

FOCUS ON LABOUR EXPLOITATION

England & Wales · Charity number 1159611

Details

Other names FLEX

Status Registered

Legal form Charitable company

Company number [08451701](#)

Registered 2014-12-15

Register [View on the Charity Commission register](#)

Contact

Address The Foundry
17 Oval Way
London
SE11 5RR

Phone 02037525516

Email info@labourexploitation.org

Website <http://labourexploitation.org/>

Activities

Objects: TO PROMOTE AND ADVANCE THE HUMAN RIGHTS OF VICTIMS OF HUMAN TRAFFICKING, AND IN PARTICULAR THOSE TRAFFICKED FOR THE PURPOSE OF LABOUR EXPLOITATION, IN THE UNITED KINGDOM AND THROUGHOUT THE WORLD, BY ALL OR ANY OF THE FOLLOWING MEANS: A) MONITORING ABUSES OF THE HUMAN RIGHTS OF VICTIMS OF HUMAN TRAFFICKING; B) OBTAINING LEGAL OR OTHER REDRESS FOR ABUSES OF THE HUMAN RIGHTS OF VICTIMS OF HUMAN TRAFFICKING; C) RESEARCH INTO ISSUES AFFECTING THE HUMAN RIGHTS OF VICTIMS OF HUMAN TRAFFICKING, AND IN PARTICULAR THOSE TRAFFICKED FOR THE PURPOSE OF LABOUR EXPLOITATION; D) PROVIDING TECHNICAL GUIDANCE, BOTH TO GOVERNMENTS AND ORGANISATIONS WORKING WITH VICTIMS OF HUMAN TRAFFICKING, ON ISSUES CONCERNING THE HUMAN RIGHTS OF VICTIMS OF HUMAN TRAFFICKING; E) CONTRIBUTING TO THE SOUND ADMINISTRATION OF LAWS WHICH PROTECT THE HUMAN RIGHTS OF VICTIMS OF TRAFFICKING; 3 F) COMMENTING ON THE EFFECT OF PROPOSED LEGISLATION ON THE HUMAN RIGHTS OF VICTIMS OF HUMAN TRAFFICKING; G) RAISING AWARENESS OF, AND PROMOTING PUBLIC SUPPORT FOR, HUMAN RIGHTS ISSUES AFFECTING VICTIMS OF HUMAN TRAFFICKING; H) PROMOTING RESPECT FOR THE HUMAN RIGHTS OF VICTIMS OF HUMAN TRAFFICKING AMONGST BOTH INDIVIDUALS AND CORPORATIONS; I) INTERNATIONAL ADVOCACY OF THE HUMAN RIGHTS OF VICTIMS OF HUMAN TRAFFICKING; IN FURTHERANCE OF THESE OBJECTS, BUT NOT OTHERWISE, THE TRUSTEES SHALL HAVE POWER TO ENGAGE IN POLITICAL ACTIVITY PROVIDED THAT THE TRUSTEES ARE SATISFIED ANY PROPOSED POLITICAL ACTIVITIES WILL FURTHER THE PURPOSES OF THE CHARITY TO AN EXTENT JUSTIFIED BY THE RESOURCES COMMITTED AND THE POLITICAL ACTIVITY IS NOT THE DOMINANT MEANS BY WHICH THE CHARITY CARRIES OUT THESE OBJECTS.

Activities: Focus on Labour Exploitation (FLEX) works towards responses to trafficking for labour exploitation that are not only effective in ending exploitation, but also prioritise the needs and voices of trafficked persons and their human rights. FLEX seeks to achieve this through research, advocacy, and capacity building to promote victim-centred responses to trafficking for labour exploitation.

Classification

- **How:** Provides Advocacy/advice/information, Sponsors Or Undertakes Research, Acts As An Umbrella Or Resource Body
- **What:** Education/training, The Prevention Or Relief Of Poverty, Human Rights/religious Or Racial Harmony/equality Or Diversity, Other Charitable Purposes
- **Who:** Other Charities Or Voluntary Bodies, Other Defined Groups, The General Public/mankind

Geography

- Brazil
- Kenya
- Netherlands
- Romania
- Thailand
- United States
- Throughout England And Wales

Finances

Period end	Income	Expenditure	Assets	Employees
2025-03-31	£832,562	£677,996	£765,698	12
2024-03-31	£711,911	£616,262	£611,132	9
2023-03-31	£618,436	£469,189	£515,483	10
2022-03-31	£467,119	£386,310	-	-
2021-03-31	£413,831	£316,252	-	-

Trustees

Name	Role	Appointed
Adam Craig Weiss	Chair	2014-12-10
Anushya Thejamali Kulupana		2024-09-23
Ian Robinson		2018-06-25
Peter Andrews		2018-06-25
Rachel Hewitt		2019-09-09
Shereen Hussein		2022-09-21

FOCUS ON LABOUR EXPLOITATION

England & Wales - Charity number 1159611

Accounts

Focus on Labour Exploitation
(A company limited by guarantee)
Report and Financial Statements
For the year ended 31 March 2025

