

SUBMISSION TO THE SPECIAL RAPPORTEUR ON TRAFFICKING IN PERSONS, ESPECIALLY WOMEN AND CHILDREN

To: Ms Siobhán Mullally, Special Rapporteur on Trafficking in Persons, Especially Women and Children

From: No One Above (**NOA**)

Date: 28 January 2026

Subject: Mohamed Al-Fayed's Labour and Sex Trafficking Through Harrods and Other Corporate and Personally Owned Entities

A. EXECUTIVE SUMMARY

1. 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. We make this submission through No One Above (**NOA**) to the Special Rapporteur on Trafficking in Persons, Especially Women and Children.
2. 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-perpetrator, multi-decade, multi-organisation trafficking enterprise. The operation spanned the globe – including the United Kingdom (**UK**), Italy, France, Scotland, Switzerland, Monaco, the United States and Egypt – and was facilitated through Al-Fayed owned entities such as Harrods, Hyde Park Residences, the Ritz Paris, airlines, yachts and residences and a network of corporate, medical, security, administrative and personal actors across Harrods and other Al-Fayed-controlled entities. Survivors describe consistent accounts of recruitment, harbouring, deception, coercion, surveillance, transportation and exploitation that clearly fall within the definition of trafficking under the Palermo Protocol.
3. At least 147 formal survivor statements have been taken by the UK Metropolitan Police Service (the **Met**). From 2005 onwards, at least 21 women and girls made reports during Al-Fayed's lifetime (four allegations of rape, sixteen of sexual assault and one of trafficking); none resulted in prosecution. Earlier police files are said by the Met to have been "lost during digitisation."
4. Despite extensive evidence, a series of deeply disappointing and disheartening updates from the Met, received in July, August and September 2025, confirmed that it is not currently investigating these crimes as trafficking, nor will it confirm if it ever plans to. Additionally:
 - The investigation has been allocated to a Rape and Serious Sexual Offences (**RASSO**) team, rather than to a dedicated trafficking or modern slavery team.
 - Survivors have not been referred to the National Referral Mechanism (**NRM**) and have not received the information or participatory rights required under international law.
5. In November 2025, French authorities opened a formal investigation into aggravated human trafficking with multiple victims linked to Mohamed Al-Fayed. In correspondence with

survivors, the Met described this only as an investigation into “the handling of sexual abuse allegations involving Mohamed Al-Fayed,” omitting that the French investigation concerns trafficking.

6. The UK signed the United Nations Convention against Transnational Organized Crime (**UNTOC**) and the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children (**Palermo Protocol**) on 14 December 2000 and ratified both on 9 February 2006. It ratified the Council of Europe Convention on Action against Trafficking in Human Beings (**ECAT**) in 2008. The Modern Slavery Act 2015 consolidated trafficking offences in domestic law.
7. Under these instruments and the UN Guiding Principles on Business and Human Rights (**UNGP**), the UK is obliged not only to criminalise trafficking conduct, but also to identify victims, protect and assist them, ensure they are informed of and able to participate in relevant proceedings, and cooperate internationally.
8. The UK’s failure to act on credible complaints during Al-Fayed’s lifetime and its continued failure to identify victims of trafficking represent a clear and ongoing breach of its obligations and perpetuates the institutional inaction that allowed this network to flourish for decades.
9. Since 2010, Harrods has been wholly owned by Qatar Holding LLC, a wholly-owned subsidiary of the Qatar Investment Authority (**QIA**), the sovereign wealth fund of the State of Qatar. As a State-owned entity, QIA’s conduct is attributable to Qatar under international law. Qatar therefore bears obligations under the Palermo Protocol and UNGP to ensure human-rights due diligence, transparency and access to remedies in relation to Harrods.
10. Harrods has established an internal 2025 “redress” Scheme that is not independent, is narrowly framed and replicates discredited models of institutional self-policing. It cannot be regarded as fulfilling or discharging the UK’s obligation to ensure access to justice, contrary to UNGP Principles 25, 27 and 31.
11. By 2010, multiple survivors had come forward to the police and Harrods and Al-Fayed had already been the subject of extensive public reporting on abuse, corruption and governance failures. Al-Fayed had been interviewed under caution by the Met in 2008. Several employees had made internal complaints, and Harrods held multiple NDAs and medical files linked to sexual-health testing and access to women and girls
12. QIA should have conducted significant acquisition due diligence when it purchased Harrods in 2010, yet there is no evidence that QIA conducted a meaningful human-rights due diligence process addressing sexual exploitation or trafficking, nor that it took appropriate steps to investigate and remediate these risks after acquisition.
13. Survivors in the UK face prohibitive structural barriers to civil justice against powerful defendants, including hostile costs rules, the weaponisation of Part 36 settlement offers, the absence of a civil tort of trafficking, and the unavailability of affordable insurance for abuse litigation. In effect, there is no realistic civil pathway for survivors of the type of organised trafficking described here.

14. Against this background of domestic inaction, corporate failure and barriers to justice and in light of the French trafficking investigation, we respectfully submit that this matter falls squarely within the Special Rapporteur's mandate. We seek urgent intervention to address continuing violations and secure effective, survivor-centred remedies.

B. PRIOR ENGAGEMENT WITH UK / INTERNATIONAL MECHANISMS

15. NOA has previously submitted evidence to:
- The Committee of Public Accounts (PAC) Call for Evidence: Government Compensation Schemes – NOA provided evidence as to the requirement of independent, statutory schemes for victims of mass harm.
 - Home Office Inquiry: Identification of Victims of Modern Slavery – NOA provided evidence highlighting failures to recognise and protect trafficking victims in the UK, using the Al-Fayed enterprise as a key example.
 - Justice Committee's Access to Justice Inquiry – NOA submitted evidence on the structural barriers (costs, insurance, Part 36, lack of trafficking tort) that make civil redress for abuse survivors practically impossible.
 - GRETA (Fourth Evaluation Round) – NOA provided a trafficking-indicator matrix and detailed case evidence; we understand this will be referenced in GRETA's current report on UK implementation of ECAT.
 - Home Affairs Committee – Survivors, through NOA, offered lived-experience testimony on three occasions; each offer was declined, leaving survivors without a meaningful parliamentary forum.

