

Scotland's Trafficking and Exploitation Strategy

July 2025



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2. Foreword

Human trafficking and exploitation is abhorrent and shocking. It takes a huge toll on those involved and means support is vital – as is prevention, so it doesn't happen in the first place. It takes effort and cross-working to constantly focus on the Scottish Government's ambition for a Scotland free of trafficking and exploitation.



Siobhian Brown
Minister for Victims
and Community
Safety

Since publication of our first Trafficking and Exploitation Strategy in 2017 we have made significant progress across victim support and in disrupting this evil trade. However, trafficking is an ever-evolving crime. Criminal networks adapt quickly, and world events can create new and emerging risks and vulnerabilities. Those who wish to exploit will use any opportunity they can to target people in unstable and vulnerable situations. It is why this revised Strategy builds upon our work on prevention and ensures we remain agile and proactive.

We are taking a public health approach to human trafficking and exploitation, aligning with the original Strategy in recognising trafficking is a complex social problem facilitated by multiple drivers. The Strategy is underpinned by a number of key principles, including human rights and trauma-informed practice and continues to build on our collaborative approach. Survivors' voices are central to ensuring our response is rooted in lived experience.

The Strategy reinforces our commitment to identifying and supporting victims

and prosecuting perpetrators. Importantly, it aims to disrupt the conditions that foster trafficking and exploitation and will look to address systemic factors that place individuals at risk. There can be no tolerance for the actions of those seeking to benefit from the exploitation of others.

This requires a holistic response, bringing together Government, frontline support services, survivors, law enforcement, businesses, and communities. This revised Strategy sets out a clear foundation for action, rooted in strong partnerships and a shared determination to ensure that Scotland is a place of safety and recovery for victims whilst strengthening the role of data, evidence and research in shaping our interventions.

I want to express my gratitude to all those working tirelessly to combat trafficking and exploitation in Scotland. Your dedication and determination has helped shape this Strategy and will be essential in delivering its vision: to prevent human trafficking and exploitation in Scotland and to respond effectively when it does occur.

3. Definitions

Human trafficking: The action of recruiting, transporting/transferring, harbouring or receiving, exchanging or transferring control over another person, including children and young people, with a view to that person being exploited.

Exploitation: Taking advantage of someone, in particular the act of taking unjust advantage of another for one's own benefit.

Modern slavery: A term used to describe several types of exploitation including human trafficking, slavery, servitude, and forced or compulsory labour.

- Asylum seeker/person seeking asylum: A person who has made an application to the United Kingdom (UK) government for international protection (asylum) under the 1951 UN Refugee Convention and is waiting to receive a decision from the Home Office on their application or from a court in relation to an appeal.
- Child: Any person under 18 years of age.
- Competent Authorities: The Home Office bodies that are responsible for taking decisions on cases referred to the National Referral Mechanism (NRM) about whether the cases are recognised as confirmed victims of human trafficking or slavery, servitude and forced or compulsory labour.
- Conclusive grounds decision: A decision taken by a competent authority as to whether, on the balance of probabilities, a person is a victim of human trafficking or slavery, servitude and forced or compulsory labour.
- County lines: A term used in the UK to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas (within the UK), using dedicated mobile phone lines or other forms of 'deal line'. This often involves the exploitation of children and vulnerable adults to move and store the drugs and money through the use of coercion, intimidation and violence.
- Criminal exploitation: Victims, including children and young people, are deceived, coerced or forced into criminal activities such as drug cultivation, drug distribution, cuckooing, forced begging, pickpocketing, theft, or selling counterfeit goods and fraud – often taking advantage of a power imbalance under threat or deception.
- Cuckooing: The practice whereby a person takes over another person's dwelling (often the home of a vulnerable person, such as an individual living with substance addiction or physical or mental disabilities) to use it for illegal activities and is often associated with anti-social behaviour and the exploitation of children by criminal gangs.
- Debt bondage: A form of control utilised by perpetrators to retain control over victims of human trafficking. Victims are exploited in order to 'pay off' a debt which may be related to gifts or other goods provided to them or their travel to a destination country.

- Domestic servitude: Adults or children are exploited within private homes, often as domestic workers. Victims may experience restricted movement, long working hours, and minimal or no pay.
- First responder: An authority that is authorised by the Home Office to refer a potential victim of human trafficking into the National Referral Mechanism (NRM).
- Labour exploitation: Victims are deceived, coerced or sometimes forced to work for little or no pay, often through violence, intimidation, debt, confiscation of documents, control of bank accounts or threats about their immigration status.
- National Referral Mechanism (NRM): The UK-wide framework for identifying victims of human trafficking and ensuring they receive appropriate support.
- People smuggling: Involves the facilitation of a person's illegal entry into a State, for a financial or other material benefit.
- Perpetrator(s): The individual(s) responsible for human trafficking and exploitation.
- Potential victim of trafficking: A person who may be a victim of human trafficking at any stage of identification prior to a conclusive grounds decision via the NRM.
- Reasonable grounds decision: The initial decision taken by the competent authority that there are reasonable grounds to believe, based on all available general and specific evidence but falling short of conclusive proof, that the person is a victim of human trafficking or slavery, servitude and forced or compulsory labour.
- Refugee: A person who has been recognised as having a well-founded fear of persecution in their country of origin for reasons of race, religion, nationality, membership of a particular social group, or political opinion, is outside their country of nationality, and is unable or unwilling to avail themselves to the protection of that country and is unable or owing to such fear, is unwilling to return to it, under the 1951 UN Refugee Convention definition.
- Removal of organs: Where a person is encouraged, required or expected to have their organs or human tissue removed for the benefit of another person.
- Serious organised crime: Crime which involves more than one person; is organised, meaning that it involves control, planning and potentially use of specialist resources; causes, or has the potential to cause significant harm; and involves financial or other benefit to the individuals concerned.
- Sexual exploitation: Victims are deceived, coerced, or forced into sexual activity including, but not limited to, child sexual abuse, prostitution, pornography or lap dancing, often taking advantage of a power imbalance under threat, manipulation, or violence.
- Survivor leader: A person who uses their lived experience to lead and influence change.
- Unaccompanied asylum-seeking children: A child who is separated from both parents and is applying for asylum in the UK. Unaccompanied asylum-seeking children are looked after and accommodated by local authorities as children in need.

4. Introduction: Scotland's Second Trafficking and Exploitation Strategy

This Strategy constitutes Scotland's second Trafficking and Exploitation Strategy under the Human Trafficking and Exploitation (Scotland) Act 2015. It builds on the first 'Trafficking Strategy', published in 2017, which underwent its most recent review¹ through various forms of stakeholder engagement in 2023. The development of this Strategy was further informed by stakeholder and partner organisations, survivors of trafficking and exploitation and other practitioners, including academics. The Strategy is also informed by a series of evidence reviews carried out by the Scottish Government's Justice Analytical Services (JAS)², exploring current understanding of prevention strategies and interventions in relation to human trafficking and exploitation in the United Kingdom (UK) and other existing forms of research and evidence.

In this Strategy the terms 'victim', 'survivor' and 'people with lived experience' are used to refer to people who have experienced human trafficking and exploitation. People identify themselves differently depending on how they understand and feel about these terms.

Following stakeholder suggestions made during the 2023 review – and particularly in relation to strong

feedback to focus more on prevention and the need to strengthen data and evidence collation – this second Strategy adopts a Public Health approach (see further explanation in section 7) to the framework for tackling human trafficking in Scotland. Human trafficking and exploitation is a major public health concern, affecting individuals – adults and children – and society as a whole³.

1 Scottish Government (2023) [Trafficking and exploitation strategy: review](#).

2 Scottish Government Justice Analytical Services (2025) [Preventing Human Trafficking and Exploitation: Evidence Review](#).

3 Zimmerman, C. and Kiss, L. (2017) [Human trafficking and exploitation: A global health concern](#).

5. Background

What is human trafficking?

Human trafficking and exploitation (trafficking) are human rights abuses which are often complex and hidden crimes. It involves the illegal practice of recruiting, transporting, receiving, controlling, or exchanging people to exploit them, mostly for profit. Victims can be exploited for labour, sex and criminal purposes as well as for domestic work, organ harvesting, or other purposes.

The [Human Trafficking and Exploitation \(Scotland\) Act 2015](#) sets out that an offence of human trafficking is committed when a person is recruited, transported, harboured, received or controlled with the intention to exploit, or knowledge of likely exploitation. Any one of these actions, alongside the intention to exploit or knowledge of likely exploitation, is sufficient for an offence to be committed. Arranging or facilitating any of these actions with an intention to exploit or while knowing that the person is likely to be exploited also counts as an offence under the Act.

International human trafficking treaties and conventions

The [Palermo Protocol](#) (the Protocol) was adopted by the United Nations (UN) in November 2000 as part of the [United Nations Convention against Transnational Organized Crime](#). It was the first legally binding instrument with an internationally recognised definition of human trafficking. This definition provides a tool for the identification of victims and for the detection of all forms of exploitation which constitute human trafficking. Countries that ratify this treaty must criminalise human trafficking and develop anti-trafficking laws in line with the Protocol's legal provisions. The United Kingdom ratified the Protocol in 2006.

The [Council of Europe Convention on Action against Trafficking in Human Beings](#) by the Parties (ECAT) was brought into force on 1 February 2008. ECAT is an international treaty which provides a comprehensive framework for combating human trafficking following a human-rights based and victim-centred approach. While building on existing international instruments, ECAT goes beyond the minimum standards agreed upon in them and strengthens the protection afforded to victims. ECAT is the first international legal instrument to take a human rights-based approach to the fight against human trafficking. It has a comprehensive scope of application in that it applies to all forms of trafficking and to all victims of trafficking. In addition, an important added value of ECAT is the monitoring mechanism set up to supervise its implementation by State Parties. The UK ratified ECAT in 2008.

The [EU Anti-Trafficking Directive 2011/36/EU](#) on preventing and combating trafficking in human beings and protecting its victims came into force in 2011. This Directive lays down minimum common rules for determining offences of trafficking in human beings and punishing offenders. It also provides for measures to better prevent trafficking and to strengthen the protection of victims. The UK has opted into this Directive. A further important convention is the [European Convention on Human Rights \(ECHR\)](#) which was ratified by the UK in 1951, and came into force in 1953. It is incorporated into domestic law through the Human Rights Act⁴ 1998. Article 4 of the ECHR and of the Human Rights Act prohibit slavery and forced labour.

More information on the international treaty obligations and conventions can be found in Annex B.

Scottish and UK legislation

The [Human Trafficking and Exploitation \(Scotland\) Act](#) (the 2015 Act) was passed unanimously by the Scottish Parliament in 2015. The Act sets out the legal definition of the offence of human trafficking and the exploitation relevant for the purposes of human trafficking offences. These are:

- slavery, servitude and forced or compulsory labour
- prostitution or sexual exploitation
- removal of organs
- securing services and benefits.

The Act introduced two new offences both of which carry a maximum penalty of life imprisonment. The two offences are:

- human trafficking
- slavery, servitude and forced or compulsory labour.

Sections 9 and 10 of the 2015 Act require Scottish Ministers to secure support and assistance for adult victims of human trafficking where there are reasonable grounds (as determined through the NRM) to believe an adult is a victim of human trafficking and/or slavery, servitude and forced or compulsory labour.

Section 11 of the 2015 Act places a duty on Scottish Ministers to provide an independent child trafficking guardian for unaccompanied asylum-seeking children, where there is reason to believe they might have been, or are at risk of being, trafficked. Following a consultation, the new Independent Child Trafficking Guardians (ICTG) service, Guardianship Scotland, launched on 1 April 2023.

