOC) teams, or local policing units.

Figure 16: Function of dedicated teams across the 44 police forces



⁶⁸ MS Leads survey (n=37)

The MSOICU have launched Project Turnstone to improve the policing response to MSHT. Part of this work involves identifying a national framework for the most effective response.

MS Leads: Rank

In the survey, MS Leads⁶⁹, comprising Strategic Leads, Tactical Leads and MS force champions (such as a SOC and exploitation coordinator covering MS) reported their rank, duration of time in the role, and length of involvement in the response to MSHT. This information was gathered to understand the level of experience dedicated to MS Leads.

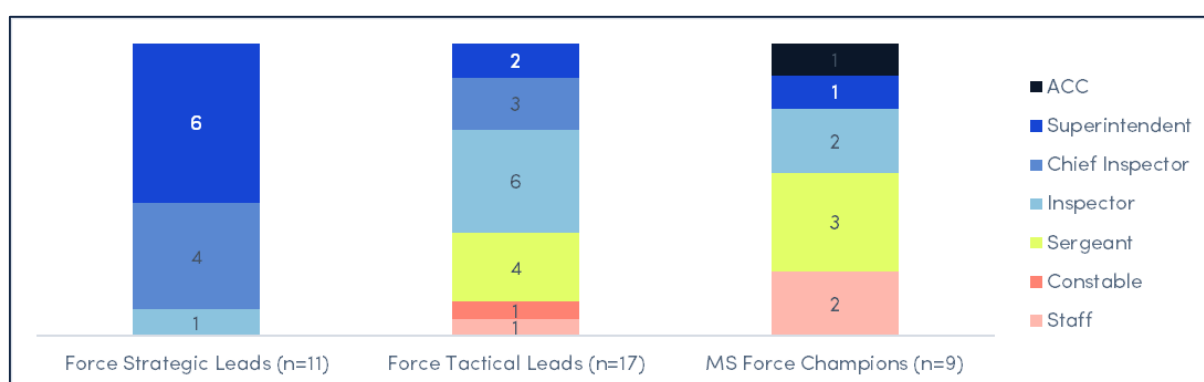


Figure 17: MS Leads by rank (n=37)

The majority of Strategic Leads hold the rank of superintendent (55%), while most of the Tactical Leads are at the inspector level. MS Champions, on the other hand, are more evenly distributed across the ranks, with the highest proportion being at the sergeant level (Figure 17). Additionally, 87% of the MS Leads reported having detective accreditation.⁷⁰

⁶⁹ MS Leads survey (n=37)

⁷⁰ MS Leads survey (n=37)

CHESHIRE POLICE'S EXPLOITATION TEAM

Cheshire Police have established an exploitation team that replicates a CID model, comprising 3xDIs, 6xDS's, 39x DC/PC's and 3 police staff, spread across three areas. These teams are considered an effective middle ground between dedicated teams in public protection, SOC and the FIB. They focus on all forms of exploitation, utilising their specialist knowledge to investigate cases thoroughly and support victims effectively.

Lessons from Cheshire's team:

- **Dedication:** Addressing MSHT requires specialist investigative training (PIP2), sufficient manpower and time to pursue lines of intelligence, including media, financial data, location information, and victim testimonies
- **Strong leadership:** Effective leadership is crucial. A leader who deeply understands exploitation and can use the national framework (benchmarking) to ensure the team has all the essential components for an effective response
- **Proactive intelligence gathering and operations:** While some forces may rely on reactive intelligence due to high demand in dense metropolitan areas, Cheshire drives operations by proactively visiting sites and gathering intelligence
- **Collaboration with other teams:** Exploitation teams may need to draw on SOC for covert tactics during investigations and share demand with CID when necessary
- **Effective multi-agency collaboration:** Successful intelligence gathering involves collaboration with other agencies which are vital for victim support and community engagement

MS Leads: Time Holding This Specific Role

For MS Leads overall:

- 27% had been in the role less than 1 year
- 46% had been in the role 1-3 years
- 27% had been in the roles over 3 years

MS Champions were most likely to have been in their roles the longest, with 44% serving for 3+ years. In comparison, 24% of Tactical Leads and 18% of Strategic Leads had held their position for the same duration (Figure 18).

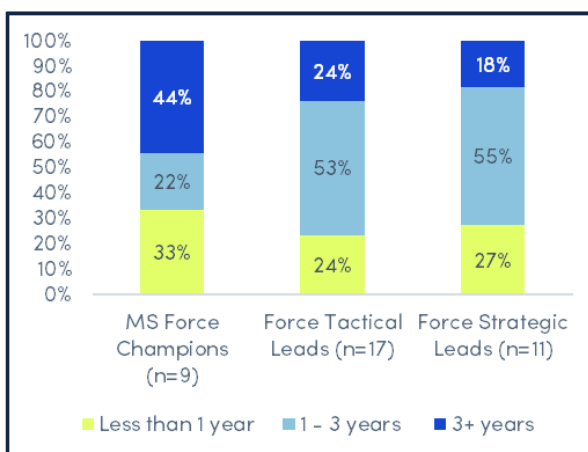


Figure 18: MS Leads length of time in current MS role (n=37)

MS Leads: Experience with MSHT overall

Tactical Leads have the longest involvement in MSHT response, with nearly a third having over 10 years of experience, compared to 0% for Strategic Leads. Most Strategic Leads have been involved in the MSHT response for 2-5 years, accounting for 55% (Figure 19).

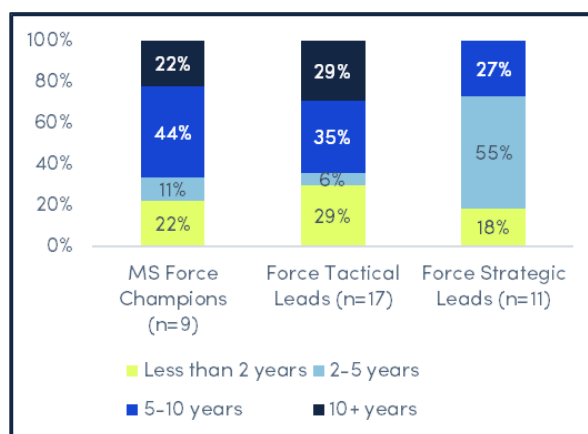


Figure 19: MS Leads length of time involved in the response to modern slavery (n=37)

MS Leads: Responsibility For Other Crime Types

Out of the 37 MS Leads surveyed, only 7 were solely dedicated to MSHT. Additionally, 51% identified OIC as another responsibility.⁷¹ This could be a singular additional responsibility or part of a broader range of thematic responsibilities. Specifically, these are:

- 7 Leads are solely dedicated to MSHT
- 7 Leads are responsible for MSHT & OIC
- 5 Leads handle MSHT, OIC & one other area
- 4 Leads manage MSHT, OIC & 2 other areas,
- 2 Leads oversee MSHT & SOC
- 4 Leads are responsible for MSHT & another area
- 8 Leads are responsible for OIC and 4+ other areas

⁷¹ MS Leads survey (n=37)

Other areas of responsibility include SOC, county lines, sex work, and/or domestic abuse, among others.

MS Leads: How The Role Has Changed

When asked whether the role of MS Leads has changed over the last decade, 20 MS Leads provided their insights. Their responses highlighted a variety of experiences and perspectives:

- 9 Leads identified improvements, noting increased awareness and greater visibility of MSHT issues
- 4 Leads highlighted that competing priorities have negatively impacted resources available for responding to MSHT
- 3 Leads pointed out that constant changes and inconsistencies, often due to new Senior Leadership Teams, have negatively impacted the role
- 2 Leads stated the role has remained largely the same
- 1 Lead mentioned that MSHT is no longer a focus for their organisation

Support mechanisms

Financial Investigations

Financial investigators are emphasised as an important part of the policing response, as they play a crucial role in tracing money flow and confiscating assets. This is particularly important for the evidence base when victim testimony is hard to secure or corroborate. Some System Leaders⁷² reported a shortage of financial investigators, with retention within policing being a significant challenge due to the demand from private companies. Despite this, MS Leads indicated a relatively high use of financial investigators, with 43% indicating they always or often use them for MSHT cases.⁷³ However, given the economic aspects of MSHT, interviewees suggested that ideally financial investigators should be used in most cases.

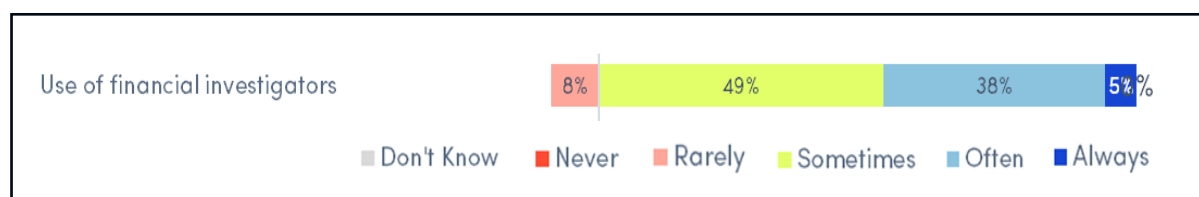


Figure 20: MS Leads' perceptions of the use of financial investigators for MSHT cases (n=37)

Technological Infrastructure & Multi-Agency Intelligence Sharing

Over the last 10 years policing has utilised advancements in technology to try to improve the data infrastructure to tackle modern slavery more effectively.

⁷² Expert Interviews (n=37). See methodology for full list.

⁷³ MS Leads survey (n=37)

The National Data Analytics Solution (NDAS) was introduced during its Foundation Phase in September 2018⁷⁴, aiming to become a centralised advanced analytics capability for UK policing. It integrated data from various sources, including crime and intelligence systems, to provide actionable insights. One key use case was modern slavery, focusing on improving the identification and management of MSHT cases. Modern slavery is seen as a network-based problem, with offenders or victims often part of wider networks, such as human trafficking rings. NDAS was designed to visualise networks and support strategic decisions. However, it was abandoned in 2021 and replaced by the Centre for Data Analytics in Policing (Project CDAP).

Despite these efforts to enhance national policing, some System Leaders and MS Leads pointed out that the current technology infrastructure is still insufficient to support MSHT investigations effectively. This issue is partly due to the technology available, as MSHT investigations require downloading and analysing large amounts of financial data, geographical data, media data and more, necessitating robust technological support. Some System Leaders highlighted notable variations in the quality of this support across different forces. For instance, in many forces, digital downloads from items such as phones can take several weeks to process. In contrast, some forces have the capability to complete these downloads within days. This disparity highlights the need for improved technological infrastructure across all forces to ensure more efficient and timely investigations.

“In some areas of the BTP, they can do phone downloads in 24 hours.”

System Leader

Additionally, the lack of intelligence flows between the various agencies involved in the response to MSHT, or interacting with victims poses a significant challenge. A few System Leaders highlighted that currently data predominantly exists in siloes across local government, 48 UK police forces & services, NGO data and other relevant organisations and agencies. However, this issue is not unique to this crime type but affects the efficiency of a range of investigations. Some System Leaders⁷⁵ also highlighted that data from the NRM is not shared or utilised to support investigations, despite the volume of information collected through the system that could be used for developing intelligence.