The Home Office, Justice Committee and PAC submissions can be found here:
www.nooneabove.org.

C. FACTUAL BACKGROUND: THE AL-FAYED TRAFFICKING ENTERPRISE

C1. Scope and structure of the enterprise

16. This letter details a sustained trafficking infrastructure involving the sexual exploitation of more than 400 women and girls over several decades. The abuse was not a series of isolated incidents but a multi-country, multi-perpetrator, multi-organisation enterprise.
17. The operation spanned the UK, Italy, France, Scotland, Switzerland, Monaco, the United States and Egypt, and was facilitated through entities owned or controlled by Al-Fayed, including Harrods, the Ritz Paris, airlines, yachts and multiple residences. A full list of known locations and conduits of abuse and exploitation is detailed at Annex 3.
18. Survivors report similar patterns of abuse by Mohamed Al-Fayed, Salah Fayed and Ali Fayed, often within the same controlled environments. Some survivors were abused by more than one brother or by a combination of a Fayed family member and another connected individual. This networked offending is characteristic of trafficking systems rather than isolated misconduct.

C2. Recruitment and deception

19. Girls and young women were recruited through deceptive tactics, often via Harrods or other business entities. They were offered fictitious jobs, contrived opportunities for advancement at Harrods, help with careers or other attractive opportunities. Their employment required relocation to Al-Fayed controlled residences, yachts, planes and offices, which gave Al-Fayed and his associates unfettered access to the women and girls.
20. Many roles were either wholly fabricated or hollowed out, so that their primary function was to give Al-Fayed and his associates access to women and girls. Survivors describe a continuum of trafficking and control, ranging from:
 - apparently genuine Harrods jobs where they were regularly summoned to Al-Fayed’s office;
 - contrived “PA” roles or posts in Harrods-linked entities; and
 - placements in Al-Fayed-controlled residences in the UK and abroad, amounting to near-total isolation.

C3. Coercion, threats, surveillance and control

21. In every case, the act of recruitment or harbouring was paired with means of coercion. Survivors remained not because they consented, but because of a web of economic dependency, fear and psychological coercion. They relied on Harrods roles—often fabricated—for income and status, and were led to believe that employment was conditional on compliance.
22. Means of coercion further involved surveillance by security, confiscation of passports, intimidation or medical control, language barriers, psychological coercion – with the purpose of sexual exploitation. Some survivors describe trauma-bonding, where alternating rewards and punishments eroded their self-worth. Fear of disbelief, stigma and the extraordinary power imbalance further ensured silence.
23. Women and girls were subjected to threats and intimidation by security teams, threats to family members, threats of physical harm or further sexual abuse, threats of being trafficked to others and threats of actual imprisonment as punishment. They also endured verbal humiliation, image-based abuse, abusive speech, false accusations, and forced participation in humiliating acts and criminal activity.
24. Al-Fayed and Harrods staff groomed survivors and their family, forced them to accept gifts and money, and gave them no choice of where and when to sleep, eat, wash, or conduct life-sustaining activities, such as healthcare provider visits. Abusers restricted food intake, monitored body weight, and choice of clothing, make-up, and hairstyles. Through forced drug use and covert drugging, abusers kept women and girls dependent on them. Women and girls were also forced to conceal evidence of abuse.
25. The financial control that Al-Fayed exercised over the women established feelings of precarity and lack of recourse. Abusers intentionally manufactured situations in which the women and girls' families would be financially dependent on them. Women and girls faced threats of and actual withdrawal of salaries, job loss, and control of remittances.

26. Women and girls were coerced into signing NDAs. Doctors employed by Al-Fayed conducted non-consensual medical testing and forced medical procedures on women, including abortions. When survivors tried to report the abuse, they were coerced into withdrawing their police reports or intimidated out of filing them in the first place.
27. The public narrative has often sanitised these patterns as “grooming.” In reality, the systemic deception, coercion and abuse of power described by survivors meet the definition of trafficking under Article 3(a) of the Palermo Protocol. These mechanisms were used to recruit, transport, harbour and control women and girls for exploitation. They align with the trafficking indicators recognised under international law.

C4. Isolation

28. After being recruited, women and girls were isolated by surveillance, intimidation, and fear. Many knew their phones were being monitored—both Mohamed Al-Fayed and Salah Fayed repeated details of private conversations back to them—creating a climate of silence where disclosure was impossible. Inside Harrods, women and girls were constantly monitored, unable to speak freely with colleagues, and lived under the unspoken rule that resistance would mean dismissal, humiliation, or worse. Apparent “freedom” (those victims not kept in near total isolation) in some cases masked a deeper isolation enforced by constant monitoring and coercive control. Abusers restricted movement and monitored and restricted communications by mail and telephone. Women and girls were not allowed to seek independent medical attention. Surveillance sometimes extended to families and victims were unable to speak to others.
29. Women and girls were often transported to other locations, both domestic and international, including via private aviation. Their passports were confiscated and their transportation methods were controlled. Some women and girls were removed to foreign countries where they did not know the language or have safe access to reliable help. Women and girls who were transported elsewhere were denied information about their own whereabouts.

C5. Corporate embedding of trafficking mechanisms

30. Women and children were harmed not just by individuals but through a corporate trafficking infrastructure embedded within the Harrods enterprise itself. Survivors consistently describe how exploitation was facilitated and normalised through the actions of multiple actors inside the corporate structure, including:
 - Doctors employed by Harrods – conducting non-consensual sexual-health testing before abuse and providing medical treatment required because of the abuse.
 - Human Resources personnel – screening and selecting victims; channelling recruitment, employment and dependency in ways that made victims vulnerable; differentiating “productive” roles from abuse-linked roles (for example, “typing” vs “non-typing” secretaries).
 - Personal assistants to Al-Fayed – arranging access, scheduling and grooming under the guise of professional duties; some PAs were victims themselves, illustrating victim-facilitated abuse.

