



Briefing | Britain is failing to protect victims of historical sex trafficking

9 July 2026 – prepared by *No One Above* (NOA), a Fayed survivor collective.

Impugning the credibility of victims who identify their own trafficking ‘late’ will entrench a pattern of failures in historical sex trafficking cases.

In the name of immigration control, the Government is dismantling the machinery that protects all trafficking victims – including the British women and girls its own VAWG Strategy promised to prioritise¹. Victims of sexual exploitation are already the system's missing cases: deterred by stigma, fear of their exploiters, and the expectation that they will not be believed². The [Immigration and Asylum Bill's](#) answer is to order decision-makers to distrust them back.

The Fayed case is one of Britain's missing trafficking cases. For five decades, victims' reports were dismissed and erased. The Metropolitan Police (MPS) launched Operation Cornpoppy in November 2024, only after the scale of the offending was inescapable. Yet, for its first 17 months, Cornpoppy formally [identified no victims of trafficking](#) on the stated grounds that the offending predates the Modern Slavery Act 2015 – and [did not investigate the case as trafficking](#).³ If the force's reasoning is upheld, it excludes an entire class of victims from the protection of the law: those who could not, or were prevented from, reporting historical exploitation.

In cases where wealthy perpetrators obstruct justice through legal intimidation – prolonging reporting delays – police reluctance to identify, record and investigate historical trafficking confers de facto impunity on criminals and maroons their victims in a legal vacuum. Mohamed Fayed should be Britain's last sex trafficker to die without facing justice.

Parliament is now poised to cement into law a pattern, evident in the Fayed and Epstein cases among others, of institutional under-recording and under-investigation of historical trafficking.

¹ HM Government, Tackling Violence Against Women and Girls Strategy (December 2025), committing to a best-practice framework for investigating modern slavery. Since its publication: the NCA's Modern Slavery and Human Trafficking Unit remains at half its 2021 strength, resources shifted to migrant smuggling "in line with government priorities" (GRETA(2026)03, §170); and the Modern Slavery and Organised Immigration Crime Unit, the national police coordination programme, was closed following Home Office defunding in April 2026 (The Observer; IBA, May 2026).

² STOP THE TRAFFIK estimates 60,000–65,000 women and girls have been sexually exploited in the UK, far exceeding those identified (Behind the Profile, 2026); the Home Affairs Committee found action against trafficking for sexual exploitation "wholly inadequate" (Human Trafficking, 2023); on fear of disbelief as a barrier to disclosure, see IASC, policy brief on the Immigration and Asylum Bill (July 2026).

³ The Met's first NRM referrals followed the Home Office's confirmation, in April 2026, that a survivor who had self-referred via the charity Unseen was a victim of modern slavery. French authorities, investigating the same network, opened an inquiry into "potential acts of aggravated human trafficking... with multiple victims" in November 2025.



Provisions of the Bill would impose a duty on authorities to treat any delay by a person in claiming to be a victim of trafficking – together with any material inaccuracy, inconsistency, omission, or “striking similarity” to another person’s account – as damaging that person’s credibility, unless the authority is satisfied there are good reasons. This inverts the settled understanding of trafficking: the very behaviours recognised as evidence of [coercion and control](#) would become mandated grounds for doubt.⁴

NOA supports calls within the anti-trafficking and modern slavery sector to de-conflate modern slavery from immigration policy⁵. We recognise that police duties to investigate trafficking offences, and the scope for prosecution, may depend on the UK’s jurisdictional connection to the offending. But the duties to [identify potential victims and refer them to the NRM](#) attach when a potential victim is encountered in the UK, wherever and whenever the exploitation occurred – a point the Fayed case, involving predominantly British victims exploited over decades through a British institution, illustrates through the failures described in this briefing.

As those with lived experience of this life-altering crime, we say this Bill abandons victims. We ask the Government to:

- Remove or revise provisions of the Immigration and Asylum Bill 2026 (Part 5; clause 36), which would statutorily impugn the credibility of trafficking victims who report late
- Deliver the VAWG Strategy’s modern slavery commitments – including the promised best-practice investigation framework (Project Turnstone) – and restore the specialist policing capability lost to the MSOIC closure and NCA cuts
- Clarify first responder duties to identify victims in historical trafficking cases
- Clarify police duties to record and investigate historical trafficking cases

The Independent Anti-Slavery Commissioner has noted that there is no clear evidence the Government consulted survivors on the Bill’s contents. We request the support of MPs and allies to ensure our voices are now heard.

⁴ IASC, [policy brief on the Immigration and Asylum Bill 2026](#) (July 2026). Two days before the King’s Speech, on 11 May 2026, the Modern Slavery Statutory Guidance was amended to insert a framework for assessing “the impact of the timing of disclosure on credibility” (§§14.15–14.23; Rights Lab, May 2026).

