

Issue Brief: Female victims of modern slavery in the UK – an analysis of NRM data

INTRODUCTION

The Government has made tackling violence against women and girls (VAWG) a key priority during this parliament with a target of halving VAWG in a decade.¹ Whilst modern slavery impacts male and female victims, for many women and girls modern slavery is not experienced as a separate form of harm, but as part of the wider continuum of VAWG. Trafficking and sexual exploitation are recognised forms of VAWG both internationally² and in the new UK VAWG strategy.

However, the systems responding to these harms remain largely separate.

This brief analysis reviews the data about the women and girls referred to the Home Office's National Referral Mechanism because they are thought to be victims of modern slavery and makes recommendations for how this data should inform implementation of commitments in the VAWG strategy related to sexual exploitation and female victims of modern slavery.

Summary

1. Women and girls are increasingly identified but represent a shrinking share of all referred victims.

The number of women and girls being identified as suspected victims of modern slavery has tripled since 2015 but now accounts for only around a quarter of all referrals, due to much larger increases in referrals of men and boys over the past decade. This trend has coincided with an increase in referrals for exploitation entirely 'overseas' (i.e. outside the UK) where males are the majority, although men and boys are also the majority of referrals for exploitation in the UK. Nonetheless, referrals of women and girls for exploitation in the UK has also been rising reaching a record high in 2025.

2. Sexual exploitation is consistently the dominant form of modern slavery affecting women and girls, overall and for UK-based exploitation.

Females constitute the vast majority of potential victims of sexual exploitation and domestic servitude. Almost half (47%) of all female referrals for exploitation in the UK and in the UK & Overseas are for sexual exploitation either alone or with other forms of modern slavery. Labour and criminal exploitation are the next most common forms of modern slavery experienced by women and girls referred for exploitation in the UK, with adults more commonly experiencing labour exploitation and children criminal exploitation. Of concern, however, is the 10% of women and girls for who the type of exploitation is 'not specified or unknown' more than half of

whom receive negative reasonable grounds (RG) decisions. For adults such a decision leaves them without access to statutory modern slavery support.³

3. More females now get positive first stage (reasonable grounds 'RG') decisions than males, but a significant minority are found to 'not meet the definition.'

Women and girls have been less impacted by a change to Home Office thresholds for reasonable grounds decisions. In 2025, 70% of all female victims received a positive RG decision compared to just 57% of males whereas in 2021 both had rates of around 90%. When women and girls exploited in the UK get a negative RG decision it is most often (59%) because they are considered not to have met the definition of modern slavery. This raises questions about whether referrals are being made inappropriately or whether a lack of information on the NRM form is a factor.

4. UK nationals are the largest single nationality of females referred — most of these are children.

24% of all females referred between 2021 and 2025 were UK nationals and 38% of females referred for exploitation in the UK. Of these, 70% were under 18 years old and almost half (49%) were aged 15-17 when they were referred. It is unclear whether adult British women are not being identified or are refusing referral.

5. Questions arise about victims who may be missing from the data.

The significant difference between the number of female and male potential

¹ Freedom from violence and abuse: a cross-government strategy to build a safer society for women and girls, Volume 1 – Strategy CPI450-1, UK Government, Dec 2025

² UN Convention on the Elimination of all forms of Discrimination against Women (CEDAW) Article 6

³ Support provided under the Modern Slavery Act 2015 s50A and Home Office Modern Slavery: statutory guidance for England and Wales (under s49 of the Modern Slavery Act 2015) and non-statutory guidance for Scotland and Northern Ireland, Version 4.6, May 2026, the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015 s18 and the Human Trafficking and Exploitation (Scotland) Act 2015 s9

victims referred to the NRM together with Duty to Notify data and Justice & Care’s own case work suggests that there is likely to be a significant cohort of female victims of modern slavery not being referred to the NRM. This raises questions about whether female exploitation is going unidentified completely, with victims too afraid to come forward, or prioritisation of subtypes of exploitation affecting more male victims or if these women and girls are being identified as victims of other forms of harm and VAWG instead.

6. There are significant learnings and questions raised by the NRM data that should be considered when implementing aspects of the VAWG strategy and action plan. These include exploring whether and why significant cohorts of female victims are missing from NRM referrals especially British adult women, understanding why the exploitation type is not recorded for such a significant proportion and why female potential victims are failing to meet the definition of modern slavery. Planned changes to the identification and support systems should take account of this analysis (full list of recommendations at the end of the report).

Notes

The term **potential victim** is used within the NRM system for a person referred to the Home Office and suspected of being a victim of modern slavery. They may have received a positive Reasonable Grounds decision but will not yet have received a Conclusive Grounds decision from the Home Office’s competent authorities.