Charity registration no 1159611

Company registration no 08451701

Focus on Labour Exploitation

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Reference and administrative details

Trustees	Peter Andrews Vaswati Arora Claire Falconer (resigned 12 March 2025) Rachel Hewitt Shereen Hussein Anushya Kulupana (appointed 23 September 2024) Ian Robinson Adam Weiss
Principal Office	The Foundry 17 Oval Way London SE11 5RR
Charity number	1159611
Company number	08451701
Bankers	Triodos Bank Deanery Road Bristol BS1 5AS The Co-operative Bank 1 Balloon Street Manchester M60 4EP
Independent Examiner	Field Sullivan Limited 9 Hare & Billet Road Blackheath SE3 0RB

Focus on Labour Exploitation

Report of the trustees for the year ending 31 March 2025

The trustees present their report and accounts for the year ended 31 March 2025.

The accounts have been prepared in accordance with the accounting policies set out in note 1 to the accounts and comply with the charity's memorandum and articles of association, the Charities Act 2011, the Companies Act 2006, the Charities and Trustee Investment (Scotland) Act 2005 and Accounting and Reporting by Charities: Statement of Recommended Practice applicable to charities preparing their accounts in accordance with the Financial Reporting Standard application in the UK and Republic of Ireland (FRS 102).

Our purposes and activities

Our charity's purpose as set out in the objects contained in the company's memorandum of association are:

To promote and advance the human rights of victims of human trafficking, and in particular, those trafficked for the purpose of labour exploitation, in the United Kingdom and throughout the world, by all or any of the following means:

- Monitoring abuses of the human rights of victims of human trafficking;
- Obtaining legal or other redress for abuses of the human rights of victims of human trafficking;
- Research into issues affecting the human rights of victims of human trafficking, and in particular, those trafficked for the purpose of labour exploitation;
- Providing technical guidance, both to Governments and organisations working with victims of human trafficking, on issues concerning the human rights of victims of human trafficking;
- Contributing to the sound administration of laws which protect the human rights of victims of trafficking;
- Commenting on the effect of proposed legislation on the human rights of victims of human trafficking;
- Raising awareness of, and promoting public support for, human rights issues affecting victims of human trafficking;
- Promoting respect for the human rights of victims of human trafficking amongst both individuals and corporations;
- International advocacy of the human rights of victims of human trafficking.

In shaping our objectives for the year and planning our activities, the trustees have considered the Charity Commission's guidance on public benefit, including the guidance 'public benefit: running a charity (PB2).

The company works to benefit both current and potential victims of trafficking for labour exploitation, in the UK and worldwide.

The trustees have considered this matter and concluded:

1. that the aims of the organisation continue to be charitable;
2. that the aims and the work done give identifiable benefits to the charitable sector and both indirectly and directly to individuals in need;
3. that the benefits are for the public, are not unreasonably restricted in any way and certainly not by ability to pay; and
4. that there is no detriment or harm arising from the aims or activities.

Achievements and performance

Throughout 2024/25, FLEX has built on its work to improve national and international responses to better protect and promote the rights of people facing or at risk of exploitation. Achievements are detailed below following the framework provided by FLEX's Strategic Plan 2020-25.

FLEX has a vision of a world free from all forms of labour exploitation, including forced labour and human trafficking. Our mission is to end labour exploitation by challenging and transforming the systems and structures that create vulnerabilities for workers. We do this by undertaking research, knowledge building, business engagement, and evidence-based advocacy aimed at preventing labour abuses, protecting the rights of those affected, and promoting best practice policy responses to labour exploitation. FLEX also conducts strategic comms work to inform the ways in which labour exploitation is spoken about, delivers bespoke training to supporting organisations directly in contact with workers at risk and to statutory agencies, and pilots innovative models to enable workers to shape their working conditions.

Our approach:

FLEX's work builds on the understanding that labour exploitation is situated within a spectrum ranging from labour compliance through to labour law violations, culminating at extreme exploitation in the form of offences such as forced labour and human trafficking for labour exploitation. These are at once serious crimes, human rights breaches and violations of labour law. Labour exploitation takes place in every country in the world, and whilst in recent years we have seen a boom of corporate social responsibility initiatives seeking to address risks in global supply chains, state surveillance and legislation remains weak, and exploitation taking place in national contexts remains largely under-researched and misunderstood. As a result, very few of the estimated millions of victims are ever identified and just a fraction of cases result in the prosecution of perpetrators or compensation for survivors.

FLEX recognises that workers at risk of poverty, destitution, discrimination and/or social exclusion are at higher risk of exploitation, and therefore pays particular attention to:

1. **Workers in low-paid and insecure work:** Struggling to make ends meet, low-paid workers are at high risk of falling into debt and facing destitution. Fear of losing work is a major deterrent to reporting abuse and many workers are willing to endure labour abuses and even exploitation. Insecure work arrangements, such as false self-employment and zero-hours contracts, create further instability as workers are not guaranteed an income and can more easily have their work terminated.