⁵ [Decade of Dignity: A Strategic Vision for Eradicating Modern Slavery in the UK](#)



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Policing deficiencies in historical trafficking cases – Fayed example

Centred at Harrods, the Fayed trafficking network⁶ involved multiple perpetrators⁷, spanned several countries⁸ and continued for decades⁹. The network systematically exploited at least 480¹⁰ young women and children. Allegations of harm include sexual assault and rape¹¹; gang rape¹²; chemical submission¹³; false imprisonment; forced drug dependency; physical assaults; forced terminations of pregnancies¹⁴; threats of serious harm to victims and their families; psychological coercion, humiliation and surveillance.

Key deficiencies in the MPS response:

- **Victim identification and referral.** Despite a statutory duty in force from 2015, the MPS referred no Fayed victims to the NRM until April 2026 – and then only after survivors' self-initiated referrals had received positive decisions.
- **Effective investigation.** For 17 months, the MPS investigated a multi-perpetrator trafficking network as a single-suspect sexual offences case, leaving the systemic elements of trafficking – recruitment, harbouring, movement, financing and facilitation – under-investigated.

Failure to identify potential victims of trafficking and refer them to the NRM

Between November 2015 and April 2026 the Met made no NRM referrals in the Fayed case, despite repeated reports bearing clear hallmarks of trafficking. A cluster of reports followed a 2017 documentary, at least one of which self-identified as trafficking; following a September 2024 documentary, around 90 additional cases were reported to the MPS before the launch of Operation Cornpoppy in November 2024, by which time the case was widely [characterised](#) as involving trafficking.

The UK has been bound to identify victims of trafficking since ECAT came into force in 2009, with police designated first responders to the NRM; following *Rantsev*¹⁵ (2010), identification

⁶ [Home Office trafficking decision](#), [French trafficking allegations](#)

⁷ [Fayed brothers](#), [Epstein](#), [Others](#)

⁸ [Fayed trafficking map](#)

⁹ [Mohamed Al Fayed: Police investigate more people over billionaire's abuse](#)

¹⁰ [APPG Harrods - The Survivors Trust statement](#)

¹¹ [Mohamed Al Fayed accused of rape](#)

¹² [A](#), [B](#), [Kervin](#) (p.137, 147, 277)

¹³ [A](#), [B](#)

¹⁴ [A](#), [B](#), [C](#)

¹⁵ *Rantsev v Cyprus and Russia* (2010), §288 — authorities must act of their own motion once credibly suspicious circumstances come to their attention, without requiring a complaint.



forms part of the police's Article 4 obligations, enforceable under the Human Rights Act; and from 1 November 2015, section 52 of the Modern Slavery Act placed the duty on a statutory footing.

The force's stated reason for making no NRM referrals – that the offending predates the Modern Slavery Act 2015 – confuses the prosecutability of historical conduct with the duty to identify victims, which attaches when a potential victim is encountered¹⁶ – wherever and whenever¹⁷ the exploitation occurred. The [Independent Anti-Slavery Commissioner confirms](#) that the relevant consideration for a referral is when a potential victim comes forward, not when the offences took place.

MPS-originated referrals commenced only after survivor-initiated referrals received positive Conclusive Grounds decisions – in cases predating even the trafficking offences introduced by the Sexual Offences Act 2003. The date of the offending was no bar to referral or to recognition. The [sequence](#) of the force's trafficking-related actions instead shows a pattern of reactivity to external pressure rather than action of its own motion, as the law requires¹⁵.

It is unclear why the Met has not referred all Fayed cases, since all involve the same centrally managed recruitment, harbouring and movement – the acts by which the [Palermo Protocol](#) defines trafficking – and the same concealment.

Failure to conduct an effective trafficking investigation

For its first 17 months, the Fayed case was investigated as a sexual offences inquiry rather than as trafficking. The known [evidence base](#), insofar as it rests primarily on the testimony of victims of Mohamed Al Fayed's offending, does not reach the matters a trafficking investigation is defined by examining – recruitment, harbouring, movement, financing, and the individuals and networks facilitating exploitation¹⁸. Yet, barely two months after launch, Cornpoppy informed documented [victims of other offenders](#) within the same network that it would not investigate their allegations.

The framework matters because it determines what counts as evidence and who can be prosecuted. In a RASSO prosecution, the machinery of control – financial dependency on Harrods employment, isolation and surveillance, an NDA regime, the alleged corruption of officers – is context. In a MSHT prosecution, that machinery is the offence and those who

¹⁶ [MSA 2015, s.52](#): "If a public authority ... has reasonable grounds to believe that a person may be a victim of slavery or human trafficking it must notify (a) the Secretary of State..."; see also [NRM guidance](#).

