

# **HOME OFFICE: IDENTIFICATION OF VICTIMS OF MODERN SLAVERY: CALL FOR EVIDENCE**

**Submitted by: No One Above (NOA), a survivor-led collective formed by individuals with lived experience of trafficking and exploitation, focused on barriers to justice and accountability in cases of abuse.**

**Date: 3 October 2025**

## **1. Preliminary Note**

Whilst we touch on Questions 1 and 3 of the Call for Evidence, our response focuses on Question 2: Initial identification of victims of modern slavery.

Our evidence assesses how effectively victims of modern slavery are identified, with particular attention to the Metropolitan Police Service (**MPS**) in its role as a designated First Responder under the Modern Slavery Act 2015 (**MSA**). The concerns we raise are systemic, extending beyond any single case.

As survivors of Mohamed Al Fayed / Harrods, we reference this case only as a high-profile example of structural failures in policing that reflect long-standing national patterns and urge the Home Office to use this case as a case study of current and ongoing failings. Given the Government's stated commitment to reforming the UK's system for identifying victims of modern slavery, it would be a serious omission for this Committee not to scrutinise the Al Fayed / Harrods case as a clear and current illustration of the system's ongoing failings.

The Group of Experts on Action against Trafficking in Human Beings (**GRETA**), which monitors the UK's compliance with the Council of Europe Convention on Action against Trafficking in Human Beings (**ECAT**), has already warned of continuing shortcomings in victim identification, including inconsistent practice by police forces<sup>1</sup>. Our evidence shows these problems persist. As First Responders in the Al Fayed / Harrods case, the MPS has failed to correctly apply both domestic law and international obligations in its framing and investigation of the case. This has resulted in the non-identification of clear trafficking victims, despite the presence of recognised indicators.

## **2. Response to Question 1: Definitions of victims of modern slavery**

The statutory definition of modern slavery under the MSA is broad and, in principle, sufficient. It aligns with international instruments such as the Palermo Protocol (2000) and ECAT, recognising that trafficking:

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<sup>1</sup> GRETA, Third Evaluation Report: United Kingdom, 2021.

- can occur domestically, without cross-border movement;
- encompasses sexual exploitation, coercion and abuse of vulnerability; and
- includes facilitation by third parties.

The problem does not seem to lie in the definition itself, but in its misapplication by certain First Responders, which results in victims being systematically erased from official records.

### 3. Response to Question 2: Initial identification of victims of modern slavery

International law places a positive duty on states to proactively identify victims of trafficking<sup>2</sup>. As FLEX has noted, *“The provision of support to victims of trafficking is dependent on the ability to recognise victim status through formal referral.”*<sup>3</sup>

Research by After Exploitation<sup>4</sup> and the Anti-Trafficking Monitoring Group<sup>5</sup> describes a “referral lottery”, where access to recognition depends less on legal entitlement than on chance and the discretion of First Responders.

#### 3.1. Case Study: Mohamed Al Fayed / Harrods

An estimated 400+ women and girls were sexually exploited through a sustained trafficking infrastructure spanning several decades. The abuse was not a series of isolated events, but a multi-country, multi-perpetrator, multi-decade, multi-organisation enterprise. The operation spanned numerous jurisdictions – including the UK, Italy, France, Scotland, Switzerland, Monaco, the United States and Egypt – and was facilitated through Al Fayed-owned entities such as Harrods, the Ritz Paris, airlines, yachts and residences. These cross-border movements were used to isolate victims and embed the trafficking structure across multiple jurisdictions, directly engaging the UK’s responsibilities under ECAT.

Survivors have received no indication that they are being recognised as trafficking victims or referred to the National Referral Mechanism (**NRM**).

The MPS updates to survivors have confirmed that it is not investigating these crimes in substance as trafficking. The MPS will not confirm if it ever plans to do so, despite having taken 147 formal statements from survivors to date, resulting

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<sup>2</sup> Article 10, Council of Europe, Council of Europe Convention on Action Against Trafficking of Human Beings, 16 May 2005, CETS 197.

<sup>3</sup> FLEX TIP report submission, 2024

<sup>4</sup> After Exploitation (2020), The Referral ‘Lottery’.