2. **Women workers:** Women face additional vulnerabilities related to gendered cultural and structural issues, such as unequal treatment at work, discrimination related to pregnancy and maternity, and gender-based violence and sexual harassment at work. Carrying a disproportionate care burden may push women into more casual employment and make them less able to leave abusive situations. Women are also disproportionately represented in low-paid and precarious work, where they may also face unequal treatment. FLEX's intersectional feminist approach recognises that gender inequality often intersects with other forms of disadvantage to increase women's risk of exploitation.
3. **Migrant Workers:** Migrant workers are also disproportionately represented in low-paid, precarious and informal work. They may also face additional situational vulnerabilities compared to non-migrants, including language barriers, limited support networks and lack of knowledge of labour rights or where to access support. Government policies affecting migrants, such as restrictions on accessing social protections (e.g., no recourse to public funds) create additional vulnerabilities for migrants. Undocumented migrants are particularly at risk of exploitation, especially in contexts where undocumented labour is criminalised.

FLEX works alongside other organisations committed to the rights of vulnerable workers and those working to combat labour exploitation. We are also guided by organisations working with people affected by, or at risk of labour exploitation in the UK, including trafficked persons. These organisations form FLEX's 'Labour Exploitation Advisory Group'.

FLEX is a member of UK-based and global networks of individuals and agencies that share its commitment and values. These include: the UK Anti-Trafficking Monitoring Group, the Ethical Trading Initiative, the Platform for International Cooperation on Undocumented Migrants, the Global Alliance against Traffic in Women, and La Strada International.

FLEX operates on the **values** of:

- **Respect** – for equality and recognition of the role of intersectionality, understood as overlapping or accumulated layers of discrimination, and systemic oppression in creating vulnerabilities and disadvantage.
- **Courage** – to explore, probe, and approach challenges with creativity.
- **Integrity** – thoroughness, rigour and reliability in how we use information to evidence the need for change.
- **Justice** – everything we do is aimed at achieving a more just society.
- **Accountability** – towards those affected by labour exploitation, whose safety, well-being and voice are central to our work.

Our working **principles** are: quality outputs; rigorous and accurate research and reporting; high ethical standards; reflection on our impact; collaborative approach; do no harm.

Top ten achievements we are most proud of this year:

1. Our analysis and evidence-based research on experiences and drivers of exploitation highlighting the interactions between **the UK's immigration system and risk of exploitation** is resulting in increased understanding amongst government and key stakeholders, including parliamentarians, APPGs and committees, as well as key statutory bodies, such as the Migration Advisory Committee, the Independent Chief Inspector of Borders and Immigration, the Director of Labour Market Enforcement, and others. We are proud to report that in January this year we were recognised as one of [Big Issue's Top 100 Changemakers for 2025](#) for 'Politics and Activism'. We are grateful to [Voice of Domestic Workers](#) for the nomination.
2. FLEX's research findings on the **Seasonal Worker Scheme** and ongoing engagement with the Home Office, the Department for Environment, Food, and Rural Affairs, and Parliament continued to evidence the need for better governance of the scheme and improved conditions for workers and grievance mechanisms. As a result of this work and evidence shared by frontline organisations, Government attempted to resolve issues of subemployment by introducing a working week of at least 32-hours of paid work per week, averaged over the worker pay period. We advocate for this change to be accompanied with a guaranteed duration of work.
3. We continued to conduct **outreach to agricultural seasonal workers** with our research partners, ensuring that our research and policy recommendations are directly informed by workers' experiences. In 2024, we published a series of three thematic reports examining risks related to recruitment, working and living conditions, and access to redress and transfers. These reports represent the largest sample of seasonal workers reached by an independent study to date.
4. We continued to advocate for a **stronger labour market enforcement system** in the UK, with the newly elected Labour government committing to introduce a 'Fair Work Agency', a historical FLEX ask, with powers to prosecute and fine employers who exploit workers and to inspect workplaces. This years, FLEX's recommendations were also included in the US State Department's TIP report and in the Liberal Democrat manifesto.
5. We continued working with workers from outsourced service sectors to **improve working conditions across supply chains**. The project represents one of the first efforts in the UK to co-create due diligence tools with the direct participation of cleaners themselves, offering a concrete model for implementing the OECD Guidelines and ILO principles in high-risk, low-wage service sectors. FLEX is piloting this model with two corporate partners.
6. We started developing **Europe's first Worker-driven Social Responsibility programme**, a worker-driven, market-enforced model to improve working conditions and tackle concerns of labour abuse in UK fishing in partnership with the International Transport Federation and the Fair Food Program.
7. We continued delivering **bespoke training** for front-line organisations supporting workers and communities represented in at-risk sectors, and trained 64 staff members, volunteers, and activists from 6 front line organisations working in London.
8. We continued to mobilise support for the introduction of **secure reporting** mechanisms to ensure that all workers are able to report abuse without fear, including by successfully bidding

for a Greater London Authority project to conduct research and design a blueprint for the implementation of a secure reporting pilot in London.

