



SUBMISSION FOR THE 2026 TRAFFICKING IN PERSONS REPORT

To: U.S. Department of State, Office to Monitor and Combat Trafficking in Persons

From: No One Above (NOA)

Date: 27 February 2026

Subject: United Kingdom's Institutional Failures in Responding to Mohamed Al-Fayed's Labour and Sex Trafficking Enterprise

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 Office to Monitor and Combat Trafficking in Persons in response to its request for information for inclusion in the 2026 Trafficking in Persons Report. This submission demonstrates that the United Kingdom (UK) has failed to meet the Minimum Standards for the Elimination of Trafficking as set forth in Section 108 of the Trafficking Victims Protection Act (TVPA).
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 but was primarily facilitated in the UK and France through Al-Fayed-owned entities such as Harrods, Hyde Park Residences, the Ritz Paris, private aviation, 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 TVPA.
3. **Failure to Vigorously Investigate and Prosecute (§ 108(b)(1)):** The TVPA requires that a government “vigorously investigate and prosecute acts of severe forms of trafficking.” The UK fails this standard by misclassifying a multi-decade trafficking enterprise as isolated sexual offenses. Despite at least 147 formal survivor statements—21 of which made during Al-Fayed’s lifetime—the Metropolitan Police (the Met) has siloed the cases to a Rape and Serious Sexual Offences (RASSO) team rather than appropriately assigning the case to a designated trafficking team. By focusing on whether individuals “aid[ed] and abett[ed]” in offences rather than the actual acts (recruitment, harbouring, transportation), means (coercion, deception), and purpose (sexual



exploitation) of trafficking, the UK has granted effective immunity to the network of corporate, medical, and security enablers who remain within its jurisdiction.

4. **Failure to Protect Victims (§ 108(b)(2)):** The TVPA requires governments to “protect victims of severe forms of trafficking,” “encourage their assistance in investigations,” and provide “legal alternatives” to hardship. The UK has failed to proactively identify or refer more than 400 survivors of Al-Fayed’s trafficking network to the National Referral Mechanism (NRM), being the UK’s statutory framework for identifying and supporting potential victims of modern slavery and human trafficking. Instead of implementing a state-led, victim-centred protection framework, survivors are funnelled into a private, non-independent “redress scheme” administered by Harrods—the very entity that harboured their abusers—forcing victims to negotiate directly with those who facilitated their exploitation. This arrangement lacks independence, denies participatory rights required under international standards, and represents the antithesis of victim-centred protection. Compounding these failures, the UK’s prohibitive “loser pays” civil litigation rules impose a structural barrier to justice, penalizing survivors for pursuing accountability and directly undermining the TVPA’s mandate to encourage victim cooperation in investigations

5. **Failure to Prevent Trafficking (§ 108(b)(3)):** The TVPA requires governments to adopt measures to prevent trafficking and educate the public about its causes and consequences. The UK has failed to dismantle the trafficking-enabling infrastructure embedded within elite corporate environments, where Al-Fayed utilized company-employed doctors and security personnel to exert coercive control over victims. Compounding this failure, the UK has permitted the continued use of broad non-disclosure agreements (NDAs) in cases involving sexual misconduct and exploitation. Although the UK Government has acknowledged concerns about the misuse of NDAs and undertaken consultations and limited sector-specific reforms in recent years, no comprehensive statutory restriction applies in cases involving trafficking or organized sexual exploitation across the corporate sector. While UK law preserves the right to report criminal conduct to police and to make protected disclosures to regulators, confidentiality clauses may still restrict broader public disclosure and limit public scrutiny of systemic abuse and so utilised to silence survivors, suppress reporting, and obstruct public awareness of trafficking abuses—precisely the mechanism Harrods employed to conceal the abuse and prevent victims from speaking out. The absence of comprehensive statutory limits in trafficking-related contexts risks facilitating concealment rather than prevention. These failures demonstrate the absence of the “serious and sustained efforts” required to eliminate the conditions that allowed this trafficking enterprise to operate with impunity for more than three decades.



