



Detective Chief Superintendent Angela Craggs
Metropolitan Police Service (MPS)
Operation Cornpoppy

Rt Hon David Lammy MP
Lord Chancellor and Secretary of State for Justice
Ministry of Justice

Rt Hon Shabana Mahmood MP
Secretary of State for the Home Department
Home Office

Rt Hon Kier Starmer KCB KC MP
Prime Minister

Jess Phillips MP
Minister for Safeguarding

10 May 2026

Operation Cornpoppy - NRM Referrals and Investigative Scope

Dear DCS Craggs, Prime Minister, Home Secretary, Justice Secretary and Jess Phillips,

No One Above (NOA) writes in connection with the MPS's handling of the Al Fayed case.

For eighteen months, Operation Cornpoppy has investigated a case in which trafficking indicators were present and visible. During that entire period, the MPS identified no potential victims of trafficking for NRM referral.

Following multiple denied FOI's, NOA asked the APPG for victims of Fayed and Harrods to write to the Home Office with questions about NRM referrals in the case. In a written response in February 2026, Jess Phillips confirmed that only two NRM referrals had been received across the entire Fayed case. While Jess did not note this in her letter, neither referral had been made by the MPS.

In April, the Home Office issued a conclusive grounds decision formally confirming that a survivor connected to this case is a victim of human trafficking. This decision was reached through survivor initiative, via NOA's NRM campaign and Unseen UK, not through police action. The number of referrals via Unseen UK and related conclusive grounds decisions has now risen.

We are aware that, following the first conclusive grounds decision, the MPS has begun contacting survivors to ask whether they wish to be referred into the NRM. This is a reactive response to an outcome the MPS played no part in achieving. It is not a demonstration of proactive compliance with its statutory duty. The MPS has had ample opportunity to refer survivors to the NRM. There has been consistent police activity in connection with Al Fayed since the Modern Slavery Act 2015.

The failure to identify trafficking indicators across eighteen months speaks to a structural problem in how this investigation has approached victim identification and the framing of the investigation itself. Where trafficking indicators are present, as they are in abundance in the Fayed case, each individual case must, as a statutory duty, be assessed against the NRM threshold. The threshold is deliberately low — reasonable grounds to suspect — and it applies regardless of whether prosecution is viable and regardless of when the exploitation occurred.



In her letter of February 2026, Jess went on to say that the absence of further referrals did not require examination: referrals had been received, therefore the question of why more had not been made did not arise. NOA considers this position untenable. The question is not whether referrals existed, it is why the police made none and what that tells us about how this investigation is being conducted.

Survivors and the public need confidence in the investigation that purports to represent them and that it is capable of delivering accountability for the full scope of what was done to the victims. The failure to identify victims of trafficking and the related narrow investigative framing makes the current investigation structurally incapable of following where the evidence leads.

We are asking the MPS to confirm in writing:

1. Framing of the investigation

Now that trafficking has been formally confirmed by the Home Office, can the MPS confirm whether Operation Cornpoppy will be conducted as both a RASSO and a Modern Slavery and Human Trafficking investigation, and that specialist modern slavery officers within the Specialist Crime Directorate are actively involved in the investigation alongside RASSO-trained investigators – with the investigation pursuing trafficking offences as its primary framework? This would mean, among other requirements, examining financial flows and the movement of money used to facilitate and conceal abuse, investigating all perpetrators and the full network of those who recruited, harboured, transported and facilitated, and treating the criminal operation – not only its primary perpetrator – as the subject of investigation.

2. Joint investigation with France

Given the known movement of victims across jurisdictions, will the MPS establish a joint investigation with French authorities, who are already investigating aggravated trafficking?

3. NRM assessment and referral

Every survivor deserves the same standard of assessment, and reassurance that the entity conducting these assessments is competent to do so and to make adequate referrals. The criteria being applied, the training of those applying them, and the oversight of decisions not to refer must all be transparent and subject to external accountability. What criteria is the MPS currently using to assess whether survivors connected to Operation Cornpoppy meet the threshold for NRM referral? Given its failure to identify trafficking indicators across eighteen months of investigation – indicators now formally confirmed by the Home Office – can the MPS provide assurance to survivors that it is properly equipped to conduct those assessments and carry out referrals in respect of both international and domestic trafficking cases?

Given the inaccuracies in the MPS's statements to survivors and the public on its statutory duties in respect of victims of trafficking, we have annexed to this letter a detailed overview of these duties as against the MPS's statements. We would be grateful for confirmation that this has been reviewed and steps taken to correct inaccuracies of understanding.

NOA is available to meet to discuss these concerns. Survivors have direct and material interests in the adequacy of this process, and we consider it important that the MPS is able to demonstrate — to survivors, to oversight bodies, and to the public — that its obligations under the Modern Slavery Act are being properly discharged.



We ask for a written response within 21 days. Please acknowledge receipt and confirm the name of the officer responsible for responding.