- Harrods security staff – monitoring victims, preventing them from leaving, and intimidating or blocking disclosure. Victims were often made aware of surveillance.
 - Managers, legal advisers, PR professionals and other enablers – coordinating recruitment, controlling communication, managing NDAs and suppressing disclosure.
31. By embedding trafficking mechanisms into the routine operations of a major UK business, the trafficking structure created by Al-Fayed—and abetted by many others—placed women and girls directly into positions of harm while shielding those in power and obstructing survivors’ ability to seek help.
32. This corporate embedding ensured that Al-Fayed and his associates had continued access to victims and maintained impunity during his lifetime and beyond.

D. APPLICABLE LEGAL FRAMEWORK

33. Article 3(a) of the Palermo Protocol defines trafficking in persons as:
- “the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.”*
34. Article 6(2) of the Palermo Protocol requires that trafficking victims be provided with:
- information on relevant court and administrative proceedings; and
 - assistance to enable their views and concerns to be presented and considered at appropriate stages of criminal proceedings, in a manner not prejudicial to the rights of the defence.
35. Article 10(1)(c) obliges States Parties to cooperate by exchanging information on:
- means and methods used by organised criminal groups for trafficking, including recruitment and transport routes;
 - links between individuals and groups engaged in trafficking; and
 - possible measures for detecting such activities.
36. UNTOC reinforces these duties, obliging States to prevent and combat organised crime, investigate and prosecute offenders and cooperate internationally.
37. ECAT requires the UK to identify trafficking victims, protect them, act with due diligence to prevent and investigate trafficking, and provide access to remedies, including compensation.
38. Before the Modern Slavery Act 2015, trafficking offences were criminalised through the Sexual Offences Act 2003 (ss. 57–60) and the Asylum and Immigration (Treatment of Claimants, etc.) Act 2004 (s. 4). These provisions implemented the standards established by

the Palermo Protocol. The Modern Slavery Act consolidated these duties into a single offence of arranging or facilitating the travel of another person with a view to exploitation (s. 2), encompassing movement into, within or out of the UK.

39. The UN Guiding Principles on Business and Human Rights (UNGPR) require that:
- Principle 1: States must protect against human-rights abuse within their territory and/or jurisdiction by third parties, including business enterprises.
 - Principle 4: States should take additional steps to protect against human-rights abuses by business enterprises that are owned or controlled by the State.
 - Principle 25: States must ensure access to effective remedy when business-related abuses occur.
 - Principle 27: States should provide effective and appropriate non-judicial grievance mechanisms, as part of a comprehensive State-based system for the remedy of business-related human rights abuse.
 - Principle 28: States should consider ways to facilitate access to effective non-State based grievance mechanisms dealing with business-related human rights harms.
 - Principle 31: State-based and non-State-based grievance mechanisms must be legitimate, accessible, predictable, equitable, transparent, rights-compatible and a source of continuous learning.
40. Taken together, these instruments require the UK and Qatar to:
- recognise and record trafficking indicators;
 - investigate trafficking as organised crime;
 - cooperate domestically and internationally;
 - protect and inform victims and enable their participation; and
 - ensure access to effective judicial and non-judicial remedies.
41. As demonstrated in the sections below, these obligations have been breached historically and continue to be breached in relation to the Al-Fayed trafficking enterprise.

E. STATE RESPONSE AND SYSTEMIC FAILURES

42. Given the scale and duration of the trafficking scheme, State inaction and institutional failure are central features of this case. A large network of actors—including financial institutions, law enforcement and public officials—failed to act on decades of survivor testimony, press reporting and widely known rumours.

E1. Historic failure to act on complaints and patterns of abuse

43. Survivors have been reporting abuse linked to Al-Fayed for decades, both formally and informally, including:
- reports to UK police and other law-enforcement bodies;
 - internal complaints within Harrods and other Al-Fayed entities; and
 - approaches to lawyers, media and support organisations.

44. The earliest known allegations against Al-Fayed extend from 1977 to 2013. As early as 1986, senior officials in London and Washington, including figures within Margaret Thatcher's government, were informed that the teenage daughter of the US Ambassador to London had been accosted and abused by Al-Fayed. No meaningful action followed.
45. The Met has stated that early police files have been lost during digitisation, despite strict duties to record and retain sexual-offence reports. It is therefore unable to confirm how many women and girls made allegations prior to digitisation.
46. From 2005 onwards, at least twenty-one additional women and girls reported allegations to police. The Met recorded four allegations of rape, sixteen of sexual assault and one of trafficking. None resulted in prosecution. The Met failed to identify clear patterns of exploitation or to fulfil safeguarding duties towards women and girls exposed to Al-Fayed and his associates.
47. Since at least the mid-1990s, public reporting has raised serious concerns about misconduct, abuse and corruption within Harrods and Al-Fayed-controlled entities, including:
 - a 1995 Vanity Fair investigation;
 - 1997 ITV "The Big Story" coverage;
 - 1998 News of the World reporting, Henry Porter's Guardian article "Crossing Swords with Mohamed," and Tom Bower's unauthorised biography, both detailing abuse, corruption and other misconduct; and
 - a 2008 Mail on Sunday report about the rape of a 15-year-old girl.
48. Press coverage in the early 2000s documented:
 - rapid turnover of directors and senior executives;
 - a culture of fear and arbitrary dismissals;
 - financial opacity and failed flotation plans; and
 - aggressive legal responses to criticism, especially to references to the "Chairman's Ladies," now understood by survivors as a formalised façade for sexual exploitation and trafficking.