While some forces, such as West Yorkshire, have effective information-sharing mechanisms in place where partner agencies can upload intelligence to a shared platform, other forces face challenges. Some System Leaders highlighted how MSHT investigators report being unsure of how to connect with partner agencies

⁷⁴ West Midlands PCC (2019). [National Data Analytics Solution – Modern Slavery Ethics Committee Briefing Note](#)

⁷⁵ Expert Interviews (n=37). See methodology for full list.

and often require support from the ROCU coordinators to facilitate these connections.

Some System Leaders also reported that it is challenging to determine which types of investigations lead to successful prosecutions due to the lack of integrated data within the CJS. This makes it hard to identify best practice for investigating MSHT.

“We don’t know which investigations across the country are leading to successful outcomes.”

System Leader

Cross-Regional Co-ordination

Additionally, some System Leaders highlighted police forces are apprehensive about taking on cases that cross regional boundaries. These cases fall outside their and the ROCU’s jurisdiction and can quickly deplete entire budgets. These boundaries impede the ability to investigate the criminal activity that seamlessly cross them and to identify the organised criminal networks operating across the UK.

“If a police force like Kent identifies brothels within their jurisdiction they may investigate and identify that there are brothels in Birmingham that are connected by the same network. Because of a lack of resource to pursue such complex lines of investigation, the intelligence would just be handed over to West Midlands Police to pursue.”

System Leader

The Tackling Organised Exploitation (TOEX) programme was established to provide intelligence and analytical expertise to support forces undertaking complex exploitation investigations. TOEX is reportedly piecing together intelligence to support investigations and subsequently improve the intelligence infrastructure. They are building the capability to data wash against their database, which will enhance the identification of organised crime groups. However, the lack of clarity on who owns cross-regional investigations remains a barrier to pursuing the intelligence collated by TOEX. Some System Leaders indicated that the NCA is more focused on OIC and investigations abroad, and therefore not always able to pick up cross-regional investigations.

Victim Safeguarding and Engagement

Most System Leaders emphasised that victim engagement is essential for supporting investigations, as it enables investigators to pursue lines of inquiry and gather evidence that corroborates a victim’s testimony. Whilst victim support has reportedly improved over the last 10 years, there remain significant challenges with maintaining the engagement of MSHT victims. Some of these challenges can be

more easily addressed, such as language differences. However, more complex issues often arise, including a lack of trust, fear of reprisals and sometimes debt bondage.

Additionally, some System Leaders⁷⁶ and MS Leads⁷⁷ highlighted that the length of investigations can be a barrier to victim engagement. Prolonged investigations can lead to victim fatigue, and some victims may also wish to return home or move on with their lives, further complicating their continued involvement in the process.

There are challenges around safeguarding that can complicate victim engagement. Some MS Leads highlighted that finding housing can be complex, particularly for British nationals who join local council housing lists.⁷⁸ This situation is further complicated by the fact that some organisations only offer dry houses. Given the vulnerability of MSHT victims and the overlap with vulnerability and substance misuse issues, this reduces the availability of suitable housing for some victims. Additionally, those who are referred to the NRM are often relocated to another area of the country. This relocation can require more resources for the police to keep these victims engaged.

“There is also a significant lack of accommodation and support for victims of modern slavery, particularly British citizens who just go onto the “homeless list”.”

MS Lead

Victim Liaison Officers (VLOs) are specially trained police officers who support victims, build trust, and ensure safeguarding. When surveyed, 49% of the MS Leads identified that their organisations have VLOs, 46% said their organisations did not and 5% were unsure.⁷⁹ The average number of VLOs per organisation was identified as 15, but this ranged from 1 VLO to 120. Some System Leaders highlighted problems with VLO models, noting that these officers often have their roles blurred and are pulled out of their dedicated positions to fill other operational roles. As a result, non-specialised officers frequently end up supporting victims, which undermines the effectiveness of the VLO model.

The Victim Navigator Programme run by Justice and Care has proved effective at supporting victims through the CJS and at helping them to rebuild their lives.⁸⁰ Some System Leaders highlighted victim navigators are essential to investigations and prosecutions but are underfunded and are only currently available in five regions. Only, 25% of MS Leads reported they often or always used victim navigators.⁸¹ A few System Leaders highlighted that without national prioritisation,

⁷⁶ Expert Interviews (n=37). See methodology for full list.

⁷⁷ MS Leads survey (n=37)

⁷⁸ MS Leads survey (n=37)

⁷⁹ MS Leads survey (n=37)

⁸⁰ Justice & Care (2022) Victim Navigator Pilot Final Evaluation

⁸¹ MS Leads survey (n=37)

resources and funding are limited, and PCCs are not as active as they could be in this area to secure funding for the navigators.

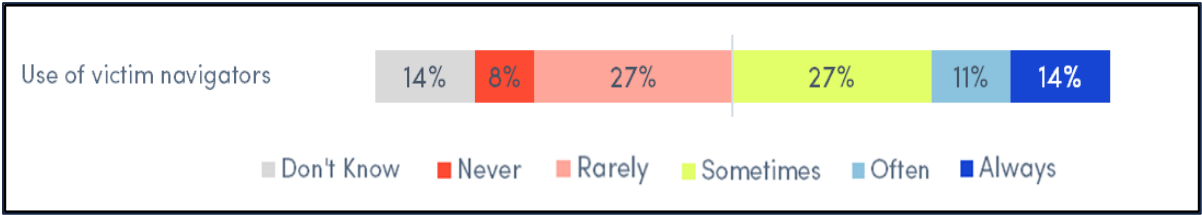


Figure 21: MS Leads' perceptions of victim navigator use (n=37)

MS Leads⁸² were asked about their use of support mechanisms for MSHT cases. The most common external mechanism for support used is TOEX, with 43% saying they often or always use TOEX to support investigations and 46% saying sometimes. ROCU coordinators were also frequently used with 41% saying often or always and 43% saying sometimes. Only 19% reported often or always using the NCA's unit.

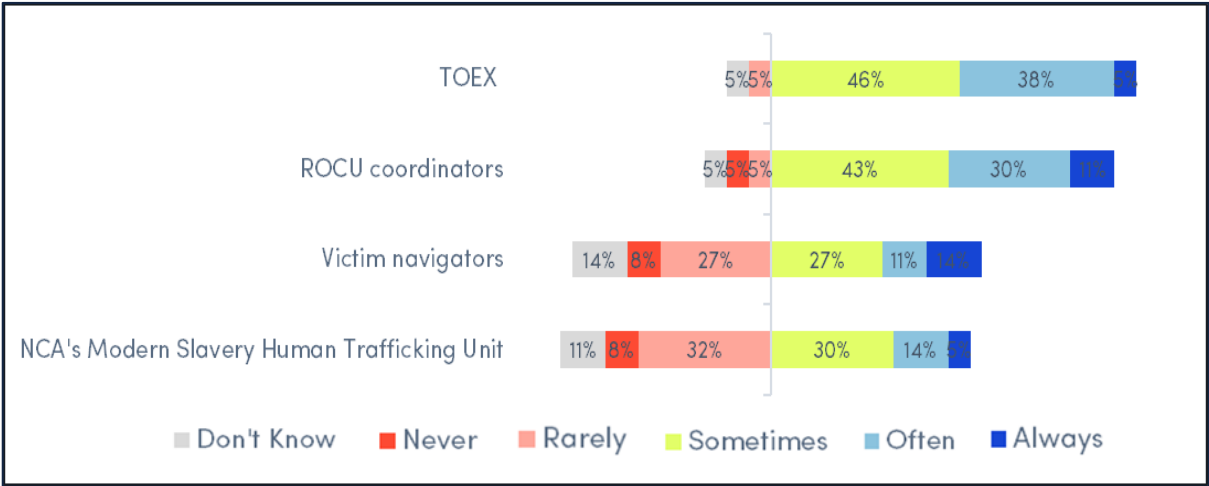


Figure 22: MS Leads' perceptions of use of external support mechanisms (n=37)

⁸² MS Leads survey (n=37)

THE UK'S FIRST ORGAN TRAFFICKING CONVICTION

Background:

The case began on May 5, 2022, when a young man from Nigeria presented himself at Staines Police Station. Initially believed to be 15 years old, it was later discovered he was 21. He had been trafficked for the purpose of organ harvesting at the Royal Free Hospital.

Investigation:

Surrey Police opened the investigation before handing it over to the Metropolitan Police Service. It involved multiple interviews with the victim, who faced challenges in identifying the suspects. Evidence collected included UK visa and immigration records, financial data, phone data and medical appointments. Collaboration with partners such as the General Medical Council and the Human Tissue Authority was essential. Justice and Care Victim Navigators played a significant role in safeguarding the victim during the transition out of local authority care, and throughout the investigation and trial.

Challenges:

The investigation faced several challenges, including safeguarding the victim, identifying suspects, and dealing with international pressures.

Role of Victim Testimony:

The victim's testimony was crucial for explaining his experiences and the conditions he faced, highlighting how cultural differences might affect victim behaviour. It was given via live link for protection.

Impact:

The case led to amendments to the Human Tissue Act 2004 and increased awareness amongst medical professionals, establishing new avenues for reporting. Globally, it raised awareness and prompted more investigations of organ trafficking.

Lessons Learned:

- Know your critical partners: Identifying who will support the investigation is essential
- Take into account cultural differences: Understanding the lifestyle and cultural background of victims helps explain their behaviour. This consideration can be crucial in getting the jury to understand the victim's experience and how they may respond to exploitation
- Do not rely on international lines of inquiry: International lines of inquiry can be slow, not forthcoming and may be unreliable. It's important to choose partners in other countries carefully, as not all may be interested in supporting an investigation and may have a different agenda to that of the investigators. The FCDO can be a great support in this process.

Bringing Perpetrators to Justice

At a Glance: Key Themes & Findings

Continued low prosecution rates over the last decade are likely driven by undercharging: While prosecution rates for MSHT have not substantially improved since the MSA, conviction rates for modern slavery have remained consistently high in the last five years. This suggests potential undercharging of offences, as reflected in the outcomes for modern slavery recorded crimes.

MS Leads revealed varying undercharging patterns for MSHT sub-threats: Half of MS Leads⁸³ said criminal exploitation is often or always charged under other legislation instead of the MSA, with similar trends for sexual exploitation (47%). A smaller percentage said the same for labour exploitation (25%) and domestic servitude (33%). They identified various alternative used: 62% identified drug offences, 59% identified sexual offences, 35% identified violent offences/offences, 21% identified financial offences, 8% identified immigration offences and 21% identified offences relating to controlling or coercive behaviour.

There are multifaceted reasons for undercharging under the MSA:

- Interviews and survey reveal a reluctance to charge under the Act or to use prevention and risk orders, largely due to perceptions that proving coercion is too challenging, especially without victim testimony.
- Practical issues in CPS and police collaboration are leading to inconsistent charging decisions for MSHT offences under the MSA. Only 33% of the MS Leads agreed CPS early advice for MSHT cases is effective.⁸⁴
- There is a gap between the perceived and actual ability to conduct successful evidence-led prosecutions for modern slavery cases that do not involve sexual exploitation. Some MS Leads and counsel believe it is impossible, despite example of successful prosecutions for criminal exploitation.⁸⁵ Improved sharing of best practices is needed to ensure more MSHT cases are prosecuted under the MSA.