9. We maintained a **strong collaborative approach**, continued to expand our networks, and worked in formal partnerships with a wide range of key front-line organisations, trade unions, academic groups, public bodies, and other stakeholders, such as employers, law firms, and funders.
10. We continued to engage the **staff team in strategic work**. This year we started conducting a full strategy review, assessing our work against the strategic aims of our Business Plan 2020-2025, and initiating the process of developing FLEX's new strategy, which will guide our work over the next five years.

FLEX has completed the following work against its four core objectives over the past year:

Aim 1: To challenge and positively transform policies, attitudes and practices that drive labour exploitation.

Within this aim FLEX seeks to build understanding and evidence of drivers of labour exploitation, including government policies and business operating models and practices, and of structural inequalities, such as gender and racial discrimination. We also work to build awareness and understanding among decision-makers and key stakeholders of drivers of exploitation. Our media and communications work within this aim has the objective of increasing decision-makers' awareness and understanding of systemic and structural issues creating risks of labour exploitation by shifting media narratives.

We are proud to report that in January this year we were recognised as one of [Big Issue's Top 100 Changemakers for 2025](#) for 'Politics and Activism'. We are grateful to [Voice of Domestic Workers](#) for the nomination.

A. General elections

This period has been marked by the 2024 General Election. During this period, we have engaged with newly appointed Ministers and with relevant Parliamentary groups. In June 2024, FLEX convened several meetings with organisations working at the intersection of migrants' rights and workers' rights in order to coordinate in relation to the post-general election period.

In spite of the change of government, the political environment remains generally hostile to migrants' rights, particularly the rights of undocumented migrants, and we have seen in this short period of time the replication of negative narratives and several detrimental measures further exposing migrant workers to abuse.

B. Safer Labour Migration Routes

During this period, FLEX has continued to actively advocate for **safer labour migration routes** into the UK. We have done this by engaging in policy processes and advocacy platforms, as well as by conducting further research to evidence risks and effective impact of the changes on workers, and by identifying actionable solutions.

B1. Seasonal Worker Scheme

In May 2024, the then Government responded to the recommendations in the review of the Seasonal Worker Scheme which it had commissioned. The most significant policy announcement contained in the response was the commitment to extend the Scheme by another five years. This meant that the scheme would continue until 2029. The number of visas available for 2025 was also confirmed as

43,000 for horticulture plus another 2,000 visas for poultry, with the stated ambition being to reduce these in future years. What was not certain was the approach of the new Labour government. However in February 2025, it was announced by the current government that the seasonal Worker visa scheme would be extended for five years, taking it to 2030. Given the strong body of evidence highlighting issues with the scheme it was disappointing that this extension was not conditional on addressing risks of exploitation on the scheme.

Government also announced the investigation of ‘the use of the Employer Pays Principle’ for the route to ‘alleviate’ the financial burden on workers travelling to work in the UK and committed to exploring complaints mechanisms for workers, and to work ‘with the sector’ to improve worker accommodation’. We continued to advocate for the structural changes needed to protect workers from exploitation and for increased transparency around transfer processes and clarity on pay.

As a result of this work, for instance, Defra responded to the Horticultural Committee report on the requirement to pay workers for 32 hours a week and clarified that “workers must receive 32 hours pay for each week of their stay in the UK”. This rule led to the second revocation of a scheme operator’s license, as stated in the media. Despite informal assurances from government that workers with time on their visa have been placed elsewhere this is still not possible within the scheme rules.

In July, the Migration Advisory Committee published its review of the Seasonal Worker visa, which FLEX contributed to. The MAC recommended included providing certainty around the future of the scheme but, disappointingly, did not recommend addressing the risks to workers as a prerequisite to this. FLEX continued its engagement with the MAC via advocacy work, including meetings and further submissions (e.g. to their annual report).

We continued to highlight these issues with the scheme to parliamentarians, including through in-person meetings. In May, we gave oral evidence to the Home Affairs Select Committee in a session on legal migration, with FLEX’s contribution focusing on risks of exploitation within the UK’s legal migration system. We submitted supplementary written evidence to the inquiry, which ended with the calling of the General Election.

Research

Throughout this period we published three reports on Making the Seasonal Worker Scheme Safer and Fairer, each covering a different aspect of the scheme related to risks of exploitation, as outlined by the ILO’s guidelines on indicators of forced labour. These included:

- On recruitment related risks: [Bearing fruit: Making recruitment fairer for migrant workers](#)
- On job transfers/access to redress: [Bound to work: Improving access to redress on the UK’s Seasonal Worker Scheme](#)
- On working and living conditions: [Not here for the weather: Ensuring safe and fair conditions on the UK’s Seasonal Worker Scheme](#)
- [Joint executive summary](#)

Findings of these reports were presented at a Welsh Government led forum on Migration and to the former leader of the Green Party, Baroness Bennett, at the House of Lords. Bennett then went on to cite the FLEX report Bearing Fruit extensively in a parliamentary session dedicated to taking note of the Horticultural Committee report. We also wrote a blog for the Food and Work Network, a collective of academics, trade unions, and community groups.

In addition to this, alongside UCL we published a research report that looked back on the implementation of the UK’s Ukraine humanitarian visa schemes, with a focus on issues encountered around exploitation of displaced Ukrainians. It summarised learning about Local Authorities’ responses to supporting displaced Ukrainians in the UK and how they were managing risks of trafficking and other exploitation across the various Ukraine Schemes.