For further details, please refer to Annex 2.
49. Harrods pursued The Times all the way to the UK Supreme Court to block disclosures from approximately sixty former executives. Survivors view this pattern of litigation and suppression as consistent with efforts to conceal a trafficking enterprise.
50. These public reports, combined with internal complaints and NDAs, meant that senior decision-makers, both within the company and in government, could not honestly claim ignorance of the risks of sexual exploitation and trafficking.
51. Survivors' accounts and media reporting show that there was ample information available to authorities and corporate leadership over many years to recognise and act on trafficking indicators. This did not occur.

52. The Crown Prosecution Service (**CPS**) has confirmed that four cases involving Al-Fayed were referred to it in his lifetime. Prosecutors declined to charge in each instance and failed to identify clear patterns of abuse.
53. Al-Fayed was interviewed under caution in 2008 and 2013, but no charges were brought and no comprehensive safeguarding response was implemented.
54. Across decades of knowledge, no adequate safeguarding measures were implemented to protect women and girls exploited through the Al-Fayed enterprise, despite clear indicators of recruitment, isolation, coercion and control within a corporate structure. Authorities failed to conduct risk assessments, put in place protective steps or develop trauma-informed procedures capable of preventing further harm.
55. After purchasing West Heath School in 1998, Al-Fayed was allowed unfettered access to the school. Several former pupils have since reported that he used this access to sexually exploit them, including children as young as 11 years old. If the Met had already received complaints about Al-Fayed's conduct in connection with Harrods, it is difficult to understand how he was nevertheless permitted access to pupils without any safeguarding scrutiny. The West Heath accounts would seem to form part of the same systemic failure that enabled his widespread abuse within the Harrods enterprise and beyond.

E2. Corruption, collusion and use of state powers to silence survivors

56. It is documented that certain police officers facilitated the silencing and harassment of survivors, accepting cash and other bribes from Al-Fayed. Evidence includes:
 - the 1997 witness statement of former Harrods security officer Bob Loftus;
 - a 1998 Evening Standard report describing how police forces had allowed themselves to be used by Harrods' owner in harassing ex-employees; and
 - survivor statements describing police collusion and intimidation.
57. Survivors describe being discouraged from making formal complaints, warned off by Harrods security or legal representatives, or seeing their complaints ignored or stalled. Some were pressured or coerced into withdrawing police reports.
58. Linked perpetrators, including Salah Fayed, benefited from quiet handling of other offences; for example, reports that drugs offences in Scotland were dealt with discreetly with assistance from former Met Commissioner Sir David McNee (now deceased).
59. The Met's Directorate of Professional Standards is reportedly examining potential historic police corruption relating to Al-Fayed, but survivors have received no updates. Complaints to the Independent Office for Police Conduct (**IOPC**) about historic handling of allegations have been referred back to the Met itself, requiring survivors to rely on the same institution they view as complicit.
60. 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 up to £120,000; 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 and paid Harrods account cards. This untraceable cash flow was used both to exploit victims and to sustain the extensive network of individuals who facilitated the trafficking. For further details, please refer to Annex 2.

61. No explanation has been given as to how a continuously revolving cast of women and girls were paid, bribed and then paid off without attracting scrutiny from accountants, auditors or financial institutions.
62. These failures reflect a pattern of institutional reluctance to pursue full and transparent investigations where perpetrators are wealthy and politically connected and where this could expose police, public bodies or influential institutions to legal or reputational consequences arising from past inaction. This has created a long-standing accountability vacuum.

E3. Breach of State obligations under Palermo, ECAT, UNGP

63. The Met's primary current failure is its refusal to investigate the case as trafficking. In direct communication with at least one survivor, the Met acknowledged that her case constitutes trafficking, but said it would 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.
64. The UK's failure to formally address these crimes as trafficking also contravenes the State Party's obligations under the Palermo Protocol. The Met has neither provided survivors with information on relevant proceedings, nor offered an avenue for presentation and consideration of their concerns. Thus far, there has been no evidence that the Met is investigating the systemic nature of the network that was used to recruit, transport, and examine the women who Al-Fayed trafficked, nor the financial institutions that assisted in funding these activities. The Met has not acted to preserve evidence, or made any attempt to prevent intimate survivor information being passed to direct family members of the accused via counterclaims against the Fayed Estate by Harrods (as to which, please refer to paragraph 98 below).
65. Publicly and privately, the Met has framed the investigation as an inquiry into sexual offences committed by an individual and those who "aided and abetted" him, rather than into a trafficking enterprise. For further details, please refer to Annex 1.
66. The case has been allocated to the Cornpoppy team, a RASSO unit led by officers whose expertise and public profile relate to rape and serious sexual violence work. There is no indication that trafficking or modern slavery specialists are leading this investigation. Survivors report that internal communications emphasise the need to "prioritise" lines of inquiry in ways that appear to exclude trafficking from consideration. A more detailed summary of police communications is provided in Annex 1.

67. No survivors are known to have been referred to the NRM), despite numerous trafficking indicators being present.
68. In at least one case, a victim of another brother (Salah Fayed), who was not also abused by Mohamed, received no response after reporting to the police, suggesting that cases falling outside a narrow, offender-specific frame fall outside the investigation's scope. There is no indication that the Met has interviewed Ali Fayed, but survivors note a petition to the United States District Court in Connecticut, which details how Ali Fayed may have evidence which shows Harrods' complicity in the sexual exploitation and in its cover up.
69. The wide range of businesses, including Harrods, the Ritz Paris, Hyde Park Residences and Fulham FC, involved in Al-Fayed's trafficking was both egregious and detectable. The ignorance of the state in recognising and prosecuting Al-Fayed and his associates constitutes a failure of the state under the UK's obligations under the UNGP. The UK failed, and still fails, to take appropriate steps to prevent, investigate, punish, and redress Al-Fayed's crimes. The Met's unwillingness to share the nature and progression of their investigation is only one example of this failure. The refusal to prosecute his crimes as trafficking is a violation of the UK's obligations as a Party to the Palermo Protocol and under the UNGP.

