



**Modern Slavery and
Organised Immigration Crime
Programme
Annual Report 2024/25**

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1. Overview from ACC Jim Pearce



National Police Chiefs' Council Lead for Modern Slavery and Organised Immigration Crime

I am pleased to introduce the Modern Slavery and Organised Immigration Crime Unit annual report for 2024/25. Over the last twelve months, the programme has continued to strengthen policing's response to both threats, recognising the national priority they represent and the need for a co-ordinated and evidence led approach.

In modern slavery, national data indicates continued demand and complexity. While recorded crimes decreased slightly over the year, police National Referral Mechanism referrals remained broadly stable. This contrast underscores the continued challenge of translating potential exploitation into recorded crime and ensuring pathways from identification to investigation are clearly established. Live modern slavery investigations also saw a reduction but driven by deliberate data cleansing activity to improve accuracy in the national picture.

These figures highlight the ongoing importance of strong recording practices, confident investigative approaches, and appropriate safeguarding pathways, particularly where exploitation may be under reported or identified through non-police routes. The programme has focused on these areas by improving crime recording, developing cultural resources to support victim engagement, and expanding training to strengthen investigative capability ahead of the Government's forthcoming Modern Slavery Action Plan.

In organised immigration crime, we have achieved a significant milestone with the completion of peer reviews across all 43 police forces in England and Wales. This represents the most comprehensive assessment of national policing capability in this area to date and provides a clear evidence base for improvement. Operationally, Project Terminus has enabled targeted and co-ordinated enforcement activity, reflected in a 63% increase in recorded disruptions over the year. The scale of activity delivered through Terminus highlights the importance of national co-ordination and demonstrates clear value for money through focused resource allocation and operational outcomes.

We recognise that challenges remain in both areas. Modern slavery continues to require improved investigative confidence, consistent recording practices, and effective pathways to safeguarding. In organised immigration crime, further development of threat assessment maturity, intelligence gathering and sharing, and consistent recording across all forces is needed to ensure a comprehensive national picture and effective disruption. The forthcoming HMICFRS inspection of policing's response to organised immigration crime, expected in Spring 2025, will provide important external scrutiny and a platform for continued improvement in this area.

Our priorities for 2025/26 will include supporting forces to implement peer review findings, strengthening modern slavery investigative capability and ensuring funding continues to be directed to the highest harm threats and areas of demand.

I would like to thank colleagues and partners for their continued professionalism and commitment. Together we will continue to build capacity, strengthen consistency, and ensure policing is positioned to meet the challenges ahead.



2. Executive Summary from T/Chief Superintendent Tamasine Matthews



Commander, Modern Slavery and Organised Immigration Crime Unit

I am proud of the immense progress the Modern Slavery and Organised Immigration Crime Unit (MSOICU) has made this year in its support of operational policing.

By expanding our reach not only into the 43 forces across England and Wales but now into forces such as Jersey and Guernsey and the British Transport Police, we are empowering more officers to grow in confidence when tackling organised immigration crime.

Unprecedented investment in our training capacity and delivery has led to a new and improved range of learning opportunities, increasing core knowledge and understanding across forces. Participants in our training models have benefitted from increased levels of confidence in identifying, reporting and responding to modern slavery and organised immigration crimes and incidents, as well as an increase in the understanding of and positive relationships with partner agencies.

We have helped to reduce administrative burdens on frontline officers by working alongside the Home Office to implement the recommendations of their Counting Rules review of the operational productivity of policing.

Changes have resulted in simpler, less time consuming processes for forces, alongside increased preservation of crime data integrity and actionable intelligence. We will take a lead role in assisting forces to embed these changes and help free-up more precious officer time. Support for forces and Regional Organised Crime Units in delivering the Crime and Courts Act tasking has seen effective data, tracking and monitoring activity and investigations. We are now in a better place to track progress, share insights and provide targeted interventions aimed at emerging themes and issues.

And Project Terminus has evolved its programme for operational activity aimed at disrupting organised immigration crime in England and Wales. This year, in addition to activity on land

and sea, we have funded activity within airports, and for specific organised immigration crime operational responses. As a result, drugs, cash and other assets have been seized, many from the same organised criminal gangs who facilitate small boat crossings.

As we look to 2025/26, our MSOICU programme will continue to respond at pace to the growing threat posed by modern slavery and organised immigration crime, working alongside valued partners to do all we can to protect, disrupt and help bring perpetrators to justice.

3. Introduction

This year the programme has continued to deliver against its vision to embed an improved policing and wider law enforcement response to modern slavery (MS) and organised immigration crime (OIC).

Progress has been achieved by working alongside the 43 forces across England and Wales and with other law enforcement partners; for the first time the programme has officially begun to work with non-NPCC forces such as the British Transport Police.

Funding streams from the Home Office - £1.26m allocated to MS, 4.7m for OIC – have allowed the programme to deliver its core functions of policy, development, and training, alongside peer reviews and commissioning through Project Terminus.

