



NO ONE ABOVE (NOA) | Parliamentary Briefing | May 2026

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The Al Fayed Trafficking Enterprise: A Proposed Home Affairs Committee Inquiry
Parliamentary Briefing for Paul Kohler MP and Dame Karen Bradley MP

May 2026

Executive Summary

The sexual abuse, rape and trafficking of women and girls by Mohamed Al Fayed, his brothers and other associates and the facilitation of the same via Harrods and other corporate entities (the Fayed Trafficking Enterprise) and the continuing lack of criminal accountability for the same, is one of the most significant institutional failures in modern British law enforcement.

This briefing focuses on the current failings of the Metropolitan Police (the Met)'s ongoing investigation and state response. There are more than 500 known survivors connected to the Fayed Trafficking Enterprise, with 154 statements having been given to the Met over more than eighteen months of investigation.

While the French investigation into the Fayed Trafficking Enterprise is examining aggravated trafficking, the Met appears to be focused on isolated sexual assaults. In fact, the Met only added modern slavery officers to their investigative team in 2026, following pressure from survivors and advocates.

The Met made no Fayed Trafficking Enterprise National Referral Mechanism (NRM) referrals prior to April 2026 and every such NRM referral made before this date — including the first to reach a conclusive grounds decision, which confirmed a survivor as a victim of human trafficking — has come from No One Above (NOA)'s campaign, via Unseen UK. This despite the Met having a statutory duty to make these referrals as a First Responder organisation.

On 5 May 2026, GRETA — the Council of Europe's expert monitoring body on trafficking — published its fourth evaluation report into the United Kingdom. The report addresses the Fayed Trafficking Enterprise directly, citing NOA's submission by name and footnote. In paragraph 171, GRETA recorded that NOA's submission expressed concern that the Met decided not to investigate the Fayed Trafficking Enterprise as human trafficking but as isolated sexual assaults, despite the obvious hallmarks of trafficking and the involvement of an organised trafficking enterprise. GRETA further noted that in November 2025, the French authorities had opened an investigation on the grounds of aggravated human trafficking in respect of the Fayed Trafficking Enterprise and that the “abuses were reportedly facilitated by the involvement of the personnel and resources of Harrods’s corporate infrastructure”.

GRETA's formal recommendation to the UK was that these trafficking offences be investigated and prosecuted as such rather than as lesser offences.

NOA requests an urgent meeting with you both to discuss the formalisation of a Home Affairs Committee Inquiry. We are asking that NOA's framework be treated as the basis for any Terms of Reference the committee develops. This briefing sets out that framework. Separately, we will send a copy of this briefing to the APPG on victims of Fayed and Harrods.



About No One Above (NOA)

NOA is a survivor-led advocacy organisation founded by survivors of the Fayed Trafficking Enterprise. Our work has produced:

- The first conclusive grounds NRM decision in the Fayed Trafficking Enterprise case (April 2026);
- Every NRM referral made in the Fayed Trafficking Enterprise case up to April 2026;
- Formal engagement with the Home Office, the Safeguarding Minister, the Independent Anti-Slavery Commissioner, GRETA, the UN Special Rapporteur on Trafficking, the Council of Europe Commissioner for Human Rights, and the US State Department TIP Office; and
- Written evidence to the Home Affairs Committee, the Justice Committee, the Public Accounts Committee, and the Home Office Modern Slavery Call for Evidence.

We are prepared to provide substantial written and oral evidence to any inquiry and ask that provision be made for survivor evidence to be heard anonymously and with trauma-informed support.

Why This Inquiry Is Necessary

The failures in the Fayed Trafficking Enterprise case are systemic, ongoing, and consequential for hundreds of survivors whose access to justice continues to be foreclosed by decisions that have never been subjected to parliamentary examination, namely:

Investigatory framework failure. The Met's investigation has centred the Fayed Trafficking Enterprise case primarily under Rape and Serious Sexual Offences (RASSO) frameworks rather than the Modern Slavery Act 2015 and associated trafficking legislation. This is a structural decision that limits the investigation's reach to individual criminal acts against individual complainants while excluding from scrutiny wider perpetrators and the trafficking network — the doctors, lawyers, HR directors, security and financial professionals — whose knowledge and active participation sustained this operation for over four decades.

