



**United Nations Special Rapporteur on Violence against women and girls, its causes and consequences, Reem Alsalem**

**Official visit to the United Kingdom of Great Britain and Northern Ireland**

**12 - 21 February 2024**

**SUMMARY OF PRELIMINARY FINDINGS AND OBSERVATIONS**

London, 21 February 2024

*Good afternoon,*

I am addressing you today at the conclusion of my official visit to the United Kingdom of Great Britain and Northern Ireland, which I undertook at the invitation of the Government from 12 to 21 February 2024.

My objective during this visit has been to evaluate the situation of violence against women and girls (VAWG) in the country, and the following statement contains my preliminary findings.

A comprehensive report with a more detailed analysis of the manifestations, causes and consequences of violence against women and girls, along with action-orientated recommendations will be presented to the United Nations Human Rights Council in June 2025.

I would like to begin by extending my sincere appreciation to the Government and Devolved Administrations of the United Kingdom of Great Britain and Northern Ireland for the invitation to visit and for the excellent engagement, cooperation and coordination extended to me both before and during my visit.

During the visit State representation was led by the Under Secretary of State, Minister for Victims and Safeguarding; and the Minister for Equalities and Women. I also met with the Minister for Social Justice in Wales; Junior Ministers from the NI Office of the First and Deputy First Ministers in Northern Ireland; and senior officials from across the devolved administrations of Northern Ireland, Scotland, and Wales. In addition, I met with members of Parliament, representatives of national human rights institutions (NHRIs) and equality commissions. I also wish to thank and acknowledge the very insightful meetings that I have had with civil society organizations, including women organizations and service providers, academics, as well women who are nationals and foreigners.

That said, I regret not having had the chance to meet with the National Health Service (NHS) and the Ministry of Education of England and Wales, nor to visit an immigration removal center as requested.

I sincerely hope that the recommendations that I will outline in my report, will contribute to the ongoing efforts by the Government of the UK and the devolved administrations to eliminate VAWG and to better assist and protect survivors, in line with its international and regional human rights obligations

and commitments under the different relevant human rights treaties such as the Convention on the Elimination of Discrimination against Women (CEDAW) and more recently the Council of Europe Convention on Preventing and Combating Violence Against Women and Domestic Violence (Istanbul Convention), to which the UK is party.

## **1. Legal framework on VAWG**

The UK has long been considered a stalwart supporter of gender equality – being one of the first countries in the world to give women the right to vote over 100 years ago. It has a robust legal framework for the advancement of gender equality starting with the Equality Act of 2010 that applies UK-wide. This framework is complemented by legislation and policies in the devolved regions along with additional UK wide legislation that attempts to tackle current and emerging forms of VAWG, including domestic violence, coercive control, economic violence, forced marriage, female genital mutilation (FGM), digitally facilitated violence, and stalking - amongst others. The UK is also leading on a number of other innovative legislative processes, including with the introduction of laws that criminalize coercive control and economic violence in domestic abuse cases; non-fatal strangulation; female genital mutilation, and honour based killings. The forthcoming national review of pornography is also an important step in recognizing that pornography is having a significant impact on violence against women and girls.

The UK's recent ratification of the Istanbul Convention offers an important opportunity to continue to consolidate its engagement on VAWG, provided that it invests in comprehensive data collection, implementation, and monitoring of its commitments under the Istanbul Convention. While important advances have been made in the quest to end VAWG, more must be done to ensure that the UK rises to its full potential. Attached is a short overview with my initial observations on main achievements and limitations of legislation in a number of VAWG related themes (see Annex 1)

## **2. Approach to VAW by the Government**

Every three days, a woman is killed by a man in the UK and one in four women experience domestic violence, prompting the Government to declare it a national priority.

The UK and devolved governments each have strategies dealing with violence against women and girls. These however do not rise to the level of binding legislation and are not framed or anchored in strong human rights language that reflect the UK's international human rights obligations. As such, the fact that "women's rights are human rights" is not palpable throughout government legislation or approaches.