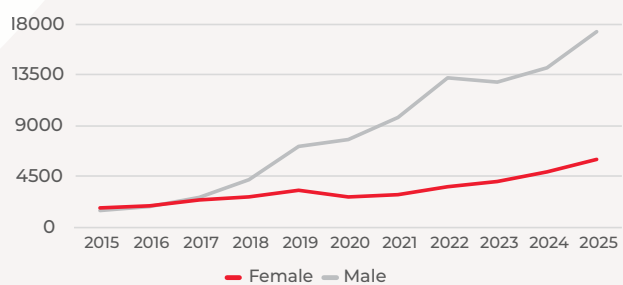
Female (and correspondingly male) in this report refers to the gender recorded in the NRM statistics taken from NRM forms. ‘Women’ is used for female records of adults aged 18 or over and ‘girls’ for records of females aged 17 or under.

Sources: Unless otherwise indicated the data analysed in this report is Home Office, Modern Slavery Research and Analysis. (2026). National Referral Mechanism and Duty to Notify Statistics, 2014-2025. [data collection]. 20th Edition. UK Data Service. SN: 8910, DOI: <http://doi.org/10.5255/UKDA-SN-8910-20>

1. Overview – women and girls identified as potential victims of modern slavery

The number of women and girls referred to the NRM as possible victims of modern slavery has tripled since 2015 (6,042 women and girls were referred in 2025 in total). However, this increase has been overshadowed by an even sharper increase in the number of men and boys referred (chart 1). There were more than 11 times as many referrals for men and boys in 2025 as were referred in 2015. This has meant that, whereas in 2015 women and girls made up just over half of all referrals, by 2025 this had reduced to around a quarter (26%).

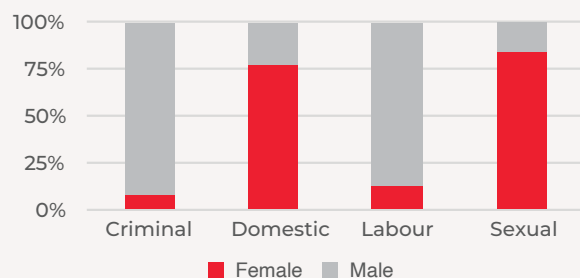
Chart 1: Potential victims referred to the NRM



This has coincided with a sharp increase over the past five years in referrals for exploitation entirely outside the UK from 3,691 in 2021 to 11,998 in 2025 of which 24% were female. Many of those who are exploited overseas seek asylum on arriving in the UK, so it is unsurprising to see a correlation in the gender split with that for asylum seekers (29% of asylum seekers in 2024 were female).⁴

The most common form of modern slavery that women and girls report is sexual exploitation – and has consistently been so for the past decade. Not only that but women and girls make up the vast majority of identified potential victims of sexual exploitation (83% in 2025) (chart 2).

Chart 2: Gender split of exploitation types all referrals 2025



*Note: A small number of records where gender is recorded as ‘other’ amounting to less than 0.5% have been excluded

Female victims receive higher rates of positive first stage (reasonable grounds 'RG') decisions than male victims. This is a change since a Home Office policy change in 2023 applying a higher evidential threshold.⁵ 70% of all female victims received a positive RG decision in 2025 compared with 92% in 2021. In comparison just 57% of male victims received a positive RG decision in 2025 down from 90% in 2021. For adults there is an even greater difference with 65% of adult women and just 45% of adult men receiving a positive RG decision in 2025 although there were still many more men than women with a positive decision (5,396 men compared to 3,075 women).

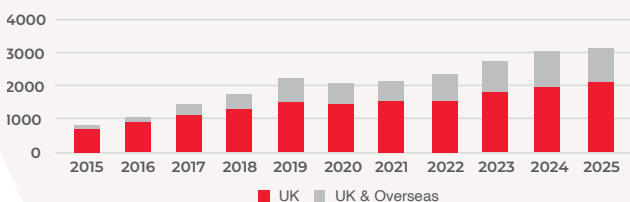
Although far fewer in number than male victims, in 2025, almost half (48%) of all referrals for women and girls related to exploitation entirely overseas. Women and girls exploited entirely overseas need to access services and support to aid their recovery and we have made recommendations regarding support services in section 5. However, there is little that can be done in the UK to prosecute their exploiters or intervene at an earlier stage to limit or prevent their exploitation. To support the fullest implementation of the UK VAWG strategy we have therefore focussed the rest of this brief on data relating to women and girls referred for exploitation in the UK.

2. Women and girls exploited in the UK

2.1 Number of women and girls identified

In 2025, 2,089 women and girls were referred to the NRM as potential modern slavery victims for exploitation in the UK with an additional 1,072 referred for exploitation both in the UK & Overseas (chart 3). This is the highest number ever since 2015. However, it is significantly lower than the 6,979 men and boys referred for exploitation in the UK (and 1,260 in the UK & Overseas).

Chart 3: Female NRM referrals for exploitation in the UK



2.2 Nationality

Over a third of all female victims who report exploitation in the UK (whether exclusively or as well as exploitation overseas) are UK nationals making this the largest national group by some way (38%

during 2021-2025) (chart 4). Considering girls under the age of 18, UK nationals made up more than two thirds (67%) of all girls referred.

The vast majority of female referrals for the other top nationalities are adults, whereas the majority of UK nationals are girls (chart 5). (More details about UK national victims in section 3).