Article 4 ECHR - positive obligation to investigate trafficking. The Met's obligation to investigate trafficking is not dependent on survivor referrals or consent. Under Article 4 ECHR, the state has a positive obligation to investigate where there are reasonable grounds to suspect trafficking – an obligation that is proactive and ex officio. Those grounds existed from September 2024. Whether they existed prior to this is a matter of a statutory public inquiry.

NRM failure. Despite eighteen months of investigation and 154 formal complaints, the Met made no NRM referrals prior to April 2026, leaving survivors to make those referrals through Unseen UK off their own initiative. This is a complete failure of the Met's statutory obligations under the Modern Slavery Act 2015.

Independent oversight failure. Despite several investigations, including a 1990s DPS investigation, a 2024 IOPC-directed DPS investigation into five officers' handling of 2008 complaints and a separate investigation into 21 further historic reports, there has been no accountability for the structural choices which underpin the Met's investigation and continue to determine what justice is available to survivors today. The findings of the 1990's DPS investigation have not been disclosed. There are serious allegations that the Met itself was used by Al Fayed to silence and intimidate survivors and to cover up his tracks. The cumulative picture, from suppressed investigations to repeated complaint handling failures, raises a serious question which the Committee must put directly: is the Met



capable of independently investigating a case in which its own institutional history is part of the subject matter?

[Civil redress failure](#). Judicial College Guidelines fail to reflect the severity and duration of trafficking harm; Part 36 offers deter litigation against well-resourced defendants and there is no standalone civil tort of trafficking in English law. GRETA has now formally recorded that survivors are being forced to rely on causes of action that are structurally unsuitable for their circumstances, and NGOs are actively calling for a dedicated trafficking remedy.

[Evidence at risk](#). We are unaware of any formal preservation requirements to documents held by Harrods, the Al Fayed estate, or associated professional and corporate entities.

This is not a series of isolated failures. It is a systemic pattern of negligence, ineptitude and apathy by the Met and state authorities.

NOA's Proposed Inquiry Framework

The following areas must, in NOA's assessment, be covered by any Terms of Reference.

1. The Met: Investigatory Strategy and Framework Decisions

Any inquiry must examine:

- The Met's decision, as evidenced by its communications to survivors, to investigate the Fayed Trafficking Enterprise primarily under RASSO frameworks rather than the Modern Slavery Act 2015 and associated trafficking legislation. This should include when that decision was made, by whom, and whether it was ever reviewed or challenged internally. This must include whether the decision-makers had regard to any existing information, including the established pattern of prior survivor reporting from the 1990's onwards and the police corruption investigations, including the 1990's DPS investigation into officers acting on Al Fayed's behalf to silence complainants. The investigatory strategy cannot be assessed in isolation from that institutional history. Whether the decision to investigate individual sexual assaults rather than an organised trafficking network was in any way informed by knowledge of corrupt relationships between the Met and Harrods must be considered.
- On what basis the Met concluded that its positive obligation under Article 4 ECHR – to investigate trafficking proactively, without waiting for survivor referrals or complaints – did not apply or had been discharged.
- Whether the RASSO framing was assessed for its effect on the scope of investigation, including its structural inability to reach further perpetrators, wider alleged enablers, and third-party facilitators.
- How the Met defined the parameters of the Fayed criminal network, and whether all perpetrators and enablers, individual and institutional, fall within the current scope of investigation. GRETA's fourth evaluation report records that the abuses were reportedly facilitated by Harrods's corporate infrastructure. Between 2005 and 2010, at least three payments were made to women who had complained about Al Fayed's conduct, including a six-figure sum routed through the Harrods payroll. When Harrods was sold to the Qatari sovereign wealth fund in 2010, legal advisers must have conducted acquisition due diligence on a company subject to numerous abuse allegations, police scrutiny, and compelled NDAs and yet still approved the sale.