Section 12 of the 2015 Act ensures that where there is uncertainty over a person's age, and there are reasonable grounds to believe they may be a child, they are presumed to be under the age of 18 for the purposes of support and access to services until their age is formally established.

4 [Human Rights Act 1998.](#)

Section 35 of the 2015 Act required Scottish Ministers to produce a Trafficking and Exploitation Strategy and this was published in 2017. The Strategy centred on three action areas:

- Action Area 1 – identify victims and support them to safety and recovery
- Action Area 2 – identify perpetrators and disrupt their activity
- Action Area 3 – address the conditions that foster trafficking and exploitation.

The Strategy also covers child trafficking which brings together the elements of the three action areas which relate to children who are, or may be, victims of human trafficking and exploitation.

The UK Parliament passed the [Modern Slavery Act 2015 \(MSA\)](#) which came into force in 2015. Although the MSA primarily relates to England and Wales, some provisions do extend to Scotland. The Home Office provides the following overview of the Act's provisions:

- it ensures that perpetrators receive suitably severe punishments for modern slavery crimes (including life sentences)
- it enhances the court's ability to put restrictions on individuals where it's necessary to protect people from the harm caused by modern slavery offences
- it creates an independent anti-slavery commissioner to improve and better coordinate the response to modern slavery (UK-wide)
- it enables the secretary of state to make regulations relating to the identification of and support for victims

- it makes provision for independent child trafficking advocates
- it introduces a new reparation order to encourage the courts to compensate victims where assets are confiscated from perpetrators
- it requires businesses over a certain size to disclose each year what action they have taken to ensure there is no modern slavery in their business or supply chains (UK-wide).

More information on Scottish and United Kingdom legislation can be found in Annex B.

6. Trafficking and Exploitation in Scotland

Since the implementation of the 2015 Act, victims of trafficking have been identified in all 32 local authority areas in Scotland. The identification of potential victims has been increasing, from 145 referrals to the NRM in 2015 compared to 920 in 2024. Adults (aged 18 or above at point of referral) accounted for 664 referrals with 256 relating to children in 2024, with males comprising 714 referrals and females 206 referrals.

Forms of exploitation can include, but are not limited to:

- sexual exploitation – victims are deceived, coerced, or forced into sexual activity, including but not limited to prostitution, pornography or lap dancing, often under threat, manipulation, or violence.
- labour exploitation – victims are deceived, coerced or forced to work for little or no pay, often through violence, intimidation, debt, confiscation of documents, control of bank accounts or threats about their immigration status. This occurs in all sectors of industry including manufacturing, hospitality, agriculture, social care, construction, fishing, car washes, and the beauty industry.
- domestic servitude – domestic workers are exploited within private homes, and they may experience restricted movement, long working hours, and minimal pay. This form of exploitation may be particularly hard to detect as it would tend to be hidden from view.
- criminal exploitation – victims are deceived, coerced or forced into criminal activities such as drug cultivation, drug distribution, cuckooing, forced begging, pickpocketing, theft, or selling counterfeit goods and fraud, often under threat or deception.

Victims of trafficking may be unaware that they are being exploited or that they have been trafficked for the purposes of exploitation. Survivors have explained that it was often too dangerous for them or their families (sometimes outside the UK) to report or escape their exploitation. A person can be a victim of trafficking regardless of whether they have consented to any circumstance or aspect related to their exploitation. The Palermo Protocol also recognises that a child's consent is irrelevant, ensuring children are protected from exploitation regardless of whether they appear to agree to it⁵.

5 United Nations Human Rights Office of the High Commissioner (2000) '[Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime](#)'.

As outlined in the 'Preventing Human Trafficking and Exploitation: Evidence Review'⁶ commissioned to inform this Strategy, human trafficking and exploitation creates significant physical and mental health harms to individual victims. Physical abuse, including sexual exploitation, can result in long lasting health conditions both during victims' trafficking experience and following removal from such a situation. Lack of medical intervention during exploitation and limited access to basic nutrition can also facilitate long-term health complications. The psychological impact experienced by victims will often create long-lasting mental health challenges. These challenges can be exacerbated by uncertainty around the future and difficulties and delays navigating criminal justice processes, immigration systems or accessing education and employment opportunities.

There are some common misconceptions that for trafficking to occur international borders or domestic boundaries must be crossed. However, movement of a victim is not required for an offence of human trafficking to be committed in Scotland. Victims can be men, women, or children of any nationality, including British citizens. The number of British nationals identified as victims of trafficking is increasing with 10% of NRM referrals relating to Scotland in 2024 being British, compared to 5% in 2021.

Often different forms of exploitation overlap with one another where a victim may be exploited in more than one way, consecutively or concurrently, for example, through labour and sexual exploitation, or criminal and labour exploitation. Activities in which victims have been identified include agriculture, fishing, construction, commercial sexual exploitation/prostitution, illegal drugs trade, the beauty industry (nail bars, beauty salons), hospitality, car washes and social care, and many others. For child victims, reporting of trafficking for criminal exploitation is increasing and involves the exploitation of an individual to engage in criminal activity for the benefit of the exploiter. Technology-facilitated human trafficking and exploitation is an area of increasing risk.

Given the large number of sectors in which trafficking and exploitation takes place in Scotland, as well as the devastating impact that experiences of trafficking and exploitation can have on victims, it is vital that national policies, strategies and practices are fully aligned to achieve the outcomes of this Strategy. A public health approach requires collaborative and interlinked actions to deliver results at both national and local levels. Aligning the new trafficking strategy within wider Scottish Government frameworks therefore ensures a more resilient and preventative approach. Annex C outlines key policy areas essential to delivering these outcomes. Strengthening coordination across local partnerships and public services will ensure that we will be able to better prevent trafficking and to respond effectively when it occurs.

6 Scottish Government Justice Analytical Services (2025) [Preventing Human Trafficking and Exploitation: Evidence Review](#).

Public Protection approaches to the interconnectedness of risk and harm

The term Public Protection is used to encompass the many different strategic approaches and responses to keeping children and adults safe. Child Protection, Adult Support and Protection, Multi-Agency Public Protection Arrangements (MAPPA), Alcohol and Drug Partnerships, Violence Against Women and Girls (VAWG), and Suicide Prevention are all part of the Public Protection system in Scotland. Risk is interconnected across the system and people who are vulnerable to harm often need support from several parts of the Public Protection system. For people that have been, or are at risk of being trafficked, an integrated, person-centred system where services are co-ordinated is vital.

Being exposed to certain harms and risks can make adults and children more vulnerable to trafficking and exploitation. The type of harm to which they may be exposed may be psychological, physical, environmental or structural. Structural and environmental factors that increase the risk of trafficking and exploitation include poverty, conflict and instability, organised crime networks, lack of opportunities, and gender inequality. Social and family factors can include domestic violence, socioeconomic conditions, parental substance use and family debt. Individual factors that increase vulnerability to trafficking and exploitation include substance misuse, homelessness, having no recourse to public funds, being in residential care,

not being able to communicate using the dominant language and disability, amongst others⁷. Some of these risk factors can also be symptoms of and ways of coping with the trauma and distress experienced by individuals who have been exploited and trafficked. Technology-facilitated enablers of exploitation, such as the use of social media, contribute to increased risk. The interrelationship of all these factors highlights the potential of a coordinated public protection approach aimed at protecting those at risk of harm.

A collection of action and co-ordination is required at local and national levels to understand the risk factors that lead to vulnerability, to try and prevent or minimise the risk factors, and to respond both upstream but also when harm occurs. Local authority Chief Officers are individually and collectively responsible for public protection, and nationally the National Public Protection Leadership Group seeks to provide national multi-agency leadership of public protection across Scotland, to support continuous improvement, and to work collaboratively with local areas. The National Public Protection Leadership Group has, as part of its remit, the need to consider public protection interests in human trafficking.

In Scotland the public protection approach is working to build on existing work and improve multi-agency collaboration, information sharing, and shared strategic ownership with a view to preventing and reducing harm across a range of these potential harm types, including trafficking and exploitation.

7 [Modern Slavery and Human Rights Policy and Evidence Centre \(2021\) 'The top 20 non-UK source countries for modern slavery in the UK: Research Summary for internationally focused actors'](#).

Public protection approaches recognise the intersection of different harms, some of these listed above, which affect victims and survivors of trafficking and seek to address these holistically in order to protect and support victims. The ['National Guidance for Child Protection in Scotland'](#), for example, sets out the responsibilities of everyone who works with children, young people and their families. This guidance, which was reviewed and updated in 2023, makes clear that all concerns that a child has been abused or is at risk of abuse, including trafficking and exploitation, must be reported to the police or social work. An [evaluation report by the Centre for Excellence for Children's Care and Protection \(CELCIS\)](#) published in March 2024 highlighted significant progress by local areas despite challenging fiscal and workforce circumstances, including improved alignment between local child protection processes.

The Adult Support and Protection (Scotland) Act

Human trafficking and exploitation constitute 'harm' to a person that can be physical, sexual, psychological, financial, or a combination of these. The [Adult Support and Protection \(Scotland\) Act 2007](#) places a duty on local authorities to make inquiries about a person's wellbeing, property or financial affairs if it knows or believes that the person is an adult at risk, and that it might need to intervene in order to protect the person's wellbeing, property or financial affairs. The Act is designed to support and protect adults aged 16 and over, and who meet all three of the following criteria:

- they are unable to safeguard their own wellbeing, property, rights or other interests
- they are at risk of harm
- they are affected by disability, mental disorder, illness or physical or mental infirmity and so they are more vulnerable to being harmed than adults who are not so affected.

The Act provides a framework for intervention and support for adults at risk of harm. It provides measures to identify and to provide support and protection for those individuals who are vulnerable to being harmed whether as a result of their own or someone else's conduct.

7. A Public Health Approach to Human Trafficking

Scotland's second Trafficking and Exploitation Strategy takes a public health approach to trafficking. There have been growing calls for taking such an approach to trafficking and exploitation within academic literature, as outlined in the series of evidence reviews, produced by the Scottish Government's Justice Analytical Services (JAS), but this is at an early stage of development within policy and practice⁸.

There is no one universally adopted model or definition of a public health approach to trafficking. Prevention is a central component of the public health approach, and Liz Such and colleagues developed a definition of prevention which was informed by lived experience:

".... an on-going process of avoiding and minimising exploitation and harm. This can be achieved by intervening before harm occurs, by intervening early and by treating harms. It also includes action to prevent re-exploitation and re-trafficking." (Such et al, 2024: 2.)

Taking a public health approach does not mean focusing only on health nor focusing only on prevention. It means taking an approach that has demonstrated improvement in the health and wellbeing of populations by delivering targeted interventions and resources aligned to their specific

needs or challenges and applying it to trafficking. Other examples of taking this approach across the Scottish Government are the '[Violence Prevention Framework](#)' and the '[Equally Safe Strategy](#)'. It aligns with the Scottish Government's '[Vision for Justice](#)' which aims to improve outcomes for individuals, focussing on prevention and early intervention.

Using a public health approach to trafficking brings with it a number of advantages including, but not limited to:

- focusing on preventing trafficking by understanding and changing the conditions that allow it to happen. This means looking at the existing situations and social conditions that put people at risk – both in local communities and on a national and international level. Prevention is already a key part of the previous strategy but is an area that requires further focus.
- using multi-agency and collaborative approaches to address interrelated causes and effects such as those outlined above. This is already the approach taken in the previous Trafficking Strategy and strengthens it.
- viewing the harm done by trafficking not only as impacting specific individuals but also their family and community.

8 Sprang, G., Stoklosa, H. and Greenbaum, J. (2022) '[The Public Health Response to Human Trafficking: A Look Back and a Step Forward](#)', Public Health Reports.