Similarly, alongside academic and NGO partners we also conducted research for a report funded by the Modern Slavery and Human Rights Policy and Evidence Centre (Modern Slavery PEC) that focused on worker exploitation and obstacles to redress for workers in the care and agriculture sectors.

B2. Health and Care Worker visa

Following the increasing reports of labour exploitation of Health & Care Worker (H&CW) visa holders, FLEX has continued to engage with various organisations in relation to the exploitation of migrant workers on that visa. This has included meeting with the community union Acorn, the trade union GMB, the Liberal Democrats and the Association of Directors in Adult Social Services, among others. Additionally, FLEX supported Dr Natalie Sedacca's submission for the UN expert workshop and comprehensive thematic study on the human rights dimension of care and support and presented to a wide group of relevant stakeholders on the exploitation concerns at an industry event at the GLAA headquarters on 6 March 2024. In September, FLEX participated in the LSE's international recruitment of care workers policy roundtable, which was attended by local government, regulators, employers, recruiters and civil society representatives.

We published a research briefing on a Single Enforcement Body (SEB) and the H&CW visa. It details how an effective SEB, in the form of the 'Fair Work Agency', could improve UK labour market oversight in order to build resilience against risks of labour exploitation, specifically in relation to risks for care workers on the H&CW visa.

B3. Overseas Domestic Worker visa

FLEX is a member of the Home Office FBIS Overseas Domestic Worker Advisory Group, which met again, following a long pause in communications, in April 2024. Via this group, FLEX advocates for improvements to the high-risk visa route exposing migrant domestic workers to exploitation in the UK. In June, we published a blog for International Domestic Workers Day setting out the UK's immigration rules for ODW visa holders and how these have reduced options for workers, increasing risks of exploitation.

B4. Research on risk of exploitation due to the end of free movement:

We have continued exploring risk of exploitation in sectors that have previously been highly reliant on migrant workers from the EU to identify positive recommendations for the development of safer labour migration routes. As a result of this work, during this period, we have published:

- [The UK Labour Migration System after the End of Free Movement: Employer Views on Recruitment](#): This report looks into post-Brexit employer practices and it's based on interviews with recruiters, specialists and trade associations from the care, agriculture and hospitality sectors. The report offers a temperature check on employment in some of the sectors historically reliant on migrant labour.
- ["I kept waiting and waiting": The realities of asylum seekers' restricted right to work in the UK](#), a report on the restricted right to work for those in the Asylum system, which outlines the key barriers to access work, the risks linked to the current policy, and the actions that should be taken to address them in order to ensure that asylum seekers are protected from labour exploitation.

C. Legislative processes

In July 2024 a new King's Speech, set out the legislative agenda for the new Government. FLEX has engaged with the Employment Rights Bill and Border Security, Asylum and Immigration Bill, seeking to put forward positive recommendations on secure reporting and bridging visas among other areas. The Employment Rights Bill contains a package of measures that aim to improve worker rights and enforcement in the UK but fail to respond to the interaction of immigration policy with employment

rights. FLEX is a member of Trust for London's stakeholder group ELAN, through which we are engaged in joint advocacy work, working jointly with fellow member organisations.

In November 2024, the Government announced a White Paper on labour migration, with publication in spring 2025. Civil society were not consulted.

D. Improving working conditions across supply chains

FLEX continues to advocate for safer corporate practices and mandatory human rights and environmental due diligence (mHREDD) legislation, both in the UK and the EU, by working with relevant networks. FLEX continued to engage with the Corporate Justice Coalition on the draft Business, Human Rights and Environment Act, and advocated for increased worker engagement to identify, prevent and remediate impacts.

We remain members of the Ethical Trading Initiative (ETI), actively taking part in discussions about the NGO Caucus position on mHREDD legislation in the UK, along with other NGOs in the sector. FLEX continued to engage in consultation spaces to highlight the impact of lack of accountability on outsourced service staff. For example, we provided written input to the Corporate Transparency Framework (CTF) review process for the ETI..

Aim 2: Ensure that the enforcement of the full range of workers' rights forms part of national and international responses to labour exploitation.

Within this aim, FLEX works to build evidence about the links between severe labour abuses, exploitation and trafficking, and about the impact of labour market enforcement strategies and of the role of marginalised workers in preventing and addressing labour exploitation. We also seek to build understanding of the 'prevention' obligation in state responses to human trafficking for labour exploitation, by advocating for enforcement of labour standards as a central plank of effective anti-trafficking responses.

A. A Fair Work Agency (previously called the Single Enforcement Body):

FLEX continued to advocate for a stronger labour market enforcement system in the UK. Both the Labour Party and Liberal Democrats indicated strong support for a Single Enforcement Body with Labour announcing it would introduce a 'fair work agency' (FWA) with powers to prosecute and fine employers who exploit workers and to inspect workplaces. This agency would combine the Gangmasters and Labour Abuse Authority, the National Minimum Wage unit and the Employment Agency Standards Inspectorate and would provide an important base to build on for proactively protecting the rights of all workers in the UK. During this period, FLEX has continued to highlight the need for secure reporting pathways with various stakeholders, such as political parties, the ICIBI and government departments. As a result of previous FLEX submissions, the need for secure reporting was included within the US State Department's TIP report and the Liberal Democrat manifesto, and was part of our submission to the Victims and Prisoners Bill Committee.