Our Regional Co-ordinators, embedded in Regional Organised Crime Units across the UK, are instrumental in connecting investigators across regions, strengthening partnerships, and driving collaboration.

These functions drive the activities and deliverables in our Business Plan, which is held to account by the Home Office and key stakeholders.

This report sets out the key achievements made by the MSOICU in 2024/25.

This year at a glance:

40

**Guidance /
Policy
Documents
Produced**

3952

**Officers/
Staff Trained**

4617

**Intelligence
Logs Reviewed**

345

**Law
Enforcement
Operations
Supported**

**Modern Slavery
Standards
Benchmarking
with Forces**

115

**Subject Matter
Inputs across
NGOs and Law
Enforcement
Partners**

The MSOICU periodically conducts benchmarking with forces to establish an evidence base on current performance in the policing response to modern slavery, and to inform activity to drive improvement. The benchmarking process involves the Regional Co-ordinator network liaising with forces to mark themselves against the 47 National Slavery and Trafficking Policing Standards, covering the five key themes of: leadership and governance, intelligence, investigations, victims, and training.

Latest benchmarking, completed in 2023/24, showed stability in the average score across all forces, compared with the previous year. High average scores across the leadership and governance standards indicated a strong recognition of modern slavery and human trafficking (MSHT) as a priority. Weaker scores seen across the intelligence, investigation and training standards highlighted the enduring challenge of implementing an effective operational response in the complex area of MSHT. Regional Co-ordinators completed a follow-up exercise with forces in November 2024 to discuss the benchmarking findings and formulate improvement plans to tackle lower scoring areas.

The results of the benchmarking will be analysed to inform the MSHT business plans for future training and development opportunities, and guidance through the policy and development team to increase operational effectiveness and consistency.

4. National Context

The landscape of modern slavery and organised Immigration crime continues to present complex challenges that require continuous adaptation and strategic response. Both crime types are increasingly varied, involving sophisticated criminal networks, international elements, and substantial safeguarding and enforcement needs.

As illustrated in the table below, there was a drop in the average monthly number of live MS investigations recorded in the year to February 2025, however this was in part due to a data cleansing exercise completed by MSOICU. Recorded crime and National Referral Mechanism (NRM) data showed a more stable year-on-year picture with a slight reduction in crimes and a slight increase in NRM referrals.

	Year	Total	Change
MS Live Investigations	Year to Feb 2024	3552	-27%
	Year to Feb 2025	2608	
MS Recorded Crimes	Year to Sep 2023	9197	-4.8%
	Year to Sep 2024	8755	
Police NRM Referrals	Year to Dec 2023	3604	3.9%
	Year to Dec 2024	3465	

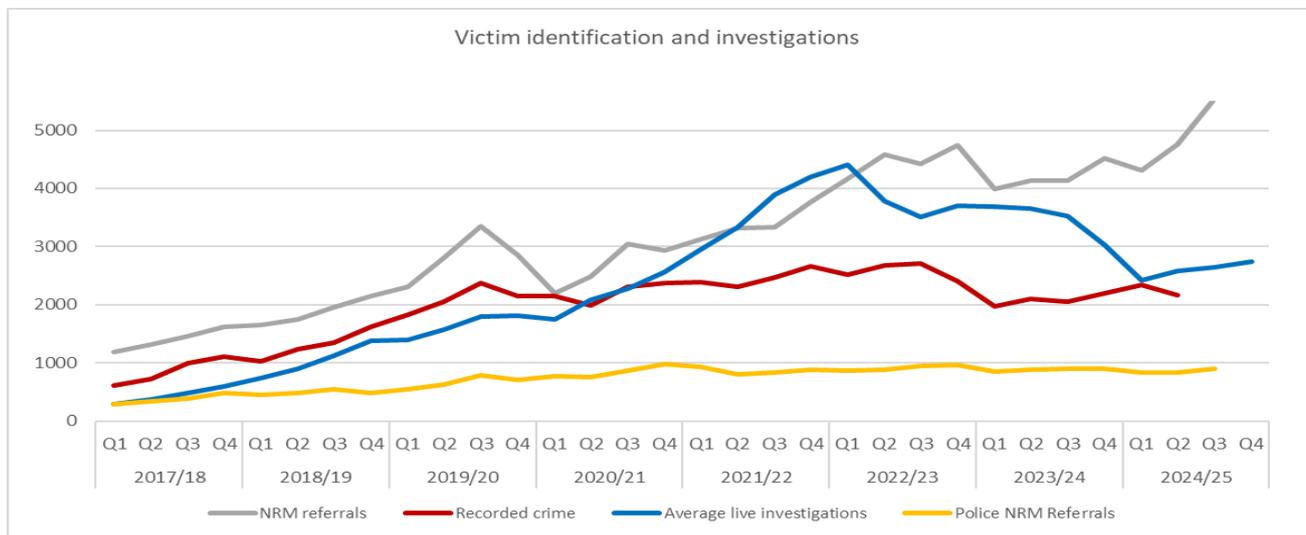
OIC data for 2024/25 showed a marked increase in the number of primary threat OIC disruptions recorded by NPCC police forces, up 63% on 2023/24. A lesser increase was also seen in the number of assessments on the National Crime Agency's Serious Organised Crime Master List which featured OIC as a threat, up 13% to 81 assessments. Due to the complexity of the OIC landscape and the number of partners involved, data sharing will be a key issue in the upcoming year to ensure a comprehensive understanding of the wider OIC picture.