- being evidence and data-driven with a clear focus and ambition to evaluate the outcomes of the Strategy and the processes required to achieve these. While it can be challenging to identify outcomes and indicators for some broader prevention measures, the intention to monitor and evaluate the outcomes of the Strategy leads to an improved evidence-base.
- having flexibility to respond to changing and complex circumstances, contexts and impacts. This is of particular relevance within the fast-changing national and international context in which traffickers adopt alternative strategies to avoid detection.
- a more effective use of resources at local and national levels to maximise the impact of interventions and programmes.
- an alignment with other Scottish Government approaches focused on vulnerable groups and public protection as outlined above.

Public health approaches in action

A public health approach works across three levels⁹:

Primary prevention: prevents trafficking and exploitation before it occurs. This involves programmes and interventions designed to reduce factors that put people at risk of experiencing or perpetrating trafficking.

Secondary prevention: provides an immediate response to trafficking and exploitation after it occurs through addressing short-term consequences and effects. Programmes and interventions focus on the identification of victims and their immediate needs such as safe housing, health care (physical and mental) and other forms of support alongside the disruption and prosecution of perpetrators.

Tertiary prevention: provides long-term support after the trafficking and exploitation has occurred and prevents re-trafficking from occurring. Programmes and interventions include long-term supportive services, advocacy and outcomes as well as other services aimed at mitigating long-term impacts and re-trafficking, and facilitating community reintegration.

These three levels are referred to in this Strategy in the following way:

- before harm occurs – primary prevention
- intervening early – secondary prevention
- treating harms and supporting recovery – tertiary prevention

9 Based on the work of Modern Slavery and Human Rights Policy and Evidence Centre (2022) '[Prevention of adult sexual and labour exploitation in the UK: What does or could work?](#)'. Also based on the work of U.S. Department of Health and Human Services Administration for Children and Families (2024) '[National Human Trafficking Prevention Framework: A Public Health Approach to Preventing Human Trafficking](#)'.

The prevention continuum below, developed by Liz Such and colleagues, illustrates these different levels across the prevention levels.

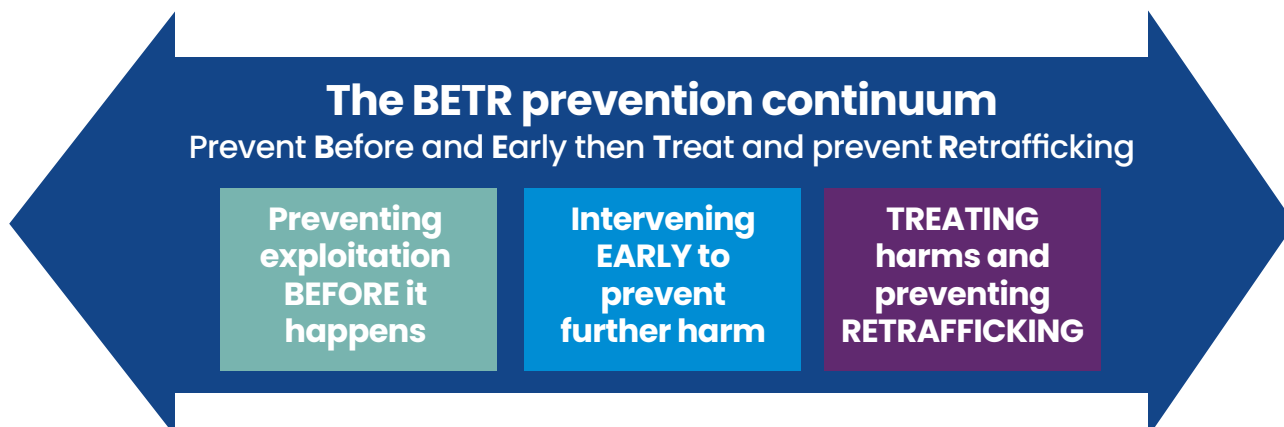


Figure 1: The BETR Prevention Continuum by Such et al. (2022)¹⁰

The public health approach enables policy makers and practitioners to adopt a prevention lens that incorporates different actions depending on the stage or phase at which trafficking is identified, disrupted and victims supported. This approach also focuses on early detection by using multi-agency working (such as specialist trafficking support services, health and legal interventions, social work involvement, and criminal justice investigations) to mitigate the effects of trafficking as soon as harm is identified.

In general, a public health approach is characterised by the following components:

- reviewing evidence to identify the best ways to solve the problem, including considering what 'works' and for 'whom'
 - identifying risk and protective factors for individuals, groups and communities
 - developing and testing prevention strategies across primary, secondary and tertiary levels
 - monitoring and evaluating their effectiveness through data and evidence collection
 - adapting strategies to changing circumstances and evaluation evidence.
- defining and understanding the problem, the extent of the problem and its root causes

¹⁰ Modern Slavery and Human Rights Policy and Evidence Centre (2022) 'Prevention of adult sexual and labour exploitation in the UK: What does or could work?'.
[Prevention of adult sexual and labour exploitation in the UK: What does or could work?](#)

Most of these components were present in the previous Strategy but a public health approach places a greater emphasis on prevention as a holistic focus – a “whole systems approach”¹¹ – rather than as one of three separate strands of work. This will underpin the delivery of preventative measures more consistently and the implementation of these more strategically, potentially strengthening opportunities for identification and support. In addition, the importance and centrality of data collection, information and intelligence sharing processes to build the evidence base for effective interventions is highlighted.

11 Modern Slavery and Human Rights Policy and Evidence Centre (2022) [‘Prevention of adult sexual and labour exploitation in the UK: What does or could work?’](#).

8. Child Trafficking and Exploitation

Child trafficking and exploitation has evolved significantly since the previous Strategy, with changes in the methods and types of exploitation, and the responses needed from police, local safeguarding partners and other key agencies to protect children. We have seen the widespread use of technology and social media creating new avenues for exploitation, as well as a rise in specific types of exploitation – most notably the expansion of ‘county lines’ drug trafficking – intensifying the complexity and impact of this crime (see Annex A for further information on child criminal exploitation). There is also now greater awareness that trafficking and exploitation can, and does, occur both within Scotland and between Scotland and other countries.

In Scotland, the exploitation and trafficking of children is a form of child abuse, requiring a child protection response. The [‘National Guidance for Child Protection in Scotland 2021 \(updated 2023\)’](#) provides a framework for identifying, reporting and responding to child abuse, outlining specific protocols for professionals working with children. This includes guidance on relevant legislation, duties and responsibilities towards child victims of trafficking, recognition of the range of abuse and exploitation associated with child trafficking, and ensuring inter-agency working in cases of concerns about exploitation or trafficking.

The National Guidance for Child Protection also provides advice on the role and working with Independent Child Trafficking Guardians (ICTGs). The statutory ICTG service provides assistance, support and representation to all unaccompanied children who are, or may be, a victim of the offence of human trafficking or who are vulnerable to becoming victims of that offence¹². Examples of Guardians’ responsibilities includes providing trafficking support, such as contributing to the safeguarding of the young person and supporting them through the National Referral Mechanism process. Guardians also provide asylum support and help a child or young person to be actively involved in the decisions that affect their life.

Child protection and support for victims of exploitation and trafficking falls within the broader Getting it Right for Every Child (GIRFEC) approach to improving outcomes for children and young people. The GIRFEC approach ensures that all children receive the support they need early on and at the time they need it, aiming to prevent issues from escalating to the point where urgent child protection measures are necessary. It highlights the importance of collaborative planning, with services working together to safeguard children’s rights and wellbeing. This approach is in line with public health principles in that it is child centred and rights based and shares a similar objective to prevent

12 Section 11 of the [Human Trafficking and Exploitation \(Scotland\) Act 2015](#).

harm and promote overall child welfare. Under section 6 of the [United Nations Convention on the Rights of the Child \(Incorporation\) \(Scotland\) Act 2024](#), public authorities must act in a way that is compatible with UNCRC when exercising relevant functions. This would include, for example, public authority functions under the 2015 Act.

Adopting a public health approach means that all of the principles and outcomes would apply to both adults and children. One example of how a public health approach could enhance current strategies to combat child trafficking and exploitation include further implementation of *Contextual Safeguarding*¹³. This approach addresses social environments – such as schools, peer groups, and online spaces – where children are often exposed to risks. Another example is Transitional Support¹⁴, which focuses on keeping young people safe as they transition to adult services. Maintaining continuity of support during this period helps to reduce vulnerabilities and ensures that preventive measures against exploitation remain consistent and responsive to the person's evolving needs. As outlined in the Scottish Government JAS paper, 'Preventing criminal exploitation – social research findings', both approaches are deeply interconnected to the public health approach in that they focus on preventing exploitation through holistic, supportive, and proactive measures.

Child protection is an inter-agency responsibility that requires strong collaboration between agencies and ongoing efforts to prevent harm or reduce risk. The public health approach is designed to enhance rather than replace existing person-centred processes. By working alongside current interventions, it strengthens prevention efforts and improves partnerships among those involved in protecting and supporting child and adult victims of trafficking and exploitation.

13 The Institute for Research and Innovation in Social Services (Iriss) (2021) [Child protection in the 21st century: a role for contextual safeguarding](#).

14 Scottish Transitions Forum (2025) [Principles of Good Transitions](#).

9. Vision and Purpose

The **vision** of the Strategy is to:

prevent human trafficking and exploitation in Scotland and to respond effectively when it does occur.

There is no place for trafficking in Scotland and our shared ambition is for a Scotland free of this grave and unacceptable human rights violation.

The overarching **purpose** of this Strategy is to:

prevent trafficking and exploitation of adults and children by providing a clear framework, informed by survivor voices and data, through which our anti-trafficking interventions will be delivered.

We recognise, however, that it will not be possible to prevent trafficking and exploitation entirely given the systemic and global issues that drive and facilitate trafficking, as well as contextual factors out with the control of the Scottish Government, such as UK immigration policy. We also recognise that trafficking and exploitation often occurs outside of and before entering Scotland and the UK which will make our ability to prevent it more challenging.

The recognition that not all trafficking and exploitation can be prevented does not weaken our ambition for a Scotland free of the dehumanising exploitation that underlies trafficking. There can be no tolerance in Scotland for the actions of those seeking to benefit from the exploitation of others.

Where trafficking and exploitation has occurred, we will respond effectively and according to the principles outlined below. This will be in line with internationally recognised practices and will be focused on the timely identification, support and protection of victim-survivors and the identification, disruption and prosecution of perpetrators. We will also strengthen data and evidence collection in order to understand and increase the impact of our strategic actions.

10. Principles

The following principles underpin our approach to this strategy. The Delivery Plan (see section 12 on page 29 for more information) will outline in more detail how these will inform the implementation of the Strategy.

Human-rights based

Human rights are universal, non-divisible and central to all efforts to prevent and combat trafficking and exploitation. Trafficking is a fundamental violation of human rights. Survivors need to be assisted to restore their rights, and the dignity and human rights of victims and survivors must be respected at all times. A human rights approach based on the 'PANEL' principles means that:

- survivors are involved in decisions that affect them and their rights (**Participation**)
- there should be monitoring of how people's rights are being affected, as well as remedies when things go wrong (**Accountability**)
- all forms of discrimination must be prohibited, prevented and eliminated. people who face the biggest barriers to realising their rights should be prioritised (**Non-Discrimination and Equality**)
- everyone should understand their rights, how to assert them and be fully supported to take

part in developing policy and practices which affect their lives (**Empowerment**)

- approaches should be grounded in the legal rights that are set out in domestic and international laws (**Legality**).

Trauma-informed and culturally competent

Survivors of trafficking have experienced repeated and often prolonged traumatic events which have profound and long-lasting, detrimental effects on their mental and physical health. Trauma-informed practice describes a way of working with people that recognises the prevalence of trauma and responding in ways that reduce the impact of trauma and re-traumatisation on survivors while supporting them to recovery.

