

Understanding the Application and Implementation of Slavery and Trafficking Prevention and Risk Orders under the Modern Slavery Act (2015)

Research report

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Foreword

Modern slavery is a horrific crime that preys on vulnerability, profits from exploitation and causes lasting harm to individuals and communities.

Yet prosecutions and convictions remain far too low. Even where offenders are sentenced, prison is seen as an inconvenient cost of doing business. A prison sentence does not stop someone from returning to society and committing further harms.

That is why a fundamental shift is needed from simply reacting to harm to preventing it. Disrupting those responsible and preventing further exploitation should be at the heart of the Government's response. This is why my [Strategic Plan 2024-2026](#) committed to promoting the better use of the powers already available to disrupt offenders. Slavery and Trafficking Prevention Orders (STPOs) and Slavery and Trafficking Risk Orders (STROs) are an important part of that toolkit.

STPOs and STROs are orders that place targeted restrictions on individuals who have committed, or pose a risk of committing, slavery and trafficking offences. These restrictions could prevent someone's movement to or in certain areas or their access to devices or activities that enable exploitation. This is even more critical given that Government has announced that perpetrators of modern slavery will be released even earlier from prison under the Sentencing Act.

Despite being great tools for disruption, these powers are not being used to their full potential. I have seen the data on how many STPOs and STROs are made each year and the numbers are woefully low.

To understand why the numbers of Orders made are low, I worked with the Modern Slavery Policy and Evidence Centre to review the operation of these Orders and make recommendations to Government to improve their use. This research shows that awareness and expertise remain inconsistent and too often depend on individual practitioners rather than being embedded within organisations. There are also significant gaps in national data, monitoring, coordination and information sharing.



This comes at a critical time. The Immigration and Asylum Bill brings new reforms to STPOs and STROs. While I welcome the new measures, this report demonstrates that stronger powers need to be backed by strong delivery. There must be routine consideration of orders in all cases, better training, improved national data collection and publication, stronger safeguards for survivors, consistent monitoring and better communication on orders in force across organisations.

We cannot afford for effective powers to sit unused while people continue to be exploited. STPOs and STROs must become a routine and effective part of our response, used wherever appropriate and at scale to disrupt perpetrators, prevent further offending and protect people from exploitation.

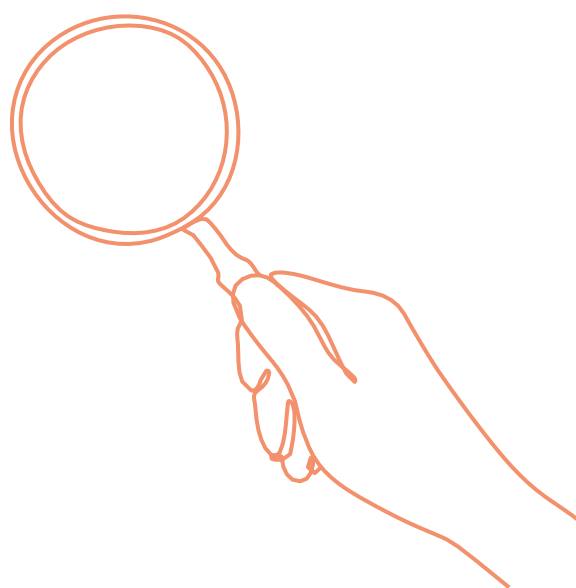
I would like to thank the Modern Slavery and Human Rights Policy and Evidence Centre and, in particular, Dr Alicia Heys, Dr Bethany Darby and Dr Craig Barlow for undertaking this important research, as well as all those who contributed their expertise and experience. This report provides a clear evidence base for action, and I urge the Government and relevant agencies to take forward its recommendations.

Eleanor Lyons,
Independent Anti-Slavery Commissioner

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1. Introduction

The Modern Slavery Act (MSA) 2015 was introduced to strengthen the UK's response to human trafficking and modern slavery, providing comprehensive tools to identify offenders, secure convictions, and protect victims. Whilst prosecutions and convictions under the Act remain low,¹ it also provides legal tools that offer mechanisms alongside or instead of prosecution, in order to manage ongoing risks.

This report examines the use and implementation of two measures under Part Two of the Act: Slavery and Trafficking Prevention Orders (STPOs) and Slavery and Trafficking Risk Orders (STROs).² This report focuses specifically upon those orders within the Act that are applicable to England and Wales, although we note that similar orders are also available in Scotland and Northern Ireland.

The research brings together existing published evidence with original qualitative evidence from interviews with practitioners. It explores awareness of the orders, the restrictions imposed by the orders, monitoring and enforcement, and perceptions of effectiveness; and provides recommendations based on these findings. This research supports the Independent Anti-Slavery Commissioner's Strategic Plan 2024–2026, which calls for better understanding of existing powers, including STPOs and STROs, to disrupt perpetrators and prevent further exploitation.³ It is particularly timely given the Immigration and Asylum Bill, introduced to Parliament in June 2026, which proposes reforms to these orders.⁴

This report is the second in a series of three reports arising from the 'Legal Enforcement of Modern Slavery' research project (2025–2026). Informed by a series of workshops with policymakers and practitioners to identify research needs and priorities, the researchers focused on:

- Workstream One, Survivor Engagement: working with people with lived experience of modern slavery in the UK to understand their experiences of the criminal justice process and what a successful criminal justice outcome looks like.

¹ Alicia Heys, *Barriers to Prosecutions and Convictions under the Modern Slavery Act 2015* (Modern Slavery and Human Rights Policy and Evidence Centre, 2025), <https://www.modernslaverypec.org/resources/prosecutions-modern-slavery-act>.

² Reparation Orders were initially included in the remit of the research. However, the literature review and interviews revealed a substantial disparity between the evidence available on STPOs and STROs and that relating to Reparation Orders. This report therefore focuses solely on STPOs and STROs.

³ Independent Anti-Slavery Commissioner, *Independent Anti-Slavery Commissioner Strategic Plan 2024–2026* (Independent Anti-Slavery Commissioner, 2025), <https://www.gov.uk/government/publications/independent-anti-slavery-commissioner-strategic-plan-2024-to-2026/independent-anti-slavery-commissioner-strategic-plan-2024-to-2026-accessible>.

⁴ *Immigration and Asylum Bill*, Bill 105, 59/2 (House of Commons, 2026).

- Workstream Two, Civil and Ancillary Orders: investigating the use and impact of Slavery and Trafficking Prevention Orders and Slavery and Trafficking Risk Orders under the Modern Slavery Act 2015 as alternative or complementary mechanisms to prosecution.
- Workstream Three, The Statutory Defence: analysing how the statutory defence, which is intended to protect victims who have been compelled to commit offences as a consequence of their exploitation, is understood and applied in practice.

This report presents the findings from Workstream Two and draws on two key sources of evidence. First, a structured review of relevant academic and grey literature was undertaken covering English-language material published between 2013 and 2025 following a pre-defined research protocol. Searches were undertaken across legal, multidisciplinary and social science databases, including Westlaw, Lexis+, HeinOnline, Scopus, Web of Science, JSTOR, ProQuest, PubMed and Criminal Justice Abstracts, alongside targeted online searches of relevant government, parliamentary, law enforcement and non-governmental sources. Records were deduplicated and screened by title, abstract and full text in accordance with the research protocol. To ensure the review reflected significant subsequent developments, key publications appearing after the completion of the searches in December 2025 were included where necessary, although no further structured search was undertaken.

Second, semi-structured interviews were conducted with 24 professionals with experience of these orders. Participants included barristers, police officers (including those who were part of the former Modern Slavery and Organised Immigration Crime Unit – MSOICU), local authority staff, and representatives of the Crown Prosecution Service (CPS), HM Prison and Probation Service (HMPPS), and the former Gangmasters and Labour Abuse Authority (GLAA). Interviews were conducted between March and July 2026, and subsequently anonymised, transcribed, and then thematically analysed using NVivo. Quotations are attributed using broad professional roles or organisational affiliations, with participants numbered where multiple respondents came from the same professional group.⁵ Findings from the literature review and interviews are integrated throughout the report, allowing practitioner experiences to be considered alongside the existing published evidence base. The findings are presented thematically, but it should be

⁵ Given that a number of organisations have recently changed remit, some of the participants requested to be referred to as 'former [agency name]'. This covers, for example, those who were part of the former Modern Slavery and Organised Immigration Crime Unit, and the Gangmasters and Labour Abuse Authority. For others, 'former' refers to those no longer in that role, but who were interviewed because of their knowledge of the orders.

noted that many of the issues are interrelated and should be recognised as overlapping rather than understood in isolation.

2. Legal Framework and Context

Slavery and Trafficking Prevention Orders (STPOs) and Slavery and Trafficking Risk Orders (STROs) were introduced under Part 2 of the Modern Slavery Act 2015 and are preventative/protective orders which are aimed at managing the risk of future slavery or trafficking offending and protecting the public, or particular individuals, from resulting harm.

For an order to be imposed, it must be shown that there is a risk of the named person committing a slavery or human trafficking offence, with consideration given to the likelihood and imminence of such offending, and the potential harm which may result from it.⁶ STPOs can be imposed only on those with a relevant conviction, caution or finding; whereas STROs can be imposed on those without such prior outcomes. The orders can list restrictions and prohibitions that the named person must adhere to for the duration of the order. Section 4 of this report provides more detail on the types of prohibitions and notification requirements that can be included in the orders, but the contents must be reasonable and proportionate.⁷ When considering whether an order is necessary, the court must give consideration to whether the risk is already suitably addressed by the nature and length of the sentence imposed (in the case of STPOs), and any other controls on the offender.

Both STPOs and STROs are civil orders but breaching them constitutes a criminal offence. Breaches are prosecuted by the CPS, and have a maximum penalty of five years' imprisonment.⁸ Cases against children and young people will usually be heard in the youth court, where the maximum custodial sentence for a person aged 12-17 is two years.⁹

2.1 Slavery and Trafficking Prevention Orders

STPOs may be made by a magistrates' court or the Crown Court,¹⁰ and they can be made on sentencing or on application. STPOs made on sentencing are predominantly made against defendants convicted of a slavery or human trafficking offence (the offences listed in Schedule 1 of the Modern Slavery Act) and the court may make the order when dealing with the defendant following a

⁶ Home Office, *Guidance on Slavery and Trafficking Prevention Orders and Slavery and Trafficking Risk Orders under Part 2 of the Modern Slavery Act 2015* (Home Office, 2017), 10.