	Year	Total	Change
OIC Disruptions	Year to Mar 2024	752	63.3%
	Year to Mar 2025	1228	
SOC Master List for OIC Threat Assessment	Year to Jul 2024	72	12.5%
	Year to Mar 2025	81	

NRM Referrals and Recorded Crimes

The number of referrals into the NRM and the number of modern slavery offences reduced notably at the start of 2023/24 following long-term increases observed since 2015. This decline was likely to have been linked to the introduction of a new higher threshold for making reasonable grounds decisions in the NRM. Subsequently, the total number of NRM referrals increased through 2023/24 and into 2024/25 to the highest levels seen to date. First responders primarily drove this increase outside of the police with NRMs initiated by the police remaining relatively stable.

Recorded modern slavery offences also increased slightly in 2024/25 but remain below levels seen in the previous two years. This slight divergence in trend between NRM referrals and recorded crimes is likely linked to the increasing proportion of NRMs where the exploitation occurred overseas (39%-49% per quarter across the past four quarters), as these referrals are not captured as modern slavery crimes.



Active Investigations

The number of live modern slavery investigations saw small steady increases in 2024/25, from just under 2,500 to just over 2,750 reported monthly via direct data entry. This follows reductions in the average number of live investigations linked to data cleansing activity which was conducted with the aim of improving the accuracy of data recorded. It should be noted that the number of live investigations excludes cases from forces not using the direct data entry method and as such the full scope of ongoing activity will be higher.

Types of Exploitation

Criminal exploitation continued to account for the majority of modern slavery investigations at 59%. The high proportion of investigations is largely linked to the identification of county lines cases involving exploitation. Outside of criminal exploitation, the next highest proportion of investigations were for sexual exploitation (19%), followed by labour exploitation (14%). Domestic servitude remained at 3% of all investigations.

5. Delivery Highlights

In this section some of the key achievements from the programme in 2024/25 are summarised.

Traditionally the programme has only worked with the core 43 forces. However, the Home Office widened this remit and in 2024/25 the programme has worked with forces such as Jersey and Guernsey and the Isle of Man. This initially involved engagement and fact finding to understand how these forces are affected by organised immigration crime.

Home Office Counting Rules MS

In 2022 a review was led by CC Rowley (NPCC lead for Crime Data Integrity) under the auspices of the NPCC led review of the operational productivity of policing. The Home Office Counting Rules (HOCR) review was prompted by anecdotal evidence from police leaders that issues regarding crime and data recording were imposing excessive administrative burdens on front line officers.

In 2024 the MSOICU worked with the Home Office to implement the review's recommendations, with the aim of streamlining processes to reduce administrative burdens on policing. This was to be achieved by simplifying and standardising recording practices while maintaining accuracy and fairness and ensuring all NRM referrals and Duty to Notify (DtN) referrals are recorded consistently, regardless of the agency involved, and removing the need to have a N200 process.

The programme supported the Home Office to bring about change ensuring crime data integrity was preserved, actionable intelligence was not lost, and forces could see the process was simpler and less time consuming. The programme also collaborated on a consultation with partner agencies and third sector organisations to ensure all of those working in the modern slavery sector were content and understood the proposed changes.

April 2025 will see two years' behind-the-scenes work - analysis, consultation, iteration and problem solving, come to fruition.

The programme will then take a lead role in the implementation of the changes in force data recording and assisting them to embed the new processes. Guidance will be provided alongside ongoing support to ensure data integrity and efficiency.

Crime and Courts Act Tasking

The Crime and Courts Act (CCA) tasking has continued to play an important role in strengthening policing's response to OIC. Since the revised tasking was issued in 2023, forces and ROCUs have demonstrated sustained commitment to delivering against the measures, resulting in significant national uplift.

Over the past 12 months, policing successfully evidenced and discharged the majority of requirements, with all but two measures formally recognised as achieved. This reflects

considerable progress in establishing consistent disruption reporting, improving the visibility of organised crime groups, and strengthening the systems and processes required to support these improvements.

The achievements were underpinned by practical enhancements at force level. Forces have increased the volume of recorded disruptions, improved system compliance, expanded debriefing activity through targeted funding, and made greater use of the OIC intelligence hashtag to capture and share intelligence more consistently. Collectively this has strengthened the national intelligence picture and improved understanding of OIC activity across forces and ROCUs.