Trauma-responsive methods of working are thus based upon an understanding of the harmful effects of traumatic experiences together with fundamental principles of compassion and respect¹⁵. Being trauma-informed does not only apply to ways of working with survivors, however, but needs to extend to any organisations who come into contact with victims and therefore need to adopt an overarching framework that "emphasizes the impact of trauma and guides the general organisation and behaviour of an entire system" (Hopper, 2004 cited in OSCE ODIHR, 2023, p.2)¹⁶.

15 National Trauma Transformation Programme (2023) A Roadmap for Creating Trauma-Informed and Responsive Change: Guidance for Organisations, Systems and Workforces in Scotland.

16 Organization for Security and Co-operation in Europe (OSCE) Office for Democratic Institutions and Human Rights (ODIHR) (2023) 'Guidance on Trauma-Informed National Referral Mechanisms and Responses to Human Trafficking'.

Cultural competence refers to the requirement to support the needs of a diverse population of survivors in a way that understands their cultural background. The lack of culturally competent practice may be experienced as re-traumatising by survivors¹⁷. Survivors can face barriers to support created by a lack of cultural and structural competency at individual, organisational and policy levels¹⁸. Organisations need to develop and implement strategies that removes barriers at all three levels and address how these might affect survivors' needs and responses to care and support. Language plays an important role in the provision of culturally competent support.

Victim/Survivor-informed

Survivors of trafficking and exploitation have lived experience and therefore expert knowledge and insight into the effects this violation has on the lives, health and wellbeing of individuals and their families. Survivor leaders are key in ensuring that service delivery for protection, support and recovery meets the needs of survivors. They also play a crucial role in identifying the specific risks and challenges they face, especially in relation to re-trafficking. There is strong evidence that when

people with lived experience are directly involved in decision-making, outcomes for people are improved¹⁹.

Lived experience engagement has to be meaningful and ethical. People with lived experience have been involved and influenced the revision of this Strategy. It is crucial that they continue to inform and influence all aspects of its implementation. In collaboration with survivors, partner organisations and others, we will work to embed lived experience within the Strategy implementation structures and ensure survivor voices are heard throughout the delivery phase.

Gender-sensitive

All genders experience all forms of trafficking and exploitation. However, trafficking may impact women, men, girls and boys differently and some forms of trafficking and exploitation are more likely to affect one gender over another. It is important that this recognition translates into appropriate support for each survivor of trafficking and exploitation and is based on an understanding not only of the differences of experiences and their impact on individual survivors but also of the complexities of power hierarchies between and within genders²⁰.

17 St Mary's University Twickenham London '[Cultural Influences and Cultural Competency in the Prevention and Protection of Survivors of Modern Slavery and Human Trafficking: Insights from the UK and Albania](#)'.

18 Modern Slavery and Human Rights Policy and Evidence Centre (2024) '[Cultural competency in UK responses to modern slavery](#)'.

19 Scottish Government (2024) [Participation Handbook](#). Modern Slavery and Human Rights Policy and Evidence Centre (2022) '[A review of current promising practices in the engagement of people with lived experience to address modern slavery and human trafficking](#)'.

20 Organization for Security and Co-operation in Europe (OSCE) Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings (2022) '[Applying Gender-Sensitive Approaches in Combating Trafficking in Human Beings](#)'.

The intersection between different vulnerabilities affects genders in different ways which may result in the amplification of specific risks. People who identify as LGBTQI+, for example, may experience increased barriers to identification and support due to gender identity-based discrimination intersecting with other risk factors and marginalisation²¹. A gender-sensitive approach recognises that these intersections of risk and vulnerabilities necessitate tailored, gender-responsive strategies that address gender-specific vulnerabilities and needs of victims of trafficking and exploitation²².

Age-sensitive

This principle is grounded in human rights, affirming that people of all age groups are entitled to the same fundamental rights. However, it recognises that experiences of trafficking and exploitation differ depending on whether a person is a child or an adult, both in terms of the types of exploitation they may face, and the support services required to assist them. Even within the broad categories of 'child' and 'adult', specific age groups may experience exploitation in distinct ways. The intersection of age with other characteristics such as gender, race, disability, socioeconomic status, and more can also create compounded challenges.

In Scotland, children have inherent rights linked to their development, protection, and participation²³. However, the distinction between child and adult victims of trafficking and exploitation can create challenges, for example when children turn 18 and transition between services where support systems change. These transitions raise concerns about gaps in support, unmet needs, and heightened vulnerability for young people. At the same time, older victims of trafficking and exploitation may face additional risks if their needs and experiences are overlooked due to their age. Being age-sensitive means understanding and responding to the unique and nuanced experiences of individuals at different life stages. It requires taking targeted actions to address these complexities while fostering an inclusive approach that effectively supports people across all age groups.

Multi-agency approach

Collaboration across services and organisations to improve outcomes for survivors of trafficking and exploitation and ensuring that perpetrators are held to account is an essential cornerstone of how the Strategy has been implemented to date and will continue to serve as a guiding principle. Effective communication and

21 Human Trafficking Search (2016) [LGBTQI+ victims of human trafficking](#).

22 This includes the identification and support of both male and female victims in non-corresponding trafficking sectors which are forms of trafficking that mainly affect the victims of the opposite sex, such as sexual exploitation of men and boys, or trafficking for the purpose of organ removal of women and girls (Organization for Security and Co-operation in Europe (OSCE) Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings (2022) '[Applying Gender-Sensitive Approaches in Combating Trafficking in Human Beings](#)').

23 [United Nations Convention on the Rights of the Child \(Incorporation\) \(Scotland\) Act 2024](#).

information-sharing is key to multi-agency working as are the willingness to learn from other agencies and regular opportunities for knowledge sharing. Using a multi-agency approach effectively requires considering not only the specific characteristics of the individual survivors and their situation but also the geographical context within which services are to be provided. Delivering at a local level remains a key criterion for how multi-agency working can be implemented successfully.

Based on partnership working at local, Scottish, UK and international levels

Partnership working has been central to the work done in delivering the Strategy to date and remains a crucial principle as we seek to improve our efforts to prevent trafficking and support and protect victim-survivors.

- **Local level:** The whole system and multi-agency approach that underpin the strategy means that we will continue to draw on a range of policies and sectors to implement it at local level. Local authorities, Police Divisions, NHS Boards and Health and Social Care Partnerships across Scotland will continue to work together to deliver the outcomes of this Strategy. Continued partnership and collaboration between civil society, the third sector, business, academia and government forms part of an effective Strategy that recognises and supports the important contributions of these sectors in preventing trafficking and exploitation, supporting survivors and holding perpetrators to account.
- **Scottish level:** Scottish Government will continue to strengthen our cross-policy engagement internally and working outwardly alongside other relevant national organisations. Given the complex legislative and policy landscape in Scotland (see Annex C), we will take a lead in aligning policy areas that impact survivors' lives, ensuring that services are provided in line with the principles outlined in the Strategy.
- **UK level:** Collaboration across Scotland and the rest of the UK is a cornerstone of effectively delivering support to survivors and holding perpetrators to account. The nature of serious organised crime and the fact that trafficking and exploitation occurs throughout the rest of the UK means that our continued collaboration across local authorities, support organisations, regulators, devolved administrations, UK Government, law enforcement agencies and with the Independent Anti-Slavery Commissioner (IASC) is vital for successful implementation.
- **International level:** We will continue to be informed by and work with international counterparts, including survivor support and civil society organisations, to ensure that Scotland not only remains abreast of new developments in anti-trafficking work but also continues to collaborate effectively with European and global partners to tackle transnational trafficking in Scotland and abroad.

11. Outcomes

The Strategy has four long-term outcomes

1

Child and adult victims are identified, protected and supported to safety and long-term recovery: the protection and support of child and adult victims remains an absolute priority for the Strategy. For this to be effective, early identification, access to co-ordinated services, legal entitlements and community integration opportunities are crucial. The voices of people with lived experience will continue to inform work in this area.

2

Perpetrators are identified, their activities are disrupted and they are prosecuted: taking robust and swift action against perpetrators, be they individuals, businesses or organised crime groups, is essential in order to protect children, adults and communities against the harm caused by trafficking and exploitation. The identification and prosecution of those involved in serious organised crime continues to be an essential part of the '[Serious and Organised Crime Strategy](#)'²⁴.

3

Improved use of data, evidence and research informs strategy implementation: in order to understand the nature of trafficking and profile of victims and perpetrators in Scotland, it is vital that evidence and data use is improved. This is also important for learning from activities that have proven to be most effective and identifying areas for improvement as well as keeping abreast of emerging trends in trafficking and changes across associated risk factors.

4

Conditions that expose children, adults and communities in Scotland to increased risks of trafficking and re-trafficking are addressed: this outcome aligns with the overall prevention framework of a Public Health approach as well as the existing Government strategies that seek to ensure a safer and fairer Scotland. Efforts directed towards the prevention of trafficking will continue to span local, Scottish, UK and international levels.

Using the public health approach to trafficking outlined above, the outcomes are mapped across the primary (before harm occurs), secondary (intervening early) and tertiary (treating harms and supporting recovery) levels of

prevention. Annex C provides an overview of the strategic and policy context in Scotland to show how various other strategies contribute to reducing general risk factors at a population level.

24 Scottish Government (2022) [Serious Organised Crime Strategy](#).

Human Trafficking and Exploitation Strategy 2025

Our vision is to prevent human trafficking and exploitation in Scotland and to respond effectively when it does occur

The **purpose** of the strategy is to prevent trafficking and exploitation of adults and children by providing a clear framework, informed by survivor voices and data, through which our anti-trafficking interventions will be delivered

The following **principles** underpin our approach



Human rights



Trauma-informed and culturally competent



Victim/survivor-informed



Gender-sensitive



Multi-agency approach



Partnership working at local, Scottish, UK and international level



Age-sensitive

Taking a **public health approach** we will prevent before harm occurs, intervene early, treat harms and support recovery

Outcomes

- 1** Child and adult victims are identified, protected and supported to safety and long-term recovery
- 2** Perpetrators are identified, their activities are disrupted, and they are prosecuted
- 3** Improved use of data, evidence and research informs strategy implementation
- 4** Conditions that expose children, adults and communities in Scotland to increased risks of trafficking and re-trafficking are addressed

Outcome 1: Child and adult victims are identified, protected and supported to safety and long-term recovery

The protection and support of child and adult victims remains an absolute priority for the Strategy. For this to be effective, early identification, access to co-ordinated services and to legal entitlements are crucial. The voices of people with lived experience will continue to inform work in this area.

Before harm occurs

- Awareness of trafficking and exploitation is raised across the public and third sectors through systematic training
- Locally developed partnership mechanism allows stakeholders to exchange area-specific information and co-ordinate resources
- Awareness of trafficking, exploitation and rights is raised with at-risk individuals and communities, including internationally
- The rights to protection from exploitation and trafficking are upheld through persistent efforts in planning and action between agencies to prevent harm and safeguard children and adults at risk.

Intervening early

- Those who encounter victims understand signs, know what to do and have the knowledge and skills to identify and refer to appropriate services
- Multi-agency, trauma-informed and culturally competent adult and child centred support processes, services

and advocacy enable victims to recover and build resilience

- Service providers deliver an accessible and reliable service to victims which engenders trust
- Service providers work closely with individuals and communities to identify potential victims
- Victims have access to the information and support they need to make informed decisions about their situation
- Greater knowledge of trafficking and exploitation amongst the legal and criminal justice sector is developed.

Treating harms and supporting recovery

- Prevent re-trafficking and reduce harm through the provision of trauma and survivor-responsive long-term support
- Support survivors with legal processes, social/community reintegration and building resilience during the different stages of their recovery journey.