⁷ Sentencing Council, *Guidance on Ancillary Orders* (Sentencing Council, 2025), <https://sentencingcouncil.org.uk/media/cvad1acc/2025-06-guidance-on-ancillary-orders-full-texts.pdf>.

⁸ Sentencing Council, *Guidance on Ancillary Orders*.

⁹ Home Office, *Guidance on Slavery and Trafficking Prevention Orders*, 30.

¹⁰ Sentencing Council, *Guidance on Ancillary Orders*.

relevant conviction or finding.¹¹ As one respondent noted: “if the leading role offenders are convicted, then we would probably then be seeking a follow-on order.” (CPS 3)

An STPO made on application does not immediately follow a conviction but requires the applicant to apply for the order; these orders can also be made in respect of those who are convicted abroad.¹² STPOs can be made on application by police, immigration officers, the National Crime Agency (NCA), or the Secretary of State (where the offence relates to a labour market offence; in practice this would be the Fair Work Agency).¹³ When an STPO is made on application, evidence must be provided to demonstrate that the offender still poses a risk, i.e. that they have committed actions since becoming a relevant offender to indicate that there is a risk they will commit a slavery or trafficking offence.¹⁴

STPOs can be made for a fixed period of at least five years, or until a further order is made.¹⁵ The literature discusses examples of orders lasting from these shorter terms to one STPO which was made for 30 years.¹⁶ The NCA has reported on a case in which a man was sentenced to 16 years in prison for modern slavery and human trafficking offences and received an STPO. The report notes that this was a lifetime order.¹⁷

2.2 Slavery and Trafficking Risk Orders

Unlike STPOs, there is no requirement that the defendant be a relevant offender for an STRO to be made, meaning that an STRO can be imposed without a previous conviction, caution or relevant finding for a slavery or human trafficking offence. Rather, the defendant must have acted in a way that demonstrates to the court that there is a risk that the defendant will commit a slavery or trafficking offence: “any time you identify risk, risky behaviour that could lead to somebody being convicted of a modern slavery offence then start that application [for a risk order] there and then.” (Police 2)

¹¹ Other situations in which they can be made include where a defendant is found not guilty of a slavery or human trafficking offence by reason of insanity, or where there is a finding that the defendant is under a disability and has done the act charged against the defendant in respect of a slavery or human trafficking offence.

¹² *Modern Slavery Act 2015*, c. 30, s. 16(3)–(4).

¹³ *Modern Slavery Act 2015*, c. 30, s. 15.

¹⁴ Hugh Davies, Ryan Dowding, Brittany Clarke, and Emma Sharp, *Guidance on the Use of Slavery and Trafficking Risk Orders and Slavery and Trafficking Prevention Orders in County Lines Operations*, version 1 (National County Lines Coordination Centre, May 2021).

¹⁵ Sentencing Council, *Guidance on Ancillary Orders*.

¹⁶ Jennifer Bristow and Helen Lomas, *The Modern Slavery Act 2015 Statutory Defence: A Call for Evidence* (Independent Anti-Slavery Commissioner, 2020).

¹⁷ National Crime Agency, ‘NCA Publishes Updated List of Restrictions Imposed on Convicted Criminals’, 2023, <https://www.nationalcrimeagency.gov.uk/news/nca-publishes-updated-list-of-restrictions-imposed-on-convicted-criminals>.

Like STPOs, the order must be necessary for protecting people from the harm likely to result from a slavery or human trafficking offence.

These orders are made by a magistrates' court and can be applied for by police, immigration officers, the NCA or the Secretary of State (in cases that relate to a labour market offence; in practice this would be the Fair Work Agency).¹⁸ STROs have a minimum term of two years.

2.3 Interim Orders

Interim Prevention or Risk Orders may be applied for when the decision on an application for an STPO on application or STRO has not been determined. They are intended to protect the public, or specific individuals, during the period between the application for a full Order and its outcome.¹⁹

Interim STRO will be made pending a final determination of the order...So let's say the police have made an application for an STRO, but it's going to be contested, so you'll have your initial hearing where everyone turns up and it's confirmed it's going to be contested, these are the issues, this is why it's not going to be appropriate. The court may make an interim order pending the final determination. And so the interim order will normally be made on a rolling basis to the final hearing at which point it will either be confirmed in those terms or it might be made in amended terms, but it's there essentially to manage the risk in the interim until a final order is made. (Barrister)

2.4 Proposed Developments in the Immigration and Asylum Bill

The Immigration and Asylum Bill was introduced to the House of Commons in June 2026 and, at the time of writing, is at committee stage.²⁰ Clauses of the Bill propose amendments to STPOs and STROs within the Modern Slavery Act. The most significant of these are outlined below.

- Make STROs directly available to an acquitting court. As it stands, an STRO following an acquittal would have to be sought through a separate application to the magistrates' court. The Bill proposes a new procedural route: that the court should be able to make an STRO as part of the criminal

¹⁸ *Modern Slavery Act 2015*, c. 30, s. 23.

¹⁹ Home Office, *Guidance on Slavery and Trafficking Prevention Orders*.

²⁰ *Immigration and Asylum Bill*.

proceedings following a defendant's acquittal.

- Give the Chief Constable of the British Transport Police the power to apply for orders. This would broaden the remit of which organisations have the power to apply for orders to include the British Transport Police.
- Allow police forces to apply for orders irrespective of the defendant's connection to the applicant's force area. At present, a police force, acting through its chief officer, may apply for an order in respect of a person who lives in that force's area, or where the chief officer believes that person is in, or is intending to come to, that area. The proposed changes would remove this restriction on which police force may make the application. This responds directly to concerns that have also been raised by respondents in this research project about the complexity of modern slavery cases where the offences may not occur in the location where the offender lives (see Section 3.2.2).
- Make notification requirements mandatory. At present, an STPO or STRO *may* require the defendant to notify a relevant authority of their name and address. The Bill would require these core notification provisions to be included in new orders and would allow courts to impose further notification requirements prescribed in regulations.
- Electronic monitoring of STPOs and STROs. These provisions would offer a further means of monitoring a person's compliance with the terms of their order.

3. Use and Application of the Orders

Published data on the use of STPOs and STROs remains limited. 147 STPOs and 60 STROs were issued between July 2015 and March 2020, while at March 2022 there were 250 orders in existence.²¹ More recently, Ralph reported that, when a list of all STROs issued in the UK was obtained in 2023, this comprised 114 orders.²² The absence of routinely published, comprehensive national data means that these figures do not provide an up-to-date picture of the total number of orders currently in force, or the number issued each year.

²¹ Rebecca Brown, Katarina Schwarz, and Vicky Brotherton, *Slavery and Trafficking Risk and Prevention Orders: A Background Review of History and Use to Date* (Rights Lab, University of Nottingham, 2023), 15.

²² Neil Ralph, *Slavery and Trafficking Risk Orders* (College of Policing, 2026), <https://www.college.police.uk/article/slavery-and-trafficking-risk-orders>.

3.1 Levels of Use

Both the literature and interview data suggest that both STPOs and STROs are underused.²⁴ However, some respondents felt that “Prevention orders...are about right.” (Police 6). Those who held this view explained that, in relation to STPOs on conviction, the pathway is more straightforward and much of the work to obtain the order has already been undertaken, which can mean fewer barriers in terms of workload. Further, “if the officer doesn’t know, the CPS should be kicking in and/or the barrister [should] say, right you know we’re coming up to, you know, the jury going out, let’s think about our prevention orders” (Police 3). This indicates that in cases where STPOs could be considered, there should be multiple people aware of the process who have an opportunity to raise the possibility of the order. Such a measure would help to reduce the likelihood that a potentially appropriate STPO be overlooked.

Some respondents viewed the underuse of STROs as more pronounced. Former Immigration Manager referred to STROs as: “Underused...to the point of near invisibility.” Similarly, HMPPS was asked about the use of prevention orders: “I think they’re underused”. When asked the same about risk orders: “Massively underused. A million percent underused.”

Unfortunately, concerns of underuse have been raised repeatedly over the past eight years, with particular apprehension noted around police officers, police forces, and court clerks not being aware of the orders or not understanding them properly.²⁵

In 2025, a report from the Independent Anti-Slavery Commissioner indicated that some professionals consider the thresholds for obtaining STPOs and STROs to be higher than the thresholds for other restrictive orders such as those under the Sexual Offences Act.²⁶ Reports have suggested that “There is sometimes insufficient awareness, understanding, training, and guidance relating to them [the orders]. There is a lack of data, both publicly and operationally, which hinders evaluation of effectiveness and proper implementation of legislation.”²⁷ This concern over lack of data was previously raised very early after the introduction of the Modern Slavery Act, with a proposal that case analysis when an order is refused

²³ House of Lords Modern Slavery Act 2015 Committee, *The Modern Slavery Act 2015: Becoming World-Leading Again*, Report of Session 2024-25, HL Paper 8 (House of Lords, 2024); Brown, Schwarz, and Brotherton, *Slavery and Trafficking Risk and Prevention Orders*.

²⁴ Anna Sereni and Catherine Baker, *Before the Harm Is Done: Examining the UK’s Response to the Prevention of Trafficking* (Anti-Trafficking Monitoring Group, 2018).

²⁵ Independent Anti-Slavery Commissioner, *Policing Response to Modern Slavery: How Has It Changed in the Last 10 Years?* (Independent Anti-Slavery Commissioner, 2025).

²⁶ House of Lords Modern Slavery Act 2015 Committee, *The Modern Slavery Act 2015*, 38.

would allow for the sharing of good practice.²⁸ Concerns raised in the literature also indicated that practice is geographically inconsistent, with different police forces showing different levels of understanding and differences in approaching the orders.²⁹

3.2 Barriers to Application and Use

Throughout the literature and interview responses, several barriers to applying for orders were identified. These broadly related to awareness, reliance on individuals, interpretations, capacity, reluctance from partners and risks to both criminal proceedings and survivor safety.