As a result of this strong performance, it was acknowledged that policing had exceeded expectations in the quantitative elements of the tasking and had established a credible foundation for ongoing improvement in the qualitative areas. The two remaining measures focused on intelligence development representing opportunities for the next phase of work rather than gaps in delivery.

Recognising the maturity now reached, it was agreed that refreshed tasking would be more appropriate than further incremental uplift against the current measures. Work is underway, jointly with the NCA, to develop a revised set of measures that builds on the success to date and shifts focus towards outcomes, intelligence quality, and system impact.

This transition marks a positive step. It reflects a landscape where the foundations have been built, progress is evidenced, and policing is now positioned to focus on maturing capability rather than simply expanding volume. The programme will continue to lead this work with the NCA to ensure that the refreshed tasking supports continued improvement and delivers a more refined and outcome focused response to OIC.

Anti-Slavery Partnerships

Anti-slavery partnerships are essential for creating a comprehensive and collaborative approach to tackling modern slavery. All forces are involved in some form of partnership, and the programme collaborates with numerous agencies and groups within these networks. The programme's Regional Co-ordinators are key to this.

The South Wales Regional Co-ordinator has continued to work with Anti-Slavery Wales – Welsh Government Social Partnership, Employability and Fair Work Directorate, on the development of the first three modules of an online training package aimed at MSHT awareness throughout the public sector in Wales. Work on further bespoke modules for first responders, and on thematic topics within the threat area such as child criminal exploitation and others will follow.

The Regional Co-ordinator presented to the North Wales Commissioning Board MSHT awareness and the issues relating to exploitation in the care industry in their locality. The

transitional process from child to adult and the referral process in the MSHT MARACs (South Wales specific) was also presented to the Pan Wales Exploitation networking meeting.

Following widespread partnership building with social care commissioning services and development of working relationship with Working with Care Inspectorate Wales, a co-ordinated series of multi-agency meetings have been held to develop intelligence and investigations from several direct referrals of concern for MSHT in the Care Sector. Follow up investigations by both UK Visas and Immigration and regional forces have been ensured.

Chinese and Vietnamese Cultural Resource

Investigations into modern slavery frequently involve victims who are foreign nationals. This underscores the importance of cultural competency in building trust and providing appropriate support to victims. Officers who are aware of the cultural nuances and needs of their victims are better equipped to engage in an effective and appropriate manner leading to better outcomes for all.

Previously, the programme has developed cultural resource guides for the Romanian and Roma cultures and in 2024/25 Chinese and Vietnamese versions were launched. The guides provide essential insights into key cultural elements including reasons for migration, family structures, taboo subjects, and attitudes towards authority. By amplifying the voices and experiences of victims through cultural understanding, this resource enables officers to deliver more informed and empathetic responses ensuring that victims feel heard and supported.

Feedback following the workshop sessions where the guides were presented indicates the following:

- Before the sessions 91% said they lacked confidence in the subject areas.
- After the session 83% said they were more confident than before the sessions.
- 84% of respondents found the topics of particular interest and 100% of respondents would recommend the resource to colleagues.

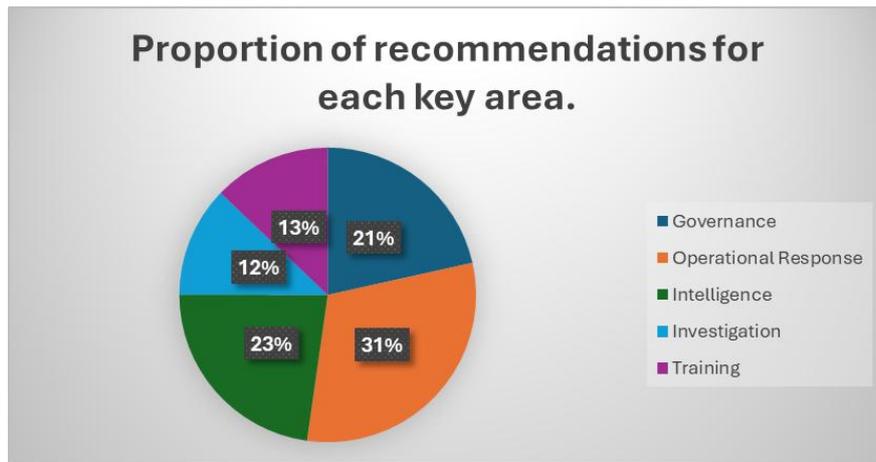
Peer Reviews Summary

In 2024, the programme reached a major milestone by completing the first national OIC peer review assessment of all 43 police forces in England and Wales, marking the successful conclusion of a two-year programme of work. This was a significant national achievement which provides policing with the most comprehensive understanding of OIC capability to date.

Over the past two years, specialist MSOICU staff have assessed each forces' approach to OIC, providing policing with a consistent national picture of capability for the first time and setting clear foundations for future improvement.