After UK nationals, women (and some girls) from Viet Nam (7%), the Philippines (5%) and Albania (5%) are the next most common. Most of these cases are for adult women and notably they mainly report exploitation overseas as well as in the UK. If we consider women and girls exploited only in the UK, then Romanian and Chinese are the next most common nationalities (chart 4).

Chart 4: Most common nationalities for female referrals for exploitation in the UK, 2021-2025

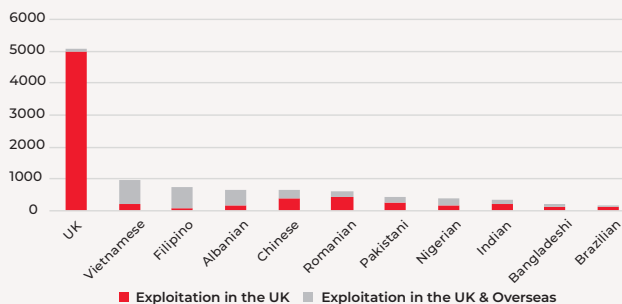
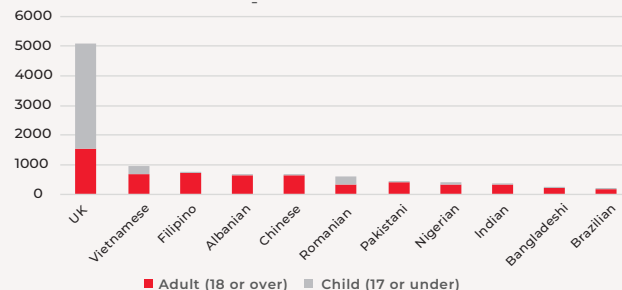


Chart 5: Ages of female referrals from most common nationalities 2021-2025



*Note: A small number of records where age or location of exploitation is blank have been excluded from charts 4 & 5

2.3 Age

Since 2015 the number and proportion of referrals for girls under the age of 18 exploited in the UK and the UK & Overseas has increased from 19% to 37% (chart 6).

This is particularly driven by a significant increase in referrals of girls for exploitation in the UK only. In 2025, 1,026 girls were referred to the NRM amounting to 49% of referrals for female victims reporting exploitation in the UK only, compared to just 148 girls referred in 2015 making up 22% of females exploited in the UK (chart 7). For the last

⁵ See [House of Lords Modern Slavery Act 2015 Committee HL Paper 8 The Modern Slavery Act 2015: becoming world-leading again, 2024](#)

five years female referrals for exploitation only in the UK have been split almost evenly between adults and children. In comparison over 80% of referrals for females exploited both in the UK and overseas are for adult women.

Chart 6: Female referrals for exploitation in the UK and the UK & Overseas by age

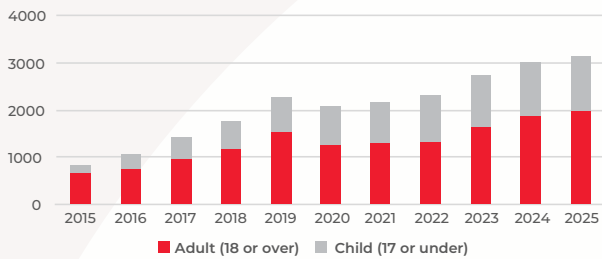
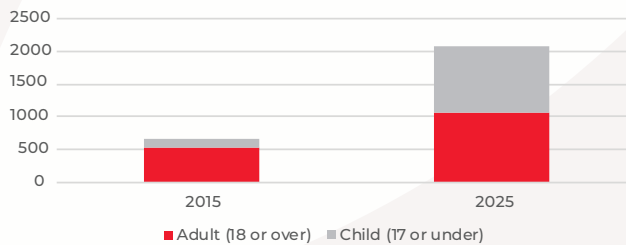


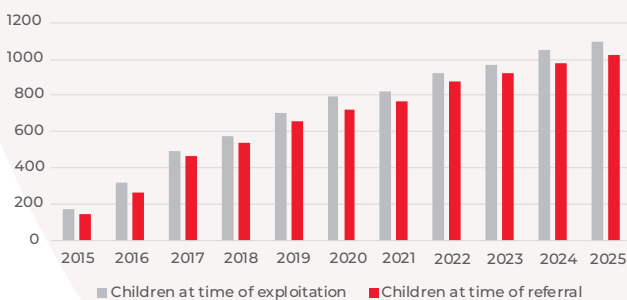
Chart 7: Female referrals for exploitation in the UK only by age



*Note: A small number of records where age is blank have been excluded from charts 6 & 7

Taking only those referred for exploitation in the UK alone, slightly more referrals are made each year for people who were children at the time they were exploited than at the time of referral which suggests that some young women are not identified until after they turn 18 (chart 8). That the difference is small could suggest that professionals are effectively identifying young women at the time they are being exploited. However, it is also possible that others are going completely unidentified and are thus absent from the data entirely.