- The extent to which financial investigation and intelligence-led approaches have been deployed, given the material consequences that failing to deploy these approaches has on the outcome of any criminal investigation and GRETA's documented finding that these tools are under-developed across UK law enforcement.
- What changes, if any, have been made to the investigatory framework since 2024, and the rationale for those changes.
- Whether the Met has initiated or sought formal judicial cooperation with French authorities, following France's opening in November 2025 of an aggravated human trafficking investigation into the same perpetrators and alleged accomplices. The French investigation is framed on precisely the trafficking basis the Met has declined to adopt. Without formal cooperation, the two investigations risk running in parallel with no evidence sharing, no witness coordination, and potentially conflicting processes that could prejudice both. The committee should examine what cooperation has been sought, what mechanism is in place or proposed, and whether the absence of formal coordination reflects a deliberate choice about the scope of the Met's own investigation.

2. Failure to make NRM referrals

Any inquiry must examine:

- The Met's NRM referral record in the Fayed Trafficking Enterprise, as detailed above. Under the Modern Slavery Act 2015, the Met has a statutory duty to refer potential victims with their consent, and where consent is absent, a duty to notify the Home Office. The threshold is reasonable suspicion only — it is not a prosecution decision, is not dependent on the date of the abuse and has no bearing on which legislation was in force when the offending took place.
- The Met told the BBC it had no obligation to refer survivors whose exploitation predated the Modern Slavery Act 2015. This is wrong. The Independent Anti-Slavery Commissioner has confirmed to NOA that historic cases are fully eligible for NRM referral and that the duty applies from the point of identification regardless of when exploitation took place. The Committee should thus examine how the Met came to make that statement, whether it reflects the Met's understanding of its statutory obligations, and what steps have been taken to correct the public record.
- The criteria by which the Met identifies trafficking indicators among survivors, and its application of the statutory definition under the Modern Slavery Act 2015.
- Whether the Met has applied trafficking-specific investigatory frameworks alongside RASSO frameworks, and whether and when Modern Slavery Act units have been integrated into the investigation.
- The Home Office's oversight of NRM referral practice by police forces, and whether the current regulatory framework provides adequate accountability for failures of this scale.

3. The IOPC: Adequacy and Scope of Oversight

Any inquiry must examine the question of whether the oversight framework for the Met investigation is adequate:

- Whether the IOPC's statutory powers are sufficient to investigate institutional corruption of the depth alleged in this case.



- Whether the IOPC has examined the strategic and structural decisions governing the current Met ‘Operation Cornpoppy’ investigation, or whether its oversight has been confined to historical complaint handling.
- What recommendations the IOPC has made thus far and what actions the Met has taken in response.
- Whether the IOPC's oversight has been commensurate with the scale and seriousness of the case and if not, what additional powers or resourcing are required.

4. The Absence of State Oversight of Civil Redress

Any inquiry must examine:

- Whether any government body is currently monitoring or providing oversight of the civil compensation landscape for Fayed Trafficking Enterprise survivors.
- The Harrods redress scheme — launched by the Qatar Investment Authority in March 2025 — is operating with no state or independent oversight. Any inquiry must examine whether a private redress scheme operating with no independent oversight and terms that risk compromising safeguarding and criminal evidence is consistent with the state's obligations to trafficking survivors and how this can be remedied.
- The adequacy of the Judicial College Guidelines in valuing harm arising from sustained trafficking and sexual exploitation.
- The effect of Part 36 offers on survivors' capacity to pursue claims against well-resourced defendants, and whether the current costs framework deters litigation in cases of personal injury where Qualified One Way Costs Shifting (QOCS) applies.
- The absence of a standalone civil tort of trafficking in English law. The current available causes of action, such as assault, battery, harassment, false imprisonment, and breach of contract, are structurally unsuitable for trafficking cases. The GRETA report records that NGOs are actively calling for a dedicated civil remedy. This requires a legislative response.
- Whether the current compensation framework — criminal and civil — enables survivors to obtain compensation for the full damage suffered as part of their exploitation. GRETA's report formally urges the UK authorities to ensure this.

