



Integrating Modern Slavery into the Violence Against Women and Girls Strategy 2025-2035

The Government's VAWG Strategy must include victims of modern slavery

The UK Government's Violence Against Women and Girls (VAWG) Strategy must recognise and include victims of modern slavery—particularly women and girls—who are disproportionately affected by this hidden, gendered abuse. The Strategy should include the voices of survivors affected by modern slavery.

Women and girls make up the majority of those exploited through modern slavery in the contexts of sexual exploitation, domestic servitude, and forced marriage – all of which are inherently tied to systems of coercion, and control.¹ These abuses are deeply gendered and mirror wider patterns of violence against women and girls.

The scale of the issue is deeply concerning. Recent figures indicate that nearly 5,000 women and girls were identified as potential victims of modern slavery in the UK last year, with referral numbers for females reaching the highest annual number since the National Referral Mechanism (NRM) began.² This represents only the tip of the iceberg. The true extent of modern slavery remains largely underreported with growing forms of exploitation, including commercial sexual exploitation facilitated online and trafficking women and girls for criminal purposes.

This briefing sets out why victims of modern slavery must be represented in the VAWG Strategy.

Modern Slavery is a form of gender-based violence that overwhelmingly affects women and girls.

As the Government prepares to launch its 2025–2035 VAWG Strategy, with the aim of halving violence against women and girls within a decade, it is essential that modern slavery and sexual exploitation are treated as central to this agenda. These are not marginal issues, they are deeply systemic, gendered, and increasingly enabled by digital platforms.

It is critical that the VAWG strategy adequately address the drivers of demand and the broader culture of misogyny in which this abuse thrives. Perpetrators of modern slavery of women and



girls, operate within systems that tolerate and even profit from the commodification of women and girls. These crimes are not isolated acts but part of a continuum of gender-based violence, sustained by unchecked demand, harmful gender norms, and systemic failures to disrupt exploitative industries, including online platforms. Tackling modern slavery as part of the VAWG Strategy means not only supporting survivors but actively confronting the conditions and attitudes that enable exploitation in the first place and holding perpetrators to account.

Addressing them demands urgent action: regulation of adult services websites to disrupt online exploitation, stronger legal protections and trauma-informed care for survivors, and a funding model that reflects the true scale and complexity of sexual exploitation. The Scottish Government's Independent Strategic Review of VAWG funding has already highlighted the stark underfunding of services for sexual exploitation compared to domestic abuse.³

Without targeted investment and meaningful reform, survivors of modern slavery will continue to be overlooked and perpetrators of this most severe form of violence against women and girls will continue to go unpunished. The new Strategy must set clear funding priorities, embed survivor voices, ensure law enforcement can hold perpetrators to account and extend protections into the digital spaces where exploitation thrives. Only then can the Government deliver on its promise of a safer future for all women and girls.

The VAWG Strategy must include the following recommendations to protect female victims of modern slavery:

1. Centre Survivor Voice in Policy and Practice

- **Evidence Base:** Survivor voices are essential to tackling modern slavery as a form of VAWG. Inquiries such as the Telford Inquiry have exposed systemic failures that enabled the abuse of over 1,000 girls, with survivors now leading calls for trauma-informed, survivor-led reform.⁴ There are organisations that do already incorporate survivor voices into their policy work, such as Not For Sale that documents the lived realities of women trafficked into forced marriage or labour, highlighting the deceptive tactics of traffickers and the long-term trauma survivors endure.⁵ Alongside this, Scotland offers a model for embedding survivor voice. The 2023 Independent Strategic Review of VAWG Services and the work of TARA show how participatory approaches, storytelling, art, peer-led recovery, can transform both healing and system design.⁶ The Modern Slavery PEC further emphasises that recovery is long-term and non-linear, shaped by safety, autonomy, and inclusion.⁷ Survivor-led panels like Lived Experience Advisory Panels (LEAP) show how lived experience can shape national anti-trafficking strategies.⁸
- **Policy Ask:**
 - The Government must establish a Survivor Advisory Council to meaningfully inform their work. Survivors should be remunerated in recognition of their shared expertise.