3.2.1 Awareness

Levels of awareness of STPOs and STROs were consistently raised as a concern within the interviews. “There is still a lack of knowledge around their existence” (Former MSOICU 1); this issue is widely reflected in the literature.³⁰

Some respondents raised specific concerns in relation to police awareness: “it’s hard enough finding officers that know about the Slavery and Trafficking Risk Orders and Prevention Orders in the first place” (Police 2). One respondent, Police 3, did feel that their particular police force had specialist officers who were well versed in the orders, but had concerns that this was not reflected across all forces or regions.

Others highlighted concerns over awareness at courts: “you’ve got the court lack of awareness and then I think probably lack of understanding what they’re looking at when they’re faced with a civil order alongside a serious crime.” (HMPPS)

You know you’ll have magistrates...they’ve never seen a STRO application in front of them before and all of a sudden they’ve got to try and make a decision on whether to grant it or not and again I have witnessed magistrates kind of thinking that the Modern Slavery Act is all about people coming across on boats and working as slaves etc and therefore you’ve got to be really, if you don’t put that in your application and describe the grooming process, what exploitation looks like, what modern slavery looks like then you’re probably not going to get it through because you’ve got to make sure they

²⁷ Christine Beddoe and Vicky Brotherton, *Class Acts? Examining Modern Slavery Legislation across the UK* (The Anti-Trafficking Monitoring Group, 2016).

²⁸ Brown, Schwarz, and Brotherton, *Slavery and Trafficking Risk and Prevention Orders*, 23.

²⁹ See for example: House of Lords Modern Slavery Act 2015 Committee, *The Modern Slavery Act 2015*; Independent Anti-Slavery Commissioner, *Strategic Plan 2024-2026*.

understand why these, why these children are looking like they're willing participants. (Police 2)

This quote highlights a broader concern not only about the awareness of the orders, but of a limited understanding of modern slavery itself. This is a concern that has been raised repeatedly in literature on responses to modern slavery.³¹

Routes to Awareness

Two respondents described becoming aware of STROs through their own informal research after growing increasingly frustrated that there appeared to be no effective way to disrupt a particular individual's behaviour. Local Authority 1 described a local situation in which National Referral Mechanism referrals had been made for multiple survivors, all naming the same exploiter. Community members were raising concerns; there were stabbings and shootings, but that main offender was still operating:

And it was just going on and on, I was really frustrated but I started to do some research just myself at home in terms of orders and disruption and things like that...It was literally from literally laying in bed on a night infuriated that we couldn't do anything with these kids. And I've come across this slavery and trafficking risk order. (Local Authority 1)

Another respondent described a comparable case of a well-known offender in their local area where practitioners had become increasingly exasperated because no action they took seemed to deter his actions. "I literally opened up Copilot and said 'how do you deal with cuckooing'. It came back with 'have you considered an STRO?'" (Police 10)

Similar examples were provided of awareness of the orders arising incidentally as opposed to via structured training or awareness raising:

So somebody approached me out the blue and said, "I see you've got this investigation where you've got four individuals who have taken

³⁰ Lauren Eglén, Esther Weir, and Emmanuelle Zagabayou, *Voices: Survivor Narratives for UK Policy and Practice: Project Report* (Rights Lab, University of Nottingham, 2024); Caroline Haughey, *The Modern Slavery Act Review* (Home Office, 2016); Frank Field, Maria Miller, and Elizabeth Butler-Sloss, *Independent Review of the Modern Slavery Act 2015: Final Report*, CP 100 (Home Office, 2019); Tatiana Gren-Jardan and Louise Gleich, *A Path to Freedom and Justice: A New Vision for Supporting Victims of Modern Slavery* (Centre for Social Justice and Justice and Care, 2022).

children from this area to this area, have you heard of Slavery and Trafficking Risk Orders?” and again I was embarrassed to say, “No I don’t,” and luckily she ran me through what I needed. (Police 2)

These examples demonstrate awareness being dependent on individual initiative or informal personal networks rather than a systematic approach towards formalised training and awareness. Each of these individual cases did result in orders being applied for, but this approach is far from robust and demonstrates a clear need for a more standardised approach to awareness raising, “just to make sure that everybody has the knowledge.” (CPS 3)

Reasons for Low Awareness

When asked about why they thought awareness was low, respondents noted the wider context of policing modern slavery. One commented “really and truthfully it’s down to resources as opposed to anything else.” (Police 8). A further important point was made that the Modern Slavery Act continues to see relatively few prosecutions: “So if your starting point is this is a piece of legislation that we hardly use then getting into the orders that are available in relation to that legislation, the usage and awareness is going to be lower still.” (Police 2)

It is important to consider these points in the development of future training packages. Given that modern slavery cases and the associated legislation may be encountered relatively infrequently by many practitioners, training on the orders may struggle to compete for limited time and resources. However, respondents noted that “the training doesn’t need to be long or in depth, but basically more of an awareness you can apply for STRO, this is what you need, this is how you do it.” (Former GLAA 1) As such, the awareness raising that is required on the orders could be relatively light touch, but it remains necessary to move from a model that currently relies on individuals towards a model that sees expertise institutionalised within organisations.

3.2.2 Force Responsible for Applying

At present, a police force acting through its chief officer may apply for an order in respect of a person who lives in that force’s area, or where the chief officer believes that person is in, or is intending to come to that area. Respondents highlighted this as problematic, given that travel is a common component within trafficking situations, and the offender could be living in one area while offending in another.

And we've also requested some in the past but our legal services team won't deal with them because the offender may live off our patch. Obviously he'd traffic in, they're trafficking into our area. So then you're very much reliant [on] that other force's legal team to then decide, yeah we'll run with it, we'll monitor it, etc. And getting that joined up working is difficult I think. (Police 8)

As highlighted in Section 2.4, the proposals under the Immigration and Asylum Bill would remove this restriction on which police force may make the application. While this would be a positive outcome relating to the concern raised above, consideration must be given to which force area would be responsible for monitoring the order.

3.2.3 Reliance on Individual Expertise

As Section 3.2.1 notes, a common theme emerged that applying for the orders is “reliant on the enthusiasm and professionalism of individual officers.” (Former MSOICU 1) One respondent identified that “the training provided to officers in relation specifically to the Slavery and Trafficking Risk Orders is very, very basic if it's there at all.” (Police 2) As a result of this, this respondent had proactively established surgeries to offer tactical advice. While this is a strong example of cross-force specialist support, as a model this is not resilient. It is vulnerable to staff turnover and remains reliant on this person staying in role and having the freedom and enthusiasm to run these sessions and being available to be called on for advice. As with concerns around awareness (3.2.1), this reinforces that proactivity around the orders tends to be dependent on individual initiative rather than something that is systematically embedded within organisations.

3.2.4 Knowledge

Practical knowledge was another issue identified as a barrier to the application of orders. One respondent highlighted that even when practitioners were aware of the orders, there was confusion around what level of evidence was required in order to progress an application: “when I am speaking to the officers they knew about the STRO, they were aware it exists, but they were not trained to know whether they have enough, or whether with the information they had they can apply for an STRO.” (Former GLAA 1) This was echoed by another respondent who identified that even across police forces there are different levels of understanding and interpretations of when and how to apply for an order (Former MSOICU 1). Wider concerns about

inconsistent awareness, understanding, training and guidance are also reflected in the literature.³²

Concerns were also raised about a lack of understanding of the additional benefits that an order can offer on top of a custodial sentence.

This was highlighted particularly in relation to judges deeming an order unnecessary if a significant custodial sentence had been ordered: "I had someone sentenced recently to 20 years and an order was refused because the judge felt that the sentence was already long enough. Which well the reality is he'll be released after 10 years, so it's actually not that long effectively." (Police 7)

A custodial sentence may also fail to remove all ongoing risks associated with the offender, and research has identified cases in which survivors of modern slavery have been detained in the same prison or wing as those who had exploited them.³³ The assumption that custody sufficiently addresses the risk also overlooks the possibility that an offender can continue to offend from within prison, an issue raised by another respondent:

[the judges] had said well he's been locked up for ten years, 15 years, I don't need to issue an order, it's not required. But we have done quite a bit of work with the prison service around you know, continued offending in prison, which I'm sure you're aware is quite prolific. (Former MSOICU 1)

One police respondent noted that, when met with an application for an STPO, judges will comment "I'm putting them in prison for seven years, why do I need a [prevention] order?" (Police 2) This officer felt that the approach of the judiciary regarding STPOs for those who had received a prison sentence was very different to their approach in making orders for those convicted of sexual offences, where they deemed such orders to be much less likely to be questioned. This concern was reinforced by the point that "it really is the attitude of judges to this legislation that damages its usage and the understanding of its usage." (CPS 1)

Notwithstanding concerns raised by respondents, it must also be considered that the judges in such scenarios may have made a well-considered decision given that guidance states: "In determining whether any order is necessary, the court must consider whether the risk is sufficiently addressed by the nature and length of the

³¹ House of Lords Modern Slavery Act 2015 Committee, *The Modern Slavery Act 2015*, 37.

³² Marija Jovanović, Patrick Burland, Vanessa Topp, and Franziska Fluhr, *Tackling the Blind Spot of the UK Anti-Slavery Regime: The Role and Responsibility of Prisons in Securing the Rights of Modern Slavery Survivors* (Modern Slavery and Human Rights Policy and Evidence Centre, 2023).

sentence imposed, and/or the presence of other controls on the offender. The court should consider the ability of a chief officer of police to apply for an order if it becomes necessary to do so in the future.”³⁴ Such examples are demonstrated in the literature, with one STRO refused because the judge did not deem the order to be necessary or proportionate.³⁵ In another example, the Metropolitan Police applied for an STRO on a 24-year-old man following conviction for drugs conspiracies which led to a 14-year imprisonment sentence. The application for the STRO was refused by the judge on the argument that the offender was serving a long custodial sentence, had made positive progress towards rehabilitation, and would receive licence conditions when released on parole.³⁶

In *R v Wabelua (Glodi) and Others*, three appellants were tried in Crown Court for trafficking charges. All were convicted, sentenced to imprisonment, and received a 15-year STPO; all then appealed the STPOs, with arguments that the requisite risk was not established, that the orders were unnecessary, and that the terms of the order were wrong, disproportionate or ambiguous. The appellants’ representatives raised the fact that the defendants were sentenced to significant terms, would be barred from working with children and vulnerable adults on release and that an STPO could be applied for later down the line if deemed appropriate. The argument was made that the STPOs were therefore unnecessary and could impact rehabilitation. The appeal outcome upheld that the STPOs were necessary, but that the duration and some of the terms were not. The orders were then reduced from 15 years to seven, and the restrictions reduced significantly.³⁷

This section highlights mixed concerns about the necessity of an order being imposed. It emphasises the importance of STPO and STRO applications closely following the required guidance to ensure necessity and proportionality so as not to risk applications being either rejected outright or appealed. However, it also reinforces the importance of investigators keeping track of the behaviour of defendants, given that an STPO or STRO could be applied for at a later date, should the offender be deemed at risk of committing a slavery or trafficking offence. While this may feel burdensome given the workloads facing those investigating modern slavery offences, it is a strength of the orders that STROs and STPOs on application can be applied for at any point where risk becomes identified.