¹⁷ The [2015 Regulations](#) define "human trafficking" to include conduct "if section 2 had been in force when the conduct occurred" — expressly bringing pre-MSA exploitation within the notification duty.

¹⁸ Best practice requires a proactive, offender- and finance-led approach: [GRETA's fourth UK report](#) calls for reinforced financial investigation and references this case; the IASC advises commencing modern slavery investigations with financial investigation; and the CPS commits to charges that "accurately reflect the entirety of the offending".



operated it are principals in their own right. Operation Cornpoppy was not staffed with MSHT-specialist officers until [January 2026](#).

Neither the age of the offending nor the existence of earlier investigations extinguishes the duty to investigate trafficking. The investigative duty does not depend on the law in force at the time¹⁹; the conduct was always prosecutable under general offences²⁰; and trafficking markers must be flagged on crime records whatever the classification²¹.

Nor do the earlier investigations discharge the duty. Trafficking is by definition systemic – recruitment, control, movement and exploitation repeated across victims – and the duty is to investigate the system, which no prior inquiry did²². The earlier handling is itself in question on corruption and misconduct grounds, and *Brecknell* revives the obligation where credible new allegations emerge²³.

An investigation conducted through the lens of human trafficking would therefore have referred victims to the NRM as it encountered them; flagged historical crimes with trafficking markers; and developed an evidence base spanning recruitment, harbouring, movement, financing and facilitation — including victims of other offenders within it. A change of framing seventeen months into an investigation does not retrofit the network-focused evidence gathering – financial investigation, corporate records, recruitment chains – that a trafficking inquiry would have pursued from the outset.

¹⁹ C.N. v United Kingdom, App No. 4239/08: the ECtHR held that the absence of a specific domestic criminal offence for domestic servitude did not excuse the state.

²⁰ In R v Plakici, offending between 2000 and 2002 was successfully prosecuted under general offences including kidnapping and living on the earnings of prostitution.

²¹ Under College of Policing APP and CPS guidance, the duties to identify, refer and investigate are triggered by encountering a potential victim or recognising indicators of exploitation, not by a crime-recording decision; a referral itself generates the obligation to record a crime, rather than a recorded crime being a precondition of referral.

²² 2008/2015/2018 inquiries were single-complaint CPS referrals, see [B: Sequence of MPS Investigations of Fayed offending](#)

²³ Brecknell v United Kingdom, App. no. 32457/04, [2007] ECHR 989 – where a credible allegation relevant to identifying or prosecuting a perpetrator comes to light after an earlier investigation, a fresh obligation to take further investigative steps arises where there is a realistic prospect of progress.



Credibility provisions in the Immigration and Asylum Bill 2026 – Fayed case implications

The [Immigration and Asylum Bill 2026](#) makes extensive changes to the modern slavery framework, justified on an immigration-enforcement rationale. The provisions nonetheless apply to every reasonable grounds and conclusive grounds decision, for any potential victim.

Clause 36 inserts a new section 60A ("Deciding if a person is a victim: credibility") into the Nationality and Borders Act 2022. In making any reasonable grounds or conclusive grounds decision, the competent authority must take account, "as damaging the person's credibility", of: any delay in claiming to be a victim (s.60A(2)(a)); delay in providing relevant status information ((2)(b)); any material inaccuracy, inconsistency or omission ((2)(c)); any material inconsistency with a protection or human rights claim or with civil or criminal proceedings to which the person is party ((2)(d)); and any "striking similarity" to information provided by another person ((2)(e)). The duty is disapplied only where the authority is satisfied there are "good reasons" – a term the Bill leaves undefined, its content deferred to future Home Office guidance.

Applied to the Fayed cohort, section 60A operates directly against the class of historical trafficking victims this briefing concerns:

- **Delay.** Every decision on a Fayed referral would begin from a mandatory statutory finding that the victim's delay damages her credibility – although the delay was manufactured by the perpetrators and compounded by the state's own referral failures.
- **Inconsistency and similarity.** The provisions would treat trauma-affected accounts, and the similarity between survivors' accounts – the corroborating signature of systemic trafficking – as grounds for doubting each victim.

Delay: penalising victims for the success of the silencing

The Fayed offending spans decades and largely predates trafficking legislation; reports clustered only after documentaries in 2017 and 2024. Delay in this cohort was manufactured: through trauma; threats of serious harm; unlawful NDAs; witness intimidation; the suppression of press reporting through SLAPPs and Part 36 offers – which concealed the systemic character of the exploitation, and with it the recognisability of trafficking; the alleged corruption of officers; and false reports of Fayed's unfitness to face charges. Under section 60A, each success of the silencing would open as a statutory deficit in the victim's credibility. Delay caused by the state would also count against her: the Met made no NRM referrals between November 2015 and April 2026 despite the statutory first-responder duty. The statute would convert first-responder failure into a credibility deficit for the victims it failed.