<sup>5</sup> The Anti-Trafficking Monitoring Group (2021), A Review of the National Referral Mechanism Multi-Agency Assurance Panels.

in it reviewing over 50,000 pages of evidence<sup>6</sup>. These updates underscore an ongoing institutional failure to correctly identify the nature of the abuse, representing a significant breach of the UK's obligations under ECAT and perpetuating the institutional inaction that allowed this network to flourish for decades. The survivor statements evidence clear trafficking patterns: grooming, harbouring, transportation, control through threats and dependency, and systematic, corporatised abuse and silencing by a powerful man and his enablers. Please refer to the Annex for key trafficking indicators in the Al Fayed / Harrods case.

The pattern of abuse clearly falls within the definition of trafficking in human beings, even though much of it occurred before comprehensive UK domestic trafficking legislation was enacted. The UK, as a Party to the Palermo Protocol<sup>7</sup>, is obligated not only to criminalise trafficking conduct, but also to protect and assist victims, ensure they are informed of relevant proceedings and cooperate internationally in the investigation and prosecution of such offenses (Arts. 2, 4, 6, 10). Even where domestic trafficking offenses were not yet codified, these provisions require the UK to pursue underlying crimes in substance as trafficking and to uphold victims rights consistent with its international commitments.

### 3.1.1. Systemic Failure 1: Failure to Investigate as Trafficking

The UK's primary failure is its refusal to investigate this case through a trafficking lens. When pressed, the Met has acknowledged to at least one survivor that their experience constitutes trafficking, yet that survivor is not formally recognised as a victim of trafficking and has not been referred to the NRM, because the abuse pre-dated domestic legislation. This position is legally indefensible:

- Identification of victims is a separate statutory duty under the MSA.
- The UK's obligations to identify victims under ECAT have been binding since ratification in 2008.
- ECAT is retrospective in scope: authorities must recognise trafficking indicators and protect victims even in historic cases.

By failing to formally identify the Al Fayed / Harrods abuse as trafficking, the MPS has breached both domestic duties under the MSA and international obligations under ECAT.

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<sup>6</sup> MPS updates to survivors: July, August and September 2025.

<sup>7</sup> UNGA, Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organised Crime (adopted 15 November 2000, entered into force 25 December 2003) 2237 UNTS 319.

Framing these events as isolated sexual assaults, rather than as components of an organised trafficking enterprise, denies survivors the accountability, protections, and remedies they are entitled to under law.

The elements of trafficking under Article 4 of ECAT are clearly present:

- Act: Victims were recruited, often under the guise of legitimate employment at Harrods or other Fayed-owned entities and then harboured and transported to controlled environments for the purpose of exploitation.
- Means: Coercion was systematic and multi-faceted. It included abuse of power, economic dependency on fabricated jobs, deception, surveillance by security staff, intimidation, confiscation of passports, and non-consensual medical control. Survivors remained not out of consent, but because of this intricate web of control.
- Purpose: The singular, overarching purpose was the sexual exploitation of women and children by Mohamed Al Fayed, his brothers, and others in their network.

This was enabled by a corporate infrastructure embedded within the Harrods enterprise itself. Harrods employees and resources were mobilised to facilitate the abuse.

This included HR staff who selected victims, doctors who conducted non-consensual sexual health testing of victims and facilitated medical intervention required as a consequence of the abuse, personal assistants who scheduled access to victims, security staff who enforced compliance and other enablers and facilitators on the Harrods enterprise payroll or connected to Al Fayed, whose roles contributed to facilitating the financing of trafficking, recruiting and silencing victims and maintaining control.

This enterprise-level facilitation directly engages the UK's obligation under Article 22 ECAT to ensure corporate liability for trafficking offences.

By refusing to recognise these patterns, the UK disregards GRETA's criticism of failures to identify victims in non-traditional contexts and reduces decades of trafficking to "assaults by one man."

### 3.1.2. Systemic Failure 2: Lack of Communication and Transparency

The Met's communication with survivors remains opaque. In July 2025, the Met said it was investigating "*over five individuals*" complicit in Al Fayed's "*offending*" but has refused to confirm whether this extends to

the wider networks and institutional enablers that sustained the trafficking enterprise.