Key Achievements

- Completed peer reviews across all **43** forces, assessing governance, intelligence, operational response, investigations, and training.
- Produced **1,3886** recommendations and tailored enhancement plans for every force.
- Highlighted training as the most common area for improvement, driving wider uptake of MSOICU learning products and renewed focus on frontline capability.
- Supported forces to establish task and finish groups to progress recommendations.
- Developed and shared an OIC Good Practice Digest to provide a practical resource for ongoing improvement.



The MSOICU has created a robust evidence base that demonstrates national demand, variation in practice and opportunities for uplift. It has enabled forces to better understand their local picture and has supported a more consistent, intelligence led response to OIC across England and Wales.

This represents the most comprehensive national assessment of OIC policing undertaken to date and provides a strong foundation for continued improvement.

Looking ahead, the next financial year will see us expand our peer review offer beyond Home Office forces, with British Transport Police, Police Scotland, and the Police Service of Northern Ireland scheduled to undergo review. This expansion reflects national recognition of the Unit's value and the growing need for a consistent, cross border understanding of OIC threat and capability.

Illicit Finance

The programme's financial investigative advisor continues to actively engage with Regional Economic Crime Groups, Tactical Delivery Groups and modern slavery units established in police forces across the country. This approach ensures that existing resources and structures are effectively supported, offering tailored financial investigative advice to enhance ongoing modern slavery investigations.

This has led to the development of the MS Finance Investigators' course, trialled within Wiltshire with roll-out to all interested forces in 2025/26.

Feedback from the trialled course showed:

- 20% of respondents had previously been involved with MSHT investigations.
- 80% of respondents were slightly confident that they knew where MSHT occurs, and 80% were unsure how MSHT takes place.
- After the course 100% of respondents said they were more confident that they knew where and how MSHT takes place.
- After the course 100% of respondents went from being unsure to being confident in contributing to an MSHT investigation from a financial intelligence perspective.
- 75% of respondents said the course was highly informative and felt the case studies were of particular benefit.

Project Aidant

Project AIDANT is a series of multi-agency operational intensifications to tackle modern slavery and human trafficking under the collective stewardship of the Unit and the NCA.

- **Aidant 37**
The Regional Co-ordinators were key in raising awareness of methodologies used to recruit victims through online platforms. They supported forces to increase their use of Open Source Intelligence (OSINT) research to identify potential cases by cross-referencing contact details with other systems and online platforms. Forces also engaged positively with communities including hosting collaborative workshops with high-risk communities to understand the nature and extent of their use of social media, providing an insight into the risk of recruitment through these means. Proactive visits led to the safeguarding of over 30 victims and the arrest of at least seven suspects.
- **Aidant 38**
This was the first in a reformulated project cycle within the NCA, enabling longer-term delivery allowing activity to build consistently over a six-month period. The MSOICU's Regional Co-ordinators were key in ensuring sustained interest and buy-in through this transition and fed into workshops that tested hypotheses about the structure of Romanian Organised Crime Groups (OCG). Through the Regional Co-ordinators, the NCA collected intelligence concerning subjects and peripheral actors in proactive investigations across the UK, which allowed the Tackling Organised Exploitation programme (TOEX) to deliver an analytical exercise identifying the most influential individuals and roles with offending networks. 32 police forces submitted intelligence to this exercise resulting in 52 overlaps being identified, of which five were flagged as new or significant subjects of interest and disseminated back to forces. Targeting networks through the most influential modes enabled policing to deliver high-impact, sustainable disruptions.

Project Terminus

Recognising that many OCGs operate across a variety of methods, Project Terminus was established in 2023 to address the organised immigration crime threat posed across land, sea and air in England and Wales.

Building on the existing work of police forces, additional Home Office funding has allowed the programme to accelerate, promote and co-ordinate focused operational activity across UK policing to address the organised immigration crime threat.

During the year, the programme was able to use the lessons learnt in year one to evolve the commissioned funding. Subsequently the programme has moved into funding operational activity within airport settings, as an example, and to fund specific OIC related operations and responses.

Operational activity includes:

- **Land:** Combatting organised immigration crime on the strategic road network at key locations, stopping commercial goods vehicles and others based on intelligence on those entering and leaving the country. Migrant debriefs and enhanced engagement with migrant communities also feature in the land methodology.
- **Air:** Heightening activity including engagement and visibility at inland airfields and strips, targeting areas that are more likely to be used by OCG networks. The aim being to raise the profile of these locations with local communities and further build the intelligence picture.
- **Sea:** Enhancing policing's ability to understand and address the issue of clandestine arrivals into smaller ports and unconventional landing sites, improving engagement and intelligence flow with maritime communities.

The programme was given further in year funding to target specific operational responses. This has led to subsequent seizures of cash, drugs, and other assets, some of which are detailed below. Most come from the same OCGs that operate within the people smuggling arena.

A dedicated team manages the distribution of these funds allowing forces to bid for support aligned with their specific operational needs.