E4. Failure to apply trafficking duties

70. The conduct described in this submission occurred substantially within London, within the jurisdiction of the Met. Recruitment, employment and supervision of women through Harrods and other entities controlled by Al-Fayed occurred in Knightsbridge and other parts of London. Survivors describe being interviewed, employed and monitored in London-based offices and residences connected to Harrods. These acts involved recruitment, harbouring, and control of persons within the UK, which are consistent with the elements of trafficking in persons as defined in section 59A of the Sexual Offences Act 2003 and section 2 of the Modern Slavery Act 2015.
71. Related conduct—including confiscation of passports, surveillance by security staff, dependency created through deceptive or coercive employment, and transportation to other locations domestically and abroad—constitutes “arranging or facilitating the travel of another person with a view to exploitation” under the Modern Slavery Act 2015. Because these acts originated in London, they fall within the statutory remit of the Met.
72. Under the Palermo Protocol, ECAT and domestic law, the Met has a continuing duty to:
- identify trafficking indicators;
 - investigate trafficking as an organised offence, including recruitment, transport, harbouring, financial flows and international links;
 - cooperate with French and other authorities; and
 - ensure survivors are informed and able to participate in proceedings.

The London nexus of the recruitment and control described in this submission therefore engages the UK's obligations to investigate, cooperate and provide access to justice for victims of trafficking in persons.

73. Regardless of the fact that the Met has confined the case to a RASSO framework, that framework itself requires investigators to identify patterns of offending, recognise coercive control and consider contextual factors such as power imbalances and institutional settings in cases of sexual abuse. Survivors' accounts clearly disclose multiple RASSO indicators: repeat offending by the same suspects, multiple victims linked to the same institution, coercive and controlling behaviour and vulnerability arising from economic dependency and immigration status. The Met's refusal to recognise or record these crimes as trafficking and its reduction of a complex pattern of organised exploitation to isolated sexual assaults is inconsistent not only with international and domestic law, but also with its own RASSO guidance and VWAG (Violence Against Women and Girls) commitments.
74. A trafficking-led investigation remains legally required and practically feasible. The London nexus of recruitment and control, the volume and consistency of survivor testimony and the French trafficking investigation together demand a coordinated international response.

F. CORPORATE RESPONSIBILITY: HARRODS AND QATAR

75. Since 2010, Harrods has been wholly owned by Qatar Holding LLC, a subsidiary of QIA, the sovereign wealth fund of the State of Qatar. As a State-owned entity, QIA's conduct is attributable to Qatar under international law, engaging its obligations under the Palermo Protocol and the UNGP.
76. By 2010, Harrods and Al-Fayed had already been the subject of extensive public reporting on abuse, corruption and governance failures (see Section E1). Al-Fayed had been interviewed under caution by the Met in 2008. Several employees had made internal complaints, and Harrods held multiple NDAs and medical files linked to sexual-health testing and access to women and girls.
77. Since 2023, Harrods and QIA have issued public statements that:
- suggest abuse was limited to historic sexual assaults;
 - characterise prior reports as mere "rumours"; and
 - imply that senior management and owners were unaware of abuse until 2023.
78. These claims are incompatible with the public record and with the information available within Harrods' own archives (NDAs, medical files, internal complaints and legal records).
79. In September 2024, Harrods stated that "since new information came to light in 2023" about historic allegations of sexual abuse by Al-Fayed, it had prioritised settling claims quickly. Shortly afterwards, Harrods' Managing Director acknowledged the existence of long-standing public "rumours" but professed ignorance of "criminality or abuse."
80. It is clear that Harrods management concealed their knowledge of the abuse. Harrods had the opportunity to make a statement about their findings in 2010 during significant due diligence processes, but did not do so. Survivors ask why, in 2010, the acquisition process did not trigger a public reassessment of the long-standing claims. They also ask why no action was taken in 2017, when Harrods was reportedly given a right to reply to the Channel 4 documentary, "Al-Fayed: Behind Closed Doors", which detailed serious new allegations of

abuse linked to Harrods. Had action been taken, more women may have felt able to come forward while Al-Fayed was alive. Harrods' current owners did not create the conditions survivors describe, but they benefited from the silence that followed.

81. In 2024, Harrods announced that it would no longer enforce NDAs linked to historic abuse. Multiple law firms have publicly called on Harrods to disclose information relating to the NDAs, yet it:
 - did not proactively identify the total number of NDAs;
 - did not contact survivors bound by them; and
 - did not publish a transparent account of its internal review.
82. A robust due-diligence process at acquisition should reasonably have:
 - identified historic and ongoing abuse allegations;
 - scrutinised NDAs, medical files and internal complaints; and
 - treated these as serious human-rights and safeguarding risks.
83. Instead, there is no evidence that QIA conducted a meaningful human-rights due diligence process addressing sexual exploitation or trafficking, nor that it took appropriate steps to investigate and remediate these risks after acquisition.
84. At the same time, Harrods exhibited patterns typical of a high-risk governance environment (see Annex 2 for further details).
85. Survivors believe that the financial burden of operating and concealing a sophisticated trafficking ring – one involving hundreds of women and girls over several decades – would have had a material impact on Harrods' finances, governance decisions and internal culture. They note that many of the behaviours described publicly – opaque accounts, high turnover of executives, offshore movements of funds and aggressive suppression of scrutiny – are consistent with patterns observed in other cases where organised exploitation is enabled or concealed within legitimate-seeming institutions.
86. These factors jointly created an environment in which a large-scale trafficking operation could be financed and concealed. QIA's failure to identify and address this environment at the point of acquisition represents a historic failure of due diligence. By neglecting to investigate, QIA has obscured the mechanisms of exploitation and hindered accountability.
87. In March 2025, Harrods launched its internal compensation Scheme. The Scheme:
 - treats abuse as isolated sexual assaults and invasive medical testing;
 - does not recognise trafficking or the wider corporate network; and
 - excludes survivors abused by Ali and Salah Fayed.
88. UNGP Principles 27, 28 and 31 require States to ensure effective non-judicial grievance mechanisms and facilitate access to non-State mechanisms that are legitimate, accessible, predictable, equitable, transparent and rights-compatible.