- The VAWG Strategy 2025–2035 should embed survivor leadership at all levels of policy and practice, recognising lived experience as central to effective system design.
- Survivors of modern slavery must be actively involved in shaping services, from commissioning to delivery and evaluation.
- Participatory, trauma-informed approaches should be recognised and resourced as core components of survivor support.

2. Include Victims of Modern Slavery and Human Trafficking in the VAWG Strategy’s Core Framework and Baseline Estimates

- **Evidence Base:** The Home Office’s Quarter 1 2025 NRM statistics show approximately 25% of potential victims referred were females.⁹
- **Policy Ask:**
 - Mandate the inclusion of victims of modern slavery and human trafficking—particularly women and girls subjected to sexual exploitation and domestic servitude—within the baseline estimates, strategic objectives, and delivery plans of the VAWG Strategy 2025–2035. This must include:
 - Disaggregated data on modern slavery in all VAWG prevalence estimates.
 - Inclusion of modern slavery in the Strategy’s 10-year impact targets (e.g. halving VAWG).
 - Formal recognition of modern slavery and human trafficking—particularly sexual exploitation and domestic servitude—as core forms of gender-based violence within the VAWG Strategy’s commitment to protecting people from exploitation and harm.

3. Strengthen Oversight of Adult Services Websites to Disrupt Exploitation

- **Evidence Base:** The National Crime Agency has identified adult services websites (ASWs) as key enablers of trafficking and sexual exploitation, particularly of women and girls. Victims are routinely recruited and advertised through these platforms. While the Online Safety Act 2023 introduces duties to tackle illegal content, ASWs remain unregulated. The Government has acknowledged this risk in its response to the Home Affairs Select Committee’s 2024 report on Human Trafficking, committing to work with ASWs through voluntary principles aimed at preventing exploitation, improving moderation, and supporting law enforcement.¹⁰ But voluntary measures are not enough. Without stronger regulation enforcement, these platforms will continue to facilitate harm—leaving women and girls exposed to abuse in digital spaces.
- **Policy Ask:**
 - In implementation of the Online Safety Act 2023 Ofcom should use its full powers to hold platforms accountable where harm is evident. This includes: Promoting age and consent verification for users posting or responding to adult



content; Encouraging real-time moderation and swift takedown of suspected trafficking or non-consensual material; Ensuring platforms report suspected exploitation to the NCA under the child sexual exploitation and abuse (CSEA) Reporting Regulations 2025¹¹; Using Ofcom's powers to audit compliance and issue penalties where platforms fail to act.

- Alongside full implementation of the Online Safety Act 2023 new legislation is needed to regulate ASWs.

4. Guarantee Equal Protection and Access to Support for Survivors of Modern Slavery

- **Evidence Base:** Thousands of women and girls are referred to the NRM each year as potential victims of modern slavery, with sexual exploitation and domestic servitude among the most common forms.¹² Many, especially migrant women, face barriers like insecure status, fear of enforcement, and decision-making delays. Refuge and Unseen UK report that these gaps raise the risk of re-trafficking and trauma.¹³¹⁴
- **Policy Ask:**
 - The VAWG Strategy Delivery Plan and statutory guidance should explicitly name modern slavery survivors as a priority group.
 - Local authorities must be mandated to provide equitable access to VAWG services for all survivors, regardless of immigration status or type of exploitation. To ensure meaningful access and protection, survivors must be entitled to the full range of VAWG services, including: Safe and secure accommodation, including refuge spaces; Legal aid eligibility, regardless of immigration status.; Trauma-informed mental health support and specialist advocacy.; Inclusion in local VAWG commissioning frameworks and multi-agency safeguarding.