The MSA should be used to ensure proportionate justice is delivered and victims are properly recognised and supported: While other legislation can successfully disrupt and prosecute perpetrators, the sentences might not be as high and victims are at risk of being ostracised from their communities without genuine recognition of victimhood.

⁸³ MS Leads survey (n=37)

⁸⁴ MS Leads survey (n=37)

⁸⁵ MS Leads survey (n=37)

Application of the Modern Slavery Act 2015

Some System Leaders highlighted persistent challenges in applying the MSA over the last decade.⁸⁶ Figure 23 illustrates the decreasing percentage of charged or summonsed outcomes for modern slavery recorded crimes.

“Not a single Supreme Court judgement has been made on the MSA, leaving critical aspects of the legislation such as the interpretation of “ought to know” in Section 1, unclear.”

System Leader

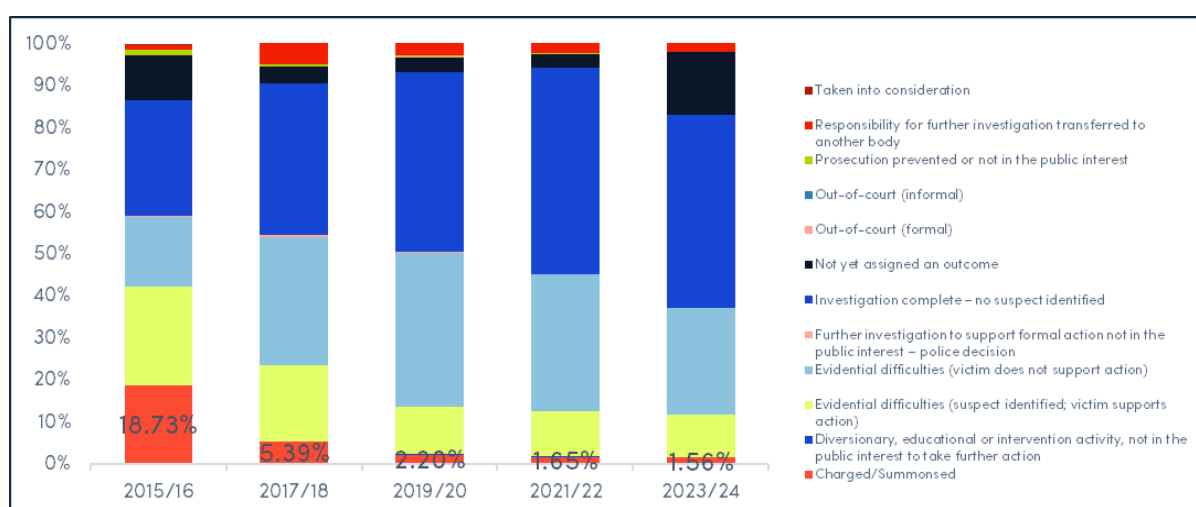


Figure 23: Outcomes for Recorded Crimes of Modern Slavery and Trafficking for Sexual Exploitation

Most System Leaders highlighted how prosecution rates for MSHT have remained low since the introduction of MSA. In 2016 there were 349 prosecutions and in 2023/24 there were 416 (Figure 24). Given the significant increase in recorded crime and the number of police investigations over the same time period the lack of increase in prosecutions is problematic.

However, the conviction rates for modern slavery are relatively high, averaging at 72.5% and ranging from 70% to 76% over the last four years (Figure 24). These rates are comparable to the overall conviction rate of 77% for all crown court cases.⁸⁷ This suggests the low prosecution rates may be due to the undercharging of modern slavery offences. This observation aligns with the challenges identified in applying the MSA as highlighted in the interviews and the changes in outcomes illustrated in Figure 23.

⁸⁶ Expert Interviews (n=37). See methodology for full list.

⁸⁷ Clark, D. (2025). [Conviction rate for courts in England and Wales Q2 2013-Q3 2024](#)

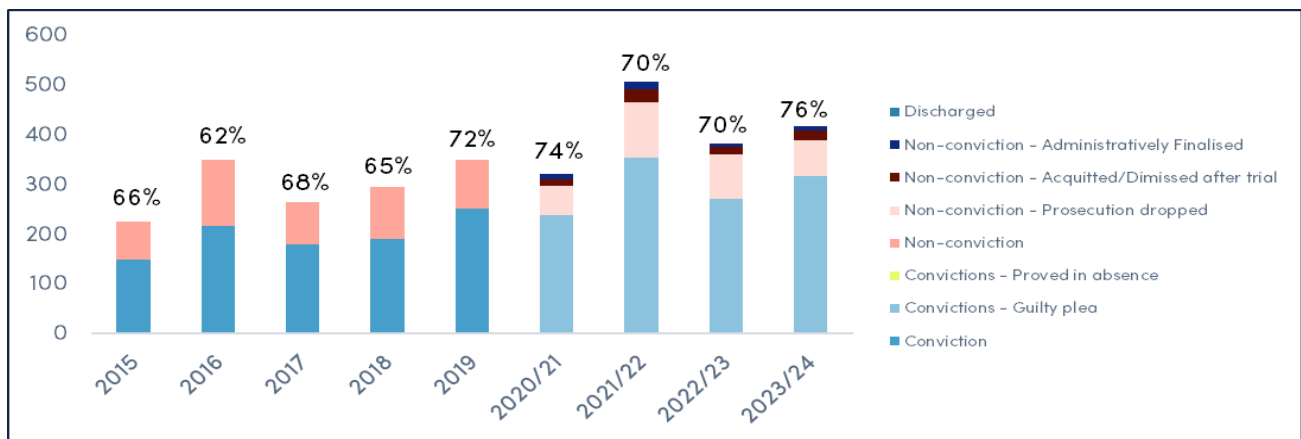


Figure 24: Breakdown of Prosecutions for Modern Slavery Flagged Cases with Conviction Rates. Source: CPS Prosecution Crime Types Data Tables (2020/21 – 2023/24); UK Modern Slavery Annual Reports (2017-2019)

While the CPS in late 2023 issued guidance to prosecutors to always use the MSA where applicable, MS Leads⁸⁸ indicated that other legislation is frequently used *instead of* the MSA. This varies based on the type of MSHT sub-threat (Figure 25):

- **Sexual Exploitation:** 47% of MS Leads reported that it is often or always charged with other offences instead of those under the MSA, 35% said sometimes, 8% said rarely, 0% said never and 11% were unsure.
- **Criminal Exploitation:** 50% of MS Leads reported that it is often or always charged with other offences instead of those under the MSA, 27% said sometimes, 11% said rarely, 0% said never and 11% were unsure.
- **Labour Exploitation:** only 25% of MS Leads reported that it is often charged with other offences instead of those under the MSA, 35% said sometimes, 19% said rarely, 3% said never and 19% were unsure.
- **Domestic Servitude:** 33% of MS Leads reported that it is often charged with other offences instead of those under the MSA, 19% said sometimes, 22% said rarely, 5% said never and 22% were unsure.

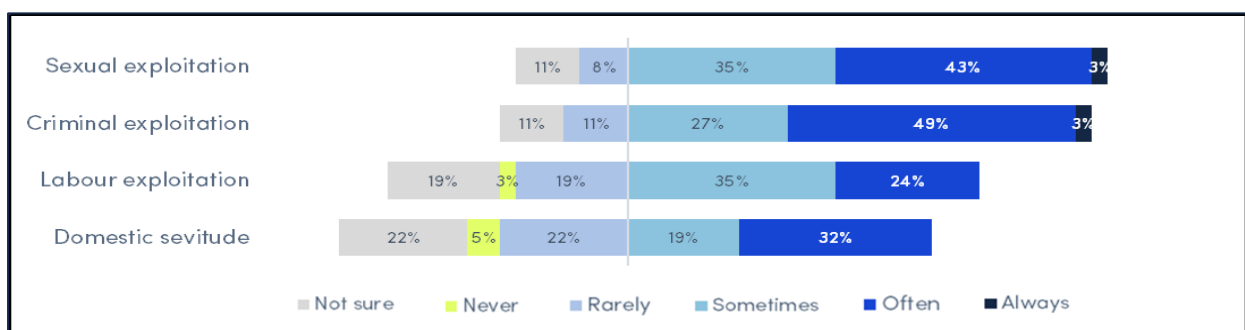


Figure 25: MS Leads' perceptions of how often other legislation is used instead of the MSA by exploitation type (n=37)

⁸⁸ MS Leads survey (n=37)

MS Leads⁸⁹ identified the alternative offences being charged, shedding light on the poly-criminal nature of MSHT:

- 62% identified drug offences: possession of drugs, supply of drugs, drug cultivation, concern in supply of drugs, misuse drugs act (e.g. Possession with Intent to Supply)
- 59% identified sexual offences: rape and sexual offences, controlling prostitution for gain (S53 Sexual Offences Act), living off immoral earnings, allowing premises to be used for prostitution, managing a brothel
- 35% identified violent offences/offences against the person: domestic abuse related offences, harassment, assault, threats to kill, kidnap, false imprisonment, theft
- 21% identified financial offences: fraud, money laundering, proceeds of crime legislation, minimum wage offences
- 8% identified immigration offences
- 21% identified offences relating to controlling or coercive behaviour

Some System Leaders also highlighted that the use of the civil orders within the MSA, specifically the Slavery and Trafficking Prevention Orders and Slavery and Trafficking Risk Orders, has been notably low since the MSA's introduction.⁹⁰ There is a perceived lack of awareness about these orders, and the thresholds for obtaining them are considered higher than those for other orders, such as those under the Sexual Offences Act 2004. The application process for these orders is seen as particularly time-consuming, as it is perceived that a full case file is required to secure them. This preparation diminishes their ability to fulfil their preventative role effectively.

Challenges in Applying the Act

Preference For Other Legislation

Most MS Leads highlighted that police and judiciary often prefer using other legislation over the MSA because there is a lack of understanding of the legislation, coupled with a lack of appetite to test it.⁹¹ Police and prosecutors are more familiar with other legislation, leading to a preference for charging with other offences. Additionally, there is a lack of understanding of the nature of MSA offences within the CJS.

“Offences are not well understood... victims are often seen as complicit in their exploitation because they have not actively tried to leave their exploiter.”

MS Lead

⁸⁹ MS Leads survey (n=37)

⁹⁰ Expert Interviews (n=37). See methodology for full list.

⁹¹ MS Leads survey (n=37)

Some System Leaders⁹² and MS Leads⁹³ pointed out a preference for offences that are more likely to obtain a guilty plea, as they carry lower sentences. This approach reportedly supports CPS in fast-tracking cases with lesser offences to achieve quicker results. Additionally, prison overcrowding has been cited as a reason for the preference for lesser offences.

While the maximum sentence for MSA offences is life, some MSHT offending is deemed to be at the lower end of the scale. New sentencing guidelines for modern slavery offences advise judges to consider the level of harm.⁹⁴ However, evidencing the harm caused by psychological trauma from exploitation is challenging. A few System Leaders argued a lack of understanding of the level of harm caused by exploitation is resulting in excessively lenient sentencing under the MSA, with an average custodial sentence of 5.5 years between 2017 and 2019.⁹⁵

“There is a need for improved alignment between investigative and prosecutorial standards to achieve better CJS outcomes.”