89. Harrods' 2025 internal compensation Scheme does not meet these criteria. Its main features are:

- coverage limited to sexual assaults and wrongful medical testing linked to Al-Fayed's tenure as Chairman;
- offers of compensation, a personal apology, and an optional meeting with a senior Harrods representative.

Survivors have identified the following fundamental problems:

90. Narrow and misleading scope: The Scheme acknowledges only that Al-Fayed sexually assaulted women and girls and subjected them to invasive testing. It does not recognise trafficking, nor does it acknowledge the role of a wider corporate and personal network, coercive control, surveillance, intimidation, threats, financial manipulation or other harm. The Scheme fails to acknowledge the scale of Al-Fayed's human trafficking operation.

91. The Scheme's eligibility criteria exclude survivors abused by Ali and Salah Fayed, despite evidence that their offending was part of the same enterprise. This reinforces a "one bad man" narrative, shielding other perpetrators.

92. Lack of independence and survivor-centredness: The Scheme is designed and administered by Harrods itself. Harrods:

- sets eligibility rules;
- assesses evidence;
- determines compensation levels; and
- controls the appeals process.

93. This is directly at odds with the current international norm in institutional abuse redress, where independent statutory or quasi-judicial bodies (for example, IICSA, the Scottish Child Abuse Redress Scheme, the Australian National Redress Scheme) are established precisely to prevent institutions from sitting in judgment over their own victims.

94. By keeping decision-making in-house, Harrods reproduces the power imbalance that enabled abuse: the same institution that failed survivors now determines whether they are believed and how their suffering is valued.

95. Inadequate, minimising compensation model: Survivors are divided into "medical" and "non-medical" pathways, each with compensation ceilings. Awards include general damages, aggravated damages and work-impact payments, aligned somewhat with the Judicial College Guidelines for personal injury.

96. The Judicial College Guidelines are advisory only and based on a small subset of cases that reach trial. They were never designed as a benchmark for remedies in cases of human trafficking, organised sexual exploitation and lifelong harm. By adhering to these ceilings—and in some respects imposing caps where English courts do not, particularly on work-impact

payments and treatment costs—the Scheme trivialises and monetises profound, long-term harm.

97. Extractive and one-sided information-gathering: The Scheme requires survivors to provide extensive personal information, including:
- medical records;
 - financial records;
 - employment history; and
 - any additional documentation deemed necessary.
98. In October 2025, Harrods quietly updated the Scheme documentation to remove survivors' rights to object to Harrods using their evidence against any other adversary, for the purpose of enabling Harrods to pursue a claim against that third party. Harrods has stated that it intends to counterclaim against the Fayed Estate and that it will not settle survivors claims unless it can do so. The current executors of the Fayed Estate are Heini and Camilla Fayed – direct family members. In June 2025, Harrods reported in the press that they intended to make a passing over application to the High Court, to appoint independent executors. This was never done. Survivors see this as a disempowering appropriation of survivors' personal information and a removal of their agency. Survivors also note the safeguarding issues and conflict of interest that arise through this situation with regards the ongoing criminal investigations in the UK and France.
99. Harrods and the Fayed family thereby gain intrusive access to survivors' lives once again, while survivors have no power to compel Harrods to disclose internal HR files, security logs, NDAs, corporate medical records or due-diligence reports.
100. This one-way flow of information replicates the secrecy and power imbalance that enabled abuse. Survivors are re-exposed and humiliated, with no external oversight and no transparent appeals mechanism.
101. As a result, the Harrods Scheme functions less as a remedy than as a liability-management tool, allowing Harrods (and, by extension, its State owner) to contain financial exposure and limit public accountability while presenting the appearance of action.
102. In the absence of accessible civil litigation (as to which, see Section G) and an independent State-run redress process, the Harrods Scheme has become, in practice, the only available avenue for many survivors. This is incompatible with the UK's obligations under the Palermo Protocol, ECAT and the UNGP to ensure effective, independent remedies.
103. Survivors note that there is no information or statements from survivors exiting the Scheme. Harrods claims 150 survivors have been processed through the Scheme. A further 250+ survivors have to date opted not to access the Scheme, despite there being no alternative form of redress or accountability at present.
104. QIA has not publicly disclosed:
- any independent audit of historic abuse and trafficking risks;

- any cooperation plan with UK or UN bodies to support independent investigations; or
- any commitment to support an independent, survivor-centred redress mechanism beyond Harrods' internal Scheme.

105. This ongoing failure to conduct meaningful due diligence, ensure access to independent remedy and cooperate transparently with investigative processes constitutes a current violation of Qatar's obligations under the Palermo Protocol and UNGP Principles 1, 4, 25 and 31, and is inconsistent with Qatar National Vision 2030 commitments to transparency and human development.
106. Harrods' internal process replicates discredited models of self-policing for institutions implicated in sexual abuse. The company has reserved for itself the authority to determine whether survivors are credible, how much their suffering is "worth," and what forms of evidence are sufficient; all without oversight or appeal to an external body. This framework allows Harrods to limit both its financial liability and the scope of public accountability. The absence of external scrutiny means that decisions are unreviewable, survivors have no procedural recourse, and the process itself remains opaque. This lack of independence compounds survivors' disempowerment. By keeping decision-making in-house, Harrods reproduces precisely the dynamic that modern redress reforms sought to abolish by allowing the institution that failed survivors to control the recognition and valuation of their suffering. It denies survivors the basic procedural fairness that is now recognised as the foundation of any legitimate system of reparations.