Currently, the Home Office is the lead department in charge of coordinating engagement on issues to do with violence against women and girls – primarily through the lense of gender equality and gender-based discrimination. References to VAWG is scattered throughout different pieces of legislations both at national and devolved levels in a fragmented and incoherent manner. **In view of this fact, I observe a need for a central framework that brings all the strands relating to VAWG together under one roof. This could facilitate the design, implementation, monitoring, and evaluation of the commitments by the UK and the devolved governments towards its women and girls.**

Furthermore, the UK should elevate the attention given to the equality of women and girls and treat it as a priority, including through the creation of a ministry for women and equality with a separate cabinet minister and brief, and explicitly use the term and concept of VAWG in all relevant legislation and policies.

The ability of the UK and the devolved region's ability to address VAWG effectively is also impacted by the devolution structure in the UK. On the one hand, devolution of powers provides flexibility to the devolved administrations to make laws and deliver public services, allowing them to take initiatives on gender equality and VAWG and to localize them. On the other hand, the fact that VAWG is not a

statutory matter, and that there is no clear approach to non-devolved powers that impacts women and girls such as on issues related to equality, immigration and asylum. As such, there does not appear to be a coherent approach to crucial legislation, such as the Equality Act<sup>1</sup> and the Nationality and Border Act of 2022, which affect women and girls in the UK. The understanding and transposing of these and other key legislations in the devolved regions varies, as does political commitment. Local authorities do not have firm duties to uphold, ringfence funds, or assume significant VAWG related aspects or non-discrimination. For the latter, the duty of local authorities is limited to the generalized principle of promoting equality and fairness.

**Where they do not exist, I observed a need for devolved authorities to create robust coordination and oversight structures on VAWG, where the responsibility of each actor is clear and workplans are monitored.**

The UK has a very vibrant civil society with internationally recognized and respected women rights groups. Despite this, their role and contribution to VAWG has been curtailed in recent years by a series of developments and policies that include the lockdown measures during COVID, reduced funding and a tendering process introduced by the Government that has intensified competition and anxiety amongst frontline organizations. Women and victim organizations are expected to “do more with less”. Many grassroots organizations that I have spoken to, particularly those representing black and minoritized women, feel that consultations with Government entities have become tokenistic or have become a “box-ticking” exercise. While they may be consulted, their recommendations are often not retained, and their expertise and specialization is not fully appreciated.

In terms of policies, all stakeholders recognize the grossly inadequate investment in prevention activities, particularly in schools, within the wider public, and in terms of work with perpetrators.<sup>2</sup>

A serious key challenge across the board is the lack of **good quality, disaggregated data**. While data provided by the police can be disaggregated by crime type and geographical location, the collection of vital basic data, such as sex, gender, age, ethnicity, etc. of both the victim and the defendant/perpetrator, is missing. This issue is – in my view – the single biggest obstacle to advancing on ending VAWG as it makes it impossible to measure progress, identify trends and inform related policies.

The lack of a sex and gender-sensitive approach to programming is also detrimental to effective prevention and response efforts. Skewing data will result in the misguided and ill-informed assessment of societal problem, including violence against women and girls and therefore also undermine the prospects of funding efforts that are destined to end and respond to such violence.

The afore-mentioned challenges have undermined the ability to mainstream an intersectional approach to all aspects of planning, implementation and response. As such, women who belong to racial, ethnic or religious minorities, and who are living in rural areas, are elderly or with a disability are not adequately included and attended to.

### **3. Criminal justice system**

The current backlog in courts throughout the UK, partly as a result of delays following the COVID-19 pandemic, are having a detrimental impact on victims and survivors of domestic abuse, sexual abuse and rape. In September 2023, Ministry of Justice figures showed the highest backlog on record, with 64,709 cases.

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<sup>1</sup> Equal opportunities and discrimination are “transferred matters” under the Northern Ireland Act 1998. As such, with a few exceptions the Act does not form part of the law of Northern Ireland

<sup>2</sup> Some excellent initiatives exist at the devolved, regional and local level, such as for example in the Greater Manchester Area

Chronic underfunding has meant that the criminal justice system is at a breaking point with highly damaging delays, for victims and defendants, a huge shortage of judges and lawyers, and spiraling numbers on remand, overwhelming the prison system. With trials adjourned for long periods, sometimes over a year, some survivors never see justice, resulting in serious mental health consequences for many survivors who feel they are unable to progress with their lives.