Notable Headlines from Project Terminus:

**7560
Vehicle Stops**

**1291
General Aviation
Visits**

**1672
General
Maritime Visits**

**949
Debriefs
Completed**

**£1,700,000+
Cash Seized**

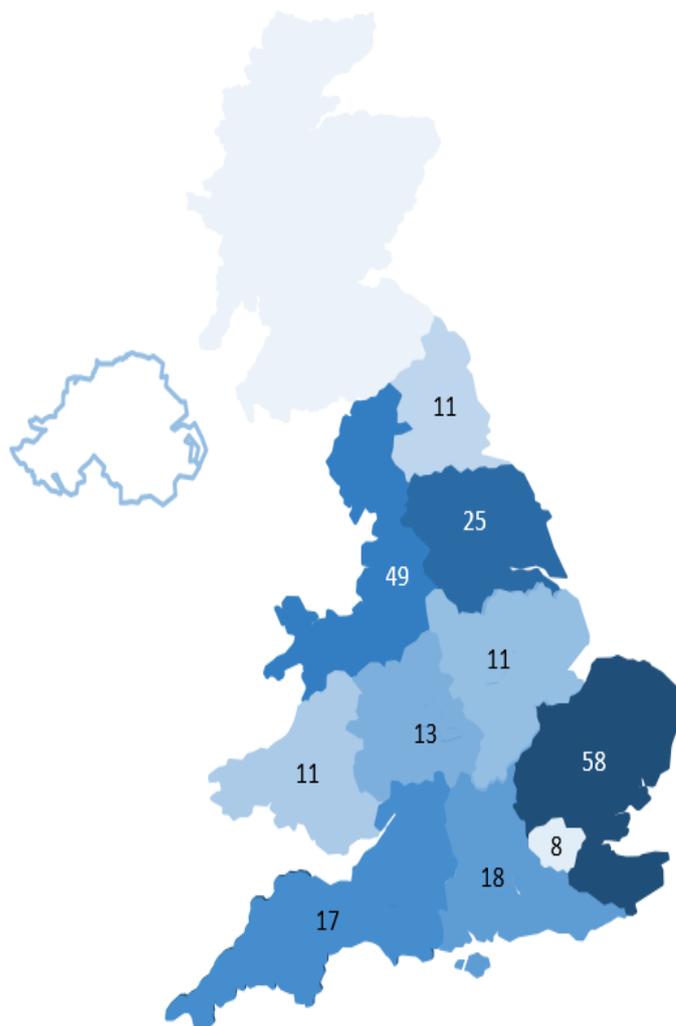
**£2,250,000+
Fines
Fixed Penalty
Issued/ Received**

**£10,000,000+
Drugs Seized**

Approved bids by Regional Organised Crime Unit

No. of Bids per Region

ROCU	Number of Bids
Eastern	58
Yorks and Humber	25
North West	49
South West	17
South East	18
West Mids	13
East Mids	11
Wales	11
North East	11
London	8
Total	221



Training and Capacity Building

Over the last twelve months the learning provided or supported by the MSOICU can be grouped into the following:

1. Training provided directly by the Unit's central staff (training and policy):
 - Online sessions to care sector partners in respect of potential forced labour and labour exploitation.
 - One-day Hydra events designed to improve police responses to dynamic organised immigration crime incidents.
 - Cultural webinars, provided nationwide, to support engagement with the nationals of specific countries.
 - Training nationally in the best use of the policing infrastructure including Police National Database and financial intelligence to support MS and OIC law enforcement agencies.
 - 'Train the Trainer' sessions with police forces to enable their own trainers to conduct various levels of MS and OIC training.
 - MS specialist investigator, and MS financial investigator training courses to forces and regions.
 - Sessions with public and voluntary sector partners to improve their knowledge and understanding of MS including Border Force, NWG, and Immigration Enforcement.
 - As a result, currently 81% of forces regularly collaborate with local Immigration Enforcement Criminal Financial Investigation teams.

2. Training provided directly by the Unit's Regional Co-ordinators:
 - Inputs to staff within Regional Organised Crime Units regarding MS and OIC.
 - Sessions with staff from financial institutions to improve knowledge and understanding of MS.
 - Inputs to Crown Dependencies – Isle of Man, Guernsey, and Jersey - to improve awareness of MS and OIC.
 - Development sessions with individual forces to improve awareness of MS and OIC.
 - Sessions with local partners such as Trading Standards.

3. Training supported by the Unit:
 - Mentoring of trainers in-force to develop MS and OIC training.
 - One to one inputs with force trainers regarding course developments.
 - Provision of training material to forces including presentations and case studies.

The Unit has completed the following:

- Adaptation of the existing MS specialist investigator course to the MSOIC specialist investigator course.
- Adaptation of the existing MS financial investigator course to the MSOIC financial investigator course.
- Creation of a new MSOIC Hydra event.
- Improved evaluation processes for both MS and OIC learning.