Modern slavery law, the Modern Slavery Statutory Guidance and NRM guidance treat delayed disclosure, non-self-identification, apparent consent and trauma-affected accounts as predicted consequences of coercion and control – to be expected and accounted for, with trafficking indicators assessed independently of self-identification. Section 60A would enact the opposite principle at the decision-making stage: the later the disclosure, the less credible the victim.

Inconsistency and "striking similarity": reversing the evidential logic of trafficking

All Fayed cases link to one network operating through centrally managed recruitment, harbouring, movement and concealment. Similarity across victims is the corroborating signature of systemic trafficking – it is what a competent network investigation exists to establish. Section 60A(2)(e) would instead oblige the competent authority to treat similarity between survivors' accounts as damaging each survivor's credibility.

In a trafficking analysis, the documented mechanisms of control are constituent elements and affirmative evidence of the offence — the victim's silence evidences the effectiveness of the silencing. Section 60A reverses this settled evidential logic: the very features that trafficking law treats as proof of control — delay, omission, inconsistency, commonality across victims — become mandated grounds for doubt. The IASC's July 2026 policy brief objects that “the duty refuses to acknowledge the trauma, displacement and fear that victims experience”¹, noting that disclosure is rarely immediate and typically occurs only once a survivor feels safe.

The combined effect is circular: the state's failure to identify victims promptly creates the delay the state would then hold against them. Section 60A would entrench in statute precisely the pattern of failure documented in the preceding section – and would do so for every future trafficking case.



Annexes

A: Cornpoppy and Home Office statements

NRM referrals

Jun 30, 2026 **Cornpoppy letter to NOA**

“The senior investigating officer’s overseeing the investigation since 2024 have always ensured that each case being investigated is done so through the lens of human trafficking, and where legislation allows, these cases will be progressed.”

“There is no automatic, or retrospective requirement for the Met to submit a NRM referral to the Home Office for offences that occurred prior to 2010. The Home Office, who are the single competent authority encourage first responders to make referrals when there are modern slavery indicators present, regardless of how long ago these incidents may have occurred. The timing of the offence would be taken into account when the Competent Authority makes the victim status decisions.”

“In January 2026 the newly appointed senior investigating officer applied this against the investigative material collected by the MPS throughout 2024/25 and submitted NRM’s for victims that met the guidance.”

Note: per Jess Phillips MP’s letter to the APPG, only two referrals had been made by February 2026. These were the two survivor-initiated referrals via Unseen.

Jun 11, 2026 **Cornpoppy update responding to survivors’ questions**

“Why weren’t NRM referrals completed at the time of reports from 2018 onwards? At that time, the primary focus was on investigating serious sexual offences. While trafficking was always considered, and relevant international enquiries were pursued, the applicable trafficking legislation did not cover the period of offending under investigation and cannot be applied retrospectively.

That position remains unchanged. However, we are continuing to investigate the case through the lens of human trafficking, ensuring all available avenues under current legislation are fully explored.”

“It is entirely your choice whether to consent to a referral. If you do not consent, we may



still submit a referral under our Duty to Notify obligations; however, your personal details will not be shared, and you will not be contacted.”

“Human trafficking has always been at the heart of this investigation.”

Jun 3, 2026 Cornpoppy letter to NOA

“There is no automatic requirement to make an NRM referral solely because alleged offending predates 2010 or the Modern Slavery Act 2015. However, where there are indicators of trafficking or modern slavery, referrals can be considered in line with Home Office guidance and safeguarding needs.”

May 11, 2026 Cornpoppy update to survivors

“Another review taking place has been the on-going review of accounts to identify indicators where human trafficking may have taken place. Where an NRM referral had not already been submitted, survivors have been contacted to confirm that we are making this referral on their behalf.”

Apr 29, 2026 BBC World at One ([article](#))

“The Met Police said it had broadened its Al Fayed abuse investigation to include human trafficking. It is understood to have strengthened its team with officers with a background in modern slavery and will contact victims who it feels could be referred.”

“Important to point out: there is no automatic requirement for the Met or any other police force to refer a suspected victim of trafficking to the Home Office if the offences took place before the Modern Slavery Act in 2015, but we understand that the force will now contact victims who it feels it could refer.”

Note: transcribed by NOA.

Feb 23, 2026 Home Office letter to the APPG

“First, you asked whether any individuals connected with the Fayed case have been referred into the NRM, either historically or more recently. I can confirm that the Single Competent Authority (SCA) has received two such referrals.