System Leader

Proving MSA Offences

Some MS Leads⁹⁶ noted the complexity and resource intensity required to evidence MSHT offences, making other legislation appear easier and quicker options. There are reported difficulties with gathering sufficient evidence to demonstrate the presence of coercive control and a heavy reliance on victim testimony. There is a preference for other offences that are perceived as easier to prove without victim testimony.

Problems With Early Advice

Some Systems Leaders and a few MS Leads noted challenges around obtaining early advice from the CPS. Police argued CPS require a full case file to provide advice, necessitating the completion of the full investigation prior to any CPS engagement. This delays the process, as police inevitably need to address concerns in the case file based on advice that could have been delivered at an earlier stage. There are also reported inconsistencies in the advice provided by the CPS across the country. Engagement with the CPS used to be more effective when prosecutors were more embedded within police; however, now they are harder to access.

While MS Leads generally agree that CPS early advice is accessible, they were less likely to agree it was effective. Specifically, 57% of MS Leads agreed CPS early advice

⁹² Expert Interviews (n=37). See methodology for full list.

⁹³ MS Leads survey (n=37)

⁹⁴ Sentencing Council (2021). New sentencing guidelines for modern slavery offences

⁹⁵ University of Hull (2023). Prosecutions under the Modern Slavery Act

⁹⁶ MS Leads survey (n=37)

is accessible for MSHT, but only 33% agreed CPS early advice is effective with 35% neither agreeing nor disagreeing.⁹⁷

It was noted that both police recommendations and CPS charging decisions result in the use of other legislation used. When asked, a slightly higher proportion of MS Leads said CPS often or sometimes (78%) charges with other legislation compared to police recommending charges (72%).⁹⁸ This suggests there is a need for improved understanding and greater confidence in both the police and the CPS to charge under the MSA.

Evidence-Led Prosecutions

Some System Leaders⁹⁹ highlighted securing evidence for a realistic prospect of conviction (RPOC) is challenging. There is a reliance on victim testimony to secure prosecutions, partly to identify perpetrators during investigations, but also to demonstrate impact during trial. Covert operations can lead to evidence-led prosecutions, but these are resource-intensive and take time. Most System Leaders highlighted that these efforts are not as effective without witness statements.

The importance of financial investigators is emphasised, as they play a crucial role in tracing money flow and confiscating assets. However, some System Leaders reported a shortage of financial investigators, with retention being a significant challenge due to the demand from private companies. Digital media investigators are also in demand and essential for conducting thorough investigations.

However currently, there is no readily available guidance for evidence-led prosecutions for police, resulting in a lack of standardised approaches or knowledge of what works.¹⁰⁰ Additionally, there is a discrepancy between what is considered feasible under the MSA and the cases that have resulted in successful convictions. MS Leads reported that evidence-led prosecutions are only feasible for cases of sexual exploitation due to the specificities of the MSA. To secure evidence led prosecutions for sexual exploitation, it is necessary to prove both the controlling prostitution for gain and the trafficking of victims. However, there have been successful evidence-led prosecutions for criminal exploitation (see the case study below for an example). This indicates an opportunity to enhance the sharing of best practices across policing to improve prosecutions for MSHT.

Despite these challenges, there appears to be a reasonable appetite for pursuing evidence led prosecutions, with 30% of respondents indicating they always or often pursue evidence lead prosecutions for MSHT.

⁹⁷ MS Leads survey (n=37)

⁹⁸ MS Leads survey (n=37)

⁹⁹ Expert Interviews (n=37). See methodology for full list.

¹⁰⁰ Home Affairs Committee (2023-24). [Human trafficking](#).

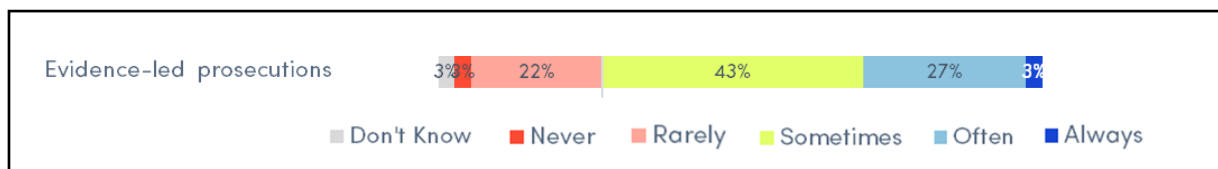


Figure 26: MS Leads' perception of use the pursuit of evidence-led prosecutions for MSHT cases (n=37)

The importance of Enforcing the Modern Slavery Act

Obtaining convictions through other legislation can help to successfully disrupt or dismantle networks, especially if the sentences received are comparable to the those under the MSA. This approach can be effective in targeting the broader criminal activities associated with MSHT, ensuring that perpetrators face significant consequences. However, it is essential to maintain a focus on the specific aspect of MSHT to ensure victims are recognised and supported appropriately.

Using other legislation may be more likely to secure convictions, but it can be problematic for victims. For example, when perpetrators are charged with controlling for prostitution rather than sexual exploitation or trafficking for sexual exploitation, victims may be perceived as 'willing' sex workers. This misperception can lead to their ostracism from their communities and further stigmatisation. Without applying the MSA, there is an absence of formal acknowledgement of their victimhood.

There are also significant issues with safeguarding, as perpetrators may not receive severe enough sentences, leading to a risk of reprisals if they are released sooner than expected. The average sentence under Section 1 of the MSA is 5.4 years and under Section 2 is 5.6 years¹⁰¹, despite the Act carrying a maximum life sentence. This discrepancy highlights the need for improved understanding among the judiciary, as MSHT offences can sometimes be deemed to be at the lower end of the scale.

"The use of alternative legislation should complement, rather than replace efforts to prosecute under the MSA."

System Leader

New sentencing guidelines¹⁰² now advising judges to consider the level of harm, often consider sexual exploitation to be the most harmful. However, evidencing the level of psychological harm or trauma remains particularly challenging. This difficulty in proving the extent of harm can result in less severe sentences, which

¹⁰¹ University of Hull (2023). Prosecutions under the Modern Slavery Act

¹⁰² Sentencing Council (2021). New sentencing guidelines for modern slavery offences

do not adequately reflect the severity of the crime or the impact on the victims. Moreover, there is a gap in understanding what the best outcomes are for victims.

“We need to understand what victims’ ideas of a good outcome is. We put so much emphasis on convictions but actually what does a successful outcome look like?”

System Leader

EVIDENCE-LED PROSECUTION FOR CHILD CRIMINAL EXPLOITATION: OPERATION VERDIN

Background:

On 22nd September 2022 a 15-year-old was stopped at London Bridge Station by the BTP. The young person (YP) had been missing for a week, claiming to have stayed with a friend. The YP appeared dishevelled and was found with a smartphone, burner phone and a substantial amount of cash. While with officers, the YP received 18 missed calls from the same number in 30 minutes. He was arrested for Concerned in the Supply of Class A drugs and was later found in possession of Class A drugs.

Investigation:

During a search of the YP's home, his father disclosed a text message conversation suggesting his son was being controlled. Data from the YP's phone identified two suspects, who were subsequently arrested for Concerned in the Supply of Class A drugs and Modern Slavery Offences. Evidence was collected from phone downloads, call data, forensic examination of drugs and packaging. The BTP worked with Sussex Police, the MPS, the National County Lines Coordination Centre Orders Team, and Social Services.

Challenges:

One of the key challenges was around safeguarding concerns. Due to these concerns and failures in service provision by social services, the OIC and safeguarding team at the BTP maintained regular contact with the YP.

Additionally, the CPS lawyer initially refused charges under the MSA, believing it wouldn't be possible without victim testimony. This decision was challenged with supporting evidence demonstrating control of the victim, and the charges were made.

Outcome & Impact:

The two perpetrators pled guilty to all charges, receiving sentences of 4 years and 8 months, and 28 months, respectively.

DI Matt Davies, the SIO on the case, developed MS guidance to assist charging decisions for modern slavery for cases involving county lines exploitation. The document supports police in preparing modern slavery pre-charge advice files and helps the CPS to consider modern slavery offences when providing charging advice.

Lessons Learned:

- Approach the child as a victim, not a suspect, and prioritise safeguarding while they are in custody
- Involve partners such as NGOs to support with victim engagement
- Quickly secure and analyse the phone data to identify control of the child and gather evidence
- Work with the CPS to demonstrate the feasibility of charges without victim testimony

How could the response to modern slavery be improved?

This section summarises the key issues identified in each previous section of this report and presents recommendations to overcome them. These recommendations were developed through interviews, internal and external workshops with stakeholders. They will benefit from further testing with stakeholders, as well as costing and implementation planning prior to implementation.

Prioritisation and strategic approach

Key issues:

Absence of a national strategy

We have consistently heard that a national strategy is essential to ensure a more consistent approach and clearly defined roles for the multiple partners involved alongside policing. Such a strategy would need to address critical issues like data and intelligence sharing, which are necessary to fully understand the scale of the problem and improve our ability to respond to and prevent it. There is also significant potential to learn from the highest performing forces and operating models to improve consistency and quality of the response, while respecting genuine differences in local context.

Conflation of MSHT and OIC

It is crucial to demarcate MSHT and OIC and resolve the confusion between smuggling and trafficking. This involves clear communication that smuggling is a crime against the border, and trafficking is a crime against a person. British nationals can be trafficked within the country, but they cannot be smuggled. Numerous factors can put people at risk of MSHT, with OIC being only one of them. However, conflating the two issues due to the focus on immigration and small boats has come at a cost to victims and has diminished the ability to respond to MSHT effectively.

Issue with Prioritisation

MSHT is no longer as prioritised as it was around the time of the MSA. An absence of a national strategy and conflation with OIC have contributed to this declining prioritisation. However, understanding and communicating the significant economic cost to the UK economy may help drive political focus and support to tackle this crime.

Recommendations:

1	Develop a new Home Office-led national Modern Slavery Strategy to ensure prioritisation and effective coordination of the response to modern slavery and human trafficking (Home Office).
2	Demarcate the narrative between modern slavery & human trafficking (MSHT) and organised immigration crime (OIC)
3	Communicate the significant economic impact of MSHT and the positive financial impact on the wider economy from reducing these offences to build support for a more prevention-oriented response

Identifying the modern slavery challenge

Key issues:

Understanding and awareness of how MSHT presents itself

Over the last decade, MSHT have evolved with constantly emerging forms of exploitation. It is crucial to continuously understand and recognise these different forms to respond effectively. This approach not only helps in tracking the overall scale of exploitation but also builds on existing knowledge of effective strategies against exploitation for financial gain, ensuring issues are tackled through a lens that understands the complexities of exploitation. Using 'modern slavery' as an umbrella term provides a valuable way to maintain focus on understanding and addressing these emerging forms of exploitation.

The frontline response

MSHT is characterised by substantial vulnerability. One of the most complex aspects of identifying adult victims of MSHT is defining whether coercion has occurred and recognising whether vulnerabilities have led victims to engage in criminal activities as a result of coercive control. Recognising the signs of coercive control requires looking beyond what is immediately presented. While the specific complexities of how MSHT manifests require ongoing training, the basics of recognition and response – identifying vulnerability, gaining trust, and safeguarding – can be achieved through the implementation of a simple and standardised 'golden hour' response. Current approaches / models are not translating into fully effective frontline responses.