Currently, victims of crime have limited statutory rights in the legal system. Whilst there are some procedural protections (such as giving evidence behind screens), most are won through application, not given by right, and are subject to judicial discretion. There is a consistent lack of sanctions against violent/abusive men, evident through low levels of prosecution/high attrition rates across offences. While measures adopted to facilitate access to civil legal aid for victims of domestic violence and child abuse are welcome, cuts to legal aid, as well as the strict criteria for gaining access to legal aid under the Legal Aid, Sentencing and Punishment of Offenders Act 2012, continue to have a negative impact on women's access to justice and effective remedies in areas such as family, housing, immigration and welfare benefits law.

**Government funded research to better understand who does and does not access the criminal justice system, and to further investigate the experiences of Black, minoritized and marginalized women's experience of criminal justice interventions, would be beneficial, as would the allocation of more resources to ensure that victims of domestic abuse and sexual offences are fully supported throughout the criminal justice process.**

#### **4. Police**

A pattern of continued skepticism, indifference and a lack of empathy towards women, particularly women from black and minority ethnic communities, has prevented many women and girls from reporting crimes of violence against them to the police. Action continues to be largely ineffective and inadequate even when injuries from physical assaults are visible and is virtually non-existent in cases of coercive control involving emotional, sexual and financial abuse.

Besides the immediate safety concerns for victims, the failure of the police to investigate or provide support can also affect other legal proceedings, such as child custody or immigration matters. In other cases, police failure to properly record or act on domestic violence can have an adverse effect on women's applications for legal aid in family proceedings, including when seeking a divorce or protection.

Victims of sexual violence are particularly reluctant to report to the police for various reasons, including fear of victim-blaming and gender-stereotyping. The fact that defendants know that there may be a withdrawal of support for prosecution, often means that they will not make any admissions of guilt during police interviews and may plead not guilty in court in the anticipation that the victim will not give evidence. The uncovering of police officers as perpetrators in some areas, including of sexual abuse, has further eroded confidence in policing, an issue that law enforcement and the respective authorities say they are committed to tackle effectively.

Of particular concern is that some UK police forces have reported sharing information about the immigration status of victims of crimes with the Home Office, which reportedly deters migrant women with insecure immigration status from reporting and seeking protection from domestic abuse and other gender-based violence.

The pledge by the police, to dedicate substantial funds to provide front-line services for victims of VAWG, is a welcome development. I acknowledge and welcome the effort made in good faith by police forces throughout the UK to address these structural and endemic problems, including engaging in a more victim and trauma sensitive manner, and to doing more to improving outreach to black and ethnic minority communities as a means of improving overall trust in the police. However, these well-founded intentions cannot be achieved without adequate and sustainable funding, and by addressing the non-

criminal aspects of the attention and care required to assist victims, as well as ensuring accountability for police misconduct.

**Consider the Final Inspection Report into the Police Response to VAWG published in September 2021 by HM Inspectorate of Constabulary, Fire and Rescue Services (HMICFRS). Its first recommendation (page 13) was that: “There should be an immediate and unequivocal commitment that the response to VAWG offences is an absolute priority for government, policing, the criminal justice system, and public-sector partnerships” and that “there needs to be an immediate upwards shift in the prioritisation of VAWG offences in policing”.**

## **5. Funds and resources for VAWG and engagement of civil society**

Another recurring theme throughout the visit has been the ongoing concerns about the overall lack of funding for the specialist services working day in and day out to prevent violence against women and girls. The cost-of-living crisis, the continued aftermath of the COVID-19 pandemic and an increase in the complexities of cases is having lasting impacts on prevalence of VAWG and operation of the VAWG sector.

Funding for statutory issues such as migration (and in some regions justice) largely comes from central sources of funding, from the Ministry of Justice, the Home Office and the Department for Levelling Up, Housing and Communities. While equality is a statutory issue that applies UK-wide, no resources are attached to upholding and ensuring it throughout the country.