You also asked whether the Home Office has examined why referrals may not have been made. As referrals have been received in this case, this question does not arise.”

Note: two survivors referred to the NRM via Unseen on 19 January 2026.



2026 Cornpoppy letter to survivor

“I was informed that a referral was not completed for you in 2018, or any of the other victims/survivors, who had come forward during this time. This was due to the fact that the new NRM scheme had only started in 2016, and it was a new process that the police were still learning how to utilise.”

Note: The NRM was established in April 2009. The Met regularly made NRM referrals in other cases prior to the commencement of the statutory duty in 2015, according to HMICFRS, Stolen Freedom ([October 2017](#)), Figure 4, p.49.

2025 Cornpoppy letter to survivor

“We cannot record it as human trafficking due to it being outside the human trafficking legislation.”

Note: the referenced offending took place in 2001.



Evidence base

June 11, 2026 **Cornpoppy update to survivors**

“it has been necessary to obtain detailed victim evidence through visually recorded interviews. This evidence enables us to fully understand the nature of the offending”; during May the team met the General Medical Council and Harrods’ solicitors “to support the progression of key lines of enquiry.”

May 11, 2026 **Cornpoppy update to survivors**

Following a review of all 155 accounts in April, the team “moved into a second phase of evidence gathering” consisting of further victim VRIs, which would “inform the next phase of the investigation, including identifying potential suspects”.

March 7, 2026 **Met statement to the BBC ([Article](#))**

“The force said to date, 154 victims have come forward and reported allegations of sexual assault, rape, sexual exploitation and human trafficking. Information gathered from these victims “has broadened the scope of the inquiry to cover all reported offences including human trafficking,” it said.”

March 6, 2026 **Met update to survivors**

Detailed victim accounts “have been the foundation of this progress”; “over the past 18 months, officers have taken detailed accounts from victims and witnesses to build a comprehensive picture of the alleged offending”; this was described as “the first survivor led phase” of the investigation.



B: Sequence of MPS Investigations of Fayed offending

Key: [historical MPS investigations](#), [Cornpoppy investigation](#), [trafficking identified](#)

1951	Legal development	UK ratifies the European Convention on Human Rights
1986	Police involvement	(Kervin , p.88) When Fayed abducts and assaults Melissa Price, the daughter of the United States Ambassador to Britain, No. 10, the White House and the CIA are informed. American diplomatic security and British police officers receive Melissa when she is returned to London.
1993	Police investigation	(Times) Grampian police discover drugs in the possession of Salah Fayed. Former Met commissioner Sir David McNee advises on the matter and no charges are brought. However, Special Branch officers apprehend Salah Fayed's distressed assistant at Heathrow. (Bower)
1995	Offending reported to MPS	(BBC) A Harrods employee reports sex offences. No action is taken though officers say she is "not the first" and they have "files inches high". MPS later say the files are lost.
1995	Press allegations	(Vanity Fair) Fayed's sue for libel when allegations including sexual misconduct, surveillance and coercion at Harrods are published. Vanity Fair conducts a two-year investigation revealing further serious allegations but settles before trial.
1997-1999	Press allegations	Multiple press reports, a documentary and a book by Tom Bower detail further allegations of sexual offending. Fayed's litigate to suppress reports of a rape otherwise do not sue.
1998	Legal development	The Human Rights Act comes into effect
1998	Police investigation (CIB anti-corruption)	(Evening Standard) CIB anti-corruption investigation into a serving police officer involved with the improper arrest of an alleged victim of sexual assault by Fayed.
2003	Legal development	The Sexual Offences Act criminalises trafficking
2003-2023	Offending reported to MPS	(Guardian) The MPS receives 21 reports of sexual offending. Later allegations emerge that further reports were withdrawn after victims were intimidated by Fayed staff (Times).
2006	Legal development	The UK ratifies The Palermo Protocol to Prevent, Suppress and Punish Trafficking in Persons
2008	Press allegations	(Daily Mail) Sexual offending against a minor by Fayed is reported in the press. Fayed's litigate to suppress the naming of the 'Harrods executive'.