FLEX's advocacy priorities in relation to the FWA include: proper resourcing of the agency, secure reporting mechanisms, and being able to issue bridging visas and prevent visas being cancelled where relevant. In July 2024, FLEX published a briefing entitled '[Caring about workers' rights: How a well-designed 'Fair Work Agency' could benefit care workers](#)'. The briefing details risks of exploitation for care workers on the H&CW visa and plots how a well-designed FWA could best respond to these risks. It is hoped that the early contribution of this briefing will help to influence the creation of the agency. We have also sought to influence the ecosystem of allies around these points, including trade unions, labour market inspectorates and the Independent Anti-Slavery Commissioner, as well as colleague organisations in the sector.

In July 2024, the Independent Anti-Slavery Commissioner published a briefing entitled, 'Preventing Labour Exploitation: Tackling Modern Slavery is Everyone's Business.' FLEX provided technical advice

to support this piece, which echoes several FLEX recommendations regarding labour exploitation, including the adoption of a 'continuum of exploitation' perspective on the issue.

B. Secure reporting (Labour Exploitation Advisory Group – LEAG):

FLEX has continued to highlight the need for secure reporting pathways for migrant victims with insecure immigration status with various stakeholders, such as the Director of Labour Market Enforcement (DLME), the ICIBI, government departments, and law enforcement (namely the City of London Police) as well as promote this as a key issue for the prevent work of the Home Office's Modern Slavery Stakeholder Engagement forum.

As a result of previous FLEX submissions, the need for secure reporting was included within the US State Department's TIP report. Further, it was included within the Liberal Democrat manifesto following FLEX advocacy. Following a sustained period of advocacy from FLEX, LEAG and others, the Greater London Authority launched a tender at the end of August 2024 to commission organisations to conduct research and design a blueprint for the implementation of a secure reporting pilot in London. We were commissioned to conduct this research in 2025. This project presents a significant opportunity to understand statutory authority practice, and help to build towards an operational London-level secure reporting pilot.

C. Victims of trafficking in immigration detention (aka the 'Detention Taskforce')

FLEX coordinates and hosts the Detention Taskforce. FLEX also works closely with its Chair which, during this period, passed from the Helen Bamber Foundation to another active member, Medical Justice. This year, the Taskforce has also onboarded two new members (Snowdrop and Hibiscus).

In July 2024, the Detention Taskforce produced a policy briefing for its key priorities, a document that supports cross-sector coordination. Additionally, the Taskforce also produced a document on the considerable issues pertaining to the Immigration Enforcement Competent Authority, as well as the changes to the Adults at Risk policy. During this period, the Detention Taskforce has also provided evidence to the ATMG coordinated submission to the Council of Europe's Group of Experts on Action Against Trafficking and has submitted to the Public Bill Committee in relation to the Border Security, Asylum and Immigration Bill.

D. Improving working conditions across supply chains

D1. Piloting worker engagement in human rights due diligence - Cleaning

FLEX has now completed both Phase 1 and Phase 2 of a pioneering pilot project aimed at embedding meaningful worker engagement in human rights due diligence (HRDD) processes in the UK cleaning sector.

Developed in response to the inadequacy of audit-driven models to capture the realities of outsourced labour, this initiative centres workers, particularly migrant women from Latin American and Afro-Caribbean communities, as key stakeholders in identifying and addressing labour risks. The project represents one of the first efforts in the UK to co-create due diligence tools with the direct participation of cleaners themselves, offering a concrete model for implementing the OECD Guidelines and ILO principles in high-risk, low-wage service sectors.

To ensure safe and effective participation, FLEX developed a Worker Engagement and Safeguarding Framework, co-designed with workers, cleaning agencies, and client companies. The framework sets out clear protocols to prevent retaliation and protect workers' identities, and includes tools such as anonymised surveys, non-retaliation commitments, invitations to rights training, and a safeguarding resource pack. During Phase 1, FLEX engaged workers independently of their employers, holding workshops and focus groups to identify key risks such as low pay, lack of sick leave, unsafe conditions, discrimination, and barriers to raising concerns.

Building on Phase 1 insights, Phase 2 focused on advancing human rights due diligence within the participating companies' cleaning supply chains. FLEX developed a due diligence requirement list for cleaning agencies, including questions and document requests covering key areas of concern. FLEX also mapped the terms and conditions of cleaners working in these supply chains by engaging with outsourced cleaning agencies and examining company purchasing practices to assess potential contributions to worker exploitation. Based on this, FLEX has provided tailored recommendations outlining specific actions for both companies and agencies to cease, prevent and mitigate risks, including strengthening procurement practices, improving management systems for identifying and addressing impacts, and ensuring more effective protections for cleaners.