G. ACCESS TO JUSTICE, REDRESS AND ONGOING HARM

107. Under UNGP Principle 25, the UK must ensure access to effective judicial remedies. In practice, survivors of sexual abuse and exploitation face structural barriers that make civil litigation against wealthy individuals or powerful institutions virtually impossible.
108. Key barriers include:
- Adverse costs risk – survivors risk financial ruin if they lose or if they do not "beat" a defendant's settlement offer in court.
 - Lack of affordable insurance – meaningful costs protection and insurance products are largely unavailable for abuse claims.
 - Part 36 offers – defendants can use low settlement offers coupled with draconian cost consequences to pressure survivors into accepting inadequate settlements, under threat of severe financial penalties if they proceed to trial.
 - No civil tort of trafficking – survivors cannot directly sue for trafficking and must piece together claims such as assault, negligence and harassment, which do not capture the full scope of organised exploitation.
109. Harrods has indicated that it will invoke limitation and issue a Part 36 offer to any survivor seeking to bring a civil claim in the UK courts. This effectively blocks survivors from pursuing court-based justice on their own terms and allows Harrods to use civil procedure as a tool of impunity.

H. CONTINUING VIOLATIONS

110. The harm described in this submission is ongoing. Survivors continue to suffer physically, psychologically, socially and economically from both:
 - the original exploitation and violence; and
 - the continued failure of the UK and Qatar to provide effective redress.
111. While Mohamed Al-Fayed is deceased, his network of perpetrators and enablers—including Ali Fayed and other associates—remains alive, and the institutions that facilitated exploitation (Harrods, associated companies, and State bodies) remain in place.
112. The UK's refusal to properly investigate and prosecute those who remain, its failure to treat survivors as trafficking victims, the practical unavailability of civil litigation and the reliance on an institution-controlled redress scheme together create a situation of continuing violations.
113. Survivors have no meaningful State-run forum to present their trafficking claims, seek a full investigation into the enterprise, or pursue remedies that are independent, transparent and rights-compatible.
114. The UK has failed to provide meaningful avenues for survivors to present their claims to the state. After decades of intimidation and being disbelieved, survivors are finally coming forward to lay bare Al-Fayed's crimes. However, there has yet to be a state-run forum that will accept our claims and commit to taking action to redress the harms done by Al-Fayed, his associates, and the entire network that facilitated the operation and concealment of his trafficking scheme.
115. The UK has also failed to encourage and facilitate non-judicial grievance mechanisms. The currently existing redress Scheme run by Harrods is extractive, not independent, does not provide survivors with equal access to information, opaque, and offensive in its assessment of the monetary value of remedying years on unchecked physical, sexual, and psychological harm.
116. The UK has a positive obligation to remedy the harms of Al-Fayed's trafficking. It owes the survivors legitimate avenues of recourse and punitive action against the institutions and individuals that enabled and actively facilitated and committed harms against them. As a first step, the UK has an obligation to thoroughly investigate the survivors' claims, even if they were largely committed by and through personal actors and business enterprises.
117. Harrods and QIA continue to present a limited, sanitised narrative, portraying abuse as historic, isolated and divorced from corporate structures and State responsibilities. They have not acknowledged trafficking, nor have they committed to independent investigation or redress.
118. Survivors continue to live:
 - without recognition as trafficking victims;
 - without adequate, independent remedy; and

- under the shadow of institutions that have not been held to account.

119. This continuing denial of rights falls directly within the Special Rapporteur’s mandate and constitutes an ongoing breach of obligations under the Palermo Protocol, UNTOC, ECAT and the UNGP by both the UK and the State of Qatar.

RECOMMENDATIONS

1A. Recommendations to the UK

120. Based on the above information, we submit that the UK has violated its obligations under the Palermo Protocol to criminalise trafficking conduct, protect and assist victims, ensure they are informed of relevant proceedings, and cooperate internationally in the investigation and prosecution of such offences. The widespread and egregious harms carried out under Al-Fayed's trafficking enterprise merit a full investigation and redress for survivors conducted through independent and unbiased channels. Unfortunately, the UK has demonstrated that it is either unwilling or unable to meet its obligations vis-a-vis properly investigating and prosecuting Al-Fayed's trafficking and the collaborative actions of his associates and various involved institutions. The UK has also failed at being transparent with survivors about the status of their claims and the ongoing—if at all existent—investigation. Based on the above, we respectfully request that the Special Rapporteur:

121. Issue a formal communication to the UK acknowledging that Mohamed Al-Fayed, together with Ali and Salah Fayed and numerous accomplices, used Harrods and other corporate and personally owned entities to enact a trafficking scheme that targeted and victimised over 400 women and girls.

122. Examine the Al-Fayed case as a primary illustration of systemic failures in trafficking identification and investigation in the UK, including:

- misclassification of complex trafficking enterprises as isolated sexual offences; and
- the use of RASSO frameworks without integration of trafficking expertise.

123. Assess the UK’s compliance with its obligations under:

- the Palermo Protocol;
- UNTOC;
- ECAT;
- the Modern Slavery Act 2015 and earlier trafficking legislation; and
- the UNGP,

with particular attention to the performance of the Metropolitan Police and the Crown Prosecution Service.

124. Recommend a prompt, thorough and independent review of how both State and private actors—including the Met, CPS, central government and Harrods—have responded to trafficking and exploitation in this case, to:

- identify institutional failures;

- address potential complicity, including corruption and cover-up; and
 - strengthen accountability and safeguarding frameworks.
125. Encourage the UK to establish an independent redress scheme for survivors of the Al-Fayed trafficking enterprise that is:
- fully independent of Harrods and its owners and the Fayed family;
 - survivor-centred;
 - trauma-informed; and
 - designed with meaningful survivor participation.
126. Recommend reforms to civil-justice barriers, including:
- the creation of a specific civil tort of trafficking;
 - improved costs protection and insurance availability for survivors; and
 - reform of Part 36 rules where they operate to coerce survivors into low settlements.
127. Consider a country visit to the UK to:
- investigate the Al-Fayed trafficking enterprise;
 - examine the Met's ongoing inaction and RASSO-only framing; and
 - review broader systemic obstacles to justice for trafficking survivors.
128. Urge the UK to formally recognise survivors as trafficking victims and to:
- reopen the investigation under a trafficking and organised crime lens;
 - ensure survivors are informed of relevant proceedings and able to participate; and
 - ensure that both criminal and civil pathways to accountability are accessible and effective.