Yours faithfully,

No One Above (NOA)

contact@nooneabove.org

www.nooneabove.org



ANNEX

NRM Referral Obligations — Mohamed Al Fayed / Operation Cornpoppy

Background to Our Concerns

As a designated First Responder Organisation under the Modern Slavery Act 2015, the MPS is under a statutory duty to identify potential victims of trafficking and modern slavery. Where there are reasonable grounds to believe a person may be a victim, and where that person gives their consent, the police must refer them into the NRM. Where consent is not given — or where it cannot be obtained — they are subject to a separate and distinct Duty to Notify the Home Office. These are independent obligations. Neither is contingent on prosecutorial viability and both apply to historic cases.

The threshold for an NRM referral is deliberately low. It requires only a reasonable suspicion that a person may be a victim, based on recognised indicators such as control, exploitation, or deception. No definitive proof is required, and the referral decision itself is not a finding of fact.

We are concerned that the MPS has not met this standard in connection with the Fayed investigation. Our concerns arise from three related failures.

First, to our knowledge, prior to the April 2026 survivor update, the MPS made no NRM referrals of its own motion across the entirety of this investigation. Every referral made to that date was initiated by survivors themselves, through NOA's NRM campaign, via Unseen UK. It was only following those referrals via Unseen UK that the MPS indicated it would consider making referrals — a position that itself gives rise to concern, since the duty to identify and refer arises at the point of identification.

The Modern Slavery Act 2015 and its associated Regulations make clear that the duty to refer applies regardless of when the trafficking occurred. The definitions are explicit on this point:

“In these Regulations — ‘human trafficking’ means — (a) conduct which constitutes an offence under section 2 of the Act, or would constitute an offence under that section if the person responsible for the conduct were a UK national, or (b) conduct which would have been within paragraph (a) if section 2 had been in force when the conduct occurred.”

Sub-paragraph (b) is the operative provision. It expressly extends the definition — and therefore the referral duty — to conduct that predates the Act's commencement in 2015. Where a first responder has reasonable grounds to believe a person may be a victim of trafficking, the statutory duty to refer arises irrespective of whether the abuse occurred before or after the Act came into force. There is no temporal exemption. The MPS, as a designated first responder, was bound by this duty in respect of the Al Fayed survivors.

Second, there has been a demonstrated difficulty in the MPS understanding the duty to refer or notify as distinct from the ability to prosecute. These are separate questions. A referral into the NRM is not contingent on the viability of prosecution under relevant legislation.

Third, a representative of the MPS stated — in the context of a report broadcast by the BBC on 29 April — that the force had no obligation to make NRM referrals in respect of cases involving exploitation that took place before the Modern Slavery Act 2015 came into force. That statement is incorrect.

To be clear, the duty to notify and the NRM referral process apply from the point of identification of a potential victim, regardless of when the underlying exploitation took place. The Home Office's own



statutory guidance (section 2.4) states that specified public authorities are required to notify the Home Office about any potential victim of modern slavery they encounter — a duty that arose on 1 November 2015 and is not qualified by the date of the exploitation.

The IASC has further advised NOA on the applicable framework. On the question of whether obligations extend to historic cases, the IASC confirmed:

"The duty to notify and referral applies from the point of identification, regardless of when the exploitation took place."

On the threshold for identification, the IASC confirmed:

"The threshold is deliberately low at the identification stage. If there are reasonable grounds to suspect someone may be a victim — based on indicators such as control, exploitation, or deception — police should refer into the NRM. No definitive proof is required at this point."

And on the investigatory scope:

"Police investigations into trafficking must go beyond individual suspects to examine wider networks, recruitment chains, premises, financial activity, and potential institutional complicity."

The consequences of the Met's failure to refer are not confined to individual survivors. Where the police do not make referrals they are obliged to make, the Home Office is denied information that is material to the accuracy of its decisions. The integrity of the NRM depends on First Responders performing their identification and referral functions properly.

Applicable Authorities

For completeness, the principal authorities NOA relies upon are as follows:

- Modern Slavery Act 2015, s.52 — duty to notify the Secretary of State where a public authority has reasonable grounds to believe a person may be a victim of slavery or human trafficking;
- Modern Slavery Act 2015 (Duty to Notify) Regulations 2015, s2 — the duty to notify applies even where the trafficking conduct predates the Modern Slavery Act 2015;
- Home Office, Statutory Guidance on Modern Slavery (current edition), section 2.4 — the duty to notify has applied since 1 November 2015 and is not limited by the date of the underlying exploitation;
- College of Policing, Modern Slavery Authorised Professional Practice — designation of police as First Responders, with obligations in respect of identification, NRM referral, Duty to Notify, safeguarding, and evidence preservation;
- Independent Anti-Slavery Commissioner — advice provided to NOA confirming that the NRM referral threshold is reasonable suspicion only, that historic cases are eligible, and that referral and notification obligations are independent of prosecution decisions;
- National Referral Mechanism statistics UK, quarter 1 2020: January to March second edition — official NRM statistics have long recorded referrals for adults exploited as children, indicating that the mechanism accommodates conduct that may predate the Modern Slavery Act 2015; and
- ECAT (Council of Europe Convention on Action against Trafficking in Human Beings) — entitling identified victims to access support, which the NRM process enables.