Outcome 2: Perpetrators are identified, their activities are disrupted, and they are prosecuted

Taking robust and swift action against all perpetrators, be they individuals, businesses or organised crime groups, is essential in order to protect children, adults and communities against the harm caused by trafficking and exploitation. The identification and prosecution of those involved in trafficking and exploitation, including serious organised crime, continues to be an essential part of the Strategy²⁵.

Before harm occurs

- Adequate and accurate information and data is gathered and shared within local, Scottish, UK and international partnerships, including emerging issues in specific sectors
- Regulatory compliance standards and mechanisms are implemented, monitored and reported on to strengthen transparency in supply chains
- Fair work policies and practices are adopted and monitored
- Awareness, education and training within the justice system and other public bodies to identify trafficking and exploitation activities and understand the victims' situation.

Intervening early

- Use the law effectively to disrupt and prevent perpetrators from committing trafficking, including the online facilitation of exploitation

- Police work with counterparts in source and other countries to disrupt and prevent perpetrator activity
- Victims of trafficking are supported through the justice process in a trauma-informed and person-centred manner, including the application for special measures available to victims
- Knowledge of the Lord Advocate's Instructions on the presumption against prosecution of victims of trafficking is increased within the justice sector.

Treating harms and supporting recovery

- Police, prosecutors and courts use prevention and risk orders effectively to prevent perpetrators from re-trafficking victims
- Named public bodies are equipped to meet the duty to notify once commenced
- Victims are supported to pursue both criminal and civil remedies where appropriate.

25 The Serious Organised Crime Taskforce Strategy makes these links clear. Scottish Government (2022) [Serious Organised Crime Strategy](#).

Outcome 3: Improved use of data, evidence and research informs strategy implementation

In order to understand the nature of trafficking and exploitation and the profile of victims and perpetrators in Scotland, it is vital that evidence and data use is improved and shared across all partnership groups. This is important for learning from activities that have proven to be most effective, identifying areas for improvement, keeping abreast of emerging trends in trafficking and exploitation and measuring the extent to which we are meeting Outcomes 1, 2 and 4 of the Strategy. Outcome 3 therefore serves to inform and strengthen all actions of the Strategy. The complex nature of trafficking and exploitation and the fact that prevention research in this area is relatively new, means that it is challenging to establish a robust evidence-base of effective preventative interventions. However, we will continue to work with our partners to share the learning, and build the evidence base, on what works to prevent and reduce the harm caused by trafficking and exploitation.

Before harm occurs

- Regular horizon scanning at local, Scottish, UK, and international levels identifies emerging trends and changes in trafficking and exploitation activities
- Improved understanding of drivers and risk factors at individual, community and structural level is shared with stakeholders and used to inform prevention activities
- The effectiveness of activities to prevent trafficking in Scotland is monitored and identifies where improvement is needed across all outcomes of the Strategy
- Research provides insights into the conditions, responses and prevention of trafficking into, within, and outside of Scotland.

Intervening early

- Improve data to understand the challenges in meeting outcomes in Scotland
- Regular monitoring and evaluation of support and service provision using survivor-informed outcomes leads to improved delivery
- Lived experience influences and shapes strategic actions across all Outcome levels
- Efficient use is made of existing data collected by local authorities, law enforcement and Scottish and UK authorities.

Treating harms and supporting recovery

- Learning in local areas is shared across Scotland through a community of practice to inform improved anti-trafficking activities and support for victims
- Data needs are identified for those cohorts at high risk of exploitation
- Data, research and information from Scotland is shared internationally in order to contribute to wider anti-trafficking initiatives.

Outcome 4: Conditions that expose children, adults and communities in Scotland to increased risks of trafficking and re-trafficking are addressed

This outcome aligns with the overall prevention framework of a Public Health approach as well as existing Government strategies that seek to ensure a safer and fairer Scotland. Efforts directed towards the prevention of trafficking and exploitation will continue to span community, Scottish, UK and international levels.

Before harm occurs

- Awareness of trafficking and exploitation is raised and a systematic approach to training across the public and third sectors is taken
- Community resilience is strengthened through partnership working and peer support including targeted support for communities and individuals at risk
- The private and public sectors strengthen their commitment to improving transparency in supply chains from production to sale and address risks identified
- Improve co-ordination in relevant policy sectors to deliver a whole system approach to trafficking and exploitation
- Identify policy areas where early interventions can reduce known factors that increase the risk of trafficking and exploitation.

Intervening early

- Public, private, third sector and civil society have the required awareness to identify and report trafficking and exploitation
- Sector-specific and targeted trafficking risk analysis is carried out and appropriate measures are taken to address the risks when identified
- Risks of trafficking are reduced through criminal justice and third sector partnerships within key source countries.

Treating harms and supporting recovery

- Service providers deliver appropriate long-term support to victims, including by fostering resilience, and promoting social integration to prevent re-trafficking
- Victims will be supported with opportunities to rebuild their lives.

12. Delivery Plan and Next Steps

The Delivery Plan will be developed in collaboration with people with lived experience of trafficking and partners, and will outline how the Strategy will be implemented.

The Delivery Plan will:

- define the short and medium-term outcomes that will contribute to the achievement of the four long-term outcomes above
- identify the activities that need to be undertaken in order to meet the outcomes ('what we will do to achieve these')
- outline how the principles will guide the way in which the activities will be carried out (section 10 above of the Strategy) ('how will we do this')
- identify indicators to be used to monitor and evaluate the effectiveness of the activities developed to achieve the outcomes of the Strategy ('how will we know if we are achieving our outcomes').

The Strategy will come into effect from its publication date and will be reviewed after three years as required under section 36 of the Human Trafficking and Exploitation (Scotland) Act 2015.

13. Annex A: Contextual Challenges of Human Trafficking and Exploitation

The contextual challenges outlined below summarise some of the factors that influence the circumstances within which the Strategy will be implemented.

The Constitutional Context

The Scotland Act 1998 (the 1998 Act) created the Scottish Parliament and the Scottish Executive (now called the Scottish Government, and transferred legislative competence for matters which are not reserved (commonly referred to as devolved matters) from the UK Parliament to the Scottish Parliament, and executive competence from the UK Government to the Scottish Government. The Scottish Parliament can pass laws on devolved matters, and the Scottish Government has sole executive responsibility in these areas. Under the 1998 Act there are reserved matters which remain the responsibility of the UK Parliament and UK Government (the UK Parliament has also retained the power to legislate in devolved areas, with the consent of the Scottish Parliament under the Sewel Convention).

Human trafficking and exploitation legislation is devolved, and in 2015 the Human Trafficking and Exploitation (Scotland) Act was passed. This legislation created the offences of human trafficking, and slavery, servitude and forced or compulsory labour. The legislation also set out duties placed on Scottish Ministers to provide support and assistance for victims/survivors of

those offences. While human trafficking is devolved, certain matters that can affect victims remain reserved to the UK Parliament. For example, immigration policy, which can be closely linked to human trafficking (as many victims are trafficked across borders), remains reserved to the UK Parliament. Visas and asylum also remain reserved to the UK Parliament, both of which can influence an individual's vulnerability to trafficking and exploitation.

In 2009 the UK Government established the National Referral Mechanism (NRM) for trafficked persons. This was extended to cover all individuals subjected to an offence defined under the Modern Slavery Act 2015 (MSA – the equivalent trafficking and exploitation legislation in England and Wales), and the Human Trafficking and Exploitation (Scotland) Act 2015. Potential victims are referred into the NRM where one of the UK's two competent authorities – the Single Competent Authority (SCA) or Immigration Enforcement Competent Authority (IECA) – will make an assessment of the case. For adults, referral should only occur through informed consent. Children should always be referred; however, it is good practice to inform them, explain the NRM process and refer to child protection procedures. The Scottish Government provides statutory support and assistance to adults entering the NRM.

While Scotland has its own trafficking and exploitation legislation, there are still parts of the MSA that apply UK-wide. For example, the UK Parliament has

primary responsibility for areas related to business regulation, including supply chain transparency. A key provision in legislation that directly addresses this is section 54 of the MSA. This section requires certain businesses to produce a statement setting out the steps they have taken to ensure there is no modern slavery in their own business and their supply chains. This requirement applies UK-wide, so any business in Scotland with an annual turnover of £36m or more is required under the MSA to publish a modern slavery statement. These statements must include actions taken to identify and mitigate the risks of slavery and human trafficking within their supply chains.

The Global Context

Human trafficking is a crime heavily impacted by global events. NRM statistics show that many non-UK victims originate from regions such as Eastern Europe, Africa, and Asia, where economic instability and, in some cases, conflict creates conditions for trafficking and exploitation²⁶. Displaced populations are susceptible to exploitation, with traffickers targeting vulnerable adults and children. Since the previous Strategy, there has been an unprecedented increase in the number of unaccompanied asylum-seeking children arriving in the UK and being referred to the NRM, including in Scotland. These children, along with those who are victims of trafficking and exploitation, represent some of the most vulnerable individuals in the country. Alone and in an unfamiliar environment,

they are at high risk of being exploited for forced labour, criminal activities, or sexual exploitation.

This ever-changing global context requires a human trafficking and exploitation strategy that can adapt to global trends and emerging crises, with strong UK-wide and international co-operation.

Budget Constraints and Economic Influences

Public finances remain under severe pressure. Prolonged Westminster austerity, the economic damage of Brexit, the COVID-19 pandemic, the war in Ukraine, the energy crisis, and inflation shock have placed a cumulative pressure on public finances. In the 2025/26 budget the Scottish Government continues to prioritise investment in key public services, with record funding for health and social care, local government, and social security. However, the financial context within which this Strategy will be implemented remains challenging.

Fluctuations in global economies will also continue to be an influencing factor behind human trafficking. Individuals facing destitution and poverty become vulnerable to exploitation, and the cost-of-living crisis increases economic instability, further exposing people to the risk of exploitation²⁷. The growth of the gig economy and informal labour markets has also created conditions where instances of labour exploitation can spread, often hidden from

26 UK Government (2024) [Official Statistics Modern Slavery: NRM and DtN statistics, July to September 2024](#).

27 Modern Slavery and Human Rights Policy and Evidence Centre (2022) [Cost of living likely to make people more vulnerable to modern slavery](#).

regulatory oversight²⁸. Migrant workers are frequently employed in industries such as hospitality, agriculture, and construction, which remain high-risk for trafficking and exploitation.

Technological and Digital Advances

The ongoing advancement in technology will continue to transform the methods used by traffickers, as well as presenting new challenges and opportunities for detection and prevention. The increased use of social media, online gaming, messaging apps, live streaming and online methods to recruit and groom victims allow traffickers greater reach to operate and target vulnerable individuals²⁹.

Encrypted communication tools can provide perpetrators with a secure space to advertise and trade in illicit services, complicating law enforcement efforts to disrupt these networks.

Online sexual exploitation, including live-streaming abuse, can often involve victims in different countries. Perpetrators may exploit online platforms to manipulate children and young people into criminal activities, tracking and controlling their movements, such as through location monitoring, or using their online banking or gaming accounts to launder money from illicit activities³⁰. Detecting and prosecuting technology-facilitated trafficking requires specialised skills and international co-operation.

Criminally Exploited Children

Child criminal exploitation (CCE) is on the rise in Scotland (and in the rest of the UK). CCE-related NRM referrals have almost doubled since 2020, the first full year when NRM referrals started to record criminal exploitation indicators. In 2024 the trend continued and CCE is now the most prevalent reason for referring children to the NRM in Scotland.