Central funding should be cross-government and collaborative in relation to male violence against women, including in the devolved administrations, and relevant statutory bodies within the health, education, and labour sector should receive adequate resources. In times of austerity, projects and activities destined for women, and children who may be amongst the most at risk are frequently cut or funded only on a short-term basis.

The current short-term and competitive funding model for specialist support provision is not working and pits services against each other. Tendering is a competitive process; resulting in commissioners and funders preferring large generic service providers in order to cut costs, thereby disrupting life-saving services and losing the vital expertise and experience of specialist services in supporting survivors. Without urgent action to reform the funding landscape for these specialist services, the government will not be compliant with Article 22 of the Istanbul Convention.

Women’s sector organisations are forced to underwrite contractual delivery, leaving them in a precarious financial situation, and resulting in a postcode lottery for VAWG, which has enormous costs to women and girls, as well as to society and the state as a whole, and strategic investment is urgently required to ensure the full range of specialist support services that women and girls need are available, accessible and sustainable. The UK Government has a number of duties under the Equality Act 2010, Istanbul Convention and Human Rights Act 1998 to fund this vital work - from prevention to therapeutic and psychoeducational support, to refuge services.

Prevention and early intervention investment should include specialist services for girls and young women under 25, who are disproportionately affected by domestic abuse. Statutory agencies, e.g. education, social care, health, and criminal justice, have a human rights obligation in identifying young women who are at risk of escalating harm. With nowhere to turn for support, many young women and girls are left traumatised by their experiences and can go on to experience further harm, be forced into prostitution, modern slavery and other forms of exploitation and violence. The hand extended to them by grassroots organizations is often not only the last resort but a lifeline as they can access counselling, legal aid, support with housing, and access to other services such as health and education. **VAWG and equality related funding should be placed on a statutory footing, to protect vital investment. Payments should be timely and in advance of a new service implementation, rather than paid in**

**arrears, with full pay review and analysis of cost recovery reflected in awards, with no cost scoring.**

The situation is further complicated by the fact that the UK has a policy of no-recourse to public funds (NRTPF), which is based on the principle that people without a permanent right to remain the UK should not have the same access to benefits as British citizens. The current migration policy is clear that migrants coming to the UK should be able to provide for themselves financial without relying on public funds.<sup>3</sup>

The lack of access to public funds is however proving to be detrimental to those women and girls who have entered the country with a husband or partner on whom they are fully reliant economically and are therefore trapped in abusive relationships for fear that if they leave they will end up on the streets and destitute. The application of the NRTPF has accelerated situations of destitution, homelessness and vulnerability for many women and girls. Grassroot organizations and specialized NGOs find themselves having to attend to these women and girls using non-public funds that are not readily available and for which they have to fundraise. In doing so, has the State not only failed its human rights obligations to women and girls that are most at risk of violence but also wrongly shifted the burden care for the most vulnerability has therefore shifted from the State to the NGO sector, thereby straining it further. **In light of the above, I would strongly recommend the Government of the UK to immediately abolish the principle of NRTPF.**

#### **6. Migration policies and impact on VAWG for migrant women and girls including refugees**

I am very concerned about the increased vulnerabilities and risks that migrant, displaced and trafficked women are subjected to by the series of migration and asylum-related policies that the UK has adopted in recent years. These policies are exacerbating and contributing to the increasing criminalization of refugees and migrants, increasing hostile attitudes towards them and eroding international human rights frameworks.

Through recent legislation such as the Illegal Migration Act, vulnerable people could be exposed to further harm and risks, including exploitation, trafficking including for purposes of forced labor and sexual exploitation, arbitrary detention, and possibly torture and other cruel, inhuman, or degrading treatment. The legislation is likely to fuel hostility, xenophobia and discrimination against migrants, asylum-seekers and refugees, including women.

These policies have served to undermine the ability of women and girls who are fleeing conflict as well as gender-based persecution, to find protection and safety in the UK. Furthermore, they increased the risks of trafficking, violence, sexual exploitation, and force victims to remain in the clutch of their abusers.