The use of vague language such as “offending” obscures whether trafficking is being investigated at all. The MPS’s refusal to provide even basic clarity on whether survivors are being recognised as victims of trafficking – and whether the investigation is being pursued on that basis – together with the fact that there is no indication that survivors are being referred to the NRM, strongly suggests that it is not. Survivors — after decades of silence and institutional neglect — are again left in the dark. This lack of transparency is profoundly re-traumatising and reinforces survivors’ belief that UK institutions cannot be trusted to deliver justice.

We are not asking the UK to change its law. We are asking it to follow its existing obligations, and at the very least, to be transparent with survivors about the scope of its inquiry. Survivors should not have to fight this hard simply to know whether trafficking is being investigated.

GRETA has warned: “*A recurring challenge is that THB [trafficking in human beings] cases are requalified as other offenses which carry lighter penalties... The legal classification of a case of THB as another offence can have negative consequences for the victims...*”<sup>8</sup>

This misclassification strips survivors of recognition, compounds trauma and removes accountability from institutions and perpetrators alike.

The message to victims is that their suffering is not recognised, while the message to perpetrators is that they can continue exploiting with impunity. For many survivors, justice is inseparable from accountability. Without recognition, there is no accountability. And without accountability, perpetrators have no reason to stop.

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<sup>8</sup> Stock-Taking of GRETA’s third evaluation round of the Implementation of the Convention on Action Against Trafficking in Human Beings: Access to justice and effective remedies for victims of trafficking in human beings, March 2024.

### 3.2. Systemic gaps in First Responder practice

The Al Fayed / Harrods case illustrates wider systemic problems:

- Training gaps: Police seem to lack the training to recognise trafficking indicators or apply the law correctly.
- Cultural reluctance: There is a persistent tendency to downplay organised exploitation by re-framing it as isolated abuse.
- Stereotypes and narrow lenses: Trafficking in the UK is too often viewed through a narrow lens, treated primarily as an immigration or border-control issue. This framing sidelines cases of domestic trafficking, including large-scale sexual exploitation within the UK.

The Independent Anti-Slavery Commissioner's 2024-25 Annual Report <sup>9</sup> highlights these very issues, stressing that inconsistent training and understanding among first responders, including the police, undermines victim identification and that transparency in the process is essential.

Home Office statistics confirm that NGOs and immigration agencies make the majority of NRM referrals, while police referrals remain disproportionately low.<sup>10</sup> The Commissioner has also observed: *"a drop in live investigations and weakened cohesion, drive and strategic focus behind the policing response"*<sup>11</sup>.

Correct identification is not a technicality. It is the foundation of prevention, support and justice.

### 3.3. Why reform matters

Reform is urgent and achievable. The Al Fayed / Harrods case is not unique. Similar failings have been documented in Rotherham and other exploitation scandals, where authorities ignored trafficking indicators and allowed abuse to continue unchecked.

Unless institutions learn from these failings, the cycle of minimisation and denial will continue. Survivors will remain excluded from recognition and protection, while perpetrators face no meaningful deterrent.

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<sup>9</sup> Independent Anti-Slavery Commissioner Annual Report 2024-2025.

<sup>10</sup> Modern Slavery: National Referral Mechanism and Duty to Notify Statistics, UK, Quarter 2 (April to June) 2024 – NRM and DTN Statistics UK: Quarter 2 2024 (April to June), Home Office, 8 August 2024.

<sup>11</sup> Independent Anti-Slavery Commissioner, Policing Response to Modern Slavery: How has it changed in the last 10 years, July 2025.

### **3.4. Strengthening identification and support**

Identification and support could be strengthened through:

- **Mandatory training:** All police officers and CPS prosecutors should be trained in recognising trafficking indicators and correctly applying domestic and international law.
- **Historic recognition:** Guidance should confirm that trafficking indicators must be recognised in historic cases, as required under ECAT.
- **Independent oversight:** In complex cases such as Al Fayed / Harrods, independent review mechanisms should be triggered whenever systemic failings in victim identification emerge.
- **Safeguarding focus:** Victim identification must be embedded in safeguarding frameworks, not immigration control.