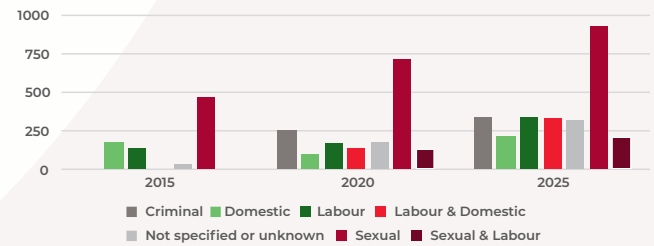
Chart 8: Identification of girls (age 17 or under) exploited in the UK only



2.4 Types of exploitation

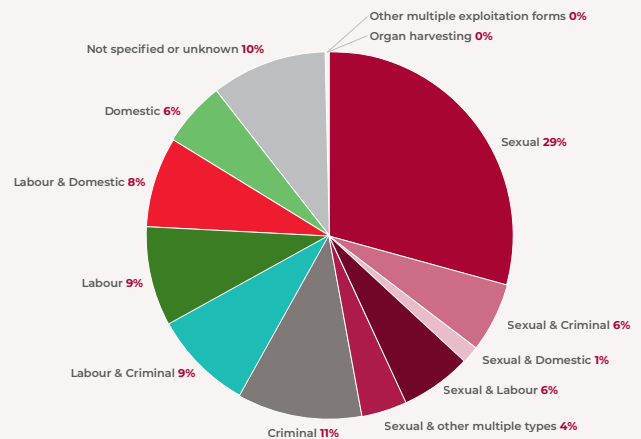
Sexual exploitation has consistently been the most common form of exploitation reported by women and girls referred to the NRM for UK-based exploitation over the past decade (chart 9). Between 2021 and 2025, 47% of all women and girls referred to the NRM for exploitation in the UK or the UK & Overseas reported sexual exploitation either alone or with other forms of modern slavery (chart 10).

Chart 9: Most common exploitation types for female potential victims (exploitation in the UK or the UK & Overseas)



*Note: until Q4 2019 criminal exploitation was recorded under 'labour exploitation'. Multiple exploitation types were also only recorded from 2019 onwards.

Chart 10: Most common exploitation types for female potential victims (exploitation in the UK or the UK & Overseas)



Sexual exploitation is the most common exploitation type for both adult women and girls referred to the NRM for exploitation in the UK or UK & overseas (23% for adults and 42% for girls) (charts 11 and 12). However, the next most common forms of modern slavery are different for adult women and girls. The second most common form reported by adult women is labour exploitation (15%) whereas girls are next most likely to be identified for criminal exploitation (16%). Criminal exploitation is also the third most common form of exploitation for adult women exploited only in the UK (chart 11)

Of concern is that for 10% of all female victims exploited in the UK or UK & Overseas (and 14% of girls) the exploitation type was not specified or was unknown (charts 10 and 12). It could be that this is because these potential victims were

identified before the exploitation could take place.⁶ However, the absence could also be a result of poorly completed NRM forms and/or a lack of understanding by first responders.

Chart 11: Most common exploitation types for adult women referred 2021-2025 (age at time of exploitation)

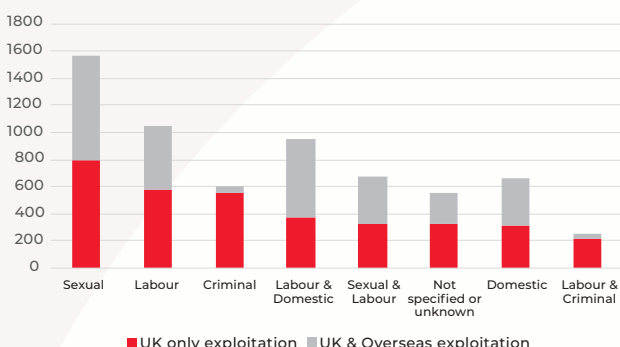
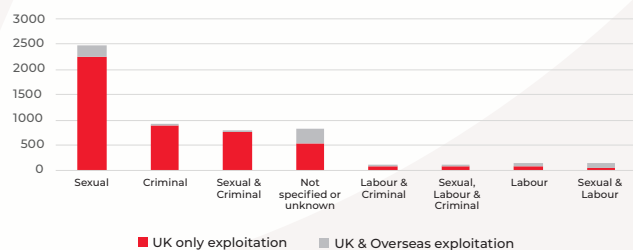


Chart 12: Most common exploitation types for girls referred 2021-2025 (age at time of exploitation)



2.5 Who is identifying and referring female victims?

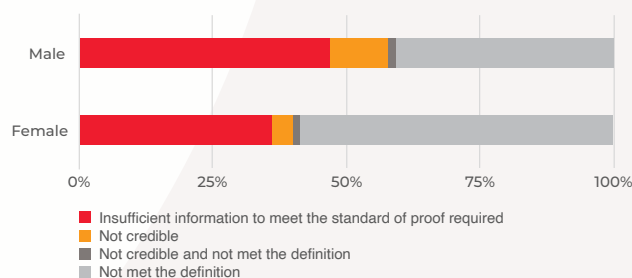
Out of all first responder organisations,⁸ over the past five years the police and local authorities have referred the most female potential victims for exploitation in the UK or the UK & Overseas. Between 2021 and 2025 police forces referred 4,619 female potential victims and local authorities 4,521. Of these, police have referred mostly adult women (70% of female referrals by police) and local authorities mostly girls (79%). 2025 reflected this same pattern with 696 out of 997 female referrals by police being for adult women and 823 out of 1,067 referrals by local authorities being for girls.