D2. Establishing [a Worker-driven Social Responsibility programme for UK Fishing](#)

Worker-driven Social Responsibility is an exciting model for tackling labour abuses and exploitation in corporate supply chains, with more than a decade of proven results in agriculture, dairy and textiles. Our project partners include: the International Transport Federation (ITF), the Coalition of Immokalee Workers (CIW), the Fair Food Standards Council (FFSC), Tufts University's Dr Jess Sparks, and FLEX. This project has started to involve collaboration among several key stakeholders including retailers and processors, a producers association, human rights experts and local community organisations.

During this period, FLEX started to build the internal structures and capacity to conduct outreach activities. We recruited an outreach & engagement team, produced a strategy in consultation with the ITF, as well as training resources, safeguarding protocols and risk/case management approaches. In addition to this, we started building our networks with local stakeholders supporting migrant workers and survivors of abuse in Scotland and implemented workshops with local partners, and our worker-partners on the ground conducted initial community outreach activities.

D. Research: Assessment of the nature and scale of labour market non-compliance in the UK (DLME/UCL project)

This project has been commissioned by the Director of Labour Market Enforcement to support their statutory obligation to provide an assessment of the scale and nature of labour market non-compliance in the UK and to enable more evidence-informed policy and practice in this space. The research is being co-funded by the Department for Business, Energy and Industrial Strategy (BEIS) and the Economic and Social Research Council (ESRC). The study will run from June 2022 until late 2025 and will cover the UK's four nations. FLEX's role is to advise on worker engagement and to organise worker advisory groups that will help inform the different stages of this project.

[Aim 3: To mobilise cooperation in addressing labour exploitation by providing leadership and expertise across sectors.](#)

Within this aim FLEX has the following objectives: To develop methodologies for engagement with 'experts by experience' and foster recognition of their role as key for driving effective change; to develop awareness about labour exploitation and its prevention among key stakeholders, such as civil society networks and platforms; and to leverage national, international and global networks to hold governments to account and advocate for the rights of victims of trafficking for labour exploitation. Our media and communications work under this aim seeks to diversify the voices and actors represented in media coverage about labour exploitation and to support the empowerment of people affected, as well as to challenge unevidenced rhetoric around slavery and the UK's systems being too generous or 'abused'.

A. Improving worker engagement:

During this period, FLEX progressed the implementation of some of the targets identified in the recently introduced Worker Engagement Strategy. This work has included developing an outreach

strategy for migrant workers in fishing, safeguarding protocols for direct worker engagement across our pilots in fishing and cleaning, and new projects to engage workers as peer researchers.

In addition to this, we continued disseminating the learnings from our implementation of a Feminist Participatory Action research approach (FPAR) and encouraging others to explore ways to engage workers as Peer Researchers and to adopt more participatory research approaches.

B. Labour Exploitation Advisory Group (LEAG):

During this period, we have continued strengthening the work of LEAG. In addition to the information provided under Aim 2, key outputs from this work include:

- Evidence submission to the Public Bill Committee in relation to the Border Security, Asylum and Immigration Bill flagging asks in relation to secure reporting and the need for bridging visas.
- Meeting with the Public Consultancy Service to contribute to their research for the Cabinet Office in relation to the Draft Equality (Race and Disability) Bill.
- Securing a commissioning grant from the GLA for FLEX to produce a blueprint on how to implement secure reporting in London, a project that involves several LEAG members.

During this period, FLEX has also started working with an independent consultant to conduct an evaluation of LEAG's work and a participatory strategic planning process to inform its future work.

C. Detention Taskforce:

During this period, the chairing of the Detention Taskforce was passed on from the Helen Bamber Foundation to Medical Justice. The Taskforce welcomed two new members, please see Aim 2 for further information about this coalition's work during this period.

D. Training statutory bodies and front-line organisations to increase their capacity to identify and respond to labour exploitation:

FLEX delivers a bespoke **training programme for front line organisations** that aims to build their capacity to identify and support beneficiaries with employment issues across the continuum of exploitation, including employment rights issues, identifying and referring potential modern slavery, and accessing specialist advice and support.

This year, we delivered 10 workshops attended by 64 participants, including staff, volunteers and activists across six partner organisations: Helen Bamber Foundation, IRMO, Project 17, Kanlungan, SEEAC, and Unity Project. These organisations reflect this project's aim to work with those supporting groups of workers who are less likely to access mainstream support services on employment issues, such as migrant workers.

E. Supporting the wider movement:

FLEX is a member of key international advocacy networks, including the Global Alliance Against Trafficking in Women (GAATW), LaStrada International (LSI), and the Platform for International Cooperation on Undocumented Migrants (PICUM). In the UK, FLEX is a member of the Ethical Trading Initiative, the Corporate Justice Coalition (CJC), the Anti-trafficking Monitoring Group, the Human Trafficking Foundation forums, Trust for London's Employment Legal Advice Network (ELAN), the BME Anti-Slavery Network (BASNET), and FLEX is a supporter of Unchecked UK. At the London level, FLEX is also a member of the Migration and Refugee Advisory Panel (MRAP), which operates as an expert panel to advise the work of the London Strategic Migration Partnership (LSMP) and the GLA's social integration team, and to inform other relevant GLA teams on issues related to migration, asylum and

refugees. FLEX also sits at the Mayor's Equality Diversity and Inclusion Advisory Forum, representing the MRAP.