³³ Sentencing Council, *Guidance on Ancillary Orders*, 74.

³⁴ Rhys Rosser, ‘Rhys Rosser Successfully Opposes Imposition of Slavery and Trafficking Risk Order’, *2BR*, 8 November 2020, <https://www.2br.co.uk/rhys-rosser-successfully-opposes-imposition-of-slavery-and-trafficking-risk-order/>.

³⁵ Doughty Street Chambers, ‘Judge Refuses the Metropolitan Police’s Application for a Slavery and Trafficking Risk Order (STRO)’, 9 June 2023, <https://www.doughtystreet.co.uk/news/judge-refuses-metropolitan-polices-application-slavery-and-trafficking-risk-order-stro>.

³⁶ *R v Wabelua (Glodi) and Others* [2020] EWCA Crim 783.

3.2.5 Capacity

Reflecting some of the issues raised above, capacity was considered another barrier to the application of orders. However, there was a level of disagreement on this point around the time and effort involved in making an application.

One example was provided of an STRO taking 14 months from initially being discussed to being granted. Another participant noted: “they are so time-consuming. And I just don’t have the team with the resources to be able to get them to the level that we should be getting them...allocating that to somebody who has already got 20 or 30 investigations and you’re saying well you’ve got to put this together as well, then they’re just going to laugh at me.” (Police 8) This concern over capacity was reflected in the literature. A 2025 report from the Independent Anti-Slavery Commissioner indicated that the application process for STPOs and STROs is considered time-consuming, with the perception that a full case file is required to be able to make an application.³⁸

One respondent reinforced this concern, highlighting that there is too much bureaucracy involved in applying for orders:

I think it’s just the bureaucracy around the application process and some of that is, you know, being created by forces. They’ve gone over the top in what they’re asking their officers to compile, trying to cover every base before it actually goes to court. (Former MSOICU 1)

However, others disagreed and suggested that the applications are not overburdensome. “Slavery and trafficking and risk orders are totally achievable. But it’s down the drive of the individuals as to whether they can actually get them or not.” (Police 9) A similar comment was made in reference to STPOs, where some felt “that pathway is very, very simple... Because you’ve...already met the criminal standard of proof.” (Police 6)

These contrasting accounts demonstrate that the barriers identified in this section are not discrete, but that perceptions of the time and resources required to pursue an order appear to be influenced by practitioners’ previous experience, knowledge of the process, and local approaches to preparing applications.

This disagreement on the work involved in applying for orders reflects the earlier concern about disparity in awareness. There was a common theme among many respondents that the first application can prove time consuming as it involves

³⁷ Independent Anti-Slavery Commissioner, *Policing Response to Modern Slavery*.

learning the requirements, however when the process has been completed once, it is much easier and quicker to generate future applications. "I think there is probably a little bit of reticence around using them when people haven't done it before and haven't necessarily got the experience of doing it." (Police 5) This reinforces the need for awareness raising on the orders, to ensure that all relevant parties are aware of the level of evidence required and that the process does not become unnecessarily burdensome.

3.2.6 Reluctance from Partners

A further barrier noted in the interviews was reluctance from partners to support applications: "we've asked when we've tried it in the past, we've asked for statements from partners which are not always forthcoming." (Police 8)

This was notable in two ways. First, one respondent reported a disparity between the enthusiasm to support an application offered by operational staff in a partner organisation, which was then overruled by strategic staff from that organisation:

[operational staff] did actually provide us with a statement. Once we'd kind of confirmed what we're going to be using that statement for [we asked] would they be willing to present in court and so forth. But sadly they had to withdraw that statement after speaking to their head of service. (Police 11)

Second, reluctance related to staff's own fear of repercussions from the offender. This was noted in a particular case where the perpetrator was so embedded within the community that "professionals were concerned about their name being put in anywhere in terms of repercussions for them as a worker." (Police 11)

3.2.7 Risks to Criminal Proceedings

A recurring theme in the interviews related to a barrier specifically to applying for STROs or interim orders in terms of risk of disclosure: "So you're pretty much putting in a full court file to be able to get them... And you can find yourselves having to disclose things as part of an investigation that you wouldn't have disclosed to people before to get them through the court." (Police 4)

Respondents raised concerns that these applications could risk informing the defence of the evidence that the investigators held on the defendants, which they felt could have a negative impact on the outcome of an investigation: "you've got a balance there around sort of tipping them off and them maybe destroying evidence such as mobile phone evidence." (Police 9)

But the balance of that is the difficulty of if you're in the middle of an investigation and you feel the need to use an STRO, but you're actually not at the point where you feel you can haul them in, arrest them or whatever, then it's a fine balance...because you need to do something but you need to be able to preserve the integrity of the investigation and not create a tip-off situation. (Former GLAA 2)

One respondent suggested that STROs could be manipulated by offenders who could suggest to the court that if they had an STRO then they should be released on bail rather than remanded given that the STRO would implement restrictions: "We've had it whereby we felt that if we got...a slavery and trafficking risk order and suspects were remanded then it would make it more likely that the court would release those suspects on bail, putting the community at a greater risk...so effectively, we had the STRO applications built so that if the court released them on bail, we put the application in straight away." (Police 9)

3.2.8 Risks to Survivor Safety

A further significant barrier to applications being made is the concern that the orders could risk survivor safety and wellbeing. This related to two key points, first that it could be too much to expect survivors to give evidence for orders if they were also going to be relied on to give evidence in a trial:

the senior investigating officer had a policy decision that if the defence were going to request to call our victims to court to give evidence for the interim orders, then we would withdraw our application because we didn't want our victims to repeatedly, well, we didn't want to bring our victims to court prior to the trial. (Police 5)

The second point related to concerns that defendants may be able to identify where elements of the evidence for the orders came from, and this could put survivors at risk.

A particularly concerning example was provided by Local Authority 1 of an STRO being created for an individual suspected of exploiting children. Although the evidence supporting the application had been gathered by professionals, the individual believed that it had come from one of the young people involved and retaliated violently against them. "It was us that gathered the intelligence and the

information. He thought whilst he'd been away everybody just spoke. And they didn't." (Local Authority 1)

Respondents gave examples of situations in which orders weren't pursued over this concern of repercussions:

all the intelligence that was coming in was from the victim. And you're then potentially putting that victim back at risk. The victim was a juvenile so it wasn't like we've got them in the NRM and moved out the area. So we couldn't run with it because it was clear where that intelligence had come from... you're just going to end up causing more safeguarding issues in the long run. (Police 8)

Research has indicated parallel concerns in relation to NRM referrals, where there are perceived risks of repercussions to survivors where an intervention might reveal (or appear to reveal) that they have provided information.³⁹

In order to mitigate these types of risks, some applicants are being explicit with defendants about where the evidence is coming from: "we've actually told the perpetrator when we've had meetings with him that this hasn't come from any individual this has come from multiple professionals that are trying to stop you from causing harm." (Police 10)

3.2.9 Enforcement Overseas

A final concern was raised over the enforcement of orders overseas. While orders can prohibit actions outside of the UK, consideration must be given to how these prohibitions can be practically enforced. Examples are provided in Section 4.2 which illustrate agreements made with authorities in the relevant overseas jurisdictions; it is important that such considerations around potential need for international cooperation are made in the application.

So police officers may do a whole load of work because it is a whole load of work to get these prevention orders in place. They're not, they're not easy[or] straightforward, only to find that we can't actually police them because they've left the UK. (Police 3)

³⁸ Gillian Kane and Andrew Chisholm, *Identifying Modern Slavery and Human Trafficking in the Context of Child Criminal Exploitation in Northern Ireland* (Modern Slavery and Human Rights Policy and Evidence Centre and Northern Ireland Department of Justice, 2025).

4. Restrictions within the Orders

As outlined in Section 2, the purpose of the orders is to protect the public, or specific individuals from harm; this means that when seeking an order, consideration must be given to the likelihood that the person named in the order will commit a slavery or human trafficking offence, the imminence of such offending, and the potential harm that could result from it.⁴⁰ It is also necessary to ensure that the restrictions are proportionate, reasonable, and that they can be effectively policed.⁴¹

4.1 Drafting Principles

Both STPOs and STROs can include notification requirements and restrictions that the named individuals must comply with. When proposing these restrictions, applicants must consider:

- “will the proposed restrictions operate to reduce the risk of harm to the public or to any particular members of the public?
- are the restrictions proportionate and reasonable?
- can they be policed effectively?”⁴²

The element of policing these orders will be considered in more detail in Section 5, but consideration should always be given to how prohibitions will be monitored and enforced before an application is lodged.⁴³

Guidance for drafting the restrictions in ancillary orders states that restrictions can prohibit the defendant from specific actions both within and outside the UK, but the courts must consider any adverse impact that the order could have on the defendant’s rehabilitation. It is also necessary for the terms of the order to be clear so that they can be easily understood by the defendant and that those responsible for enforcing any orders are able to identify when a breach has occurred.⁴⁴

In describing their experience of drafting the restrictions, respondents identified that: “They’ve really got to match the picture of intelligence” (Former MSOICU 1) and “you have to be quite descriptive about the orders you put in place, and they have to be necessary to the form of trafficking.” (Police 4)

³⁹ Home Office, *Guidance on Slavery and Trafficking Prevention Orders*.