2.6 Reasons for negative NRM decisions

The most common reason given for female potential victims exploited in the UK or the UK & Overseas receiving a negative RG decision is 'not meeting the definition' (59% of all negative RG decisions for females in 2023-2025) followed by 'insufficient

information to meet the standard of proof required' (36%) (chart 13). These are also the most common reasons for male victims although more evenly split.

Chart 13: Reasons for negative RG decisions 2023-2025, exploitation in the UK and UK & Overseas



*Note: A small number of records where the gender or reason for negative decision is other, unknown or blank have been excluded.

This raises questions about whether some women and girls are being incorrectly referred to the NRM or whether first responders lack understanding of the definitions of exploitation types.

Negative RG decisions for the reason of not meeting the definition are most common for women and girls where the exploitation type is not specified or unknown (chart 14). Where the NRM referral does not list the exploitation type, just over half received a negative decision, most of those (45%) for not meeting the definition (chart 15). With 10% of all female referrals in the past five years falling into this 'not specified or unknown' category (chart 10) the high rate of negative decisions for this group highlights the importance of addressing why first responders are not specifying the exploitation type on the NRM form.

Not meeting the definition is also a significant proportion of negative RG decisions for criminal, labour and domestic exploitation which indicates there may be a need for greater understanding of the definitions of these forms of exploitation among first responders (chart 14).

By contrast, insufficient evidence is more likely to be the reason for a negative decision for women and girls referred for sexual exploitation (53% of negative decisions for females referred for this form of exploitation) (chart 14). This raises questions about whether the forms of information and supporting material the competent authorities require are more difficult to provide for sexual exploitation cases or if RG decisions which are made on average in six days are being made before that information can be

⁶ The definition of modern slavery can be fulfilled in cases of human trafficking before exploitation occurs so long as other actions such as recruitment or transportation, have been taken for the ultimate purpose of exploiting the individual. See paragraphs 2.23- 2.25 of the [Home Office Modern Slavery: statutory guidance for England and Wales \(under s49 of the Modern Slavery Act 2015\) and non-statutory guidance for Scotland and Northern Ireland, Version 4.6, May 2026](#)

⁷ Analysis by IOM of NRM referrals in 2025 notes also a Home Office presentation from 2021 which specifically states that "Where there is the intent to exploit but nothing has happened, or it is unclear what sort of exploitation a potential victim would have experienced, a referral and decision can be made based on an "unknown" or suspected type of exploitation." See [IOM, UK National Referral Mechanism Data Analysis Briefing #11 2025 Annual Review](#)

⁸ First responder organisations are authorities authorised to refer potential victims of modern slavery into the National Referral Mechanism. Most of these are statutory authorities (i.e. police, local authorities and various agencies of the Home Office) with just a few NGOs also designated.

provided perhaps due to the trauma experienced by the potential victim.⁹

Chart 14: Reasons for negative RG decisions for females referred for exploitation in the UK and UK & Overseas 2023-2025

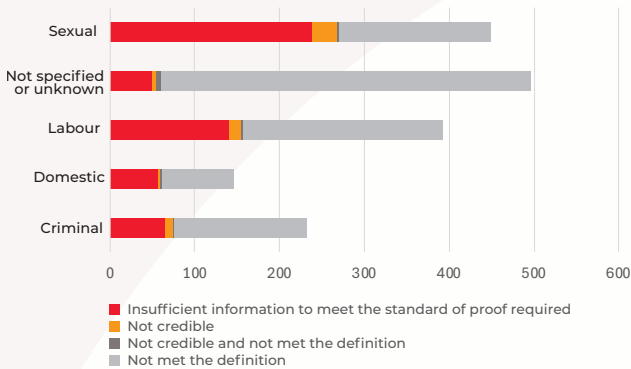
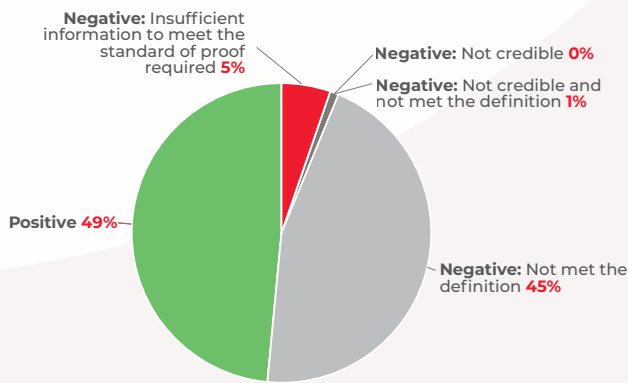
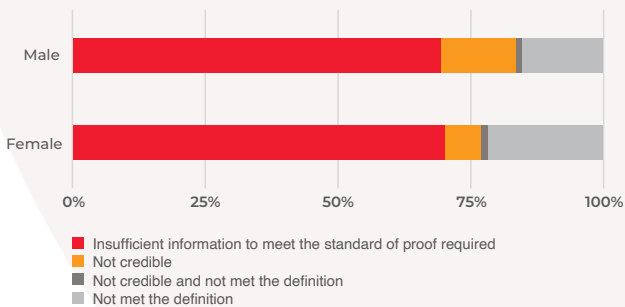