5. Align Funding with Strategic Priorities

- **Evidence Base:** The Scottish Government's 2023 Independent Strategic Review of VAWG Funding found that services for sexual exploitation and trafficking are significantly underfunded compared to those for domestic abuse.¹⁵ The Review called for a consistent funding model to ensure quality services across all forms of violence. Without targeted investment, survivors of modern slavery will continue to face fragmented or non-existent support.
- **Policy Ask:** Embed a funding framework within the VAWG Strategy 2025–2035 that ensures equitable, needs-based investment across all forms of gender-based violence, including ring-fenced funding for services addressing sexual exploitation and modern slavery. This should include:
 - Dedicated funding streams for specialist support providers working with survivors of trafficking and exploitation.
 - Multi-year funding commitments to ensure service stability and sustainability.
 - A requirement to prioritise underfunded areas, including sexual exploitation, in line with national strategy objectives.



International Insights: Models That Work

Global practice shows embedding victims of modern slavery into VAWG Strategies is both possible and necessary. Countries and institutions are already treating trafficking, sexual exploitation, and emerging abuses such as reproductive exploitation as central to their gender-based violence responses. These integrated, survivor-led models offer practical lessons the UK can adopt to strengthen its approach over the next decade.

Evidence in Action: Proven Models of Integration

International frameworks already provide a roadmap. The UN's Committee on the Elimination of Discrimination against Women (CEDAW) General Recommendation No. 38 recognises trafficking as a form of gender-based violence and urges governments to embed anti-trafficking measures within broader VAWG strategies.¹⁶ Initiatives such as IWRAW Asia Pacific's Feminist Approaches to Counter-Trafficking and academic work like Global Human Trafficking Unmasked argue that trafficking must be addressed as a structural form of gendered violence rooted in inequality and exploitation.¹⁷¹⁸

Countries including Sweden, Canada, France, and Mexico have adopted foreign policies focused on gender equality and human rights. Alongside this survivor-led programmes supported by the Freedom Fund in India, Nepal, and Ethiopia show that community-based, rights-driven approaches can reduce exploitation and empower women. The methods used by traffickers—from sexual exploitation to forced marriage and reproductive abuse—mirror the same patterns of coercion, control, and gendered harm that underpin all forms of VAWG.

Adapting to the Future: Responding to Emerging Exploitation

To lead on VAWG, the UK must act on emerging forms of abuse, the IASC is doing ongoing work on this area. Across all forms of exploitation such as emerging threats like Artificial Intelligence (AI) enabled trafficking, where technology is used to profile, recruit, and exploit victims online, further highlight the need for integrated and future-ready responses.

According to the United Nations Office on Drugs and Crime (UNODC), traffickers are now using AI to profile, recruit, and control victims online, often through fake job ads, dating platforms, and social media.¹⁹ AI-generated deepfakes and live-streamed abuse are also being used to exploit victims virtually, while cryptocurrencies and the dark web help traffickers conceal their identities and profits. These developments demand urgent policy attention. As the UK looks to future-proof its VAWG Strategy, it must anticipate how AI will continue to reshape the landscape of modern slavery and embed safeguards accordingly.

There has also been a rise of reproductive exploitation. Women and girls are trafficked into forced marriages where their reproductive labour is exploited, often alongside sexual and domestic abuse.^{20 21} The UN Special Rapporteur on the sale and sexual exploitation of children has also warned that abusive surrogacy practices may meet the threshold of trafficking.²²



Europol and Eurojust have reported cases of forced surrogacy, pregnancy, and egg removal as emerging forms of human trafficking since 2016, particularly involving Bulgaria, Greece, Georgia, and other EU Member States. These trends are reflected in operational investigations and EU-level progress reports.^{23 24}

These are not distant threats. In 2024, UK-based charity Unseen reported cases of forced surrogacy to its helpline.²⁵ The identified presence in the UK demands early policy intervention.

The Home Office has pledged to build the next VAWG Strategy on the strongest available evidence. That must include recognising reproductive exploitation—including forced marriage, surrogacy, and egg removal—as a serious and growing threat. Acting now allows the UK to lead with foresight rather than respond with delay.