⁴⁰ Sentencing Council, *Guidance on Ancillary Orders*.

⁴¹ Home Office, *Guidance on Slavery and Trafficking Prevention Orders*, 11.

⁴² Davies et al., *Guidance on the Use of Slavery and Trafficking Risk Orders and Slavery and Trafficking Prevention Orders*.

⁴³ Sentencing Council, *Guidance on Ancillary Orders*, 74.

In order to be approved, not only must the order be considered necessary, but so must all the individual terms of the order:

We've got to justify each specific prohibition. And then what's the value for it and how does that link back to your body of evidence you've submitted? So you know what's the operating platform this group have been using? Are they web-based? Do they have any caveats where they need to say for example arrange accommodation or travel for family members? So you know you've got to make sure these caveats exist otherwise it's unduly infringing on their right to family life. (Police 6)

It is the court's decision to accept or reject the restrictions, and there will be scope for proposed restrictions to be amended or reconsidered. An explicit example of this was provided in the interviews in relation to interim STROs: "Even if the magistrates are saying well you can't have all of these prohibitions, but you can have two or three of them at the interim stage and we'll reconsider the other three that you've asked for at a later stage at the full hearing." (Police 2)

Overall, properly drafted restrictions should constrain opportunities for offending without unnecessarily interfering with ordinary lawful behaviour but must be justifiable and directly reflective of the potential risk.

4.2 Common Types of Restriction

The orders must be designed to reflect the offending or risk of offending that has been identified, and they can include prohibitions to explicitly prevent the named person from taking a specific action. The orders cannot require the defendant to do something, other than in relation to surrendering their travel documents if a foreign travel prohibition is imposed, or in relation to notification requirements which concern only the defendant's name(s) and address(es) and any changes to these details.⁴⁵ The Immigration and Asylum Bill does propose to allow courts to impose further notification requirements and make the existing notification requirements mandatory for new orders.

⁴⁴ Davies et al., *Guidance on the Use of Slavery and Trafficking Risk Orders and Slavery and Trafficking Prevention Orders*.

Home Office guidance provides a non-exhaustive list of potential prohibitions including restrictions relating to employment and recruitment, working or living with children or vulnerable people, arranging transport or accommodation for others, foreign travel, contact with specified individuals, visa sponsorship and access to specific places.⁴⁶

A 2023 rapid scoping review of online news media found 23 reports on STPOs and 35 on STROs. It identified that, where the information was available, orders most commonly restricted travel, accommodation and employment/recruitment.⁴⁷ The following table summarises the main types of prohibitions identified through the literature and interviews. Selected examples that raise wider issues concerning the drafting or enforcement of restrictions are considered below the table.

Theme	Examples from literature and interviews
Accommodation	Restrictions on: residing away from a registered/home address; entering specified properties/exclusion zones; ⁴⁸ arranging accommodation for others; ⁴⁹ renting/subletting property to people outside immediate family; ⁵⁰ living with anyone connected to the sex industry; ⁵¹ taking cash payments from tenants ⁵²
Travel	Restrictions on: entering specific areas in the UK; ⁵³ travelling in vehicles with anyone other than immediate family; purchasing airline tickets for others; driving others to and from a place of work; travelling to specified countries or overseas locations ⁵⁴
Communication	Restrictions on: having more than one mobile phone; contact with groups of individuals that the defendant is known to target; contact with anyone under the age of 18 other than

⁴⁵ Home Office, *Guidance on Slavery and Trafficking Prevention Orders*, 16.

⁴⁶ Brown, Schwarz, and Brotherton, *Slavery and Trafficking Risk and Prevention Orders*, 16-18.

⁴⁷ Karen Darley, 'Yorkshire Man given Slavery and Trafficking Risk Order', *Gazette & Herald*, 1 November 2025, <https://www.gazetteherald.co.uk/news/25588266.man-given-five-year-slavery-trafficking-risk-order/>.

⁴⁸ Steve Mellen, 'Bath Drug Dealers Jailed after Snow Hill Police Operation', *BBC News*, 20 February 2023, <https://www.bbc.co.uk/news/uk-england-somerset-64703147>.

⁴⁹ Department of Justice, 'Public Consultation on Measures to Strengthen the Response to Modern Slavery and Human Trafficking - Proposed Amendments to the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015', 13 March 2022, <https://www.justice-ni.gov.uk/consultations/consultation-measures-strengthen-response-modern-slavery-and-human-trafficking>.

⁵⁰ BBC News, 'Family Jailed for Trafficking Hungarian Women Given Slavery Orders', 20 July 2016, <https://www.bbc.co.uk/news/uk-england-manchester-36845084>.

⁵¹ Emma Crates, 'Operation Fort: What Businesses Should Learn from the UK's Largest Anti-Slavery Prosecution', Independent Anti-Slavery Commissioner, 2020.

⁵² Bristow and Lomas, *The Modern Slavery Act 2015 Statutory Defence*.

⁵³ Duncan Lewis Solicitors, 'Four Years in Jail for Human Trafficking and Modern Slavery Offences', 23.02.2016, https://www.duncanlewis.co.uk/immigration_news/Four_years_in_jail_for_human_trafficking_and_modern_slavery_offences; Martin Bentham, 'Traffickers Who "Sold" Woman for £3,000 Face Travel Ban', *The Standard*, 20 January 2016, <https://www.standard.co.uk/news/uk/traffickers-who-sold-woman-for-ps3-000-face-travel-ban-under-antislavery-orders-a3160926.html>.

	dependents and siblings; ⁵⁵ contact with specific named individuals; ⁵⁶ contact with any of the victims ⁵⁷
Employment	Restrictions on: being a director of a company; employing foreign nationals; arranging or assisting in the employment of another; ⁵⁸ the circumstances in which the individual can recruit or employ workers, including in relation to their immigration status, National Insurance numbers, payment of the National Minimum Wage, and provision of payslips; ⁵⁹ advertising to recruit or employ staff without written permission ⁶⁰
Control	Restrictions on: possession of other people's bank cards; advertising on adult websites ⁶¹

Foreign travel restrictions warrant further consideration because of both specific legal provisions governing them and the potential challenges associated with overseas enforcement. STPOs and STROs can include prohibitions on travelling to any country outside the UK or specify countries that the person may or may not travel to.⁶² If the order prohibits foreign travel, then the restriction must be for no more than five years.⁶³

An example from the literature outlines a case in which a man was sentenced to four years' imprisonment and issued with an STPO with extraterritorial jurisdiction which prohibited him from visiting the Lithuanian town in which he recruited his victims.⁶⁴ A report in *The Standard* outlined a case of four men found guilty of trafficking women from Slovakia to Britain to be sexually exploited. They all received prison sentences along with STPOs which, among other restrictions, prevent them

⁵⁴ Live News, 'A Drug Dealer Who Trafficked Two Teenagers Has Been Made Subject to Bedfordshire's First-Ever Slavery and Trafficking Prevention Order', *UK News in Pictures*, 7 April 2024, <https://uknip.co.uk/news/uk/court-news/a-drug-dealer-who-trafficked-two-teenagers-into-a-different-county-to-sell-drugs-has-been-made-subject-to-bedfordshires-first-ever-slavery-and-trafficking-prevention-order-stpo-2/>.

⁵⁵ National Crime Agency, 'NCA Publishes Updated List of Restrictions'.

⁵⁶ 7BR, 'Convicted Modern Slavery Criminals Ordered to Repay over £150,000', *7BR Barristers Chambers*, 23 January 2018: <https://www.7br.co.uk/2018/01/convicted-modern-slavery-criminals-ordered-repay-150000/>.

⁵⁷ Home Office, *2021 UK Annual Report on Modern Slavery* (Home Office, 2021), <https://www.gov.uk/government/publications/2021-uk-annual-report-on-modern-slavery/2021-uk-annual-report-on-modern-slavery-accessible-version>.

⁵⁸ John Wood, 'Five-Year Slavery and Trafficking Risk Order Imposed on Owner of Hand Car Wash Business', *Forecourt Trader*, 27 January 2023, <https://forecourtrader.co.uk/latest-news/five-year-slavery-and-trafficking-risk-order-imposed-on-owner-of-hand-car-wash-business/675716.article>

⁵⁹ BBC News, 'Slavery Convicted Handed Restrictions on Life after Prison', 23 January 2023, <https://www.bbc.co.uk/news/uk-wales-64370638>.

⁶⁰ BBC News, 'Family Jailed for Trafficking Hungarian Women Given Slavery Orders'.

⁶¹ Sentencing Council, *Guidance on Ancillary Orders*.

⁶² Sentencing Academy, *Sentencing Explained: Ancillary Orders* (Sentencing Academy, 2023).

⁶³ Duncan Lewis Solicitors, 'Four Years in Jail for Human Trafficking and Modern Slavery Offences'.

from entering a specific district in Kosice, Slovakia, the area in which they recruited their victims. Slovakian authorities agreed to monitor the ban and notify UK prosecutors if the men failed to comply.⁶⁵ As highlighted in Section 3.2.9, where restrictions have an international dimension any need for cooperation with overseas authorities should be considered when the order is sought.

In the interviews, an important point was also made about a common restriction that the named person must not have more than one mobile phone.⁶⁶ While this might appear logical on the surface, a significant concern around this was raised by HMPPS:

The other thing is very often they have - you can't have two mobile phones. But that's no good for in prison. So if somebody's got an STPO or STRO that says you can't have two mobile phones and we find that they've got one illicit mobile phone, we then couldn't breach them on that because...even though they've broken the prison rules and they've broken the law by having a mobile phone in the prison, technically we couldn't breach them on it because they've only got one. So we'd prefer it for the police to go 'don't have any mobile phone unless you register it with us first'. (HMPPS)

This example highlights the importance of drafting restrictions with practical enforcement in mind, as wording that might appear logical during drafting could limit opportunities for enforcement.

Overall, the examples across Section 4.2 demonstrate the breadth of restrictions that can be used within STPOs and STROs. While the specific terms must vary depending on the circumstances of the case to ensure that they accurately reflect the risks related to that specific individual, they broadly seek to restrict accommodation, travel, communication, employment, and means of control where such elements have been linked to their offending, or where there is risk that they could offend. To ensure that restrictions are necessary and proportionate, it is important that they are tailored to individual risk and offending models rather than relying on a standard set of prohibitions.