Multi-agency intelligence sharing

Some police forces have developed effective mechanisms and platforms for sharing and receiving intelligence with partner agencies. However, others still struggle with collaboration. To address this disparity, best practice models from successful police forces could be replicated and embedded nationwide. This would enhance collaboration across the country, ensuring a more unified and effective approach to intelligence sharing and partnership.

Recommendations:

4	Continue using the umbrella term "modern slavery" for continuous tracking of current and emerging forms of exploitation for financial gain
5	Strengthen, simplify, and reinforce the frontline model for recognising and responding to exploitation and vulnerability
6	Encourage replication of best practice models for partnership arrangements and multi-agency intelligence sharing e.g. Humberside Police and West Yorkshire Police

Investigating and disrupting modern slavery

Key issues:

Inconsistent and minimal dedication to the MSHT response across the country

MSHT is an incredibly complex crime that requires dedicated resources for effective investigations. Currently, the response across the country is inconsistent. It is essential to establish a consistent and dedicated resource to tackle MSHT. Efforts should be made to build on the evidence in this report to identify the most effective models from the varying approaches across the country and ensure they are implemented to disrupt MSHT and bring perpetrators to justice.

Lack of ownership around cross-regional boundaries

Forces remain, on occasion, reluctant to take on investigations that cross ROCU boundaries, due to the substantial resources required. There is also a lack of clear responsibility for ensuring these investigations are taken on, hindering the ability to identify, disrupt and dismantle organised crime networks across the country.

Challenges in victim engagement

There are significant challenges in victim engagement due to language barriers, lack of trust, fear of reprisals and lengthy investigations. Victim engagement is also perceived as essential for intelligence gathering and securing prosecutions in court. The Justice & Care Victim Navigator programme provide that essential resource to ensuring continued support to victims, achieving improved engagement. The programme should be rolled out across the country.

Recommendations:

7	Identify and promote the most effective police operating models for tackling MSHT, including key components of what works e.g. dedicated resource, use of covert tactics, and encourage implementation across all police forces
8	Address cross-regional ownership issues by establishing clear and transparent decision-making processes outlining the criteria for determining which region and consequently which force within that region should be assigned a cross-regional case. Additionally, ensure all forces provide support to the lead force for cases that fall within their jurisdiction
9	Embed victim navigators nationally , identifying and securing funding as needed in the public interest

Bringing perpetrators to justice

Key issues:

Challenges with inconsistent charging decisions

The MSA is underutilised, partly due to inconsistent charging decisions. Police report that CPS early advice can be highly variable across the country. Enhanced collaboration and sharing of best practice between policing and the CPS can lead to more consistent and frequent charging of MSHT offences. Additionally, integrating CPS and police data will enable improved identification of effective strategies, ultimately improving the response to MSHT.

Evidence-led prosecutions

Misconceptions about the possibilities of evidence-led prosecutions for MSHT that do not involve sexual exploitation have reduced the likelihood of police and CPS

pursuing MSHT charges. To address this issue, it is essential to widely share case examples of successful evidence-led prosecutions. This practice not only enhances the likelihood of charging but also reduce the burden on victims by demonstrating that effective prosecutions can be achieved without relying on victim testimony.

Impact on victims and safeguarding

The use of other legislation may secure convictions but can be problematic for victims. As an example, victims of sexual exploitation can then be perceived as willing sex workers. This use of other legislation also presents issues with safeguarding, as shorter sentences from lesser offences may lead to a higher risk of re-victimisation. It is essential to place victims at the centre of the response to understand and achieve the best outcomes for them – this can be achieved through lived experience panels.

Recommendations:

11	Enhance CPS-police collaboration to improve early advice and promote a consistent charging approach
12	Integrate CPS and police data to enhance understanding of which investigations result in successful charges and convictions
10	Identify and widely share case examples of evidence-led prosecution strategies for modern slavery cases other than sexual exploitation to ensure knowledge of best practices for a broader range of MSHT cases is embedded across the country.
13	Draw on lived experience panels to apply a more victim-centred approach to justice, focusing on outcomes that benefit both victims and the public

Appendices

Need for Improvements

System Leaders, MS Leads and frontline officers were surveyed to assess the necessity for improvements across various critical domains. This evaluation provides valuable insights into the system's perspective on the most pressing areas for improvements and identifies the stakeholders who perceive the needs.

Policy

Frontline officers expressed the greatest need for improvements to policy, citing a lack of guidance for tackling MSHT that could be addressed through better policy. However, it was also noted that while sufficient policy exists, its implementation and use are lacking.

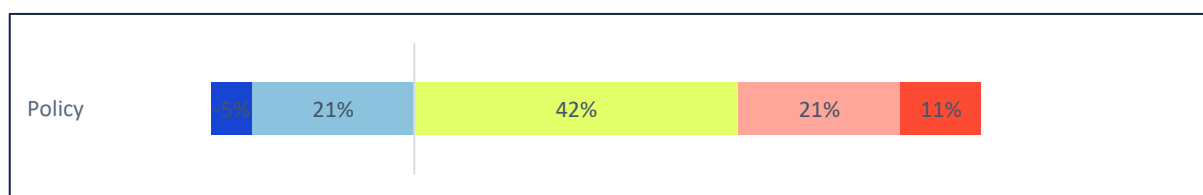


Figure 27: Systems leaders' perceptions of the need for improvement for policy (n=22)

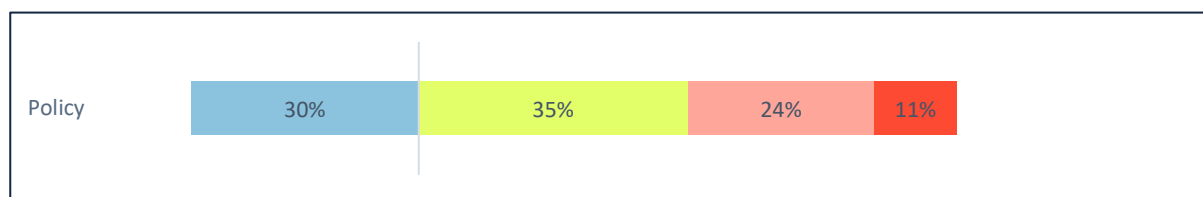


Figure 28: MS Leads' perceptions of the need for improvement for policy (n=37)

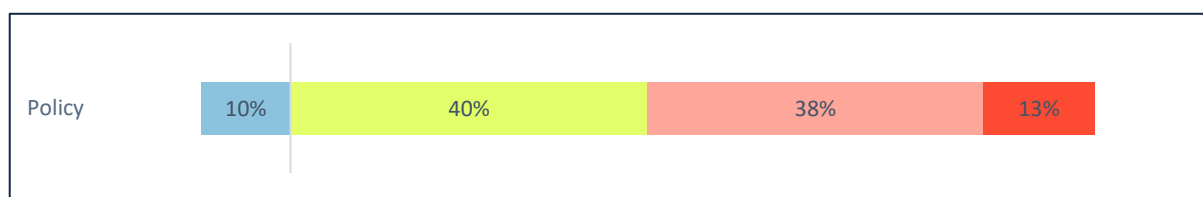


Figure 29: Frontline officers' perceptions of the need for improvement for policy (n=41)

Training & Education

When asked about the need for improvements for training and education, frontline officers expressed the greatest need, with 63% reporting significant improvements are required. They reported the training they had received was lacking in quality, which has led them to believe that their ability to respond to and detect modern slavery may not be as effective as it could be.

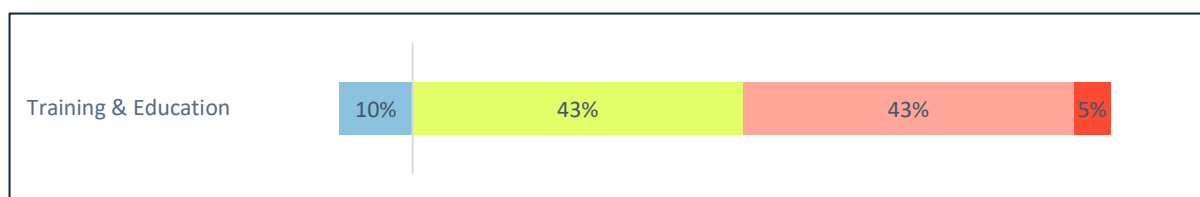


Figure 30: System leaders' perceptions of the need for improvement for training & education (n=22)

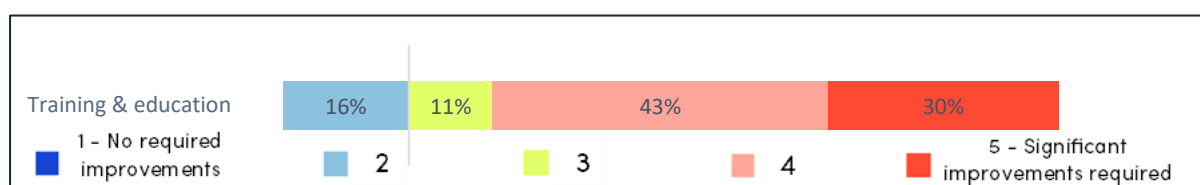


Figure 31: MS Leads' perceptions of the need for improvement for training & education (n=37)

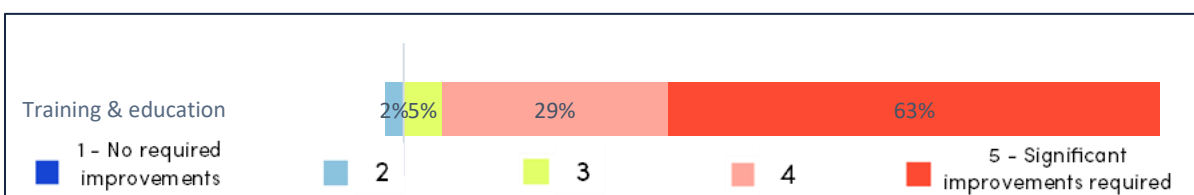


Figure 32: Frontline officers' perceptions of the need for improvement for training & education (n=41)

Community Engagement

When asked about the need for improvement in community engagement, MS Leads expressed the greatest need. They highlighted that overall public awareness needs enhancement, particularly engaging with foreign national communities at risk of MSHT. Understanding and preventing vulnerabilities, as well as building trust with these communities, will significantly improve the response to MSHT.