Key: historical MPS investigations, Cornpoppy investigation, trafficking identified

2008	Police investigation	(Independent) A file is sent to the CPS for a charging decision in respect of three victims including a minor. No further action is taken. Other victims are coerced into providing police with character witness statements in the presence of Harrods lawyers. Police return the minor victim's phone, which had contained critical evidence, in a broken and unusable state (BBC). There is no public appeal for victims, no clarification that NDAs cannot be enforced, and no prosecution results. Two complaints related to this investigation are self-referred by the MPS to the IOPC in 2024. In 2026, the IOPC announced that current and former officers were under investigation (BBC).
2008/9	Legal development	The Council of Europe Convention on Action against Trafficking in Human Beings (ECAT), establishes the UK's trafficking victim identification obligations
2011	(Unconfirmed) police investigation	(Daily Mail) A woman is summoned to Scotland Yard by officers prior to and post working for the Fayed family. She is also assaulted by Fayed.
2015	Legal development	The Modern Slavery Act updates trafficking legislation, creating a statutory duty to notify the Home Office of potential victims
2015	Police investigation	(Independent) A file is sent to the CPS for a charging decision in relation to one victim. There is no public appeal for victims, no clarification that NDAs cannot be enforced, and no prosecution results. Allegations that police leak information to the press are later subject to IOPC investigation.
2015	Press allegations	(Mirror) Fayed questioned by the MPS over an alleged rape.
2017-2018	Press allegations	(C4) Documentary and press reports detail multiple allegations of sexual offending.
2018	Legal development	In DSD , the Supreme Court rules that police failure to effectively investigate John Worboys' crimes violated victims' rights under Article 3 of the ECHR
2018	Police investigation	(Independent) Multiple women contact the MPS, which seeks early investigative advice from the CPS. At least one victim self-identifies as a trafficking survivor. Survivor Cheska Hill-Wood is told that the Met contacted women who came forward to producers, however women who contacted producers were not connected with police. Women whom Cheska connected with the police directly are told the case was already closed. There is no public appeal for victims, no clarification that NDAs cannot be enforced, and no prosecution results. It is unclear whether the investigation conducts proactive pattern recognition, a requirement clarified in DSD .



Key: [historical MPS investigations](#), [Cornpoppy investigation](#), [trafficking identified](#)

2021	Police investigation	(Independent) The MPS request early investigative advice in relation to an allegation. There is no public appeal for victims, no clarification that NDAs cannot be enforced, and no prosecution results.
2023	Police investigation	(Independent) The MPS request early investigative advice in relation to an allegation. There is no public appeal for victims, no clarification that NDAs cannot be enforced, and no prosecution results.
August 2023	Suspect deceased	Mohamed Fayed dies.
September 2024	Press allegations	(BBC) Documentary and press reports detail multiple allegations of sexual offending.
September to November 2024	Pressure to investigate trafficking	Survivors and lawyers characterise the case as involving human trafficking. (A , B , C , D , E). Reports also emerge of linked perpetrators, including Salah Fayed .
September to November 2024	Offending reported to MPS	(BBC) The MPS receives 90 new reports of offending between 1977 and 2014 with the youngest victim aged 13 years old.
September 2024	Police investigation	Police launch a public appeal for victims and a MIPP appealing for information for its "Investigation into sexual offences including rape by Mohammed Al Fayed". Harrods clarifies that it will not enforce NDAs.
October 2024	Police investigation (rear facing review)	(BBC) The MPS announces that it will review its own handling of the 21 recorded allegations prior to Fayed's death.
November 2024	Police investigation (DPS anti-corruption)	(Times) Detectives from the Directorate of Professional Standards (DPS) investigate whether any serving or former officers at the Metropolitan Police were involved in misconduct that "could have allowed Al Fayed to silence his victims or cover his tracks".
November 2024	Police investigation (Cornpoppy)	(X) The MPS formally launches Operation Cornpoppy to investigate enablers of Mohamed Al Fayed's offending.
January 2025	Police investigation (DPS and IOPC)	The IOPC announces that it is investigating two complaints in relation to handling of reporting in 2008. The complaints were self-referred by the MPS. A third complaint is referred to the IOPC in February 2025 (BBC).
January to February 2025	Cornpoppy investigation update	Two survivors who self-identify as victims of trafficking receive identical letters from the MPS confirming that it is not investigating allegations against Salah Fayed on the grounds that he is deceased.



Key: historical MPS investigations, Cornpoppy investigation, trafficking identified