B. Factual Background: The Al-Fayed Trafficking Enterprise

B1. Scope and Structure of the Enterprise

6. Mohamed Al-Fayed ran 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.
7. The operation spanned the globe but was primarily facilitated in the UK and France through Al-Fayed owned entities such as Harrods, Hyde Park Residences, the Ritz Paris, private aviation, yachts and residences and a network of corporate, medical, security, administrative and personal actors across Harrods and other Al-Fayed-controlled entities.
8. Survivors report similar patterns of abuse by Mohamed, Salah 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.

B2. Recruitment and Deception

9. 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.
10. 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:
 - a. apparently genuine Harrods jobs where they were regularly summoned to Al-Fayed's office;
 - b. contrived "PA" roles or posts in Harrods-linked entities; and
 - c. placements in Al-Fayed-controlled residences in the UK and abroad, amounting to near-total isolation.

B3. Coercion, Threats, Surveillance, and Control

11. 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.

12. 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.
13. 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.
14. 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.
15. 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.
16. 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.
17. 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 the TVPA. These mechanisms were used to recruit, transport, harbour and control women and girls for exploitation. They also align with the trafficking indicators recognised under international law.

B4. Isolation

18. 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.

19. 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 ongoing travel.

B5. Corporate Embedding of Trafficking Mechanisms

20. 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:
 - a. Doctors employed by Harrods – conducting non-consensual sexual-health testing before abuse and providing medical treatment required because of the abuse.
 - b. 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).
 - c. 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.
 - d. Harrods security staff – monitoring victims, preventing them from leaving, and intimidating or blocking disclosure. Victims were often made aware of surveillance.
 - e. Managers, legal advisers, PR professionals and other enablers – coordinating recruitment, controlling communication, managing NDAs and suppressing disclosure.
 - f. 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.
21. This corporate embedding ensured that Al-Fayed and his associates had continued access to victims and maintained impunity during his lifetime and beyond.



C. Prosecution

§ 108(b)(1): “Whether the government of the country vigorously investigates and prosecutes acts of severe forms of trafficking in persons that take place wholly or partly within the territory of the country.”

22. The UK has failed to meet the TVPA’s minimum standard for vigorous investigation and prosecution by fundamentally misclassifying a multi-decade trafficking enterprise as a series of isolated sexual offenses.
23. At least 147 formal survivor statements have been taken by 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.
24. Earlier police files are said by the Met to have been “lost during digitisation,” suggesting a gross failure of due diligence and evidentiary preservation that effectively granted Al-Fayed and his network retrospective immunity.
25. 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.
26. Despite extensive evidence, a series of deeply disappointing and disheartening recent updates from the Met, received in July, August, and September 2025, confirm that it is not currently investigating these crimes as trafficking, nor will it confirm if it ever plans to. Instead, the investigation has been siloed to a RASSO team, rather than assigned to a dedicated trafficking or modern slavery team.
27. By treating these as isolated sexual crimes rather than a coordinated trafficking operation, the Met has ignored the structural “means” and “acts” of the enterprise—recruitment, harbouring, and the systematic use of corporate infrastructure to facilitate exploitation.
28. 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.

D. Protection

§ 108(b)(2): “Whether the government of the country protects victims of severe forms of trafficking in persons and encourages their assistance in the investigation and prosecution of such trafficking[.]”



29. The UK has failed to provide meaningful avenues for survivors to present their claims to the state or obtain protection. After decades of intimidation and disbelief, survivors are finally coming forward to lay bare Al-Fayed's crimes, yet there remains no state-run forum that will accept survivors' claims, recognize us as trafficking victims, or 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.
30. Instead of a state-led, independent, and victim-centred protection mechanism, survivors are being pressured toward a private redress scheme administered by Harrods—the very entity that facilitated their abuse. This scheme is extractive rather than protective: it lacks independence, denies survivors equal access to information, operates opaquely, and assigns offensive monetary valuations to decades of physical, sexual, and psychological harm.
31. To date, survivors have not been systematically referred to the NRM. This failure denies them formal recognition as “trafficking victim,” which in turn bars them from accessing specialized psychological support, legal aid, and the “recovery and reflection” periods required under international law. Rather than receiving state protection, survivors are forced to navigate a fragmented landscape by themselves.
32. Survivors in the UK also face prohibitive structural barriers to civil justice against powerful defendants, including the “loser pays” cost regime, the weaponisation of Part 36 settlement offers, the absence of a civil tort of trafficking, and the unavailability of affordable insurance for abuse litigation. Together, these mechanisms expose survivors to catastrophic financial risk simply for seeking accountability, effectively eliminating any realistic civil pathway to restitution for victims of organised trafficking. This framework directly undermines the TVPA’s requirement that governments encourage survivor participation in investigations and accountability processes, instead penalising victims for attempting to pursue justice.