Single women and girls are particularly vulnerable, including while being housed in temporary housing and accommodation that are subcontracted by the Home Office, while awaiting the decisions on their asylum application. In many cases, this accommodation is inadequate and lacks basic safeguards and protection that have led to children, including girls, going missing from hotels and other temporary accommodation. **I remind the Home Office of its obligations to ensure that the accommodation of housing asylum seekers must meet adequate minimum standards, including the protection of residents against mistreatment, exploitation, and abuse, including sexual abuse.**

Migrant women and girls who have an uncertain immigration status are excluded from receiving state support set out in the rule of ‘no recourse to public funds’ (NRTPF), driving many into destitution and homelessness. Short term exceptions to this rule exist but are rare and extremely short term. The same applies to those women who enter on the basis of marriage and who must remain in that relationship

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<sup>3</sup> <https://www.gov.uk/government/publications/public-funds/public-funds-accessible>

for two years to regularize their residence in the UK and to be able to access state support. Frontline grassroots organizations are expected to attend to this increasing number of women (and their children) despite them not receiving public funds to do so. As mentioned, it is therefore imperative that the NRTPF is lifted as it currently excludes the most vulnerable of women and girls in the UK and denies them the ability to receive minimum assistance and support.

One significant deterrent that discourages women and girls with insecure legal status or whose residence is dependent on their partners from coming forward and seeking assistance is the fact that police and other public servants share information regarding their migratory status with the home office, leading to legitimate fears that this information sharing will end in them being removed/deported. **It is imperative that a firewall be established between reporting and access to services by migrant women regardless of their legal status and their citizenship.**

The fact that migration and asylum are functions that have not been devolved, makes it impossible for the authorities in the devolved regions to monitor the situation of asylum-seekers and refugees in their regions appropriately and to engage meaningfully to improve their situation, as the Home Office manages the provision of services and the tendering process to that effect centrally.

## **7. Discrimination and violence based on gender and sex**

Data related to gender and sex are conflated across the board, with data on the characteristics of sex being erased, and not collected. This has a devastating impact on the ability of authorities and society to tackle the root causes of VAWG – in part by obfuscating the reality that VAWG is predominantly perpetuated by males. It has also led to the adoption of public and private policies that permeate society and that have undermined the safety and security of women and girls, their full participation in society and that ignore their needs and specificities based on their sex. The recent series of wins in court for “gender-critical” persons, establishing that they have been unlawfully removed from their employment, have gone a long way in clarifying and asserting the tenants of free thought and belief in the UK. It would be important for employers to already heed the essence of these judgements and not to punish anyone for their thoughts, beliefs and expressions regarding sex and gender.

The effect of these policies has been particularly felt in the denial of single sex spaces in prisons, shelters, and sports. Women and girls, as well as their male allies that have wished to reassert their needs and rights based on their sex have been for years ostracized, attacked, and punished by State and non-State actors for their beliefs and opinions, including political parties, universities, private employers, the media.

Lesbian Women and girls have particularly suffered the brunt of this phenomenon, and are being vilified by some corners in society on account of their same sex attraction, which risks undoing decades of progress made on combatting homophobia. The right of lesbians to non-discrimination based on their sexual orientation must be protected in law and in practice, as well as their right to their own spaces. **Any draft legislation seeking to ban conversion therapies must take account of the fact that many young women who express a desire to “transition” socially and/or medically may in fact be same-sex attracted, or experiencing other issues, such as neurodiversity or dealing with past trauma.** Legislation should never prevent these young women being supported holistically and should ensure transition does not become the only option it is acceptable to discuss with them.

**All stakeholders must note that the prohibition of discrimination on sex and sexual orientation are prohibited in international law.** There are times where it will be necessary, legitimate, and proportional to give primacy to rights based on sex – and for such considerations to be reflected in current and future policy and legislation, including on self-identification of gender identity, health care, and hate speech.

Given longstanding confusion on the meaning of the characteristic of sex in the Equality Act of 2010, it is welcome that the UK Supreme Court will soon move to deliberate on and clarify its meaning.

## **8. Violence against women and violence against children**

Thought my visit I have met with several mothers who have lost the care of their children as a result of custody cases, and who are struggling to come to terms with the loss. They all spoke to me about the traumatic effect that family court proceedings and allegations of parental alienation has had on them and their children. They are terribly worried about the safety and welfare of their children.