Learning from Global and Regional Leaders

The UK is falling behind international partners. Including modern slavery in the VAWG Strategy is not only coherent but strategically necessary. In its letter to the Public Accounts Committee, the Home Office committed to using the best available evidence from both the UK and international sources.²⁶ Some examples of best practice are outlined below:

- **Scotland:** Scotland is already setting the pace. Its 2023 Independent Strategic Review of VAWG Services aligns with the Istanbul Convention and Sustainable Development Goal 5.2, embedding Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO) compliance and resource accountability. The review states: “To ensure VAWG services meet the needs of all women across all life stages, intersectionality must be embedded throughout the system... Structural inequalities including trafficked children, girls and women... must inform all responses.”²⁷
- **European Union:** The EU’s Directive 2024/1712, which came into force in June 2024, amended the original Anti-Trafficking Directive (Article 2) to explicitly include forced marriage, illegal adoption, and exploitation of surrogacy as recognised forms of human trafficking. This legal update sets a precedent for member states and offers a legislative model for the UK to consider.²⁸
- **Ukraine:** Forced pregnancy is recognised as a form of exploitation under Ukraine’s Criminal Code, specifically Article 149, which criminalises human trafficking. This provision defines exploitation to include various forms of sexual abuse, including forced pregnancy, forced termination of pregnancy, and forced marriage. As such, facilitating or coercing a person into pregnancy as part of a trafficking scheme constitutes a criminal offence under Ukrainian law.²⁹
- **Georgia & Thailand:** Cross-Border Action on Forced Egg Removal. In February 2025, authorities in Georgia and Thailand launched a joint investigation into a trafficking ring that lured women via online ads and forcibly removed their eggs. This case highlighted the growing trend of reproductive exploitation and led to new bilateral cooperation protocols.³⁰



Conclusion: A Strategy for Now and the Future

Modern slavery is one of the most extreme and hidden forms of VAWG. From sexual and reproductive exploitation to forced marriage and trafficking, the patterns of control are the same.

The VAWG Strategy must represent and include these survivors and hold perpetrators to account, and policy must be bold, inclusive, and future-ready. Integrating modern slavery is not optional. It is essential.



Annex: Policy Implementation Considerations

1. Embed Survivor Voice in Policy, Practice, and Reform

- Establish and support Survivor Advisory Panels (e.g. LEAP).
- Ensure safe, supported, and paid survivor participation in design, delivery, and oversight.

2. Integrate Modern Slavery Across VAWG Strategy and Systems

- Embed modern slavery in VAWG monitoring, evaluation, and delivery plans.
- Align NRM and VAWG data
- Ensure cross-departmental accountability.
- Ring-fence funding and track investment in services for sexual exploitation and trafficking.

3. Strengthen Regulation and Cross-Sector Coordination

- Empower Ofcom to act on exploitation via ASWs; promote voluntary principles and intelligence sharing.
- Coordinate funding and service delivery across departments to close gaps and avoid duplication.
- Promote survivor-informed regulation and ensure access to VAWG services regardless of immigration status.
- Introduce new legislation to regulate ASWs.

¹ McCabe, H. and Eglén, L. (2022) “‘I bought you. You are my wife’: ‘Modern Slavery’ and Forced Marriage”, Journal of Human Trafficking. DOI: 10.1080/23322705.2022.2096366 (Accessed: 28 May 2025).

² Home Office. Modern slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2024. GOV.UK, 6 March 2025. Available at: <https://www.gov.uk/government/statistics/modern-slavery-nrm-and-dtn-statistics-end-of-year-summary-2024> (Accessed: 28 May 2025).

³ Scottish Government. (2023). Violence Against Women and Girls – Independent Strategic Review of Funding and Commissioning of Services: Report. Cabinet Secretary for Justice and Home Affairs, 6 June 2023. Available at: <https://www.gov.scot/publications/violence-against-women-girls-independent-strategic-review-funding-commissioning-services-report/> (Accessed: 28 May 2025).

⁴ Telford & Wrekin Council. The Independent Inquiry into Child Sexual Exploitation in Telford: Final Report. Led by Tom Crowther KC. Published 12 July 2022. Available at: https://www.telford.gov.uk/info/20692/independent_inquiry_into_child_sexual_exploitation/5526/final_report (Accessed: 28 May 2025).

⁵ Not For Sale. Impact Report 2020. Not For Sale Campaign, 2020. Available at: https://www.notforsalecampaign.org/wp-content/uploads/2021/01/NFS_Impact-Report_2020.pdf (Accessed: 28 May 2025).