⁶⁴ Bentham, 'Traffickers Who "Sold" Woman for £3,000 Face Travel Ban'.

⁶⁵ *Wabelua* [2020] EWCA Crim 783.

5. Monitoring and Enforcement of the Orders

Noting the requirement that restrictions must be able to be policed effectively, the importance of monitoring and enforcing orders was raised consistently by respondents and in the literature.

If you're asking a court to provide an order it's on the assurance that you're going to then enforce that order. If your response to getting that order is then to do absolutely nothing with it then you know, using the harshest possible terms that order, that application to the court is somewhat fraudulent. (Police 1)

A House of Lords publication notes that “The effectiveness of the Orders would be improved if...there was more thorough monitoring of the Orders which are already in place.”⁶⁷ While the College of Policing notes that the investigator should actively monitor and review orders to ensure that they are still required, and should they no longer be relevant, that it is the investigator’s responsibility to apply for them to be discharged or varied,⁶⁸ there is little clarity around what is expected in practice in terms of monitoring activity, and this was a concern raised repeatedly through the interviews.

Of particular note were concerns around whose responsibility it is to monitor the orders, what precisely is expected of those monitoring the orders, and who is informed of orders when they are made.

5.1 Responsibility for Monitoring

Respondents suggested that whichever organisation applied for the order would be responsible for the monitoring, with the literature indicating that in many cases, the monitoring is the responsibility of the investigating officer.⁶⁹ However it was clear from the interviews that there is no universal approach for who within that organisation takes on the role. Multiple respondents proffered that neighbourhood policing teams would be the most appropriate officers to take on monitoring given that they are active in the community: “I’m always pleased where the neighbourhood officer applies for these because I’m generally quite confident that they’ll go on and manage those, that risk accordingly.” (Police 2) This idea was also

⁶⁶ House of Lords Modern Slavery Act 2015 Committee, *The Modern Slavery Act 2015*, 38.

⁶⁷ College of Policing, ‘Guidance for PIP2 Investigators’, *Modern Slavery and Human Trafficking*, Authorised Professional Practice, 11 February 2026, <https://www.college.police.uk/app/major-investigation-and-public-protection/modern-slavery/guidance-pip2-investigators>.

⁶⁸ Tim Evans, *The Use of Modern Slavery Risk and Prevention Orders* (Independent Anti-Slavery Commissioner, 2022).

reflected in the literature, with a report by the Independent Anti-Slavery Commissioner reporting on a survey where respondents suggested that public protection departments should have responsibility for monitoring orders, but that the policing of the restrictions could be allocated to neighbourhood teams.⁷⁰

Others suggested that those who applied for the orders should be responsible for managing the orders given that, by virtue of applying for the order, they will have an understanding of what the orders are and how the restrictions might be best monitored.

So we have got, we've got either individuals who have applied for the order managing that order which in my opinion is a really good thing because they've had the passion to go for the order themselves so therefore they've got the passion to probably try and identify breaches and manage it accordingly and I have got, like I have had examples of those but sometimes they go into Integrated and Offender Management Teams to manage who haven't applied for that order but suddenly find it on their desk but they are coming to me or they're coming to others and saying, "How do I manage this person? You know have you got a template here? What do I do when I go round to their house to visit? Is there a-" and there isn't. (Police 2)

While the concept of the person who applied for the order being the one responsible for monitoring it seems logical, it is vulnerable to staff turnover and capacity, especially given that orders can last for significant lengths of time: "unless there is something procedurally that's built in that ensures consistent management of the order we can't rely on the personalities of individuals" (Police 2).

Multiple respondents suggested that having a centralised unit to monitor orders would be valuable. However, Police 2 pointed out that it may be difficult to justify the necessity for such a unit when so few orders are currently being made, though there could be the possibility of this unit being responsible for monitoring all orders rather than just slavery and trafficking orders. To this end, some respondents suggested that Integrated Offender Management units should be responsible for the monitoring of orders to allow officers to concentrate on investigations.

⁶⁹ Evans, *The Use of Modern Slavery Risk and Prevention Orders*.

5.2 Undertaking Monitoring

As noted in Section 4, it is important that the restrictions can be monitored and that they are enforceable. It is also important that restrictions remain necessary; if circumstances change then there may be grounds for varying or discharging some of the restrictions. Respondents therefore viewed monitoring as a fundamental element of orders, both to identify potential breaches and to assess whether the restrictions continue to be necessary and proportionate: “you have to undertake some monitoring to make sure if they’re out and about that they’re not committing further offending” (Former GLAA 2) This means that it is important when drafting applications for orders that consideration is given to how the restrictions will be monitored.

5.3 Lack of Detailed Monitoring Guidance

However, it was widely agreed that there remains no standard model for how orders should be monitored or what level of monitoring is expected, which can lead to inconsistencies across regions. Updated College of Policing guidance published in February 2026 states that orders should be recorded on the Police National Computer (PNC) and actively monitored and reviewed by the investigator. It also requires a notification to a police force where an individual moves to their area. However, the guidance notes that forces may have their own policies for managing orders and does not specify the types or frequency of monitoring that should be undertaken.⁷¹ Respondents identified that “each force is very different.” (Police 10)

the really good ones treat them like a sex offender so they’ll have a management plan. They’ll have an ownership of somebody who’s looking after the order, regularly reviewed, proactive in their management to ensure there’s compliance with the conditions. Others you know, you might get them recorded on PNC and that would be it. (Former MSOICU 1)

One respondent who had achieved multiple STROs and was responsible for monitoring them highlighted their uncertainty as to what was expected within the monitoring of orders: “I can’t find anywhere that says, oh you should make sure that the person is complying with the STRO every two months or every three months, there is nowhere really that it says that” (Former GLAA 1).

⁷⁰ College of Policing, ‘Guidance for PIP2 Investigators’.

This respondent determined that checking in with the named person once every six months was an approach that balanced their capacity with what they felt was reasonable in terms of monitoring. Other respondents noted conducting checks every four to six weeks, meaning that not only is there disparity in who is assigned the task of monitoring, but also in how regularly monitoring checks are undertaken.

In terms of practicalities of monitoring, respondents mentioned visiting the person's address, checking with Border Force about who they have re-entered the country with if they have been abroad, speaking to their employer to ask if the individual has been looking for work for anyone else, or attending probation meetings alongside the probation officer. However, there was a broad consensus that some form of standard approach towards monitoring orders needs to be embedded:

I think there needs to be something which is enforceable and auditable around force management of orders. What that looks like, whether that is through regular briefing products in local policing to overcome that churn of staff, whether that is a dedicated unit... We probably need to look at other elements of it that we can embed into practice through there is always a briefing slide on your current orders or there is always a neighbourhood beat manager for example who carries a task within their workload for people with orders on their patch and then is held to account for it... What we need is the confidence that we can go into any force and say who have you got on orders? When was the last time they had a visit? Are you enforcing those orders? (Police 1)

One respondent described using the broader Lead Responsible Officer guidance for organised crime management as a framework for monitoring individuals subject to orders. The guidance is structured around the four Ps (prevent, prepare, pursue and protect) and provides for regular review and accountability, although it is not specific to STPOs or STROs: "The monitoring is carried out on a monthly basis by our organised crime management group. So every month I have to account for what actions have been done in relation to the four Ps for each one of these individuals." (Police 10)⁷²

⁷¹ Home Office, *Lead Responsible Officer Guidance* (Home Office, n.d.).

One issue that was highlighted as particularly problematic in terms of monitoring was when individuals moved out of the area of the police force responsible for monitoring their orders and how orders could be effectively monitored in such circumstances.

Concerns were also raised that heavy caseloads can mean that monitoring of orders risks being deprioritised or even forgotten about: “when you’ve got other cases coming in...it could quite easily be forgotten about unless it’s actually something that the investigator involved in the original case is keeping an eye on.” (Former GLAA 2) However, as noted above, inadequate monitoring risks breaches going undetected and may make it more difficult to demonstrate over time that the restrictions remain necessary and proportionate.

5.4 Communicating the Orders

Along with inconsistencies in monitoring orders, it was clear from the interviews that there is no standard approach to communicating with partners or the public when an order is in place. The literature indicates that Slavery and Trafficking National Policing Standards and Modern Slavery Police Transformation Unit guidance required all orders to be recorded on a local information system. However, this approach was reported to lead to inconsistencies, and although orders were subsequently recorded on the Police National Computer, concerns remained that there is no national system for monitoring compliance.⁷³

Some respondents highlighted the importance of proactive communication when an order is granted. “We should be publicising them and we should be then managing them. We should be making life hard because you’ve got this order. You should feel supervised.” (Police 1) This respondent noted that press releases were an excellent way of keeping the community informed about STPOs and STROs as evidence of police action beyond a conviction. One respondent noted that:

we’ve publicised [the STRO] through social media channels, the media. His face has been out there because of this order and it’s been published and the conditions of the order have been published. All the partners know who he is. So basically it’s very hard for him to operate because we all know him and we all know what he’s not allowed to do. (Police 11)

⁷² Evans, *The Use of Modern Slavery Risk and Prevention Orders*.

Publicising orders in this way was perceived to have two key positive outcomes: the community sees that there is work being done to disrupt criminal activity, and if community members are made aware of the restrictions, then they can make reports to the police if they identify concerns or breaches: “we need the public to be able to police for us as well.” (Police 2)

There are plenty of examples of local newspapers sharing basic information on individuals with STPOs or STROs.⁷⁴ While the level of detail varies significantly between these articles, they demonstrate that there are examples of orders that are reaching the public.⁷⁵

However, other respondents suggested that they had no formal or standardised route for communicating orders, which intersects once again with individual expertise versus institutional processes: “It’s really down to the officer who is putting the order together, to be honest. There’s no... requirement to tell anybody.” (Police 5) “there probably wouldn’t be a lot of dissemination of information around a new order.” (Former MSOICU 1)

Of particular concern in relation to communication was the lack of automatic communication to HMPPS when an individual in their service has received an order. As noted earlier in this report, a custodial sentence does not automatically mean that an individual will stop offending, and “There are a variety of ways that we [HMPPS] could actually contribute evidence to the breach of that order while they’re in the prison system.” (HMPPS)

Communication of orders with HMPPS is also particularly important given that HMPPS generate post-release licence conditions, and there may be a need to ensure that these correspond with the restrictions within the order. The interviews did not establish whether the relevant orders were simply not routinely communicated to HMPPS, or whether the issue instead lay in uncertainty about how HMPPS staff could identify who was subject to an order.