Chart 15: RG decisions for female referrals for exploitation in the UK or UK & Overseas 2023-2025 where exploitation is not specified or unknown



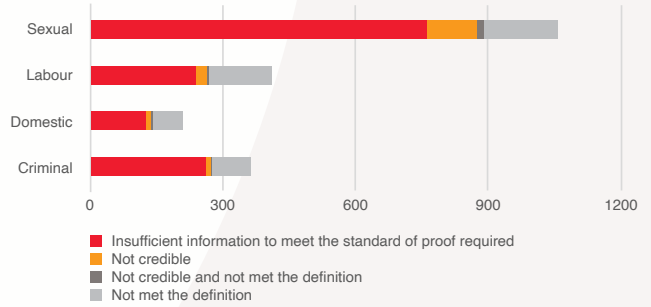
At conclusive grounds stage insufficient information is by far the most common reason for a negative CG decision for both male and female victims, although not meeting the definition is also a significant reason at this stage (chart 16). This pattern is seen consistently across all four main exploitation types for female referrals (chart 17).

Chart 16: Reasons for negative CG decisions, exploitation in the UK and UK & Overseas 2023-2025



*Note: A small number of records where the gender or reason for negative decision is other, unknown or blank have been excluded from chart 16.

Chart 17: Reasons for negative CG decisions for females referred for exploitation in the UK and UK & Overseas 2023-2025



Interestingly, male potential victims are more likely to have their modern slavery claim considered 'not credible' than female victims at both RG and CG stages (charts 13 and 16).

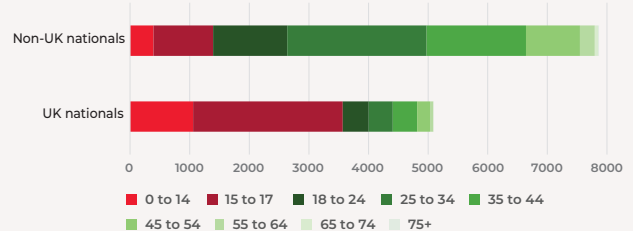
3. UK national victims

UK nationals are the single largest national group out of all women and girls referred to the NRM for exploitation, 24% of all female referrals between 2021 and 2025.

As might be expected almost all British women and girls referred to the NRM are referred for exploitation that took place in the UK (98%).

Most British female referrals are for girls under the age of 18 at both the time of their exploitation (74%) and at referral (70%). In fact, almost half (49%) of all British females were aged 15-17 when referred. This contrasts with foreign national victims where the biggest cohort is the 25-34 age group at 30% (chart 18). This raises questions about whether British women are not being recognised as victims of modern slavery or if there are other reasons they are not being referred to the NRM. (The high number of British girls referred suggests it is unlikely that adult British women are not being exploited at all).

Chart 18: Age at referral of women and girls referred to the NRM for exploitation in the UK or UK & Overseas (2021-2025)

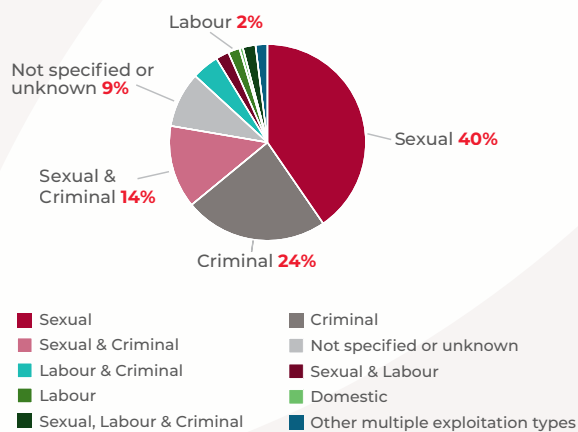


*Note: UK dual nationals have been excluded from this data

As with the general female cohort, the most common form of modern slavery reported by British women and girls over the past five years has been sexual exploitation (40%). Second most common was criminal exploitation (24%). The most notable difference with the general picture in chart 10 is the very low proportion of labour exploitation for UK

nationals just 2% compared to 9% labour exploitation for females of all nationalities. This may be a result of the much higher proportion of UK nationals who are children at the time of exploitation since labour exploitation primarily impacts adult women (charts 11 and 12). This group of victims also has a significant proportion of referrals (9%) where the form of exploitation is not specified or unknown which once again raises questions about the quality of the referrals, the understanding of first responders or the stage at which the referral is being made (chart 19).