E. Prevention

§ 108(b)(3): Whether the government of the country has adopted measures to prevent severe forms of trafficking in persons, such as measures to inform and educate the public, including potential victims, about the causes and consequences of severe forms of trafficking in persons.

33. The decades-long operation of the Al-Fayed enterprise exposes a systemic failure in the UK’s trafficking prevention framework. The state has failed to identify, regulate, or dismantle trafficking-enabling practices embedded within elite corporate environments, thereby allowing exploitation mechanisms to operate within legitimate business structures for decades.



34. Company-employed doctors conducted non-consensual medical exams and procedures on women, while private security teams surveilled and controlled women and girls. These practices went unchecked by labour regulators, professional licensing bodies, and law enforcement for over thirty years, demonstrating a profound failure of oversight across sectors with clear safeguarding responsibilities.
35. Compounding these failures and despite the UK Government undertaking consultations and introducing limited reforms addressing the misuse of confidentiality clauses in certain sectors, the UK has not introduced comprehensive statutory restrictions on the use of coercive NDAs, which silence survivors, suppress reporting, and obstruct public discovery of trafficking abuses, just as was done by Harrods. By allowing NDAs to shield criminal conduct from public and regulatory view, the UK government enabled systemic concealment rather than prevention, undermining its obligation to educate the public and potential victims about the tactics used by high-status traffickers.
36. Taken together, the UK's failure to regulate trafficking-enabling corporate practices, to hold professional and security actors accountable, or to restrict the coercive use of NDAs demonstrates the absence of "serious and sustained efforts" required under the TVPA to eliminate the conditions that allowed this trafficking enterprise to operate with impunity for decades.

F. Proposed Recommendations

To bring the UK into compliance with the TVPA's Minimum Standards for the Elimination of Trafficking, we respectfully request that the Department of State:

37. 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.
38. Direct the UK to immediately reclassify the investigation from a RASSO framework to a dedicated Modern Slavery and Human Trafficking framework. This shift is necessary to ensure that the investigation extends beyond the deceased primary perpetrator to include the network of legal, medical, security, and corporate enablers who facilitated the trafficking acts.
39. Assess the UK's compliance with its obligations under:
 - a. the Palermo Protocol;
 - b. UNTOC;
 - c. ECAT;
 - d. the Modern Slavery Act 2015 and earlier trafficking legislation; and
 - e. the UNGP, with particular attention to the performance of the Metropolitan Police and the Crown Prosecution Service.



40. 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:
 - a. identify institutional failures;
 - b. address potential complicity, including corruption and cover-up; and
 - c. strengthen accountability and safeguarding frameworks.

41. Encourage the UK to establish an independent redress scheme for survivors of the Al-Fayed trafficking enterprise that is:
 - a. fully independent of Harrods and its owners;
 - b. survivor-centred;
 - c. trauma-informed; and
 - d. designed with meaningful survivor participation.

42. Recommend reforms to civil-justice barriers, including:
 - a. the creation of a specific civil tort of trafficking;
 - b. improved costs protection and insurance availability for survivors; and
 - c. reform of Part 36 rules where they operate to coerce survivors into low settlements.

43. Urge the UK to formally recognise survivors as trafficking victims and to:
 - a. reopen the investigation under a trafficking and organised crime lens;
 - b. ensure survivors are informed of relevant proceedings and able to participate;
 - c. Ensure that survivors are proactively identified and offered formal protection via the NRM; and
 - d. ensure that both criminal and civil pathways to accountability are accessible and effective.



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.