### **3.5. Survivors at the centre**

Survivors cannot obtain justice or healing if the state refuses to name their abuse for what it is: trafficking and sexual exploitation. When institutions minimise or misclassify exploitation, it erases patterns of control, coercion and systemic abuse, adding yet another layer of harm and leaving survivors without recognition or justice.

These failures are systemic, not exceptional. They undermine the UK's commitments under ECAT and existing domestic law.

## **4. Response to Question 3: Formal identification of victims of modern slavery**

Many victims never reach the stage of formal identification because they are not referred in the first place. If First Responders ignore indicators or misapply the law, the system collapses at the outset. Victims remain invisible, unprotected and denied justice.

## **5. CONCLUSION**

The UK has binding obligations under ECAT. Yet persistent failures by First Responders, particularly the police, to apply trafficking law correctly demonstrate a systemic misunderstanding of the law and a breach of international duties.

The UK cannot claim leadership in anti-trafficking while refusing to identify survivors as victims of trafficking. As GRETA, NGOs and the Independent Anti-Slavery Commissioner have made clear, reform is overdue.

We therefore urge the Home Office to:

- Require police to apply trafficking law correctly in both historic and current cases.
- Issue clear guidance reaffirming that trafficking is defined by conduct and exploitation, not by the date of domestic statutes.
- Implement GRETA's recommendations to improve training and victim identification.

A state that fails to name trafficking cannot claim to fight it.



## **ANNEX – TRAFFICKING INDICATORS IN THE AL FAYED / HARRODS CASE, TAKEN FROM VICTIM ACCOUNTS**

This annex sets out the key acts, means, and purposes of trafficking present in survivor testimonies linked to Mohamed Al-Fayed and Harrods.

### **Acts (What Was Done)**

- Recruitment of girls and young women under false pretences (e.g. fictitious jobs, opportunities at Harrods, career help).
- Harboursing in controlled environments such as Harrods, residences, or private events.
- Transportation of some women to other locations (domestic and international, including via private aviation).

### **Means of Control (How Victims Were Subjugated)**

Survivor accounts reveal multiple overlapping methods of coercion, intimidation, and control:

- Coercion & Threats:
  - Threats and intimidation by security teams.
  - Threats to family members.
  - Threat of physical harm or further sexual abuse.
  - Threat of being trafficked to others.
  - Threat of actual imprisonment (as punishment).
  - Verbal humiliation.
  - Forced to participate in humiliating acts.
  - Abusive speech.
  - False accusations.
  - Forced participation in criminal acts (e.g. drug possession).
- Grooming & Abuse of Vulnerability:
  - Grooming by Al-Fayed and Harrods staff.
  - Grooming of family members.
  - Imposition of forced gifts and/or money.
  - Some victims describe no choice of where or when to sleep, eat, wash, activities (eg visiting doctors, dentists, etc).
  - Restriction of food, monitoring of body weight, choice of clothing, make-up, hairstyle.
  - Being forced to conceal evidence of abuse.

- Non-consensual administration of drugs
  - Forced drug use to ensure dependency.
  - covert drugging.
  
- Financial Control:
  - Withdrawal of salary or control of remittances.
  - Threat of withdrawal of job/salary.
  - Intentional establishment of family dependency on victim.
  
- Surveillance & Isolation:
  - Restriction of movement.
  - Monitoring and restriction of communications.
  - Awareness of surveillance.
  - Restriction of independent medical access.
  - Removal to foreign countries where victims lacked language skills or safe access to help.
  - Some victims' families surveilled when access allowed.
  - Being forbidden to speak to others.
  - confiscation of letters and lack of access to telephones.
  
- Control of Documents & Travel:
  - Confiscation of passports.
  - Control by private jets or transport.
  - Control by limiting information – victims describe not being told where they were being taken.
  
- Legal & Informational Control:
  - Coerced NDAs.
  - Non-consensual medical testing and forced medical procedures.
  - Image-based abuse.
  - Coercion to withdraw or refrain from making police reports.

### **Purpose (Why It Was Done)**

- Sexual exploitation of women and children by Al-Fayed and associates.
- Maintenance of a system of control and silence around the abuse, ensuring ongoing access to victims.