Chart 19: Forms of exploitation reported by UK national women and girls 2021-2025



*Note: A single referral for Organ Harvesting has been excluded from this chart

British women and girls exploited in the UK or UK & Overseas have a higher rate of positive RG decisions (85%) than other nationalities (66%) (chart 20) whereas the rates of positive CG decisions are the same for UK nationals as for other female victims (chart 21).

Chart 20: Reasonable grounds decisions for females exploited in the UK or UK & Overseas 2023-2025

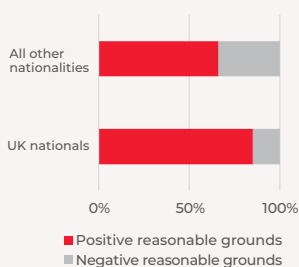
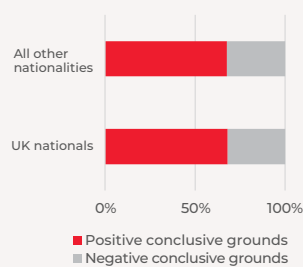


Chart 21: Conclusive grounds decisions for females exploited in the UK or UK & Overseas 2023-2025



*Note: all UK dual nationals excluded

The majority of British women and girls (77%) who get a negative RG decision do so for not meeting the definition of modern slavery. The same is true for females of other nationalities but to a lesser extent (53%), with insufficient information to meet

the definition a close second (47%). This increases the importance of the questions raised in section 2 about whether British women and girls are being incorrectly referred to the NRM, whether first responders lack understanding of the definitions of modern slavery or if the forms are inadequately completed.

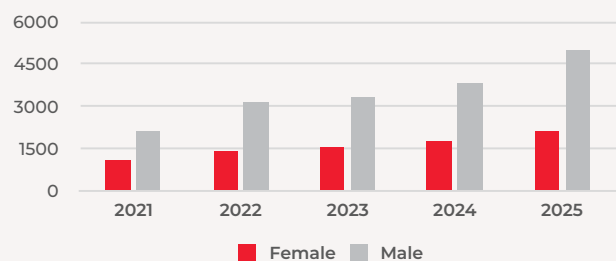
The reason most British women and girls receive a negative CG decision is insufficient information. The same is true for women and girls of other nationalities exploited in the UK or UK & Overseas, but UK nationals have a higher rate (77% compared to 66%). This raises significant concerns about why there is not sufficient information to make a positive decision for these victims.

4. Missing victims?

NRM data for adults only records adults who have consented to a referral. Our frontline experience shows there can be a variety of reasons why someone may not be referred. These include barriers to disclosure caused by the trauma and stigma of sexual exploitation and the experience of overlapping harms, making modern slavery harder to identify. 36% of Justice & Care's female/transgender female clients in 2025 had not been referred to the NRM.¹⁰

If an adult in England and Wales is identified by a public authority first responder as a possible victim of modern slavery but the adult does not consent to an NRM referral a Duty to Notify report is made instead. Duty to Notify (DTN) data shared by the Home Office in response to a Freedom of Information request shows DTN reports for 2,115 women in England and Wales in 2025 (chart 22)¹¹. Although some may have later been referred to the NRM this still suggests a significant number of women declining referral and missing from this analysis.

Chart 22: Duty to Notify (DTN) reports by gender (2021 - 2025)



*Note: A small number of reports where gender is recorded as other or unknown have been excluded from the chart

Another group of victims who may be missing from this analysis are those who are in contact with the authorities but are not identified as modern slavery

¹⁰ In 2025 Justice & Care only worked with adult victims and because our referrals come through law enforcement all of them have been subject to exploitation in the UK

¹¹ Home Office response to FOI reference 2026/03959

victims. Justice & Care established a specialist Sexual Exploitation Navigator in January 2025 supporting victims in cases of sexual exploitation (sometimes also alongside other forms of VAWG). A few of these cases have been referred to the NRM but notably a number of these cases, especially historical sexual exploitation, have been missed. Whilst our case load is small this suggests there is likely to be a wider cohort of female victims of exploitation, especially of sexual exploitation, across the country who are in contact with the police and other organisations but are not being referred to the NRM because they are not being seen as modern slavery victims and are treated as victims of VAWG or other offences.

There may also be other female victims who are not in contact with the authorities at all. Unseen's National Modern Slavery and Exploitation Helpline data for 2025 revealed a much greater percentage of female potential victims (44%) compared to the NRM data raising questions about why that should be the case.¹²

5. Recommendations for implementing the VAWG strategy

We have identified the following five planned actions from the VAWG strategy action plan¹³ which we think would benefit from consideration of the findings of this analysis. We have set out below the specific aspects of the analysis that should be considered by the Home Office as it implements each of the following commitments.

ACTION PLAN COMMITMENT 12(j): Consider improvements to the identification system for victims and survivors of modern slavery, including for victims and survivors who have been sexually exploited

When designing improvements to the identification system, including any changes made through forthcoming legislation, the Home Office should consider the following findings:

- The significantly lower number of female referrals to the NRM compared to male potential victims (even for exploitation in the UK or UK & Overseas only). The Home Office should consider how implementation of the VAWG strategy can ensure that referral to the NRM is considered in all appropriate situations and that adequate priority and resources is applied to investigating forms and situations of modern slavery that typically impact female victims (including but not exclusively sexual exploitation).
- Women and girls experience a range of different exploitation types. A focus on sexual exploitation

in the VAWG strategy should not come at a cost to these other female victims. Especially since many victims of sexual exploitation experience multiple exploitation types and as a result may have a range of needs.