CCE is a cause of significant harm. It can take a variety of different forms including children being forced or coerced into drug dealing activities (e.g. County Lines), forced to shoplift or pickpocket, forced to work in cannabis factories, or forced to threaten other young people. Criminally exploited children may experience multiple types of abuse at the same time, including sexual abuse, violence and threats. Both male and female children are affected by CCE, and children from impoverished backgrounds or deprived areas as well as black and minority ethnic children are at increased risk.

The most common form of CCE is through County Lines. County Lines is a method employed by criminal gangs to distribute drugs. It relies heavily on the criminal exploitation of children and vulnerable adults. These vulnerable individuals are used to transport, store, and distribute drugs. Although this arrangement can appear to be consensual, exploitation and threats are used by criminals to control those involved. According to

28 Athreya, B. (2020) '[Slaves to Technology: Worker control in the surveillance economy](#)', Anti-Trafficking Review.

29 Council of Europe (CoE) Group of Experts on Action against Trafficking in Human Beings (GRETA) (2022) '[Online and technology-facilitated trafficking in human beings Summary and recommendations](#)'. Scottish Government Justice Analytical Services (2025) '[Preventing criminal exploitation: evidence summary](#)'.

30 The Children's Society (2021) '[Exploitation online](#)'.

the 'Scottish Multi-Agency Strategic Threat Assessment (SMASTA)' the North of Scotland appears to be disproportionately impacted by County Lines, however, groups also feature in the East and West of Scotland.

Cuckooing is a method used by County Lines groups where a person, who is commonly vulnerable, has their home taken over by group members for the purposes of production and storage of drugs, or as a base for those involved in drug dealing or other criminal activity.

There are several recent pieces of research highlighting the scale and nature of CCE in the UK. A [Scotland-specific Scoping Review of CCE](#) commissioned by the Scottish Government, Action for Children (AfC) and Children and Young People's Centre for Justice (CYCJ) in May 2023; the report '[Invisible Children: Understanding the risk of the cost-of living crisis and school holidays on child sexual and criminal exploitation](#)' by Barnardo's in July 2023; and most recently, the '[Jay Review of Criminally Exploited Children](#)', published by AfC in March 2024.

The former Divert Theme 3 group of the Serious Organised Crime Taskforce (SOCT) published the '[Criminal Exploitation: Guidance for Practitioners](#)' in June 2023. The guidance aims to maximise Scotland's co-ordinated and joined up response to all exploited individuals, making it easier for practitioners across Scotland to support children and vulnerable adults who have been victims of exploitation.

Climate Change and Environmental Factors

Climate change resulting in rising temperatures, extreme weather events, and environmental degradation is driving large-scale displacement. The International Organization for Migration (IOM) estimate 21.6 million people were internally displaced annually by climate-related hazards worldwide in the last decade³¹. Such displacement often leaves individuals without livelihoods, housing, or legal protections, making them highly vulnerable to trafficking.³²

31 International Organization for Migration (2022) '[Climate Change and Future Human Mobility Evidence Summary](#)'.

32 United Nations Office on Drugs and Crime (UNODC) (2022) '[Global Report on Trafficking in Persons 2022](#)'.

14. Annex B: International and national legal context

This section outlines some of the important international and national legislation that guides the Scottish Government's actions against trafficking and exploitation.

The Palermo Protocol

The United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children³³, known as the Palermo Protocol, was adopted by the UN General Assembly in November 2000 and came into force in December 2003. The Protocol supplements the United Nations Convention against Transnational Organized Crime. The definition of trafficking is contained in Article 3 of the Protocol and was adopted in the European Convention on Action Against Trafficking in Human Beings (ECAT), the only difference being the addition of a definition of 'victim' in ECAT.

The European Convention on Action Against Trafficking in Human Beings (ECAT)

The European Convention on Action Against Trafficking in Human Beings (ECAT)³⁴ (ECAT), established by the Council of Europe in 2005, aims to

combat human trafficking through prevention, victim protection, and the prosecution of offenders. Signatories are required to criminalise all forms of trafficking, provide support and assistance to victims, implement measures to reduce demand, and co-operate internationally to tackle cross-border trafficking. The Convention also establishes independent monitoring through the Group of Experts on Action Against Trafficking in Human Beings (GRETA), which assesses compliance and progress. The UK ratified the Convention in 2008.

Scotland introduced the Human Trafficking and Exploitation (Scotland) Act 2015, which criminalises trafficking and exploitation, imposes penalties, and requires the development of a national anti-trafficking strategy. The Act includes support for victims, such as access to healthcare, accommodation, and legal aid. Section 8 of the Human Trafficking and Exploitation (Scotland) Act places an obligation on the Lord Advocate to make and publish instructions³⁵ about the prosecution of a person who is, or appears to be, the victim of human trafficking. These measures align with the Convention's focus on protecting victims' rights while holding traffickers accountable.

33 United Nations Human Rights Office of the High Commissioner (2000) 'Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime'.

34 The Stationery Office Limited (2012) 'Treaty Series No. 37 (2012) Council of Europe Convention on Action against Trafficking in Human Beings'.

35 Crown Office and Procurator Fiscal Service (2024) 'Lord Advocate's instructions for non-prosecution of victims of human trafficking'.

The Directive 2011/36/EU of the European Parliament and of the Council

The Directive 2011/36/EU of the European Parliament and of the Council³⁶ ('the European Anti-Trafficking Directive' or 'ETD') sets out a unified approach for EU member states to tackle human trafficking. It requires states to criminalise trafficking, impose severe penalties, provide comprehensive support for victims – including access to healthcare, accommodation, and legal assistance – and protects victims from prosecution for crimes committed under coercion. The directive also calls for measures to reduce demand, address vulnerabilities, and train law enforcement and judiciary to effectively combat trafficking. The UK opted in to the Directive in July 2011.

A new EU Directive 2024/712 proposes a series of amendments to existing anti-trafficking Directives. This Directive aims to address evolving trends in the area of trafficking and exploitation. It includes amendments related to early detection, identification and specialised support to victims of trafficking, improvements to data collection systems, and co-operation and co-ordination amongst EU and international states.

Convention on the Elimination of All Forms of Discrimination against Women

The Convention on the Elimination of All Forms of Discrimination against Women³⁷ (CEDAW) was adopted in 1979 by the UN General Assembly and consists of 30 articles. It defines what constitutes discrimination against women and sets up an agenda for national action to end such discrimination. The Scottish Government has committed to incorporating this convention into Scots law within the limits of devolved competence by bringing forward a [Human Rights Bill](#) in the next parliamentary session, subject to the outcome of the 2026 Scottish Parliamentary Election. Article 6 of CEDAW provides that States which are party to that Convention shall "take all appropriate measures, including legislation, to suppress all forms of traffic in women and exploitation of prostitution of women".

The Council of Europe Convention on preventing and combating violence against women and domestic violence (Istanbul Convention)

The Council of Europe Convention on preventing and combating violence against women³⁸, also known as the Istanbul Convention, is a human rights

36 [Directive 2011/36/EU of the European Parliament and of the Council 2011.](#)

37 United Nations Office of the High Commissioner for Human Rights (1979) '[Convention on the Elimination of All Forms of Discrimination against Women](#) New York, 18 December 1979' resolution 34/180.

38 Council of Europe (2011) '[Treaty Series No. 210 \(2011\) Council of Europe Convention on preventing and combating violence against women and domestic violence](#)'.

treaty. The Convention entered into force on 1 August 2014 and recognises gender-based violence against women as a violation of human rights and a form of discrimination. It requires parties to develop laws, policies and support services to end violence against women and domestic violence. The UK ratified the Istanbul Convention on 21 July 2022, and it entered into force on 1 November 2022.

Implementation of the Istanbul Convention is monitored by an independent Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO). Each expert has been appointed by the Council of Europe due to their expertise in the fields of human rights, gender equality, violence against women, or assistance to and protection of victims. The first step of the UK-wide evaluation was a report based on the UK's response to GREVIO's questionnaire on the legislative and other measures giving effect to the provisions of the Council of Europe Convention on preventing and combating violence against women and girls (VAWG). The full State report was published in July 2023 and included contributions from the Scottish Government for devolved matters.

Human Trafficking and Exploitation (Scotland) Act 2015

The Human Trafficking and Exploitation (Scotland) Act³⁹ (the Act), which was passed unanimously by the Scottish Parliament, introduced two offences: human trafficking; and slavery, servitude, and forced or compulsory labour. Both of these offences carry the possibility of life imprisonment. There

is broad cross-party political support for the legislative and policy framework aimed at addressing human trafficking and exploitation in Scotland.

Sections 9 and 10 of the 2015 Act requires Scottish Ministers to secure support and assistance for adult victims of human trafficking where there are reasonable grounds (as determined through the NRM) to believe an adult is a victim of human trafficking and/or slavery, servitude and forced or compulsory labour.

Section 11 imposes a duty on Scottish Ministers to appoint an independent child trafficking guardian (ICTG) for unaccompanied asylum-seeking children who are either suspected of being, or at risk of being, trafficked. Following extensive consultation, the statutory ICTG service launched on 1 April 2023.

Section 35 of the Act also imposes a duty to develop, publish, and regularly review a Trafficking and Exploitation Strategy. The strategy must outline the actions needed to tackle human trafficking and exploitation, identify victims, provide support, and ensure the disruption and prosecution of offenders.

The Act establishes the legal basis for the non-prosecution principle, requiring the Lord Advocate to publish instructions for prosecutors on the circumstances in which individuals who appear to be victims of human trafficking or exploitation should not be prosecuted for offences they were compelled to commit as a direct result of their trafficking or exploitation. For children, it is not necessary to prove that they were forced or compelled to commit a specific act. Instead, the fact that the offence occurred as a result of

39 Human Trafficking and Exploitation (Scotland) Act 2015.

being trafficked or exploited is sufficient. These instructions are central to ensuring a victim-centred and trauma-informed approach to addressing trafficking in Scotland.

Modern Slavery Act 2015

The [Modern Slavery Act 2015](#)⁴⁰ (MSA) is the equivalent legislation in England and Wales designed to combat modern slavery, forced labour, and human trafficking. The MSA consolidates existing offences into a single act and ensures that perpetrators receive proportionate punishments for modern slavery crimes (including life sentences). The MSA also created the role of Independent Anti-Slavery Commissioner (IASC). The IASC has a UK-wide remit to encourage good practice in the prevention of trafficking and exploitation. The MSA also places a duty on the Secretary of State to produce [statutory guidance](#)⁴¹ in England and Wales about victim identification and victim services. Transparency in supply chain provisions within the MSA require businesses across the UK, subject to meeting the turnover threshold, to disclose annually what action they have taken to ensure there is no modern slavery in their operations.

Gangmasters (Licensing) Act 2004

The [Gangmasters \(Licensing\) Act 2004](#)⁴² established the Gangmasters Licensing Authority (GLA). The GLA set up and operated the licensing scheme for labour providers operating in the

regulated sectors. It also created the offences of acting as an unlicensed gangmaster and using an unlicensed gangmaster. Regulated sectors include agriculture, horticulture, shellfish gathering, and any associated processing and packaging. In May 2016, the UK Parliament approved a new Immigration Act, which called for the reformation and renaming of the GLA to become the Gangmasters and Labour Abuse Authority (GLAA) and to sit under a new post of Director of Labour Market Enforcement. The GLAA has certain statutory functions in Scotland however they are narrower in scope than is the case in England and Wales. In England and Wales, the GLAA has responsibilities to investigate reports of modern slavery. In Scotland, the primacy for this lies with Police Scotland but the GLAA can offer support to Police Scotland in this activity.

Nationality and Borders Act 2022

The UK Government's [Nationality and Borders Act 2022](#)⁴³ intended to make the UK asylum system fairer and more effective, to deter illegal entry into the UK, and to remove those from the UK who had entered illegally. However, while the legislation was designed to address systemic issues and protect vulnerable individuals, its provisions raised concerns regarding their potential impact on victims of human trafficking, including within devolved jurisdictions like Scotland. These concerns remain and we will continue to work with partners to mitigate, where possible, the impacts of this Act.