⁷³ Brown, Schwarz, and Brotherton, *Slavery and Trafficking Risk and Prevention Orders*.

⁷⁴ See for example: Stuart Higgins, ‘Car Wash Boss Jailed at Kingston Crown Court over Slavery’, *Teddington Town*, 27 November 2025, <https://teddingtontown.co.uk/2025/11/27/car-wash-boss-jailed-at-kingston-crown-court-over-slavery/>; Arron Evans, ‘Bodedern Man Handed Slavery and Trafficking Risk Order (STRO) – the First of Its Kind in North Wales’, *North Wales Chronicle*, 25 October 2019, <https://www.northwaleschronicle.co.uk/news/17993443.bodedern-man-owns-caravan-allegedly-linked-prostitution-put-slavery-risk-order/>; Arron Evans, ‘Slavery and Trafficking Risk Order Granted for Conwy and Denbighshire Is “First of Its Kind” in Wales’, *North Wales Pioneer*, 28 May 2020, <https://www.northwalespioneer.co.uk/news/18481608.slavery-trafficking-risk-order-granted-conwy-denbighshire-first-kind-wales/>.

A representative of HMPPS noted “I don’t think there’s any formal route of informing us.” (HMPPS) while another respondent commented that “[HMPPS] have got access to the Police National Computer so they could check themselves to see every inmate...it’s a dedicated page on PNC, you know, orders.” (Former MSOICU 1) However, not all staff will have authorisation to access PNC which means accessing this data may not always be straightforward.

There were some good practice examples provided of police teams connecting directly with probation regarding an STRO. In one example, the person named in the STRO was released on licence at the time, and the police team applying for the order met with probation to ensure that the licence conditions and STRO conditions were aligned. However, it seems that this was reliant on a strong interpersonal working relationship rather than a standard route of practice, reiterating earlier concerns that examples of good practice tend to be dependent on individual initiative or informal personal networks rather than a systematic approach.

Overall, Section 5 has highlighted that orders need to be effectively managed, but there is little consistency of this in practice. Multiple respondents compared slavery and trafficking orders to other types of order, with regular reference made to the good practice surrounding the monitoring of sex offenders: “it’s taking that approach that we do with sex offenders you know who are given a dedicated manager, a named person, they’re...subject to regular risk assessment, subject to a whole detailed plan, regularly reviewed and proactive in terms of visits, surveillance, intelligence gathering you know, really good tight management around sex offenders, as there should be.” (Former MSOICU 1)

6. Effectiveness of the Orders

The previous sections have considered the practical elements of applying for and monitoring the orders and have included examples relating to the risks, barriers and limitations of the orders. The following sections assess the strengths of the orders and draw heavily on the responses from the research participants. Given the acknowledged lack of national data and evidence on the implementation and impact of STPOs and STROs,⁷⁶ these qualitative findings provide important insight into how the orders operate in practice and how their effectiveness is perceived by those working with them.

⁷⁵ Independent Anti-Slavery Commissioner, *Strategic Plan 2024-2026*; Brown, Schwarz, and Brotherton, *Slavery and Trafficking Risk and Prevention Orders*.

6.1 Not Reliant on Survivor Accounts

While it was raised in Section 3.2 that there can be a risk to survivors should the evidence supporting an order appear to come from a survivor account, respondents did highlight that STROs are particularly valuable because they can often be obtained without requiring survivors to give evidence.

These children, these vulnerable adults see the violence and intimidation to others, why would they ever put pen to paper and therefore we don't, within a risk order we don't need their accounts.

In fact we don't want them. We don't want to bring them in.

We want to be putting a case together which are purely based on professionals giving those statements because they see the risk and they work with risk every single day. (Police 2)

Reiterating an earlier point, one particular value of these orders is when they can be raised using evidence from sources independent of a survivor's account to limit any risk of repercussions.

6.2 Protection Beyond Prosecution and Sentencing

Respondents noted that securing convictions for modern slavery offences can be incredibly difficult and lengthy, and that STROs offer "a buffer in case you can't get the criminal prosecution over the line." (Police 7)

Convictions and sentencing for these type of offences aren't necessarily always particularly lengthy, despite the sentencing guidelines. We, you know, what you can see people being sentenced to two or three years' custody...and taking into consideration the time that they'd be released, that may be a matter of months rather than years. So I think it's still important to have to ensure that there is protection around the wider public when people are released. Especially as, for people who are committing offences, it's likely that they are quite entrenched in this type of criminality.
(Police 5)

6.3 Disrupting Criminal Activity

Perhaps the most significant benefit identified was the disruptive impact that orders have on criminal activity, with orders offering the opportunity for named individuals to be “controlled in the community in a better way than if he got a suspended sentence or a fine or something and a noncustodial [sentence].” (Former Immigration Manager)

One respondent indicated that particular strengths of STPOs might not be noticeable for a few years, given that “anybody who’s convicted of a trafficking offence with that ancillary order is probably going to still be in prison or coming out to be released.” (CPS 2) However, a research study published in June 2026 highlights a significant reduction in the volume and seriousness of offending after the imposition of an STRO. With 41 STROs included in the final analysis, it found that offending and harm decreased after an STRO was issued. Some of the most significant findings demonstrate:

- Total recorded offending events fell from 210 in the two years before STROs to 93 afterwards.
- Recorded modern slavery offending fell by 52%, violence by 50%, drugs offending by 58%, and other offending by 65%.
- Total crime harm fell by 83% after STROs were imposed.
- Crime harm associated with modern slavery offences fell by 92%, violence by 60%, drugs offences by 64%, and other offences by 99%.⁷⁶

When discussing with respondents how such changes might play out, one example was provided of a prolific offender who had not complied with probation licence conditions and was failing to engage with services. When an STRO was put in place he was repeatedly being sentenced for breaching the restrictions of the order. Because the restrictions meant that he could not continue to operate as he had done previously without repeatedly ending up in prison, he realised “that actually he either works with it or he works against it” (Local Authority 2) and he started to engage with the order and the various organisations involved in his case.

⁷⁶ Ralph, *Slavery and Trafficking Risk Orders*. The report itself acknowledges that the analysis cannot establish causation.

6.3.1 Criminal Offence for Breaching

Because a breach of an order is a criminal offence, this threat of a custodial sentence for a breach was something that respondents felt offered significant weight and provided benefits over other disruption tools. One respondent described an offender being served multiple child exploitation warning notices “and he just ripped it up or threw it back at the officers” (Local Authority 1)

Police 10 provided the example of an offender who had a number of licence conditions that he repeatedly failed to engage or comply with, but the police force worked with probation once the STRO was in place to align the licence conditions with the restrictions in the order, meaning a breach could lead to an additional sentence. This led to significantly improved engagement from the offender.

Multiple respondents identified that slavery and trafficking orders offered benefits beyond bail because of the criminal offence that accompanies a breach. One respondent noted: “most offenders [on bail] nowadays are released under investigation with no conditions” (Former MSOICU 2), with another commenting “bail conditions are more generic. Obviously you can’t, you can’t dictate how somebody uses their device on a bail condition but you can on an ancillary order.” (Police 3)

Respondents saw criminalisation of a breach as a major advantage, but its deterrent value was perceived to depend partly on what consequence followed a breach. There are multiple examples of newspaper articles outlining cases in which an individual has breached the conditions of their STRO or STPO.⁷⁸ More significant sentences included an example of ten suspects of labour exploitation receiving interim STROs with breaches that led to two receiving a 3.5-year custodial sentence and a two-year-four-month custodial sentence respectively.⁷⁹ Other examples from the literature indicate very different outcomes, with one newspaper article describing a breach of an STRO in which the named person had attempted to board an international flight without notifying police, which breached one of the conditions in his order. Despite being charged for the breach, he faced no further action.⁸⁰

⁷⁷ See for example: Gee Harland, ‘Man Arrested for Breaching Slavery and Trafficking Risk Order’, *Reading Chronicle*, 19 November 2023, <https://www.readingchronicle.co.uk/news/23933595.man-arrested-breaching-slavery-trafficking-risk-order/>; Erica Roffe, ‘Bedford Man Charged after Breaching Slavery and Trafficking Risk Order’, *Bedford Independent*, 4 December 2019, <https://www.bedfordindependent.co.uk/bedford-man-charged-after-breaching-slavery-and-trafficking-risk-order/>.

⁷⁸ Department of Justice, ‘Public Consultation on Measures to Strengthen the Response to Modern Slavery and Human Trafficking’.

⁷⁹ Roffe, ‘Bedford Man Charged after Breaching Slavery and Trafficking Risk Order’

Some respondents noted that the sentences being given for a breach were minimal: “sentencing might only be another day or two in prison. And it doesn’t feel like it’s proportionate to the breach.” (Police 3) “I had one bloke who breached three times and the maximum we got was 18 weeks in prison. But at least that was enforceable and you got something for the breach.” (Police 4)

6.3.2 Criminal Relationships

A further specific benefit of the orders relating to disrupting criminal activity was how they disrupt the defendant’s links with organised crime groups. Respondents identified that, when they have an order, an individual is “more well known in terms of their behaviour and other exploiters won’t want to work with them. They will be constrained further in terms of the restrictions and everything. They’ll be more closely monitored.” (HMPPS)

Organised crime groups are distancing themselves away from somebody that they used to you know have part of their organised crime group. Now they don’t want that type of person there and also all of the other prohibitions and the police attention that comes off the back of it. They’re going to have their doors knocked on to check that they’re complying by the order. They’re going to get stopped in vehicles and therefore that really disrupts the organised crime group and therefore they push that person away from that group. (Police 2)

The use of orders for disrupting criminal activity was broadly deemed a benefit of the orders, yet some respondents commented that the impact would likely depend on the individual: “some just don’t care because that’s what they do for a living, they’ll continue committing crimes.” (Former GLAA 1). Others noted that formally identifying any real impact is extremely difficult because the outcomes of STPOs and STROs are rarely shared, though it should be noted that this interview was conducted before the above-mentioned report outlining the impact of STROs had been published.⁸¹

⁸⁰ Ralph, *Slavery and Trafficking Risk Orders*.