⁶ Scottish Government. (2023). Violence Against Women and Girls – Independent Strategic Review of Funding and Commissioning of Services: Report. Cabinet Secretary for Justice and Home Affairs, 6 June 2023.



Available at: <https://www.gov.scot/publications/violence-against-women-girls-independent-strategic-review-funding-commissioning-services-report/> (Accessed: 28 May 2025).

⁷ **Modern Slavery and Human Rights Policy and Evidence Centre (Modern Slavery PEC)**. Survivor Support: Policy brief based on the Modern Slavery PEC-funded research portfolio. November 2023. Available at: https://files.modernslaverypec.org/production/assets/downloads/MSPEC_SurvivorRecovery_Brief_FINAL.pdf?dm=1736268038 (Accessed: 28 May 2025).

⁸ **Human Trafficking Foundation**. The Lived Experience Advisory Panel (LEAP). Established April 2022 to embed survivor expertise in anti-trafficking work across the UK. Available at: <https://www.humantraffickingfoundation.org/leap> (Accessed: 28 May 2025).

⁹ **Home Office**. Modern slavery: National Referral Mechanism and Duty to Notify statistics UK, quarter 1 2025 – January to March. GOV.UK, 15 May 2025. Available at: <https://www.gov.uk/government/statistics/modern-slavery-nrm-and-dtn-statistics-january-to-march-2025/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-quarter-1-2025-january-to-march> (Accessed: 28 May 2025).

¹⁰ **Home Affairs Committee**. Human Trafficking: Government Response to the Committee's First Report of Session 2023–24. Fourth Special Report, HC 566. UK Parliament, 22 February 2024. Available at: <https://committees.parliament.uk/publications/43435/documents/221881/default/> (Accessed: 28 May 2025).

¹¹ **UK Government**. The Online Safety (CEA Content Reporting by Regulated User-to-User Service Providers) Regulations 2025, SI 2025/368. Available at: <https://www.legislation.gov.uk/uksi/2025/368/made> (Accessed: 28 May 2025).

¹² **Home Office**. National Referral Mechanism statistics. GOV.UK, 2025. Available at: <https://www.gov.uk/government/collections/national-referral-mechanism-statistics> (Accessed: 28 May 2025).

¹³ **Unseen**. Women and girls at growing risk of modern slavery, data reveals. Modern Slavery & Exploitation Helpline Annual Assessment 2024. Available at: <https://www.unseenuk.org/latest-modern-slavery-helpline-data/> (Accessed: 28 May 2025).

¹⁴ **Airlie, A. (2023)**. More Than Bricks and Mortar: A feasibility study into delivery of best practice in domestic abuse dispersed accommodation. Refuge, supported by Commonweal Housing. Available at: <https://refuge.org.uk/wp-content/uploads/2023/08/V6-dispersed-accommodation-report-Web-higher-dpi.pdf> (Accessed: 28 May 2025).

¹⁵ **Scottish Government. (2023)**. Violence Against Women and Girls – Independent Strategic Review of Funding and Commissioning of Services: Report. Cabinet Secretary for Justice and Home Affairs, 6 June 2023. Available at: <https://www.gov.scot/publications/violence-against-women-girls-independent-strategic-review-funding-commissioning-services-report/> (Accessed: 28 May 2025).

¹⁶ **Committee on the Elimination of Discrimination against Women (CEDAW)**. General Recommendation No. 38 on trafficking in women and girls in the context of global migration (CEDAW/C/GC/38). United Nations Office of the High Commissioner for Human Rights, 2020. Available at: <https://www.ohchr.org/en/documents/general-comments-and-recommendations/general-recommendation-no38-2020-trafficking-women> (Accessed: 28 May 2025).

¹⁷ **IWRAW Asia Pacific**. Feminists for a Binding Treaty (FACT) Manifesto. April 2020. Available at: <https://www.iwraw-ap.org/wp-content/uploads/2020/04/FACT-Manifesto-web.pdf> (Accessed: 28 May 2025).