40 [Modern Slavery Act 2015](#).

41 Home Office (2025) [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 \(accessible version\)](#).

42 [Gangmasters \(Licensing\) Act 2004](#).

43 [Nationality and Borders Act 2022](#).

Illegal Migration Act 2023

Following on from the Nationality and Borders Act 2022, the UK Government's [Illegal Migration Act 2023](#)⁴⁴ ("IMA") was intended to place a duty on the Secretary of State to remove anyone classed as arriving illegally in the United Kingdom. The Act also removed the power and duties of the Scottish Ministers to provide support to victims of human trafficking and slavery, servitude and forced or compulsory labour under sections 9 and 10 of the Human Trafficking and Exploitation (Scotland) Act 2015, where these individuals were assessed to have entered the UK illegally. In January 2025, the UK Government introduced the Border Security, Asylum and Immigration Bill 2025⁴⁵. The Bill proposes to repeal some provisions within the IMA, including the duty to remove and changes to Scottish Ministers support functions for victims of human trafficking⁴⁶.

The Nationality and Borders Act 2022 and Illegal Migration Act 2023 are examples where UK Government policy can significantly impact on devolved matters.

Other legislation currently being considered by the UK Parliament, including the Crime and Policing Bill and Employment Rights Bill⁴⁷, may influence the public health approach to human trafficking and exploitation set out within this Strategy.

The United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Act 2024

The [United Nations Convention on the Rights of the Child \(Incorporation\) \(Scotland\) Act 2024](#)⁴⁸ (the UNCRC Act) incorporated the United Nations Convention on the Rights of the Child directly into Scots law, within the limits of devolved competence. The UNCRC Act makes it unlawful for public authorities, including the Scottish Government, to act incompatibly with the UNCRC requirements as set out in the [schedule to the Act](#) when acting under powers derived from Acts of the Scottish Parliament. The UNCRC Act requirements include, amongst others, Articles 19, 32 and 34 which cover the right to protection from exploitation, Article 28, the right to education, and Article 39, the right to physical and psychological recovery and social reintegration of child victims.

In addition, Article 12 (respect for the views of the child) and the principle of acting in the child's best interest are reflected in the Trafficking Strategy's commitment to age-sensitive and trauma-informed approaches, ensuring children are heard and that their views are given due weight in decisions affecting their recovery and future.

44 [Illegal Migration Act 2023](#).

45 [Border Security, Asylum and Immigration Bill \(2025\)](#). Parliament: House of Commons. Bill no. 173.

46 [UK Parliament \(2025\) Border Security, Asylum and Immigration Bill](#).

47 [Employment Rights Bill \(2025\)](#). Parliament: House of Commons. Bill no. 163.

48 [United Nations Convention on the Rights of the Child \(Incorporation\) \(Scotland\) Act 2024](#).

15. Annex C: Trafficking and Exploitation Strategy: Policy Alignment

A number of Scottish Government strategies and policies align closely with the aims of the Trafficking and Exploitation Strategy. The list below highlights some of these key areas, and points to some of the legislation, policies and frameworks which will support the Strategy during implementation.

Serious Organised Crime Strategy

The '[Serious and Organised Crime Strategy](#)'⁴⁹ focuses on strengthening the links between intelligence and operational response through use of the information in the Scottish Multi-Agency Strategic Threat Assessment (SMASTA). The Strategy's aim is to reduce serious organised crime and the harm it causes through collaboration among various sectors. Its four key objectives are to:

- divert people away from becoming involved in serious organised crime and using its products
- deter serious organised crime groups by supporting private, public and third sector organisations to protect themselves and each other
- detect and prosecute those involved in serious organised crime
- disrupt serious organised crime groups.

The Serious Organised Crime Taskforce (SOCT) continues to review its

membership to adapt to emerging needs when required, but there is a need for collective responsibility from individuals, businesses, and organisations to prevent harm and make Scotland a hostile place for serious organised crime groups to operate.

Human trafficking is a significant aspect of serious organised crime in Scotland, necessitating a strong link between both strategies. The Serious Organised Crime Strategy and the Human Trafficking and Exploitation (Scotland) Act 2015 are closely aligned in their goals of protecting vulnerable individuals, disrupting criminal networks, and ensuring that traffickers are held accountable. Through co-ordinated efforts, intelligence-sharing, victim protection and prevention, both strategies play a vital role in addressing the complex nature of human trafficking within the broader context of serious organised crime.

Equally Safe – Preventing and Eradicating Violence Against Women and Girls

'[Equally Safe](#)'⁵⁰ is Scotland's Strategy for preventing and eradicating violence against women and girls (VAWG) and addressing the underlying attitudes and systems that perpetuate it. It aims to ensure women and girls live free from

49 Scottish Government (2022) [Serious Organised Crime Strategy](#).

50 Scottish Government (2023) [Equally Safe 2023 – preventing and eradicating violence against women and girls: strategy](#).

violence, abuse and exploitation. The strategy approaches VAWG as a major public health issue, and therefore takes a public health approach in tackling it. The Strategy focuses on preventing VAWG before it occurs. Recognising the impact of societal, community and relationship factors on women and girls' lives is key to preventing and addressing VAWG. A new delivery plan was published in spring 2024 which outlines the tangible actions that must be taken to tackle violence against women and girls in Scotland.

Prostitution: Strategy for Challenging and Deterring Men's Demand

Scotland's [strategic approach](#) to challenging and deterring men's demand for prostitution and supporting the recovery and sustainable exit of those involved in prostitution⁵¹ sets out the Scottish Government's collective approach, working with stakeholders across the wider public and third sector, to challenge and deter men's demand for prostitution and support those with experience of it. It is underpinned by [policy principles](#) which aim to improve policy cohesion across the government and wider public sector.

The strategic approach recognises the links to wider forms of violence against women and girls and commercial sexual exploitation, including human trafficking. A key element of the strategy is to improve support for those with experience of commercial sexual exploitation.

Children (Scotland) Act 1995 and the Children and Young People (Scotland) Act 2014

The [Children \(Scotland\) Act 1995](#)⁵² ('the 1995 Act') and the [Children and Young People \(Scotland\) Act 2014](#)⁵³ ('the 2014 Act') are central to promoting the welfare and rights of children in Scotland. The 1995 Act is centred on the needs of children and their families and defines both parental responsibilities and rights in relation to children. It sets out the main duties and powers available to public authorities to support children and their families and to intervene when the child's welfare requires. The 2014 Act builds on this by strengthening children's rights. It is underpinned by the UN Convention on the Rights of the Child (UNCRC), and the national approach, Getting It Right For Every Child (GIRFEC), which ensures a co-ordinated approach to promoting, supporting, and safeguarding children's wellbeing.

The Human Trafficking and Exploitation (Scotland) Act 2015 complements existing children's legislation by recognising unaccompanied asylum-seeking and trafficked children as a particularly vulnerable group and providing specialist support through measures such as the Independent Child Trafficking Guardian (ICTG) service. Together, the implementation of these legislative frameworks creates a cohesive approach to protecting children at risk.

51 [Scottish Government \(2024\) Scotland's strategic approach to challenging and deterring men's demand for prostitution and supporting the recovery and sustainable exit of those involved in prostitution.](#)

52 [Children \(Scotland\) Act 1995.](#)

53 [Children and Young People \(Scotland\) Act 2014.](#)

National Guidance for Child Protection

The '[National Guidance for Child Protection 2021, updated 2023](#)' describes the responsibilities and expectations of everyone who works with children, young people and their families in Scotland. The Guidance, which informs the development of local multi-agency child protection by diverting children from exploitation or providing relevant procedures, processes and training, supports the care and protection of children across Scotland. There is a stronger emphasis on the range of issues that impact on the wellbeing and safety of children, including the importance of assessing the impact of all structural factors as part of all care and protection planning.

The Guidance advises that a child victim of human trafficking is a victim of child abuse and therefore, an immediate child protection response is required. It also recognises the intersection of child exploitation, trafficking, extra-familial risks, and child protection processes, noting the need to consider wider relationships and the location of harm when managing and reducing the risks to the child in cases of exploitation.

Getting it Right for Every Child

[Getting It Right for Every Child](#)⁵⁴ (GIRFEC) is Scotland's national policy framework designed to improve outcomes and support the wellbeing of children and young people. It provides a consistent, rights-based approach to child welfare, ensuring that children receive the right support at the right time. GIRFEC is built on key principles, including early intervention, collaboration between services, and a holistic view of a child's

wellbeing. Central to the approach is the SHANARRI wellbeing indicators – Safe, Healthy, Achieving, Nurtured, Active, Respected, Responsible, and Included – which guide decision-making across education, health, and social care to ensure every child has the opportunity to thrive.

Vision for Justice in Scotland

Scotland's '[Vision for Justice](#)'⁵⁵, published in 2022, sets out the Government's ambition to create a just, safe, and resilient society. It envisions a Scotland where people live in safer, more tolerant, and inclusive communities, free from inequality and hate. The vision is guided by four key principles: promoting equality and human rights, using evidence-based approaches, embedding person-centred and trauma-informed practices, and fostering collaboration and partnership.

For victims of human trafficking, the commitment to a person-centred and trauma-informed approach is particularly significant and is a key focus of the transformational change programme. Person-centred justice services ensure that individuals' needs and values are respected, and that communication is clear and timely, helping people navigate complex justice processes. Individuals and their families are actively involved in decisions that affect them, recognising that they are the experts in their own lives. Within the boundaries of legal frameworks and justice processes, this approach ensures that people are treated as individuals rather than as part of a system. Above all, it emphasises empathy, kindness, and the provision of appropriate support to those who need it.

54 Scottish Government (2025) [Getting it right for every child \(GIRFEC\)](#).

55 Scottish Government (2022) [The Vision for Justice in Scotland](#).

Youth Justice Vision

The '[Vision for Youth Justice](#)', as previously published in June 2021, was updated and re-launched on 19 June 2024. The updated Vision reiterates the priorities of supporting delivery of a whole system approach to preventing offending by children in Scotland; upholding children's rights; ensuring children play an active role in shaping the services and supports which affect them; addressing barriers to engagement; gathering and analysing robust data on children and young people; and offering prevention and early intervention support to families, children and young people, including mental health support.

It reflects the changing landscape and the ongoing commitment to keeping the Promise; implementation of the Children (Care and Justice) (Scotland) Act 2024 and, in particular, provisions around ending the use of young offender institutions (YOIs) for under 18s and support for victims, alongside implementation of the UNCRC (Incorporation) (Scotland) Act 2024. It also recognises policy drivers and future impacts of a potential rise in the age of criminal responsibility, recommendations from the reimagining secure accommodation work and the wider care planning needs of children, and the hearings system redesign work.

The Action Plan, for delivery of the priorities within the Vision, has been designed as a rolling document, with flexibility built in to address key policy changes as they emerge. The Plan was updated throughout 2024 and published in January 2025, and can be viewed on the [Youth Justice Improvement Board website](#).

Adult Support and Protection (Scotland) Act 2007

All adults who are at risk of harm have the fundamental right to be safe and protected. The [Adult Support and Protection \(Scotland\) Act](#)⁵⁶ was introduced to safeguard individuals who are unable to protect their own interests due to disability, mental disorder, illness, physical or mental infirmity. The Act defines harm broadly, covering all types of harm, including self-harm and neglect. It requires councils and public bodies to work together to support and protect adults who may be unable to safeguard themselves, their property, or their rights, balancing the need to intervene with an adult's right to live as independently as possible.