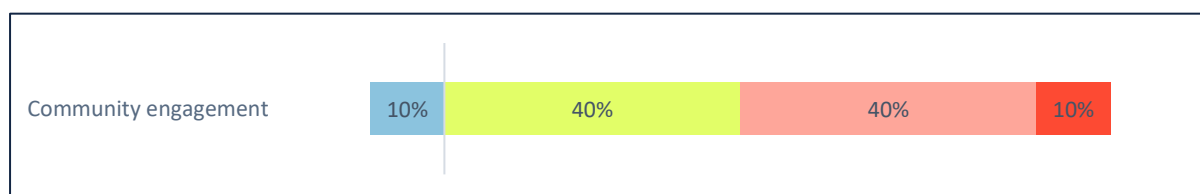


Figure 33: System leaders' perceptions of the need for improvement for community engagement (n=22)

Multi-agency collaboration

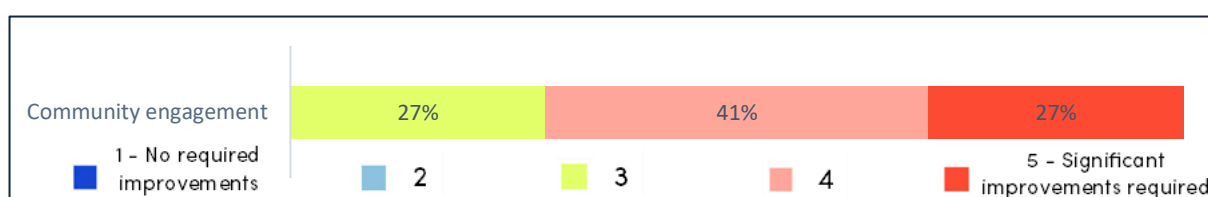


Figure 34: MS Leads' perceptions of the need for improvement for community engagement (n=37)

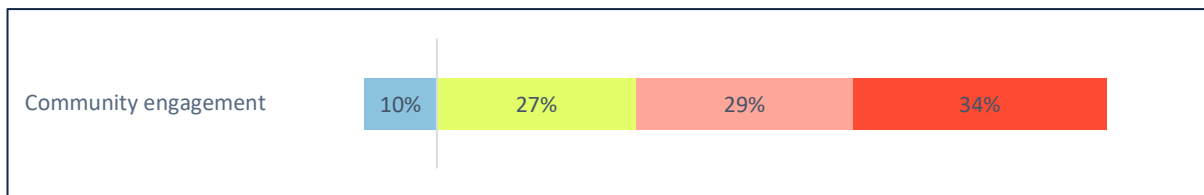


figure 35: Frontline officers' perceptions of the need for improvement for community engagement (n=41)

There are reported pockets of excellence in multi-agency collaboration across the country. Frontline officers expressed the greatest need for improvements for multi-agency collaboration.

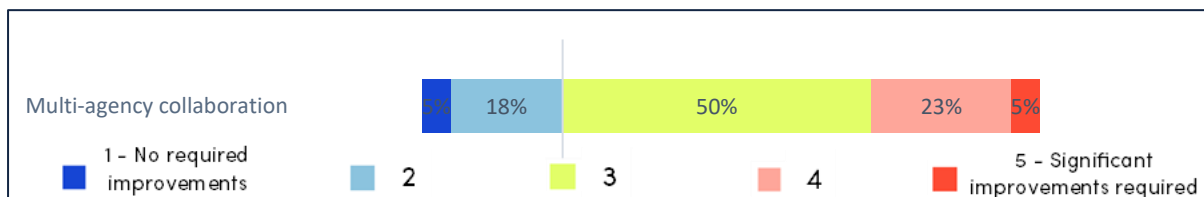


figure 362: System leaders' perceptions of the need for improvement for multi-agency collaboration (n=22)

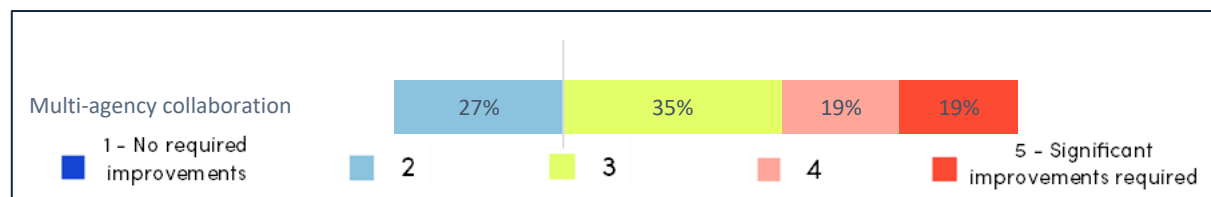


Figure 37: MS Leads' perceptions of the need for improvement for multi-agency collaboration (n=37)

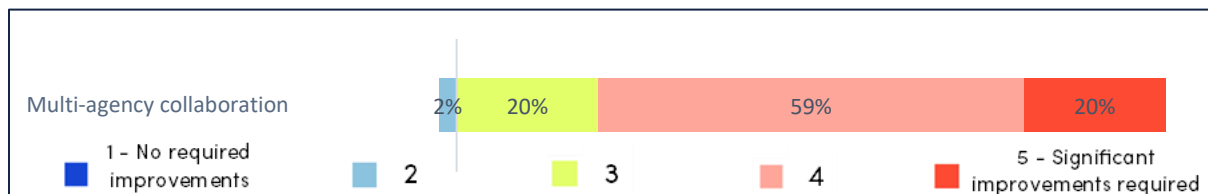


Figure 38: Frontline officers' perceptions of the need for improvement for multi-agency collaboration (n=41)

Prevention

System Leaders identified prevention in its entirety as falling outside the remit of policing. The NCA has worked abroad to try to prevent MSHT upstream. However, a few System Leaders reported that the results have been challenging to see. MS Leads expressed the greatest need for improvements for prevention efforts.

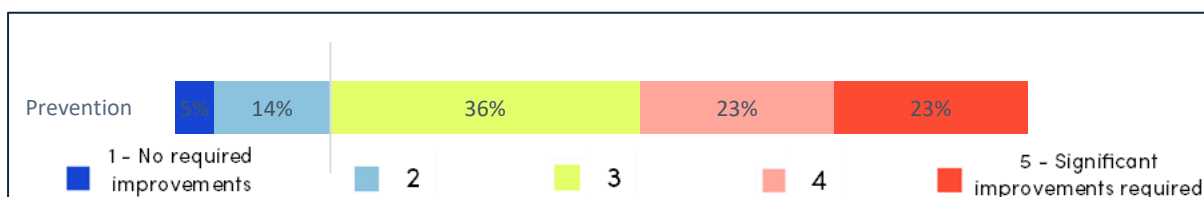


Figure 39: System leaders' perceptions of the need for improvement for prevention (n=22)

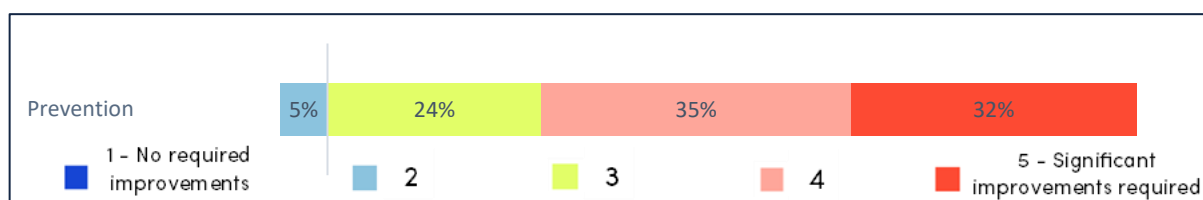


Figure 40: MS Leads' perceptions of the need for improvement for prevention (n=37)

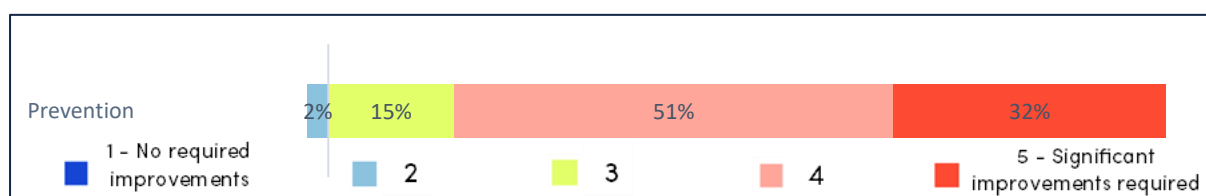


Figure 41: Frontline officers' perceptions of the need for improvement for prevention (n=41)

Resource Allocation

When asked about resource allocation, frontline officers expressed the greatest need for improvement. System Leaders and MS Leads also highlighted a substantial need for improvement in this area. It was noted that where dedicated teams are in place to support the response to modern slavery, the efforts are considered more effective.

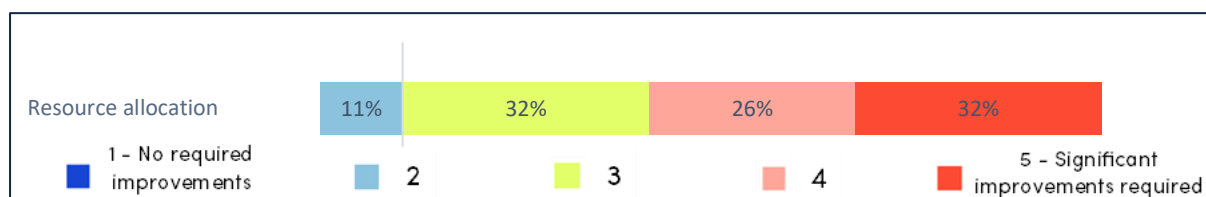


Figure 42: System leaders' perceptions of the need for improvement for resource allocation (n=22)

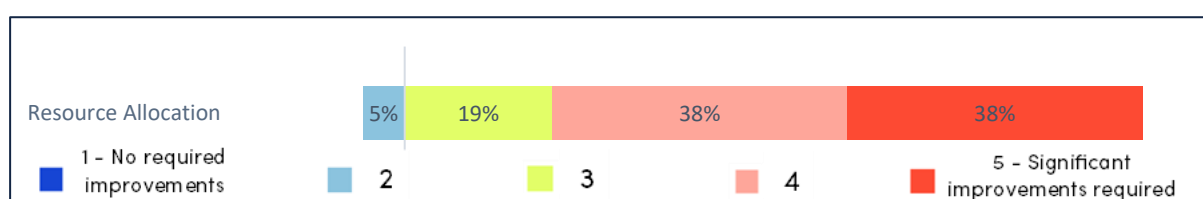


Figure 43: MS Leads' perceptions of the need for improvement for resource allocation (n=37)

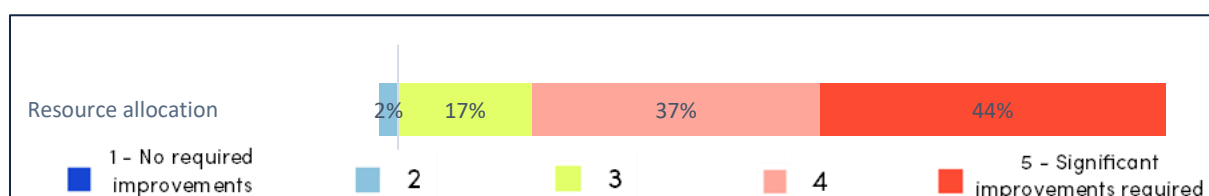


Figure 44: Frontline officers' perception of the need for improvement for resource allocation (n=41)

Data & Infrastructure

Some System Leaders highlighted a significant gap in the ability to share and analyse data effectively, while others have noted that although data tools are available, their utilisation remains insufficient. When asked, MS Leads expressed the greatest need for improvement for data & infrastructure.