As I have argued in my report to the 53<sup>rd</sup> session of the United Nations Human Rights Council in June 2023, the institutional violence perpetuated against mothers and children in family courts and the colossal failure of justice continue to be of grave concern, perpetuated through the invocation of parental alienation allegations and a move to maintain contact between the child and the perpetrator of violence – usually the father – at all costs.

At the same time, I am encouraged by the recognition of relevant stakeholders in the UK, including parts of Government, of the gravity of the situation, and the efforts underway to address these human rights violations. This recognition started with the Harm Panel report which casts a necessary spotlight on the Family Court. Both the Government and the judiciary committed to making the necessary reforms. Building on the momentum created by the Harm Panel Report, the UK's Domestic Abuse Commissioner's report entitled *The Family Court and domestic abuse; Achieving cultural change* of July 2023 contains a set of important recommendations that I would urge the Government and other relevant stakeholders to consider. More broadly, it is important that the UK moves to urgently and swiftly prohibit the use of parental alienation and related pseudo-science concepts, appoint only experts who are fully qualified psychologists or psychiatrists; that are regulated by the HCPC and that have regular accredited domestic abuse training. The presumption of contact at all costs must also end.

I welcome the ongoing independent investigation into the Mother and Baby homes in Northern Ireland, developed with a victim-centred approach in mind, and I urge the NI executive to ensure that the full inquiry is established that takes into consideration lessons learned from similar inquiries carried out by the Republic of Ireland and others for similar situations.



## **Annex 1: Key legislation relevant to VAWG applicable at country level: Impact, limitations and recommendations**

### **Domestic Abuse**

Regarding domestic abuse, the enactment of the Domestic Abuse Act ushered in a sense of optimism, given the gaps that it intended to fill and which related to the intention to increase support to victims; recognize children as victims in their own right, and introducing the Domestic Violence Protection Notices (DVPNs) and Domestic Violence Protection Orders (DVPOs). However, reporting of domestic violence continues to be underreported, in part due to the lack of confidence in the criminal justice channel, as well as the inadequate use of protection orders and real prospects for exiting an abusive relationship, particularly migrant women with insecure legal status, impoverished women and women with disability. The introduction of Independent Domestic Abuse Advisors and Independent Sexual Violence Advisors to accompany victims of domestic abuse during the criminal justice process is an important step in helping women to navigate the criminal justice system at a very traumatic time in their lives. **Measures aimed at preventing and combating VAWG, including domestic violence and sexual abuse should be strengthened, by ensuring that all domestic violence cases, are investigated in a timely and efficient manner, that perpetrators are prosecuted and, if they are convicted, are punished with appropriate sanctions; that victims have access to effective remedies and means of protection, including strong police protection, adequate emergency shelter, rehabilitative services, legal assistance and other support services must be guaranteed.**

### **Coercive control**

With regards to coercive control, the enactment of the Serious Crime Act of 2015 in England and Wales made coercive behavior in intimate or familial relationships a new offence. Despite its enactment in law, however, there seems to be minimal understanding within the police and judicial system as to what constitutes coercive control, with women and girls often being asked to produce unrealistic pieces of evidence. **The Judicial College should therefore work collaboratively with specialist VAWG organizations to improve judicial understanding and awareness around coercive control behavior as well as offer more training for the police, judges and other criminal justice agencies, to ensure that evidence gathering is robust, survivors are properly treated.**

### **Stalking**

While **stalking** has been recognized as a crime, stalking behavior continues to be poorly understood by law enforcement and criminal justice agencies and often goes unrecognized. **More training is needed on the police-Crown Prosecution Services (CPS) Protocol and for stalking related specific powers to be used by the Police.**

### **Technology facilitated violence**

The ever-increasing rise in online violence is deeply concerning, and a new reality that societies around the world are grappling with, and the UK is no exception. Women and girls are being increasingly exposed to harmful behaviors online, including humiliation, harassment, intimidation and “sexting” as a form of bullying. Threats to publish photographs of consensual sexual activity to harass and manipulate women and even force them to engage in further sexual activity is becoming disturbingly frequent, and is impacting women and girls at all levels of society.