5. Evidence Preservation

Any inquiry must examine:

- What steps have been taken to ensure the preservation of documents, communications, and records held by Harrods, the Al Fayed estate, and associated corporate and professional entities, including by the Qatari Sovereign Wealth Fund (Harrods' current owner) as of 2010.
- The Harrods redress scheme terms raise acute evidence preservation concerns. Namely, applications are required to provide detailed personal disclosures, including medical records and accounts of abuse, which may in turn be shared with the Al Fayed estate's legal representatives. NOA has written to the Met asking it to examine the safeguarding and criminal justice implications of this current arrangement. The Met responded by noting that the risks identified were “broad and hypothetical”. The Committee should examine why the Met has not taken steps to protect the evidential integrity of survivor disclosures made under the scheme and whether the current framework adequately protects evidence from being accessed by parties with a direct interest in the outcome of the criminal investigations.



6. The Case for a Statutory Public Inquiry

A Home Affairs Committee inquiry is the right mechanism to examine current and ongoing failures. It is not, however, the right mechanism to examine the historical failures. Determining how a trafficking network persisted for four decades while evading law enforcement requires compelled disclosure from state and private actors — disclosure that a Select Committee has no power to compel. NOA asks the Committee to recognise that boundary and to conclude this inquiry with a formal recommendation to the Home Secretary that a statutory public inquiry be established.

Any inquiry must consider:

- Whether the above constitutes a pattern of state conduct that exceeds what a Select Committee Inquiry can adequately address.
- Whether the Fayed Trafficking Enterprise meets the threshold for a statutory public inquiry under the Inquiries Act 2005.
- What form such an inquiry should take, including scope, powers, independence, and survivor participation and anonymity provisions.

This case is not only about the wide scale sexual abuse and human trafficking which the Fayed, associates, Harrods and related entities carried out over four decades. It is also about what has or has not happened since September 2024, when the full scale of their crimes began to be publicly known.

The failure to identify and investigate trafficking is not a historical failure, but a current and ongoing one. When France opened its aggravated human trafficking investigation in November 2025, Britain did not follow. The Met made no NRM referrals prior to April 2026 and has shown no discernible appetite to pursue the wider trafficking network which facilitated the Fayed, despite extensive public evidence.

The deeper question this case raises is whether Britain has an institutional culture of impunity when elite perpetrators are involved. The complaints in this case were made, recorded, and managed away across four decades. The corporate infrastructure and institutional apathy that sustained the Fayed Trafficking Enterprise was never scrutinised. The police officers who facilitated the suppression of evidence faced no consequences. Living perpetrators are still not being questioned. This is not coincidence. It is the predictable outcome of a police force and state that has consistently declined to deploy the full force of the law against those with the power and resources to resist it.

NOA's position is that a statutory public inquiry is necessary to examine how powerful perpetrators and their networks evade the law, what structural features of policing, oversight, and civil redress make that evasion possible, and what legislative and institutional change is required to end it.

The public must be protected from exploitation by those who consider themselves above the law. That requires not simply a reckoning with one man's crimes but a reckoning with the system that protected him. We ask the Committee to make a formal recommendation to the Home Secretary to that effect.



A Note on Joint or Parallel Scrutiny

Several of the areas above fall more naturally within the jurisdiction of the Justice Committee. NOA has already provided evidence to the Justice Committee Access to Justice Roundtable in March 2026. We would welcome your view on whether a joint or sequential approach across both Committees would be more effective, and whether the Justice Committee's ongoing work provides a vehicle for parallel engagement.

Our Key Asks

We are requesting a meeting with you as a matter of urgency to discuss:

- The Committee's appetite and timeline for formalising a Home Affairs Committee Inquiry;
- How NOA's framework can be incorporated into any Terms of Reference;
- The appropriate role for survivor evidence, including anonymity and trauma-informed arrangements;
- Whether a parallel or sequential engagement with the Justice Committee on civil redress is appropriate; and
- A formal committee recommendation to the Home Secretary that a statutory public inquiry be established under the Inquiries Act 2005.

We are available to meet at Westminster or by video call. Please direct any response to Paul Kohler MP and No One Above: contact@nooneabove.org

No One Above

contact@nooneabove
www.nooneabove.org