1B. Recommendations to the State of Qatar

129. Given Qatar's ratification of the Palermo Protocol, its sovereign wealth fund's ownership of Harrods creates a direct duty to cooperate with UK authorities, disclose relevant information, and ensure an independent and survivor-centred redress mechanism. Qatar's failure to do so undermines both its treaty obligations and its stated commitments under the Qatar National Vision 2030, which emphasises transparency and human development.

Accordingly, we also urge the Special Rapporteur to:

130. Request a detailed explanation from the State of Qatar regarding:
- the human-rights due-diligence measures QIA undertook at the time of Harrods' acquisition in 2010; and
 - any subsequent reviews or investigations into historic and ongoing abuse, trafficking and governance risks at Harrods.
131. Recommend an independent audit of QIA's compliance with:

- the UNGP, especially Principles 1, 4, 25 and 31; and
- obligations under the Palermo Protocol,

in relation to its ownership and oversight of Harrods, including its response to historic allegations, NDAs, medical files and survivor testimony.

132. Encourage Qatar's full cooperation with UK and UN mechanisms, including:

- disclosure of relevant documents and information to independent investigations and redress bodies;
- support (including financial support) for an independent, survivor-centred redress scheme that is not controlled by Harrods; and
- alignment of its sovereign investment practices with its Qatar National Vision 2030 commitments to transparency, human development and the rule of law.

Annex 1 – Metropolitan Police Communications and RASSO Framing

- 26 Sept 2024: Met announces an “investigation into sexual offences including rape by Mohamed Al-Fayed.”
- 28 June 2025: Met describes the investigation as focusing on “the many allegations of sexual violence committed by Mohamed Al-Fayed and anyone who may have facilitated his crimes.”
- 11 Aug 2025: Senior officer states that a range of offences is being considered but emphasises aiding and abetting sexual offences; trafficking is not mentioned.
- 12 Sept 2025: Statement that “all aspects of this case and any criminality arising” will be explored, without reference to trafficking.
- 7 Nov 2025: Met informs survivors that French authorities have launched an investigation into “the handling of sexual abuse allegations involving Mohamed Al-Fayed,” omitting that France is investigating aggravated human trafficking.

Additional indicators that a modern slavery framework is not being used:

- Investigation led by Cornpoppy RASSO team with public emphasis on rape/sexual violence expertise; no indication of trafficking-specialist officers.
- No survivors known to have been referred into the NRM.
- In one case, the Met privately confirmed that a survivor’s experience constitutes trafficking but said it would not be formally recognised as such because the abuse pre-dated domestic legislation.
- A victim of Salah Fayed (with no link to abuse by Mohamed) reportedly received no response after contacting police.
- A recent private communication stressed the need to “prioritise” lines of inquiry, suggesting trafficking offences may be deprioritised.

Annex 2 – Corporate Governance, Financial Irregularities and the Enabling Environment

Auditor resignation and restructuring

- In 2002, PricewaterhouseCoopers (PwC) resigned as Harrods' auditors despite an annual fee of approximately £700,000, and simultaneously resigned from FeatureCode, a shell company with directors now identified by survivors as facilitators.
- PwC was reported as being "tired of being given the runaround"; the Financial Times ironically headlined its coverage "There is no story here."
- In the same period, a judge ruled unlawful an exceptionally favourable forward tax agreement previously granted to the Fayed brothers; Mohamed Al-Fayed's appeal failed and he moved his tax domicile to Switzerland.
- Harrods underwent significant corporate restructuring (from Harrods Holdings PLC to Harrods (UK) PLC), with increased inter-company loans, dividends and fund movements.

Organisational culture and mismanagement

- Harrods' own legal counsel admitted chronic use of unlawful dismissals, with 32 unfair-dismissal cases in one year versus 2 at Selfridges (with comparable staff numbers).
- A planned flotation in 1996 collapsed after Salomon Brothers failed to find any major bank willing to participate; a senior executive told Ali Fayed that Harrods could not function with "structured boards, public controls, non-executive directors and accountability."
- City analysts repeatedly raised concerns about capital depletion, opaque offshore structures and substantial dividend extraction, with one stating: "I've never seen such fast capital decline... Fayed is using Harrods as a private piggy bank."

Cash-based mechanisms and bribery

- Weekly cash withdrawals of £40,000–£120,000.
- A locked briefcase of cash kept by Al-Fayed.
- Regular delivery of large cash sums to the Fayed family by senior banking staff.
- Routine bribery of associates and officials with envelopes of cash.

Survivors believe this cash economy financed and concealed the trafficking operation and the network of facilitators.

Networked offending

- Allegations of sexual abuse by Mohamed Al-Fayed from the late 1970s to at least 2014.
- Similar patterns of abuse involving Harrods employees by Salah and Ali Fayed.
- Many survivors report abuse by more than one perpetrator or by a Fayed and another connected individual, consistent with trafficking networks rather than isolated offences.

Annex 3 – Known Locations and Conduits of abuse and exploitation

Locations:

- Harrods
- The Ritz Paris
- Hyde Park Residences
- Balnagown Estate
- Villa Windsor
- a privately-owned residence at Rue Arsene Houssaye in Paris
- privately-owned Castel Sainte-Thérèse (St Tropez)
- MY Sakara (yacht)
- SY Ramses (yacht)
- a private estate in Belle Haven, Connecticut
- privately-owned chalets in Gstaad, Switzerland.

Conduits for victims:

- Harrods
- The Ritz Paris
- Hyde Park Residences
- Fulham FC
- West Heath School