The recent enactment of the Online Safety Act in October 2023 seeks to address some of those harms, particularly to children, including girls, by establishing a new regulatory framework to try to hold companies to account and ensure that they protect their users and uphold freedom of expression online. Platforms will need to proactively remove and prevent users from being exposed to priority illegal

content, such as offences relating to sexual images (e.g. revenge porn and extreme pornography), and controlling or coercive behavior. There is a clear and unambiguous definition of age verification and age estimation in the Act, with pornography websites, with social media sites and other services required to use the most stringent form of age verification to explicitly ensure children cannot access pornography. It is also recommended to move.

While the enactment of the Online Safety Act is a welcome development, gaps remain, specifically around the issues of violence within the pornography industry, the influence of pornography on individual and societal attitudes towards VAWG and the impact of legal pornography on perpetration of child sexual abuse, both online and offline. **We need to move away from companies self-regulating towards a legally enforced duty of care on tech companies across the distribution chain to ensure that they have adequate infrastructure to prevent tech abuse and to support survivors.**

## **Rape**

Nowhere has VAWG-related data been more alarming than that relating to rape. However, the introduction of Operation Soteria, which aims to change the focus of criminal investigation to the perpetrator rather than the victim, represents an important step in preventing the re-traumatization of women and girls who have been victims of sexual violence and rape, and I detected a genuine will from within the police forces that I met with to ensure that it is properly implemented. However there needs to be sustained investment of resources and training as well as accountability to ensure that police forces that fail to implement the new National Operating Model can be held accountable.

## **Trafficking and slavery**

Regarding trafficking and modern slavery, despite these efforts, and despite the UK's adherence to a number of key treaties and the introduction of its own Modern Slavery Act in 2015, the UK continues to face challenges in eradicating human trafficking, and it was difficult for me to obtain a good understanding of this particular workstream, and the data associated with it. There is no doubt that the recently adopted Migration Act (IMA) represents a significant step backwards, as it effectively prevents a person from claiming asylum if they have entered the UK illegally, including women and girls. In this regard, I share the concern that other special procedures have expressed that it will punish genuine victims of trafficking and those in need of international protection as well as push them further underground. It will give smugglers and traffickers impunity to continue with their harmful and illegal practices. IMA will also deny protection to thousands of victims of modern slavery and trafficking is inconsistent with the UK's human rights obligations, not to mention that it contains provisions that run counter to the provisions of its Modern Slavery Act 2015. **For this and other reasons, the IMA should be repealed.**

## **Prostitution**

The UK Parliament's Home Affairs Committee's 2023 inquiry on human trafficking heard that 75% of sex trafficking victims are now advertised online and that prostitution advertising websites are the most significant enabler of sex trafficking. Sexual exploitation of women and girls remain hidden requiring proactive police investigation, as well as a better understanding of the dynamics of prostitution, related trafficking where it may apply, and to bring the perpetrators to justice.

A large proportion of women and girls in prostitution are trafficked for the sex industry. They are migrant women from Eastern European countries it is also not possible to identify the age, ethnicity or other protected characteristics of adult trafficking victims using the available National Referral Mechanism (NRM) data. The inability to identify which groups are particularly vulnerable to sex trafficking hinders the development of anti-trafficking measures.

**Where not applicable, I would encourage the authorities to adopt the Nordic Model, to criminalise the demand for prostitution, build on the experience of a similar model which is already in place**

**in Northern Ireland and dedicate more resources and programs to exit programs. Women and girls in prostitution needs to have access to practical and flexible, assistance that is trauma informed.**

### **Surrogacy**

While modern practices of surrogacy offer new reproductive opportunities, they also introduce new legal and ethical dilemmas. Furthermore, the international regulatory vacuum that exists in relation to international surrogacy arrangements leaves children born through this method vulnerable to breaches of their rights, and the practice may often amount to the sale of children. With a growing industry driven by demand, surrogacy is an area of concern for the rights and protection of the child and the birth mother against exploitation, abuse and violence.