

To: Secretariat of the Council of Europe (trafficking@coe.int)
c/o Petya Nestorova, Executive Secretary (petya.nestorova@coe.int)

From: No One Above (NOA)

Date: 9 October 2025

Re: United Kingdom – 4th Evaluation Round: Additional Information from Survivors

We are survivors of a decades-long human trafficking operation orchestrated by the late Mohamed Al-Fayed and a network of individuals and entities within his control. In accordance with Rule 10 of the rules of procedure for evaluating implementation of the Council of Europe Convention on Action against Trafficking in Human Beings (ECAT), we respectfully request that GRETA consider the information herein as part of its fourth evaluation round of the United Kingdom's (UK's) compliance with ECAT.

We recognise that this letter falls outside of the designated submission period for the UK's fourth evaluation round; however, we are compelled to act following a deeply disappointing and disheartening series of updates from the UK's Metropolitan Police Service (**the Met**) regarding its investigation. Those updates, received in July, August, and September 2025, confirmed that the Met is not currently investigating these crimes as trafficking, nor will it confirm if it ever plans to. These updates have underscored a continuing institutional failure that warrants GRETA's immediate attention. This failure to correctly identify the nature of the abuse, despite having taken 147 formal statements from survivors to date, constitutes a significant breach of the UK's obligations under ECAT and perpetuates the institutional inaction that allowed this network to flourish for decades.

This letter details a sustained trafficking infrastructure that involved the sexual exploitation of more than 400 women and children over 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 the globe—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 strategically isolated victims and embedded the trafficking structure across multiple jurisdictions, which directly engages the UK's responsibilities under ECAT.

The pattern of abuse clearly falls within the international definition of trafficking in human beings. The UK, as a Party to the Palermo Protocol, 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 offences (Arts. 2, 4, 6, 10). The UK's failure to act on credible complaints during Al-Fayed's lifetime and its continued failure to identify victims of trafficking represents a clear and ongoing breach of its obligations.

Systemic Failure 1: Failure to Investigate as Trafficking

The UK's primary failure is its refusal to investigate this case through a trafficking lens. We note that in direct communication with one survivor, the Met privately confirmed that her case does constitute trafficking, but that it will not investigate it as such. The Met's decision to frame these events as isolated sexual assaults, rather than an organised trafficking enterprise, ignores overwhelming evidence and denies survivors accountability and access to the specific protections and remedies we, and all survivors, are owed under law.

The elements of trafficking as defined by Article 4 of ECAT are unequivocally present:

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

The Annex to this letter gives further details of the elements of trafficking as described in victims' own accounts.

Further, the UK's obligations under Article 22 of ECAT require it to investigate enterprise-level liability for trafficking offences.

The trafficking within the Al-Fayed network was enabled and sustained through Harrods's corporate infrastructure, which mobilised its personnel and resources to facilitate and conceal abuse. Human resources staff selected victims; doctors performed non-consensual sexual health testing and provided medical treatment necessitated by the abuse; personal assistants scheduled Al-Fayed's access to victims; and security staff surveilled, intimidated, and coerced victims into silence and compliance.

Other enablers on the Harrods payroll and within Al-Fayed's wider circle—including managers, legal advisers, and PR professionals—were instrumental in financing, coordinating, and suppressing disclosure of the trafficking scheme. Accounts from the press and former Harrods employees describe its financial mechanisms: weekly cash withdrawals of £40,000–£50,000; a locked briefcase of cash kept in Al-Fayed's possession; regular deliveries of large cash sums to the Al-Fayeds by senior banking staff; and the routine bribery of associates and officials with envelopes of cash. This untraceable cash flow was used both to exploit victims and to sustain the extensive network of individuals who facilitated the trafficking.

This pattern of coordinated enterprise-level participation directly engages the UK's duty under Article 22 of ECAT to ensure accountability for corporate and institutional complicity in trafficking offences—a duty the Met and UK authorities have so far failed to meet.

By failing to recognise these patterns, the UK disregards GRETA’s previous criticism of its failures to identify trafficking victims in non-traditional contexts. The UK also sidesteps its responsibility to hold institutions accountable by choosing to investigate this as merely a series of assaults committed by one bad man rather than as a decades-long trafficking enterprise.

Systemic Failure 2: Lack of Communication and Transparency

The second critical failure lies in the Met’s persistent lack of communication and transparency regarding the scope of its “ongoing” investigation. In its July 2025 update, the Met stated its focus is on identifying “individuals” who were “complicit in facilitating the offending of Mohammed Al Fayed,” noting they are examining “over five individuals.” This narrow focus on individual acts, combined with the Met’s inconsistent communications, has compounded confusion and eroded trust.