July 2025	Pressure to investigate trafficking	A survivor writes to Cornpoppy: "Your letter suggests that the scope of the Met investigation is limited to "sexual violence committed by Mohamed Al Fayed and anyone who may have facilitated his crimes". As a former Harrods' employee who was trafficked to another member of the Fayed family, I am concerned that the scope of the investigation is limited to a single perpetrator rather than the international criminal system the Fayed brothers created." She receives no reply.
July 2025	Cornpoppy investigation update	Confirms that 145 victims have reported and characterises the investigation scope "to identify individuals who've been complicit in facilitating Mohamed Al-Fayed's offending." Refers to Operation Soteria and RASSO training.
August 2025	Cornpoppy investigation update	In a video message, states: "one of the main focal points of our investigation is that of aiding and abetting an offender. So whilst Mohamed Al Fayed is dead, we can't prosecute him as such, but we can look at those that have assisted by aiding and abetting."
October 2025	Pressure to investigate trafficking	No One Above submits evidence to the Home Office detailing failures of the Met to identify potential victims of trafficking in the Fayed case.
November 2025	Pressure to investigate trafficking	GRETA , the Council of Europe Group of Experts on Action against Trafficking in Human Beings, formally adopts its 4th evaluation report on the UK's progress against trafficking. The report notes the Fayed case and the concerns of survivors that the case is not being investigated as trafficking. Unusually, publication of the report is delayed until May 2026 .
November 2025	Pressure to investigate trafficking	(BBC) French police announce an investigation into "potential acts of aggravated human trafficking... with multiple victims"
November 2025	Cornpoppy investigation update	Avoids the term trafficking to describe the French investigation: "French authorities have launched a formal investigation into the handling of sexual abuse allegations involving Mohamed Al-Fayed"
December 2025	Pressure to investigate trafficking	NOA writes to the Prime Minister, the Home Secretary and the Justice Secretary, asking why the case is not being investigated as trafficking.
December 2025	Cornpoppy investigation update	The force issues a written explainer of trafficking legislation in response to survivor questions but does not clarify the scope of the investigation.
January to March 2026	Pressure to investigate trafficking	NOA submits multiple Freedom of Information requests to the MPS and Home Office, seeking to discover whether the case is being investigated as trafficking and if victims are referred to the NRM. All are denied.



Key: historical MPS investigations, Cornpoppy investigation, trafficking identified

January 2026	Pressure to investigate trafficking	The APPG for Fayed and Harrods Survivors writes to the Home Secretary to ask if victims have been referred to the NRM, on the request of NOA.
January 2026	Pressure to investigate trafficking	Two survivors, both of whom were in contact with the Cornpoppy investigation, self-initiate referrals to the NRM via the NGO Unseen UK , informed by a survivor campaign .
January 2026	(Unconfirmed) offending reported to the MPS	<i>Both self-initiated referrals received positive reasonable grounds decisions and ought to have been transferred to the MPS and recorded or flagged as Modern Slavery crimes.</i>
January 2026	Cornpoppy investigation update	A detective specialising in Modern Slavery joins the Cornpoppy investigation.
February 2026	Pressure to investigate trafficking	Paul Kohler MP asks in PMQs : “will the Prime Minister ensure sufficient resources are committed to fully investigating this multi-perpetrator, multi-jurisdictional, multi-decade trafficking outrage”. The Prime Minister does not answer the question.
February 2026	Ministerial letter	Safeguarding Minister Jess Phillips replies to the APPG for Fayed and Harrods Survivors confirming that two victims have been referred to the NRM over the history of the Fayed case. These are the self-initiated referrals.
March 2026	Pressure to investigate trafficking	(BBC) The former head of the MPS anti-trafficking unit, Phil Brewer, told the BBC he could not understand why the operation was not already a trafficking investigation. A victim of trafficking to Salah Fayed complains that the MPS has not investigated her case.
March 2026	Cornpoppy investigation update	(BBC) The MPS announces that it has interviewed three women on suspicion of sex trafficking. The force said to date, 154 victims have come forward. “Information gathered from these victims has broadened the scope of the inquiry to cover all reported offences including human trafficking,” it said. MPS Commander Angela Craggs said the update “marks an important step in a complex and far-reaching investigation” and that “victims remain at the centre”.
March 2026	Pressure to investigate trafficking	Wendy Chamberlain MP asks in PMQs if the Prime Minister will recognise the characterisation of the crimes as trafficking. The Prime Minister does not answer the question.
March 2026	Pressure to investigate trafficking	NOA writes to the Prime Minister asking him to confirm that: “you recognise the characterisation of trafficking and that, where allegations raise potential issues of facilitation, systemic enablement, organised exploitation, or trafficking, investigative scope must be capable of testing those possibilities where evidence supports them.”



Key: [historical MPS investigations](#), [Cornpoppy investigation](#), [trafficking identified](#)