Impact of learning:

- Increased core knowledge and understanding across police forces, as reported through post-course and ad-hoc surveys.
- Increased levels of confidence in identifying and responding to MS and OIC incidents and crimes, as reported by police officers and staff.
- Increases in MS and OIC incidents being identified and reported within forces, as reported through follow-up conversations with force leads.
- Positive changes in behaviour being reported after learning events such as working with immigration services to investigate serious immigration offences.
- Increased demand for Unit MS and OIC learning sessions.

Regional Co-ordinators

The MSOICU operates a network of Regional Co-ordinators embedded within Regional Organised Crime Units (ROCU) across the UK. These senior investigators are subject matter experts in modern slavery and organised immigration crime and an essential conduit between the MSOICU and police forces. By providing advice and expertise, operational support, and strategic guidance, the Regional Co-ordinators help bridge national priorities with local needs. Their role is instrumental in connecting investigations across regions, strengthening partnerships, and driving collaboration.

The following case studies highlight some of the Regional Co-ordinators' most impactful work over the past year. These examples showcase how their expertise and insight have led to significant successes in addressing modern slavery and organised immigration crime, delivering meaningful outcomes in complex cases, and fostering stronger, more co-ordinated responses across the UK.

Operation Ilkley

Op Ilkley was a multi-victim labour exploitation investigation into the OCG from the Czech Republic led by the Drevenak family. The criminality spanned the Czech Republic, Metropolitan Police area, Cambridgeshire, and Bedfordshire.

All victims and suspects in respect of Op Ilkley lived in Cambridgeshire. All were recruited from the Czech Republic under the promise of a better life, work, and accommodation. The exploitation began in 2015 until 2019, when the police were alerted by the Czech Republic authorities, and specialist officers from Cambridgeshire's modern slavery team took on the investigation.

A joint investigation team (JIT) was agreed by Eurojust and set up between the Czech Republic and all forces involved in the UK. The JIT allowed for direct communication between both countries' authorities which was vital for the complex investigation. The MSOICU and Europol also advised and assisted all parties throughout the investigation.

Victims were either unemployed or in very poorly paid positions in the Czech Republic. The majority of the victims suffered from either mental health or previous addiction issues.

Six victims were engaged with although it was believed there were more who had either returned to the Czech Republic or moved to London under the control of Drevenak.

Victims were employed at McDonalds in a rural location near to a busy intersection which made it difficult for the establishment to retain staff. The OCG assisted in completing job applications, online tests, and interviews. Victims were encouraged to work 6-7 days per week, working up to 10 hours a day.

The victims were not in possession of their own ID and personal documents and had little or no understanding of English. The victims were in fear of the Drevenak family both in the UK and overseas in the Czech Republic; the culmination of these factors left them no other option but to continue working in the exploitative setting. While the victims were earning around £1200 to £1500 per fortnight they only received between £40-£100 of those funds.

During the time of their exploitation the victims' salary earnings totalled over £320,000 with a conservative profit estimated at around £215,000. In addition, suspects claimed benefits (working tax credits and child tax credits) in the names of three of the victims to the value of around £17,500. There were also salary payments into bank accounts from unknown sources which totalled over £60,000.

Initially salaries for victims were paid into the bank account of Drevenak followed by immediate cash withdrawal. Over time, an account was opened in a victim's name, and his salary was paid into that account, before immediately being transferred to Drevenak's account. Further victims' salaries were paid into the first victim's account or to the exploiters' account directly. While money was moved to different accounts, it was primarily withdrawn in cash.

The role of the financial investigator was key to proving the case. Financial enquiries provided a complete framework for the investigation which hinged on salaries earned, benefits claimed and how funds were diverted into the bank account of exploiters.

Initially there was a reluctance of victims to engage, until one was shown bank statements relating to the payments of his salary and transfers into the bank account of Drevenak.

The vast bulk of the proceeds were not recovered, and it is believed that these had been moved overseas in the form of cash. A linked investigation conducted by the Metropolitan Police uncovered property, land and luxury vehicles owned by family members.

Partnership working alongside the Department for Work and Pensions, HM Revenue and Customs, the local authority, and employers were instrumental in this investigation. Victim specialist teams were able to provide exceptional victim support which was needed due to the length of time the case took to prosecute.

At court Ernest Drevenak and Veronika Bubencikova denied six counts of holding a person in slavery or servitude, five counts of arranging or facilitating travel of another person with a view to exploitation and fraud by false representation. In October 2024 they were found guilty following a trial at Cambridge Crown Court and on the 7 December, Drevenak was sentenced to 12 years and six months, and Bubencikova to ten years and six months.

The other cases linked to the Drevenak family also resulted in lengthy sentences for modern slavery offences.

This case highlights the value of financial investigations into these modern slavery and human trafficking cases which can often be complex. It also shows the need for continued victim support and engagement due to the protracted time it takes to present a case to court.