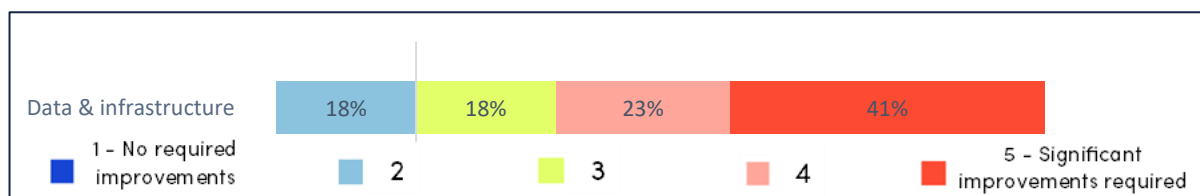


Figure 45: System leaders' perceptions on the need for improvements for data & infrastructure (n=22)

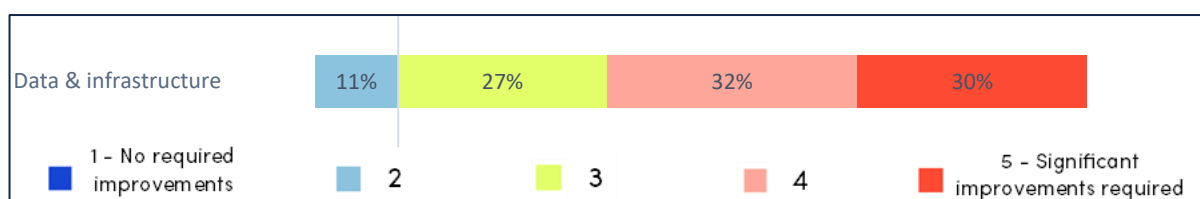


Figure 46: MS Leads' perceptions on the need for improvements for data & infrastructure (n=37)

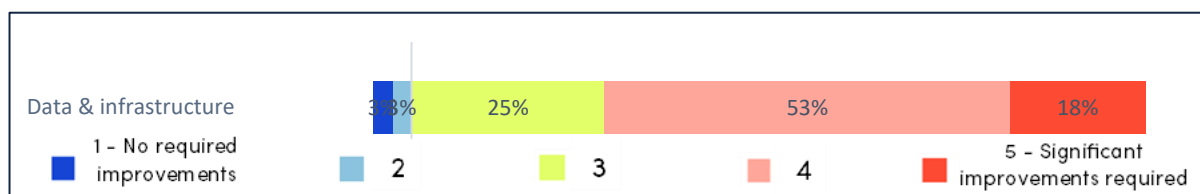


Figure 47: Frontline officers' perceptions on the need for improvement for data & infrastructure (n=41)

Victim support

When asked, MS Leads expressed the greatest need for improvement in victim support. There are examples of excellent practice of victim support. Overall, most System Leaders argued it has improved over the last decade, however if rolled out nationally, the Victim Navigator Programme would enhance victim support and engagement.

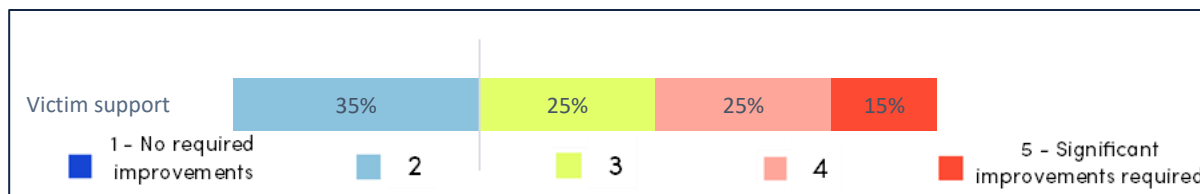


Figure 48: System leaders' perceptions of the need for improvement for victim support (n=22)

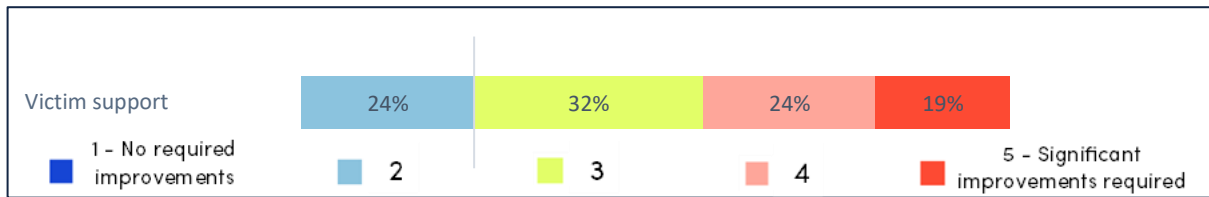


Figure 49: MS Leads' perceptions of the need for improvement for victim support (n=37)

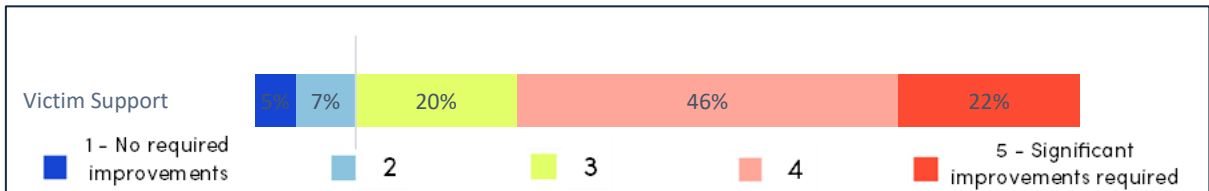


Figure 50: Frontline officers' perceptions of the need for improvement for victim support (n=41)

Investigation and Prosecution

When asked, System Leaders expressed the greatest need for improvements to investigation and prosecution. The current approach across the country needs to be made more consistent and overall outcomes need to be improved.

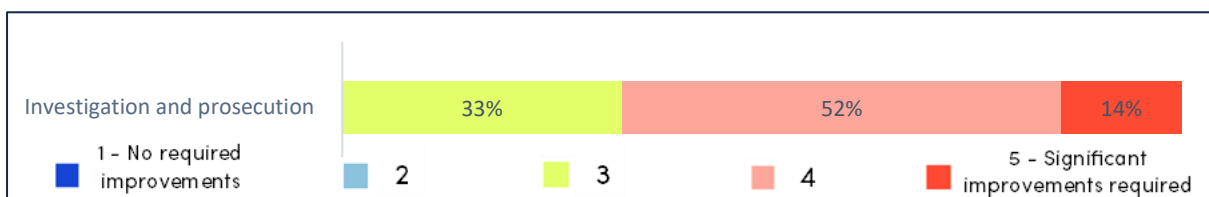


Figure 51: System leaders' perceptions of the need for improvement for investigation and prosecution (n=22)

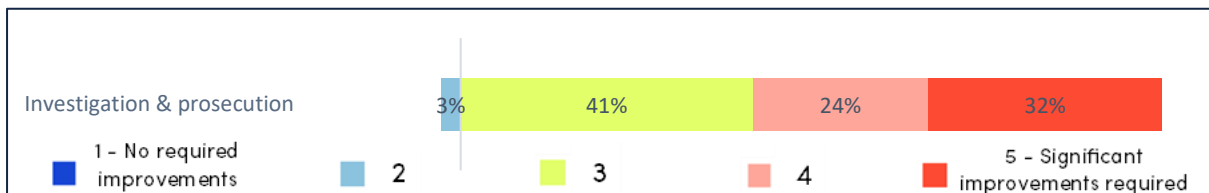


Figure 52: MS Leads' perceptions of the need for improvement for investigation and prosecution (n=41)

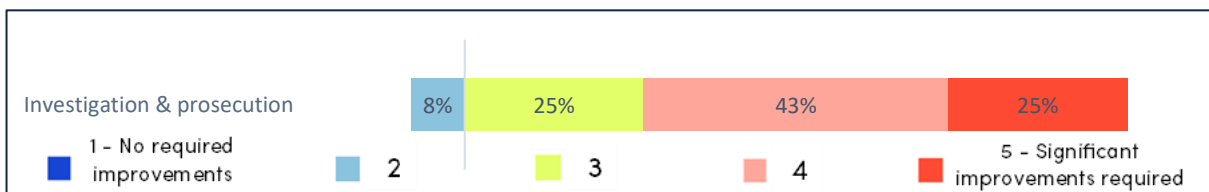


Figure 53: Frontline officers' perceptions of the need for improvement for investigation and prosecution (n=37)

Legislation

The MSA is considered sufficient for prosecuting modern slavery cases; however, its application has been problematic and requires improvement.

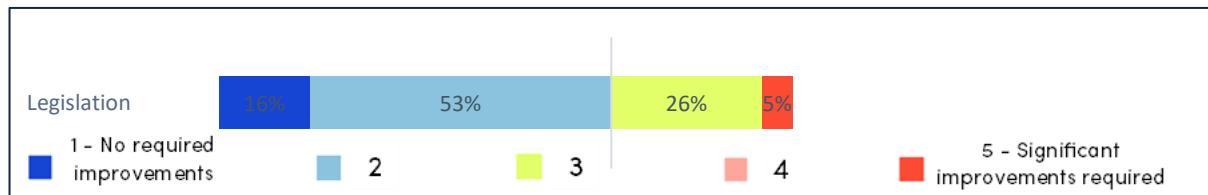


Figure 54: System leaders' perceptions on the need for improvement for legislation (n=22)

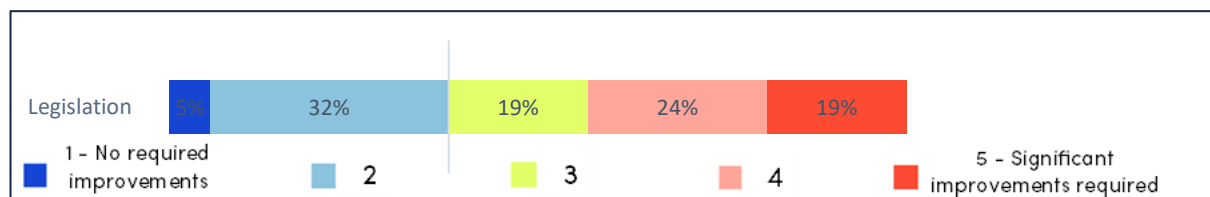


Figure 55: MS Leads' perceptions on the need for improvement for legislation (n=37)

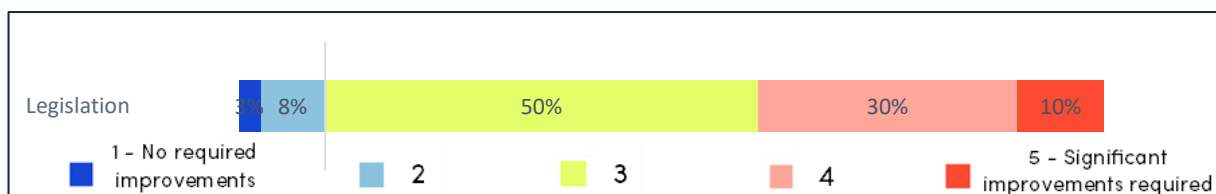


Figure 56: Frontline officers' perceptions on the need for improvement for legislation (n=41)

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Methodology

This research employed a mixed-methods approach through using semi-structured interviews, survey, and a literature review to explore how the policing response to MSHT has evolved over the last ten years since the MSA.