March 2026	Press allegations	(Times) Jeffrey Epstein is reported to have used Fayed private aviation facilities to traffic victims through UK airports and to have trafficked a victim to Fayed.
April 2026	Pressure to investigate trafficking	(BBC) The Home Office confirms that a former Harrods employee who self-initiated an NRM referral via Unseen UK is a victim of modern slavery. Further confirmations in other domestic and cross-border cases follow.
April 2026	Cornpoppy investigation update	The BBC reports that “The Met Police said it had broadened its AI Fayed abuse investigation to include human trafficking. It is understood to have strengthened its team with officers with a background in modern slavery and will contact victims who it feels could be referred.” Cornpoppy begins to refer selected cases to the NRM.
May 2026	Pressure to investigate trafficking	NOA writes to the MPS, Home Secretary and Prime Minister regarding the Met’s failure to make NRM referrals and the scope of the Cornpoppy investigation
May 2026	Press allegations	(BBC) A woman who was trafficked by an associate of the Fayed is identified as a possible victim of modern slavery.
June 2026	Prime Minister meeting	(BBC) The Prime Minister does not answer a planned question on ensuring trafficking indicators are recognised earlier “due to time running out”.
June 2026	Cornpoppy investigation update	Cornpoppy writes to NOA that there is “no automatic requirement” to make an NRM referral solely because offending predates 2010 or the MSA 2015. Nonetheless, all 156 victim accounts were reviewed and those meeting the criteria contacted for NRM referrals. The criteria for referrals are not defined.
June 2026	Cornpoppy investigation update	Cornpoppy issues a survivor Q&A on trafficking and the NRM . The force states the applicable trafficking legislation “did not cover the period of offending... and cannot be applied retrospectively”, while asserting that “human trafficking has always been at the heart of this investigation”.
June 2026	Pressure to investigate trafficking	(Observer) Survivors complain to the IOPC about MPS failures to identify and investigate their cases as trafficking; the IASC states that the relevant consideration for a NRM referral is when a potential victim comes forward, not when the offences took place.
June 2026	Pressure to investigate trafficking	NOA writes to Cornpoppy requesting reasons why there is no automatic requirement to refer historical cases to the NRM.
June 2026	Cornpoppy investigation update	Cornpoppy replies that police are encouraged to refer “regardless of how long ago these incidents may have occurred”, and says the investigation “submitted NRM’s” in January 2026 — a claim inconsistent with the Home Office’s February 2026 confirmation that only the two survivor-initiated referrals had been received.



C: Independent Anti-Slavery Commissioner ([IASC](#)) Guidance

June 27, 2026 **Observer** ([Article](#))

“In an email sent to survivors earlier this month responding to their criticism of the Met’s investigation into trafficking claims, Operation Cornpoppy said it had not made NRM referrals for the women who came forward because the existing legislation did not cover the period of offending.

But experts disagree with this explanation. The Independent Anti-Slavery Commissioner told The Observer that the relevant information regarding a trafficking referral was when a potential victim came forward, not when the offences took place.”

July 2026 **IASC** [policy brief on the Immigration and Asylum Bill](#)

The Commissioner’s brief on the Bill objects to the introduction of “a duty to assess delayed, inaccurate or inconsistent information as damaging a person’s credibility”, on the grounds that victims of modern slavery have faced coercion, control and exploitation; that they may not recognise their exploitation or may be scared to speak out; that disclosure is rarely immediate and typically occurs only once a survivor feels safe, supported and able to trust; and that such a duty “refuses to acknowledge the trauma, displacement and fear that victims experience”. The brief also notes that there is no clear evidence the Government engaged survivors on the Bill’s contents.

Oct 3, 2025 **Email response to questions from NOA**

Do the police have a responsibility to identify trafficking cases, and what does that involve?

Yes. Police are designated First Responder Organisations under the Modern Slavery Act 2015 and have a statutory duty to identify potential victims of trafficking or modern slavery. Where there are indicators of trafficking, officers must complete an NRM (National Referral Mechanism) referral (with consent) or a Duty to Notify (without consent for adults), using the Home Office portal.

Early identification is essential, and referrals should be made promptly, alongside safeguarding measures and the collection of basic evidence.

What are considered sufficient grounds to identify a trafficking case?

The threshold is deliberately low at the identification stage. If there are reasonable grounds to suspect someone may be a victim—based on indicators such as control,



exploitation, or deception—police should refer into the NRM. No definitive proof is required at this point.

Do the police have a responsibility to inform individuals that they may have been trafficked?

Police must inform the individual if they are being referred into the NRM, explain what the process involves, and what support they may be entitled to. This is a key part of obtaining informed consent for adults and should be done in a trauma-informed and sensitive manner, as soon as reasonable suspicion arises.

What are police responsibilities when investigating trafficking, particularly in complex or institutional cases?

Police investigations into trafficking must go beyond individual suspects to examine wider networks, recruitment chains, premises, financial activity, and potential institutional complicity. Cases often require coordination with organised crime units, safeguarding teams, and international partners.

Do these responsibilities apply to historic cases reported after the Modern Slavery Act came into force?

Yes. If the exploitation is still having consequences, or if it was ongoing when the Act came into force, the police still have a duty to investigate and safeguard. The duty to notify and referral applies from the point of identification, regardless of when the exploitation took place.