Operation Jet Stream

In July 2022 the victim, a female Ugandan national, arrived in the UK believing she would be working for the Deputy High Commissioner of Uganda at his diplomatic residence in London. All arrangements including visa applications, work contract and travel arrangements had been completed or co-ordinated by Lydia Mugambe (LM). At the time LM was a Ugandan High Court Judge undertaking her PHD in Human Rights at Oxford University, living in Oxfordshire with her children whilst she did so.

The victim had previously worked for LM in Uganda, living with her for many years, helping to raise the children and look after the household. LM's visa to study in the UK did not allow for her to sponsor domestic help, however an encounter with the Deputy High Commissioner, who is allowed a domestic worker under the visa rules, led to a conspiracy to facilitate the illegal entry of the victim under the false premise of a visa sponsored by the mission. From the evidence, the motivation for the Deputy High Commissioner was for LM to contact a fellow Judge for a case in Uganda for which he was facing proceedings.

The victim never worked for the Ugandan High Commission, instead she was collected from the airport by LM and was taken to her home where she was required to look after the children and household from early in the morning until late evening. The victim was not paid. LM allowed her to undertake some outside work to earn money, however this had to be after the children were put to bed and as long as it did not interfere with what LM required her to do.

Control measures were used. LM kept the victim's documents and there were threats regarding her immigration status. This was on top of LM's power and standing in Uganda. It was when the victim requested her documents that the level of control was increased to a point where the victim contacted someone in Uganda to alert people in the UK to her situation, resulting in police attendance at the home of LM and the victim entered the NRM.

The case was raised to the Regional Co-ordinator for SEROCU early in the investigation and initial guidance provided. There were unique features to the case, especially regarding the status of the co-accused. LM had a diplomatic passport and claimed to have diplomatic immunity.

Following her initial arrest, she was successfully appointed a UN Judge, which comes with immunity protection, and she used this to try and frustrate the investigation. The Deputy High Commissioner's immunity was waved to allow for a suspect interview, however it was not waved for charge, instead he has been removed from the UK.

The Regional Co-ordinator has remained engaged throughout the course of the investigation, assisting Thames Valley Police with blockers where applicable. This includes the victim receiving notification her asylum claim was unsuccessful and would be required to return to Uganda. Given the profile of the suspects this presented a significant danger to the victim. Through contacts in the Home Office at senior levels the decision was reviewed, asylum was granted, and the victim has a positive conclusive grounds decision through the NRM. The victim has remained engaged with the investigation throughout.

LM was charged with OIC (S.25 Immigration Act), Human Trafficking, Forced or Compulsory Labour and remanded in custody due to breaches of bail conditions where she had attempted to leave the UK, and also evidence of witness intimidation, for which she received an additional charge shortly before trial. Victim services engaged could not provide the wrap around support required during the trial process, especially considering the unique issues including witness intimidation from a member of the judiciary in Uganda. The MSOIC programme engaged with Justice and Care senior leaders and a victim navigator supported the victim, which was considered invaluable by the investigation team.

LM was found guilty on all counts by the jury.

On 2 May 2025 LM was sentenced to a total of six years and 4 months after the reductions and mitigation, including her previous notable and award-winning work in the field of Human Rights. She agreed to pay compensation of £12,000 to the victim rather than the prosecution seek a Reparation Order under the Modern Slavery Act, which was included in the sentencing. Due to the length of sentence, she will automatically be considered for a Deportation Order when released, although the Ugandan authorities are seeking a bilateral prisoner exchange prior to release.

There is only evidence of exploitation of a single victim in the case and so a restraining order has been granted rather than an STPO. The victim has life-long anonymity and, importantly for her, leave to remain and does not need to return to Uganda where she feels unsafe, albeit she fears for the safety of her family and friends.

Thames Valley Police were assisted by the Metropolitan Police Parliamentary and Diplomatic Protection Service, Home Office teams such as UKVI, NCA, FCDO and the MSOICU.

6. Look forward to 2025/26

Despite our multi-year funding agreements coming to an end the Unit has managed to continue with funding from the Home Office in connection with both modern slavery and organised immigration crime for 2025/26. Current funding allocations are as follows:

- **Modern Slavery: £610,000**
- **Organised Immigration Crime: £5,220,000**

This funding provides stability to plan and implement key initiatives, although the current agreements are set to expire on 31 March 2026.

In 2025/26 the Modern Slavery Policy and Development Team will be working on Project Turnstone, a cradle to grave framework for the investigation of modern slavery, in line with the objective from the Ministerial Modern Slavery Action Plan.

Project Turnstone's objective is to secure better criminal justice outcomes for victims of modern slavery. It is designed around three key pillars:

- Turning the Stone using innovative tactics and methodologies to uncover the hidden crime of slavery.
- Proactive Offender Management using legislative tools and targeted operational activity to pursue and disrupt offenders.
- Enhanced Victim Engagement developing cultural competence and structured interventions to secure the trust and support of vulnerable victims.