Respondents also identified reputational effects as one way in which orders could disrupt offending. In cases involving the criminal exploitation of children, orders often include restrictions on contact with children. It was reported that with such restrictions, assumptions were being made around the defendant's involvement in child sex offences which generated a level of stigma and associates disconnecting from them. One example was given of a defendant who received an STRO relating to the exploitation of children for drug supply and then, according to one respondent, because he was so averse to members of the community believing him to be a child sex offender, he "didn't exploit any more children." (Local Authority 1)

However, while these reputational effects may disrupt criminal networks and reduce criminal activity involving children, they also risk creating stigma which is unrelated to the conduct for which the order was imposed.

6.4 Action for the Survivors and Community

Respondents highlighted that there was value in orders beyond their disruption activity and perceived that the orders demonstrate to the survivor and the community that action is being taken, even if a conviction hasn't been secured. "[T]hey are extremely good at showing that police are acting on community concerns," (Police 8) and "to a victim it still gives a little bit of a hope." (Former GLAA 1)

6.5 Support for Offender to Change Behaviour

Beyond the disruption activity, some respondents identified that the orders offer a way to support an offender to change their behaviour. Comments were made about the fact that orders can be discharged or varied, which offers an incentive to defendants to demonstrate that they no longer pose a risk: "there [is] an opportunity there to create a driver for change in that you may be awarded an order for five years with a caveat that at the point of three years if they've committed no serious criminal offences or no criminal offences of a similar ilk that the order will be dispensed of at that point." (Police 1) "I think that's made a big difference because it's almost like he has got some element of control on it." (Local Authority 2)

An example was provided of a prolific offender who had previously failed to engage with services. Having an STRO with restrictions relating to his offending led to him committing multiple breaches and receiving multiple additional sentences. He eventually accepted that if he wanted to stay out of prison, he would have to change his behaviour, and "We've now got him housed, we've now got him a phone, he's now claiming benefits. He's now registered with a doctor" (Police 10).

Overall, this section highlights that there are significant benefits that can be drawn from STPOs and STROs, particularly in terms of disrupting offending and extending

controls beyond the criminal justice process. However, their effectiveness is closely connected to how appropriately orders are sought and drafted, and how consistently they are subsequently monitored and enforced.

7. Recommendations

This section addresses the recurring problems identified across the report and generates recommendations that arise directly from the findings from the literature review and interviews. The emphasis is on making the use and management of the orders more systematic and less dependent on individual initiative.

7.1 Routine Consideration of STPOs and STROs in Modern Slavery Prosecutions

Finding: Consideration of an order can depend on the awareness and initiative of individual investigators and prosecutors, creating a risk that an appropriate order is overlooked. Ensuring that STPOs are routinely considered at the point of prosecution is particularly important in light of sentencing reforms under which some offenders may be released earlier and spend a greater proportion of their sentence in the community.⁸² Routine consideration of STROs in all modern slavery investigations is also of greater importance if the proposed power to make STROs available directly to an acquitting court is enacted.

Recommendation 1: The Crown Prosecution Service should require prosecutors to consider an STPO in every prosecution for a qualifying slavery or trafficking offence.⁸³ The case record should state whether an STPO will be sought in the event of a conviction and, where it will not, it should record the reason for that decision. If the proposed power to make an STRO available directly to an acquitting court is enacted as part of the Immigration and Asylum Bill, consideration of whether an STRO may be appropriate should form part of the prosecution case planning, with the decision following an acquittal similarly recorded.

The CPS should periodically review cases in which an STPO or STRO was considered but not pursued, to identify patterns in non-use and inform any necessary updates to guidance and training.

⁸¹ Prime Minister's Office, 10 Downing Street and Ministry of Justice, 'Rape, Serious Child Sex and Grooming Offences Barred from Sentencing Changes', 4 August 2026, <https://www.gov.uk/government/news/rape-serious-child-sex-and-grooming-offences-barred-from-sentencing-changes>.

⁸² This should not be burdensome given the low volume of sentences for modern slavery offences per year (72 in year ending March 2026, 35 in year ending March 2025, and 61 in year ending March 2024): Ministry of Justice, *Outcomes by Offence Data Tool: March 2026*, MS Excel spreadsheet, 30 July 2026, <https://assets.publishing.service.gov.uk/media/6a61dc42e2d191f0bc8b6d66/outcomes-by-offence-data-tool-march-2026.xlsx>.

7.2 Training

Finding: Awareness and expertise in the orders appear to be concentrated in individuals rather than institutionalised within organisations, with a lack of systemic awareness across those involved in the process.

Recommendation 2: The College of Policing and the National Police Chiefs' Council, working with the Home Office and relevant applicant organisations, should develop a national training input and toolkit on Slavery and Trafficking Prevention and Risk Orders.

The training should include:

- A short awareness input for investigators and case officers on recognising when an order may be available and how to escalate it.
- A more detailed competence module for those preparing applications, covering evidential requirements, application procedures and proportionate drafting.

The accompanying toolkit should provide a central repository with examples of orders and restrictions and signpost relevant statutory and operational guidance. Chief officers of police, the National Crime Agency, and Immigration Enforcement and the Fair Work Agency should confirm adoption within their organisations. Training should also be updated to reflect any changes to the orders arising from the Immigration and Asylum Bill, if enacted.

Further relevant bodies, including the Crown Prosecution Service and the Judicial College, should be invited to reflect the same decision points in their legal guidance and judicial and magistrates' training respectively.

7.3 National Data Collection and Evaluation

Finding: The report reinforces longstanding concerns about the absence of coordinated national data on the use of STPOs and STROs. Applications, outcomes and breaches are recorded across different agencies and systems and are not brought together or published. It is therefore not possible from publicly available data to establish how often orders are sought or made, how practice varies between forces and court areas, or whether orders are effective once imposed. This limits Parliament's and the public's ability to assess how the orders are being used, and leaves policy in this area to be made on a weaker evidential basis.

Recommendation 3: The Home Office, working with the Ministry of Justice, HMCTS and the CPS, should establish coordinated national reporting on the use of STPOs and STROs, drawing wherever possible on existing collections. As a minimum, the

dataset should record: applications made, granted, refused and withdrawn; order type; the route by which it was made; and the number of breaches and consequences for breaches. Figures should be published at least annually and disaggregated by police force area, so that variation in practice is visible.

7.4 Protecting Survivors from Repercussions

Finding: Respondents recalled cases in which individuals subject to orders sought retribution against survivors they believed had provided supporting evidence. This risk is particularly relevant to applications for STPOs and STROs where evidence relied upon must be disclosed to the defendant, creating the possibility that its source may be identified or inferred. An order intended to prevent further harm could therefore inadvertently increase the risk facing individuals connected with the case.

Recommendation 4: The Home Office should amend its guidance on STPOs and STROs to require those seeking an order to assess whether any evidence relied upon could be attributed to a survivor and any safeguarding risks that may result. Wherever possible, applications should draw on corroborative evidence gathered from professional or other independent sources to reduce potential safeguarding implications.

7.5 Standardised Monitoring of Orders

Finding: Responsibility for monitoring orders, and what monitoring involves, varied substantially between areas. Some orders were actively managed and regularly reviewed, while some respondents described uncertainty around who held responsibility, what checks should be undertaken and how frequently. Where monitoring rests on individual officers, it is vulnerable to competing workloads and staff turnover.

Recommendation 5: The Home Office and College of Policing should issue detailed guidance establishing an agreed national approach to the monitoring and management of STPOs and STROs, applicable to all organisations with powers to apply for orders.

The guidance should:

- Set out clear responsibilities for monitoring.
- Establish expectations around the types and frequency of monitoring activity, while allowing monitoring to be proportionate to the restrictions within an individual order.

- Draw on existing approaches to risk and offender management, including the Lead Responsible Officer guidance for organised crime groups⁸⁴ and the College of Policing framework for managing sexual offenders and violent offenders.⁸⁵

The guidance should also establish how responsibility should be allocated where the organisation seeking the order is not the police force in the area where the individual is primarily based. This is particularly important if the proposals enabling British Transport Police to apply for orders and removing the requirement for a connection to the applying force's area are enacted under the Immigration and Asylum Bill.

Recommendation 6: Where an order is sought, the team that will be responsible for monitoring the order should be identified and the team's responsibility agreed before the order is made. The monitoring arrangements and responsible team should be recorded, together with how that responsibility would be transferred in the event of staff turnover. A named senior officer should have oversight of the monitoring arrangements and responsibility for ensuring that the order is being actively managed. Where restrictions have an international dimension, arrangements for any necessary cooperation with overseas authorities should also be identified.

⁸³ Home Office, *Lead Responsible Officer Guidance*.

⁸⁴ College of Policing, 'Home Visits', in *Managing Sexual Offenders and Violent Offenders*, Authorised Professional Practice, updated 26 March 2026, <https://www.college.police.uk/app/major-investigation-and-public-protection/managing-sexual-offenders-and-violent-offenders/home-visits>.

7.6 Communication and Information Sharing

Finding: There was no consistent process for communicating the existence and terms of an order to agencies that may have a role in monitoring or enforcing it. This was most acute in relation to HMPPS, where respondents indicated that relevant prison staff may be unaware that an individual is subject to an order, despite potentially being well placed to identify breaches. While orders are recorded on the Police National Computer, concerns were raised about authorisation and access restrictions for HMPPS staff.

Recommendation 7: The Home Office should amend the statutory guidance on STPOs and STROs to require those seeking an order to establish a communication plan, identifying which organisations should be informed if the order is made and which team will be responsible for communicating that information.

Recommendation 8: The Home Office should work with organisations with powers to apply for orders, the Ministry of Justice and HMPPS to establish a formal mechanism to ensure that relevant prison and probation staff are informed when a person in their service becomes subject to an STPO or STRO, including the terms of the order that are relevant to their role.

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