¹⁸ **Pourmokhtari, N. (2015)**. Global Human Trafficking Unmasked: A Feminist Rights-Based Approach. Journal of Human Trafficking, 1(2), 156–166. Available at: <https://refugeereseach.net/wp-content/uploads/2017/05/Pourmokhtari-2015-Feminist-rights-based-approach.pdf> (Accessed: 28 May 2025).

¹⁹ **United Nations News**. EU–UN Global Initiative on AI and Trafficking: Artificial intelligence used to exploit victims online, warns UNODC. 18 October 2021. Available at: <https://news.un.org/en/story/2021/10/1104392> (Accessed: 28 May 2025).

²⁰ **McCabe, H. and Eglén, L. (2022)**. “I bought you. You are my wife”: “Modern Slavery” and Forced Marriage. Journal of Human Trafficking. Available at: <https://doi.org/10.1080/23322705.2022.2096366> (Accessed: 28 May 2025).

²¹ **Quek, K. (2018)**. Marriage Trafficking: Women in Forced Wedlock. Routledge. Available at: <https://doi.org/10.1201/9781315620138> (Accessed: 28 May 2025).



²² **United Nations Human Rights Council. (2018).** Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences, on his mission to Nigeria (A/HRC/37/60). Available at: <https://docs.un.org/A/HRC/37/60> (Accessed: 28 May 2025).

²³ **Europol.** 66 suspected of arranging illegal adoptions and surrogacies, and human egg trafficking in Greece. 26 September 2019. Available at: <https://www.europol.europa.eu/media-press/newsroom/news/66-suspected-of-arranging-illegal-adoptions-and-surrogacies-and-human-egg-trafficking-in-greece> (Accessed: 28 May 2025).

²⁴ **Eurojust.** Surrogacy and Human Trafficking. The Hague: European Union Agency for Criminal Justice Cooperation, 2024. Available at: <https://www.eurojust.europa.eu/sites/default/files/assets/files/surrogacy-leaflet-27-08-2024-v6.pdf> (Accessed: 28 May 2025).

²⁵ **Unseen UK. (2025).** Modern Slavery & Exploitation Helpline Annual Assessment 2024. Available at: https://www.unseenuk.org/wp-content/uploads/2025/04/Unseen-Helpline-Annual-Assessment_2024.pdf (Accessed: 28 May 2025).

²⁶ **Home Office. (2025).** Letter to the Public Accounts Committee on the inclusion of modern slavery in the VAWG Strategy (17 March 2025). Available at: <https://www.gov.uk/government/publications/crime-and-policing-bill-government-amendments-for-committee/letter-from-minister-johnson-to-public-bill-committee-detailing-government-amendments-for-committee-stage-26-march-2025> (Accessed: 28 May 2025).

²⁷ **Scottish Government. (2023).** Violence Against Women and Girls – Independent Strategic Review of Funding and Commissioning of Services: report. Cabinet Secretary for Justice and Home Affairs. Published 6 June 2023. Available at: <https://www.gov.scot/publications/violence-against-women-girls-independent-strategic-review-funding-commissioning-services-report/> (Accessed: 28 May 2025).

²⁸ **European Union. Directive (EU) 2024/1712** of the European Parliament and of the Council of 13 June 2024 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims. Available at: <https://eur-lex.europa.eu/eli/dir/2024/1712/oj/eng> (Accessed: 28 May 2025).

²⁹ **Government of Ukraine. (n.d.).** Criminal Code of Ukraine, Article 149 – Human Trafficking. This provision includes forced pregnancy, forced termination of pregnancy, and forced marriage as forms of exploitation. Available at: <https://antislaverylaw.ac.uk/country/ukraine/?dataset=adld> (Accessed: 28 May 2025).

³⁰ **Woldeselasse, B. (2025).** Trapped in the Surrogacy Boom: Thai Women Rescued from Human Egg Farms in Georgia. Human Rights Research Center, 18 February, 2025. Available at: <https://www.humanrightsresearch.org/post/trapped-in-the-surrogacy-boom-thai-women-rescued-from-human-egg-farms-in-georgia> (Accessed: 28 May 2025).