The principles of the Act emphasises the importance of striking a balance between an individual's right to freedom of choice and the risk of harm to that individual. Any intervention must be reasonable and proportionate. The Code of Practice, published under the Act, includes clearer guidance on contextual capacity and delivering services in a trauma-informed way.

The Scottish Government provides guidance and support to ensure that those with responsibilities under the Act can effectively carry out their duties. This is achieved by enhancing legislation, policy, and practice to ensure a robust system of adult support and protection. The Adult Support and Protection Code of Practice⁵⁷ was updated in July 2022 to ensure that adults at risk are actively involved in decisions about their care, treatment, and support. At the same time, updated Adult Support and Protection Guidance for General

⁵⁶ [Adult Support and Protection \(Scotland\) Act 2007](#).

⁵⁷ [Scottish Government \(2022\) Adult Support and Protection \(Scotland\) Act 2007: Code of Practice](#).

Practice⁵⁸ was published to help healthcare professionals effectively recognise and respond to adult protection concerns.

New Scots Refugee Integration Strategy

The '[New Scots Refugee Integration Strategy](#)'⁵⁹ supports the integration of refugees and people seeking asylum within Scotland's communities by addressing barriers and access to essential services. It promotes community cohesion and seeks to reduce the social isolation that can exacerbate vulnerability. The Strategy aims to reduce these vulnerabilities through a number of means, including by improving access to safe housing, healthcare, education and employment. The New Scots Strategy's emphasis on community awareness and professional training overlaps with the trafficking strategy's efforts to ensure frontline workers can recognise and respond to indicators of trafficking in vulnerable populations.

Getting it Right for Everyone

'[Getting it Right for Everyone](#)'⁶⁰ (GIRFE) is a multi-agency practice model designed to improve access to support and services from young adulthood through to end-of-life care. Developed collaboratively, GIRFE has been co-designed with place-based pathfinders and a range of partners. These include health and social care professionals from local authorities across Scotland, who have worked closely with the GIRFE policy team and the Office of

the Chief Designer within the Scottish Government. This partnership ensures that the practice model reflects the needs of individuals and incorporates the insights of those with lived experience.

GIRFE aims to create a more personalised and consistent way for people to access help and support when they need it. At its core, the approach ensures that individuals remain central to all decision-making processes that affect them, regardless of the type or level of support required at any stage of life. By fostering a joined-up, person-led approach, GIRFE will shape the future practice model for health, social care, and public sector professionals, helping to design and deliver services that effectively meet people's needs.

Violence Reduction

The Scottish Government uses a public health approach to tackle violence, treating violence as a symptom alongside multiple complex harms. To strengthen efforts to prevent violence and reduce its harm, the '[Violence Prevention Framework for Scotland](#)' was published in May 2023. The Framework sits alongside and complements other government strategies, including but not limited to, Equally Safe, child poverty, suicide prevention and hate crime. Implementation of the Violence Prevention Framework is included in our Programme for Government, and forms part of the three-year delivery plan for the Vision for Justice in Scotland. It includes an action plan with a range

58 Scottish Government (2022) [Adult Support and Protection \(Scotland\) Act 2007: guidance for General Practice](#).

59 Scottish Government (2024) [New Scots Refugee Integration Strategy: 2024](#).

60 Scottish Government (2024) [Getting it right for everyone \(GIRFE\)](#).

of activities to deliver in partnership through the violence reduction partner organisations including the Scottish Violence Reduction Unit, Medics Against Violence and YouthLink Scotland's No Knives Better Lives. One of the activities within the Action Plan, includes a commitment to expand the use of [Hospital Navigators](#), who work in Emergency Departments, to intervene and support individuals away from violence and its harm. These navigators have received awareness training in human trafficking and exploitation so they can also identify and support people affected by these types of crime. The first annual '[Progress Report](#)', published in September 2024, highlights some of the progress being made over 2023–24.

Ending Destitution Together Strategy

Launched in March 2021 by the Scottish Government and COSLA, the '[Ending Destitution Together Strategy](#)'⁶¹ aims to create a humane and supportive environment for people with No Recourse to Public Funds (NRPF), who face restrictions on accessing public support due to their immigration status. It seeks to prevent and mitigate destitution, uphold human rights, and strengthen communities by aligning with wider Scottish policies tackling poverty and inequality. The strategy focuses on ensuring a basic safety net in crises, reducing barriers to support, and preventing individuals from being passed between services without resolution. It supports inclusive opportunities for people to contribute to society and realise their ambitions.

In line with Article 25(1) of the Universal Declaration of Human Rights, the Scottish Government is committed to ensuring that everyone in Scotland can access fundamental rights, as reflected in initiatives like Ending Homelessness Together, action on food insecurity, GIRFEC, and a rights-based social security system. The strategy is framed around three core principles: Prevention, providing early support before crisis; Partnership, fostering collaboration across public and third sectors; and Personalisation, ensuring responses are tailored to individual needs rather than a one-size-fits-all approach.

Destitution is a significant risk factor for trafficking, as those experiencing extreme hardship are more vulnerable to exploitation. The Ending Destitution Together Strategy aligns with the Trafficking and Exploitation Strategy by offering support to individuals at risk, reducing their vulnerability to trafficking and re-trafficking.

National Performance Framework

The '[National Performance Framework](#)'⁶² (NPF) serves as Scotland's approach to measuring wellbeing. It outlines a vision for the country, with broad national outcomes that support this vision. The NPF combines economic progress with various indicators of wellbeing to assess Scotland's overall progress. The Community Empowerment (Scotland) Act 2015⁶³ mandates public authorities to consider the national outcomes in their work, with a review of these outcomes required every five years. [The Scottish Parliament's inquiry into](#)

61 Scottish Government (2021) [Ending destitution together: strategy](#).

62 Scottish Government (2024) [National Performance Framework](#).

63 Scottish Government (2017) [Community Empowerment \(Scotland\) Act: summary](#).

the most recent review of the National Outcomes and National Performance Framework concluded in January 2025 and the Deputy First Minister has committed to “look again at every aspect of the National Performance Framework to support the development and implementation of a stronger and more strategic and impactful framework for Scotland.”

Through focusing on the protection of vulnerable individuals, the Trafficking Strategy helps to advance Scotland's commitment to safeguarding the most disadvantaged members of society and reducing exploitation. Additionally, the Strategy's emphasis on collaboration between government, law enforcement, and non-governmental organisations reflects the NPF's value of working together to improve people's lives and enhance wellbeing across the nation.

Equality Act 2010 and Public Sector Equality Duty

The [Equality Act 2010](#)⁶⁴ bans direct and indirect discrimination, harassment, and victimisation based on characteristics such as age, disability, gender reassignment, race, religion, sex, and more. Victims of trafficking and exploitation who fall within the protected groups are covered under the Act. The ‘[Public Sector Equality Duty](#)’⁶⁵ (PSED), enshrined in the Act, requires public authorities to consider the need to eliminate discrimination and promote equality in their operations. The Scottish Government has used its powers to set specific equality duties for public authorities, which must report on their

progress. The government's 2023 Equality and Mainstreaming Report outlines its efforts to advance equality, including improving the PSED framework in Scotland. By addressing systemic barriers that prevent access to services, the PSED helps reduce inequalities, reduce racial disparities, and ensure justice.

Mental Health and Wellbeing Strategy

Scotland's ‘[Mental Health and Well-being Strategy](#)’⁶⁶, published in June 2023, aims to improve mental health for everyone in Scotland. This strategy sets out key outcomes aimed at reducing inequalities, improving quality of life, increasing knowledge and access to support, strengthening community resilience, and ensuring effective cross-policy action. It prioritises timely, person-centred care, evidence-based policy, and a skilled, sustainable workforce across sectors.

To achieve these goals, the Scottish Government will promote positive mental health, prevent issues from arising or escalating, and ensure accessible, high-quality support and services. The strategy places a strong emphasis on early intervention, prevention, and tackling inequalities. The related [Delivery Plan](#)⁶⁷ will outline the specific actions taken in collaboration with people with lived experience, practitioners, and key stakeholders, ensuring continuous improvement and alignment with national policy priorities. This approach aims to create a sustainable, inclusive, and effective mental health system for all.

64 [Equality Act 2010](#).

65 UK Government (2012) [Public sector equality duty](#).

66 Scottish Government (2023) [Mental health and wellbeing strategy](#).

67 Scottish Government (2023) [Mental health and wellbeing strategy: delivery plan 2023–2025](#).

National Trauma Transformation Programme

The [National Trauma Transformation Programme](#)⁶⁸ (NTTP) is funded by the Scottish Government and delivered in partnership with COSLA, NHS Education for Scotland (NES), the Improvement Service (IS) and the Resilience Learning Partnership (RLP). Scotland has paved the way in creating a vision of a trauma-informed and responsive workforce and services that can recognise where people are affected by trauma and adversity, and that respond in ways that prevent further harm, support recovery, address inequalities and improve life chances.

NES contribute to the development of a wide range of learning resources, guidance and implementation support for all sectors of the workforce, including leaders, to up-skill staff to the appropriate level of trauma-informed and responsive practice and, critically, to embed and sustain this model of working. Both the NTTP and Trafficking Strategy are fundamentally concerned with safeguarding and supporting vulnerable individuals. The NTTP is about creating systems and practices that are trauma-sensitive, which aligns with the needs of trafficking survivors.

Alcohol and Drug Treatment Strategy: Rights, Respect and Recovery

The '[Drug and Alcohol Support Strategy, "Rights, Respect, and Recovery"](#)'⁶⁹ aims to create a country where individuals, families, and communities can live

healthy lives, free from the harms of alcohol and drugs. This is achieved through a public health-led approach focused on prevention, reducing health inequalities, and supporting recovery. Key actions include promoting a whole-population shift in attitudes towards alcohol, embedding a human rights-based, person-centred response, and prioritising those most at risk.

The strategy also emphasises a public health approach in justice settings to reduce harm and divert vulnerable individuals from the system. Delivery is guided by evidence and lived experience, with collaboration across government, health boards, local authorities, justice agencies, and community partners to ensure continuous improvement.

No One Left Behind: Employability Strategic Plan

'[No One Left Behind](#)'⁷⁰ is the Scottish Government's shared approach to delivering an all-age, place-based, person-centred model of employability support in Scotland. It promotes a strengthened partnership approach where Scottish and Local Government work together with public, private, and third sector organisations to design and deliver services.

The Scottish Government aims to build an employability system that tackles inequalities in Scotland's labour market by creating more responsive, joined up and aligned services which meet the needs of employers and local labour

68 NHS Education for Scotland (2024) [National Trauma Transformation Programme](#).

69 Scottish Government (2018) [Rights, respect and recovery: alcohol and drug treatment strategy](#).

70 Scottish Government (2024) [No One Left Behind: employability strategic plan 2024 to 2027](#).

markets, whilst helping people of all ages access fair and sustainable work. No One Left Behind services focus on those who are further from the labour market and face barriers to entering employment. Social and economic inequalities are major risk factors for both unemployment and exploitation.

Housing to 2040 Strategy

The 'Housing to 2040 Strategy'⁷¹ is Scotland's long-term strategy that positions housing as a critical element of the nation's social and economic future, with the goal of ensuring that by 2040 everyone has access to affordable, high-quality, energy-efficient homes. The strategy prioritises addressing housing inequality, eradicating homelessness, and fostering sustainable communities. It recognises that housing is not solely about the availability of physical structures but is also connected to broader social factors such as poverty, inequality, and access to essential services.

Housing insecurity, including homelessness, increases vulnerability and social exclusion, making it more difficult for individuals to break free from cycles of poverty or exploitation. Lack of stable housing can heighten the risk of individuals being trafficked or exploited, as desperation and limited choices leave them more vulnerable.

71 Scottish Government (2021) [Housing to 2040](#).



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