Research framework

We employed a research framework focused on the sections of this report:

- Prioritisation and strategic approach
- Identifying the modern slavery challenge
- Investigating, and disrupting modern slavery
- Bringing perpetrators to justice

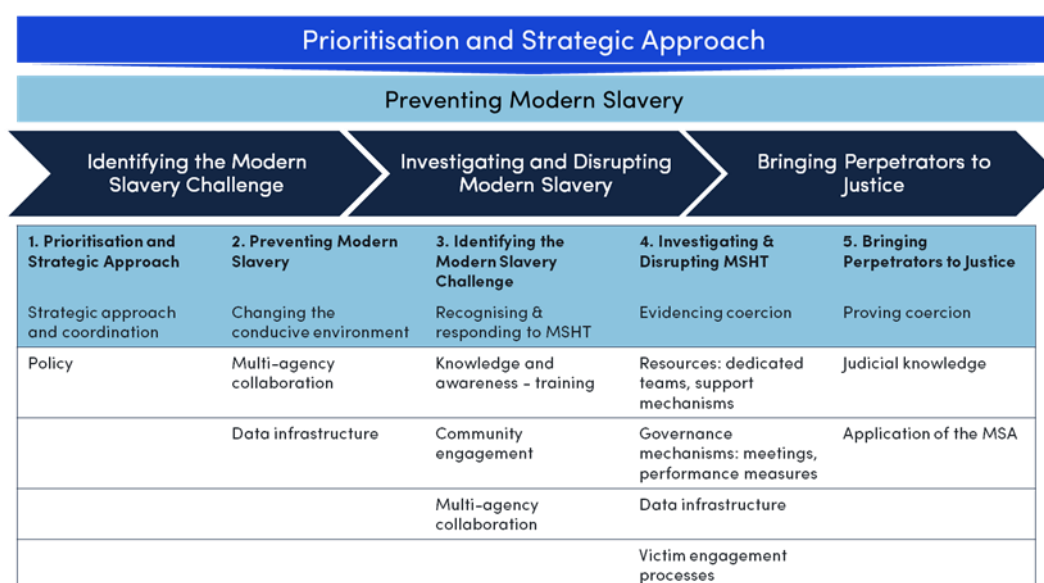


Figure 57: Leapwise Research Framework for analysing the policing response to MSHT

This approach was to ensure a comprehensive and systematic examination of how the policing response has evolved over the last decade. By focusing on these key areas, we aimed to examine the response in its entirety to provide holistic understanding and facilitate the development of effective recommendations.

Interviews

Interviews were conducted between February and April 2025, with 40 people interviewed. Interviewees were from the following organisations:

- Home Office
- NCA
- TOEX
- CPS
- GLAA
- College of Policing
- NPCC
- Justice & Care
- Human Trafficking Foundation
- Unseen
- MSOICU including 10 ROCU coordinators
- Police Scotland
- PSNI
- MPS
- University of Hull
- University of Nottingham
- University of Liverpool
- Expert Advisors

Three of the interviews were used to provide contextual background, therefore data presented in this report is from interviews with 37 people. Individual data collected through the interviews is confidential. Therefore, throughout the report, insights from these interviews are presented under 'System Leaders'. Although qualitative data was gathered from all 37 interviews, we were unable to collect quantitative data from every interview. Therefore, the score in Figure 5 reflect data from only 22 interviews. We thank all of those interviewed for their contributions and generosity with their time.

Survey of Force MS Leads

We conducted a survey with modern slavery leads from across the 44 police forces (incl. BTP). We achieved 37 responses. These included

- 11 MS strategic Leads
- 17 Tactical Leads
- 9 "Other" (named Modern Slavery Champions, e.g. SOC and Exploitation coordinator covering MS, deputy to strategic lead, Strategic MSHT analyst)

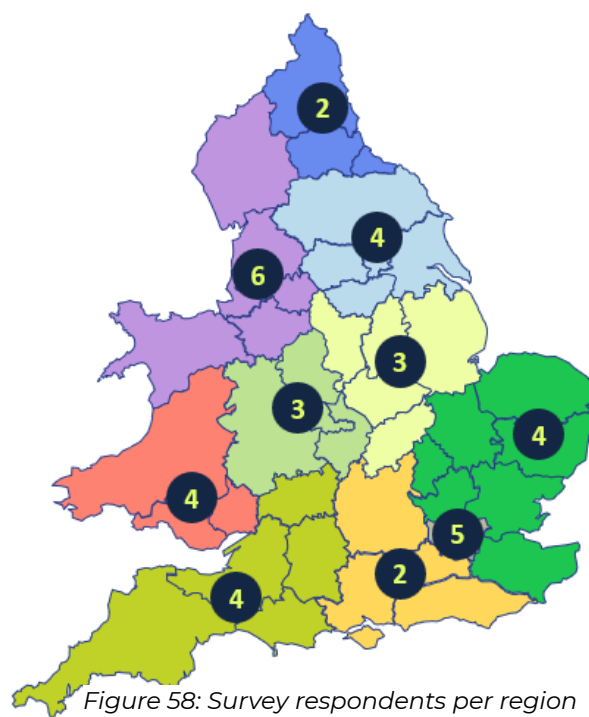


Figure 58: Survey respondents per region (MS Leads)

To maintain anonymity, we did not capture the organisations of the respondents. However, we did ask for their region. We obtained responses from all regions.

Focus Groups with Frontline Officers

We conducted four different focus groups with 48 officers attending from the following organisations:

- Devon & Cornwall Constabulary
- Durham Constabulary
- Metropolitan Police Service
- Northamptonshire Constabulary

These responses have been aggregated to maintain confidentiality and capture a representative view from frontline officers across different regions.

Throughout the report, insights from the survey and the focus groups are presented in sections titled 'Practitioners' point of view'. Although we had 48 officers attending focus groups, some had to leave part way through due to operational demands. This explains the variation in the sample size (*n* numbers) across different figures.

Literature Review

A comprehensive literature review was conducted to determine the evolution of the policing response to modern slavery over the past decade. The research framework was employed to define the parameters of the review, ensuring that only reports specifically addressing the policing response and its key elements were included. Any literature predating the MSA were excluded.

The search terms used in this review included:

- "Policing response to Modern Slavery"
- "Modern Slavery Annual Reports"
- "Report on Modern Slavery Act"
- "Modern Slavery Law Enforcement Response"
- "Modern Slavery recorded crimes"
- "Modern Slavery NRM referrals"
- "Modern Slavery CJS outcomes"
- "Modern Slavery prosecution rates"
- "Modern Slavery victim support"

The qualitative data collected from the interviews was analysed using thematic analysis to identify key findings and the frequency with which interviewees shared these views. In this context, 'most' refers to over 50% of the participants, while 'some' refers to between 10% and 50% and a 'few' refers to less than 10%.

The quantitative data from the survey was analysed using descriptive statistics to illustrate the frequency distribution of the responses

Data sources below for a list of the documents reviewed.

Data Analysis

The qualitative data collected from the interviews was analysed using thematic analysis to identify key findings and the frequency with which interviewees shared these views. In this context, 'most' refers to over 50% of the participants, while 'some' refers to between 10% and 50% and a 'few' refers to less than 10%.

The quantitative data from the survey was analysed using descriptive statistics to illustrate the frequency distribution of the responses

Data sources

All the following were accessed between January and March 2025.

CPS Prosecution Crime Types Data Tables Years Ending March 2020; 2021; 2022; 2023; 2024;

Home Office Open Data Tables: Crime Outcomes in England and Wales Open Data Year End 2016; 2018; 2020; 22; 24.

Home Office Open Data Tables: Police Recorded Crime Force Area Year End 2024.

Home Office: Modern Slavery: National Referral Mechanism and Duty to Notify Statistics Year End 2024.

Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK end of year summary 2021; 2023: Data Tables.

NCA (2015). [National Referral Mechanism Statistics – End of Year Summary 2015](#)

NCA (2018). [National Referral Mechanism Statistics – End of Year Summary 2018](#)

Bibliography

- Channel 4 (2025). Groomed: [A National Scandal](#)
- Clark, D. (2025). [Conviction rate for courts in England and Wales Q2 2013-Q3 2024](#)
- College of Policing (2023). [Modern Slavery Authorised Professional Practice](#)
- Gov.UK Justice Data (2025). [Criminal justice system crime statistics: Police recorded crime in England and Wales](#)
- Guardian (2025). [Starmer urged to prioritise child sexual exploitation victims](#)
- HM Government (2015). [Modern Slavery Act](#)
- HM Government (2017). [UK Annual Report on Modern Slavery](#)
- HM Government (2021). [UK Annual Report on Modern Slavery](#)
- HM Government (2023). [Illegal Migration Act](#)
- HMICFRS (2017). [Stolen freedom: the police response to modern slavery and human trafficking](#)
- HMICFRS (2022). [The hidden victims: Report on Hestia' super-complaint on the police response to victims of modern slavery](#)
- Home Affairs Committee (2023-24). [Human trafficking](#)
- Home Office (2017). [Modern slavery victims to receive longer period of support](#)
- Home Office (2018). [The economic and social costs of modern slavery](#)
- Home Office (2019). [How the Government is tackling modern slavery](#)
- Home Office (2021). [Devolving child decision making pilot programme: general guidance](#)
- Home Office (2025). [Modern slavery: National Referral Mechanism and Duty to Notify statistics UK end of year summary 2024](#)
- House of Lords Select Committee (2024). [The Modern Slavery Act 2015: becoming world-leading again](#)
- Justice and Care (2023). [Modern Slavery Victim Navigator Programme](#)
- Justice & Care (2022). [Victim Navigator Pilot Final Evaluation](#)
- Medaille Trust (n.d.). [Modern Slavery Bill](#)
- MOPAC (2022). [London Police and Crime Plan 2022-25](#)
- MOPAC (2025). [London Police and Crime Plan 2025-29](#)
- NPCC (2024). [Modern Slavery & Organised Immigration Crime Programme Annual Report 2023/24](#)
- The Labour Party (2024). [Take back our streets](#)

Sentencing Council (2021). [New sentencing guidelines for modern slavery offences](#)

Rights Lab & IASC (2023). [Restating the case for a Single Enforcement Body](#)

UK Parliament (2024). [Human Trafficking: Government Response to the Committee's First Report](#)

University of Hull (2023). [Prosecutions under the Modern Slavery Act](#)

University of Nottingham Rights Lab (2023). [Slavery and Trafficking Risk and Prevention Order](#)

YJLC (n.d.). [Statutory defence for child victims of trafficking and slavery – section 45 Modern Slavery Act 2015](#)

Acronyms used in this report

BTP: British Transport Police
CCE: Child Criminal Exploitation
CJS: Criminal Justice System
CoP: College of Policing
CPS: Crown Prosecution Service
CSE: Child Sexual Exploitation
DC: Detective Constable
DCI: Detective Chief Inspector
DI: Detective Inspector
DS: Detective Sergeant
DtN: Duty to Notify
FIB: Force Intelligence Bureau
GLAA: Gangmasters and Labour Abuse Authority
HT: Human Trafficking
MPS: Metropolitan Police Service
MS: Modern Slavery
MSA: Modern Slavery Act 2015
MSHT: Modern Slavery and Human Trafficking
MSOICU: Modern Slavery Organised Immigration Crime Unit
NCA: National Crime Agency
NRM: National Referral Mechanism
OIC: Organised Immigration Crime
PCC: Police and Crime Commissioner
PSNI: Police Service Northern Ireland
ROCU: Regional Organised Crime Unit
STPO: Slavery and Trafficking Prevention Order
STRO: Slavery and Trafficking Risk Order
TOEX: Taskforce on Exploitation programme
VAWG: Violence Against Women and Girls