- The significant percentage of female referrals for exploitation in the UK or UK & Overseas where the exploitation type was not specified or unknown. It must be a priority to determine how this can be prevented or reduced through improved training for first responders and quality assurance during completion of NRM forms – including perhaps making it more difficult to leave this field blank or unknown by including further follow up questions about why no exploitation type has been recorded.
- The fact that female victims are most likely to receive a negative RG decision for not meeting the definition of modern slavery. A review is needed of competent authority decisions to determine why women and girls are not meeting the definition and, therefore, what action is needed. The Home Office must consider whether the problem lies primarily with first responders (e.g. inappropriate referrals or completion of forms), with the definition itself (i.e. is it too narrow), or the application of the definition by decision-makers and the guidance they are using.
- The likelihood that some adult British women (especially for sexual exploitation) are missing from the NRM statistics and how to improve identification and referral of this group of survivors so that they receive the support they need and NRM data provides an accurate picture.

ACTION PLAN COMMITMENT 18(a): Deliver a needs-based model to ensure adult victims and survivors of modern slavery, including women who are victims of sexual exploitation and domestic servitude who are referred through the National Referral Mechanism (NRM), have access to safe housing, financial support, and a dedicated support worker to assist in their recovery.

The new Supporting Victims of Modern Slavery contract is currently out for tender including the basic support specification.¹⁴ However, in ensuring adequate long-term provision and setting the framework for needs assessments (especially outcomes leading to exit from support) the Home Office should consider the following:

- The higher rate of positive RG decisions (albeit lower overall numbers) for adult female potential victims compared to males.
- The high level of sexual exploitation among adult women referred and the likelihood of them having significant trauma and need for extensive support.

¹² Unseen, Modern slavery & exploitation helpline annual assessment 2025, April 2026

¹³ Freedom from violence and abuse: a cross-government strategy to build a safer society for women and girls, Volume 2 – Action Plan CP1450-II, UK Government, Dec 2025. Commitment numbers refer to those used in this document.

¹⁴ Written parliamentary question no.79143 answered 20 October 2025

- The significant proportion of adult women referred to the NRM by police for exploitation in the UK necessitates expert support is provided to enable those women to engage with criminal investigations and proceedings. Consideration should also be given to ensuring that women are not left without support during ongoing criminal processes which can take a number of years.

ACTION PLAN COMMITMENT 18(b): Commit to delivering a contract to provide national coverage, across England and Wales, of the Independent Child Trafficking Guardian service, which is currently available in two-thirds of Local Authorities.

In rolling out the Independent Child Trafficking Guardian (ICTG) scheme the Home Office should consider:

- Whether the operating model needs to be amended to better serve British girls given that they make up two thirds of all girls referred to the NRM and the current ICTG scheme does not as standard provide direct support for children with parents in the UK.¹⁵

ACTION PLAN COMMITMENT 10(k): Development of a statutory definition (and legislation) of adult sexual exploitation with accompanying multi-agency statutory guidance.

When developing this definition the Home Office should consider:

- The significant number of women and girls referred to the NRM with no exploitation specified and the most common negative RG decisions for females (especially UK nationals) being for not meeting the definition. Consideration is needed for how the new definition will interact with the NRM statutory guidance definitions and how the guidance will strengthen understanding and appropriate referrals to the NRM (with comprehensively completed forms).
- The possibly missing NRM referrals for adult British women (especially for sexual exploitation) and how the new definition and guidance can be used to ensure NRM referrals are fully reflective of all victims of exploitation in the UK.
- The data that many victims of modern slavery for sexual exploitation experience other exploitation types as well and how this statutory definition and guidance will reflect that.

ACTION PLAN COMMITMENT 12(j): Piloting a national law enforcement hub that will among other things identify opportunities for safeguarding victims and investigating perpetrators of sexual exploitation offences

The new law enforcement hub and the directions given to it by the Home Office should consider:

- The data showing police as the top first responder type for female modern slavery victims exploited in the UK. This is a good starting point but further exploration is needed to understand how many of these go on to engage with police investigations and how this can be increased through support for victims and sharing of best practice.
- The possibility that many British national adult women are missing from the NRM data and not recognised as modern slavery victims should lead to consideration of how police resources need to be allocated to sexual exploitation investigations in order for victims to be identified and safeguarded and also the level of training and guidance needed across policing streams (not just within Serious and Organised Crime) to ensure all victims are identified and referred.



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¹⁵ See paragraphs 9.29 of the Home Office Modern Slavery: statutory guidance for England and Wales (under s49 of the Modern Slavery Act 2015) and non-statutory guidance for Scotland and Northern Ireland, Version 4.5, 7 April 2026