Earlier communications described the investigation as an inquiry into Al-Fayed’s “offending,” which it defined as sexual abuse. Later, the Met claimed to be investigating a wider circle of persons who “aided and abetted” in a “range of offences.” While its descriptions have shifted over time, the Met’s consistent position has been to avoid classifying these crimes as trafficking. By refusing to clarify who is under investigation or define the “range of offences,” the Met is relying on undefined, catch-all language to avoid addressing the trafficking and institutional complicity at the heart of this enterprise.

For survivors who have endured years of silence and concealment, this refusal to provide clarity is profoundly re-traumatising. While we acknowledge that operational sensitivities exist which may constrain what can be disclosed, the Met’s categorical refusal to confirm whether it is investigating this as a trafficking enterprise strongly suggests it is not. This conclusion is underscored by the Met’s complete failure to connect survivors with available resources; for instance, we are not aware of any survivor of the Al-Fayed network being referred to the National Referral Mechanism.¹

This institutional silence reinforces the powerlessness survivors like us experienced and validates their long-held belief that UK institutions cannot be trusted to deliver justice, given the history of protecting Al-Fayed and failing to act on serious reports made before his death.

We are not asking the United Kingdom to change its law. We are asking it to follow its law—or, at the very least, to be transparent with survivors about what actions it is taking. Survivors should not have to fight this hard for basic transparency.

Relevance to GRETA’s Mandate and Current Evaluation

This case directly engages the priorities of GRETA’s fourth evaluation of the UK, which focuses on “vulnerabilities to human trafficking and measures taken by States Parties to prevent them, detect and support vulnerable victims, and punish the offenders.” The ongoing failure to correctly identify survivors as victims of trafficking is the single greatest barrier to their protection.

¹ By law, the Metropolitan Police Service is required to refer potential victims of trafficking to the National Referral Mechanism (NRM).

Recognition of the Al-Fayed abuse as trafficking is essential for ensuring future recognition of trafficking, real-time support for survivors, and meaningful punishment of the offenders.

The harm is ongoing. We survivors continue to suffer from the original exploitation and from the UK's failure to provide effective redress. While Mohamed Al-Fayed is deceased, his network of perpetrators and enablers are not and the corporations and institutions that enabled the exploitation remain intact. By refusing to properly investigate and punish those who remain, and by failing to identify victims or provide redress, the UK ensures their impunity and perpetuates the harm. These ongoing gaps justify GRETA's immediate involvement to ensure the UK's compliance with its ECAT obligations.

We therefore respectfully request that GRETA:

- **Examine** the Al-Fayed case as a primary illustration of systemic trafficking investigation failures in the UK.
- **Assess** the UK's compliance with its duty under ECAT and the Palermo Protocol to identify, investigate, and provide remedies for trafficking victims.
- **Recommend** that UK authorities conduct a prompt, thorough and independent review of how both state and private actors – including the Metropolitan Police, the Crown Prosecution Service, and Harrods – have responded to trafficking and exploitation cases, in order to identify institutional failures, address potential complicity and strengthen accountability.
- **Encourage** the UK to ensure independent survivor participation in inquiries and policy development.
- **Urge** the UK to recognise survivors as trafficking victims and provide them with survivor-centred remedies that ensure effective access to accountability.

This case is a critical test of the UK's commitment to its obligations under ECAT. We have provided this concise statement to outline the ongoing situation and formally invite GRETA to request any additional information, documentation, or direct testimony from survivors, who are ready to assist your review.

Thank you for your time and consideration of this urgent matter.

Sincerely,

Victoria du Caurroy Tribe
Elizabeth / Joan (pseudonym, not public)
Shanta Sundarason
Candice Dowding (not public)
Margo (pseudonym, not public)
Pelham Spong

For and on behalf of No One Above (NOA)

Annex – Trafficking Indicators in the Al-Fayed Case, 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)	
<ul style="list-style-type: none"> • 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)	
<i>Survivor accounts reveal multiple overlapping methods of coercion, intimidation, and control:</i>	
Coercion & Threats	Threats and intimidation by security teams.
	Threats to family members.
	Threats of physical harm or further sexual abuse.
	Threats 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 (e.g., 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 were surveilled when access allowed.
	Being forbidden from speaking 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)
<ul style="list-style-type: none"> • 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.