During this period, FLEX worked in collaboration with key partners on numerous joint advocacy actions in support of the wider movement for change, including a number of joint position statements and letters led by both FLEX and others. In addition, FLEX leadership also engaged in several sector-wide initiatives to progress anti-racist practices in the sector, including Migration Exchange's Equity Catalysts and a Justice Together Initiative's Racial Justice Programme.

Aim 4: To ensure that FLEX is able to respond to the interests of actual and potential victims of human trafficking for labour exploitation.

During this period, we have continued working to progress the aims of FLEX's Business Plan 2020-2025. This objective relates to maintaining a healthy and productive working environment, towards this aim, this year we explored the process of voluntary trade union recognition. Following the introduction of a Staff Wellbeing policy in the previous year, this year we initiated a staff wellbeing audit, conducted by an independent consultant. We maintained our Employee Support Assistance Programme and two no-meetings weeks ahead of the summer and end of the year break. This is an initiative that aims to help staff better manage workload and reduce stress. Finally, we held an 'end of the year' dinner, where the staff team and trustees met to celebrate 2024.

The team also held a Strategy Away Day, where we reflected on the progress made towards our four Strategic Aims and the changing political landscape. This year was the final year of our Business Plan 2020-2025, for which the review also considered the overall progress made during this five-year period. The Board has reviewed the Safeguarding policy and approved two new policies (Privacy Policy and a Remuneration Policy, documenting FLEX's salary review process).

Finally, FLEX continued developing its internal capacity and, during this period, created the following roles: Community Worker, Business and Workers Rights Officer, Policy and Networks Assistant, and renewed our secondment at the Greater London Authority. We continue to invest in improving our HR systems and support.

This objective also related to our commitment in ensuring that our work is informed and accountable to people affected by or at risk of labour exploitation. During this period, we continued to engage outsourced cleaners in the development of a worker-informed human rights due diligence framework for service sector supply chains. Through meaningful worker-engagement methods the project ensures that workers are at the front and centre in identifying risks and developing solutions to the issues that affect them. During this period, we also established a new partnership project with ITF and the US-based Fair Food Programme to launch Europe's first Worker-driven Social Responsibility pilot for UK fishing. This ambitious new project seeks to ensure migrant fishers are able to shape and monitor compliance in this high-risk sector. We also continued investing resources in working closely with migrant and community-led groups via our advocacy coalitions, our research and capacity building programmes.

Finally, this objective relates to our sustainable funding strategy. Over the past year FLEX has maintained its financial sustainability, developing existing work and new partnerships. We have worked hard to counterbalance the sustainability risks brought up by higher inflation rates and to diversify our income streams through statutory and corporate funding, as well as cross-sectoral partnerships.

We delivered formal partnership projects with a total of 23 national and international organisations including IRMO, Voice of Domestic Workers, Project 17, Kanlungan, International Transport Federation (ITF), Coalition of Imokalee Workers, Fair Food Standards Council, and various organisations currently participating in our networks and coalitions, including LAWRS, Kalayaan and

Southeast and East Asian Women Association (SEEAWA). We also delivered a partnership project with academics from UCL. Finally, during this period FLEX continued exploring opportunities for income-generation, which will support its aim to continue building a robust and sustainable organisation. We are grateful to all our partners for their collaboration with FLEX.

In terms of our external communications, during this period we **posted 27 pieces on our website**, including blogs, statements and responses to government reports, enquiry submissions, announcements, and guest blogs. Key pieces include:

- A [briefing](#) on the Fair Work Agency and the opportunities to address risks of exploitation for care workers on the H&CW visa.
- Three research reports on the Seasonal Worker Visa scheme first report in this series, '[Bearing fruit: Making recruitment fairer for migrant workers](#)' on recruitment related risks associated with the seasonal worker scheme. A second report, [Bound to work: Improving access to redress on the UK's Seasonal Worker Scheme](#) looked into the access to redress and ability to leave the employer. Finally, [Not here for the weather: Ensuring safe and fair conditions on the UK's Seasonal Worker Scheme](#), examined the working and living conditions experienced by workers on the scheme. A [combined executive summary](#) was also published.
- A briefing documenting on experiences of trying to access work within the asylum system: "[I kept waiting and waiting](#)": The realities of asylum seekers' restricted right to work in the UK
- [Closing the Loophole: Exploitation of Migrant Fishing Workers](#), a briefing highlighting the impact that the misuse of code 7 stamps (AKA 'in transit' visas) has on migrant fishermen.
- A book chapter on [Migrant women in the UK and risk of labour exploitation](#).
- An 4-minute [explainer video on the Seasonal Worker Scheme](#), outlining the complexity of the scheme.
- A learnings report form, [Worker Engagement in Human Rights Due Diligence: Learnings from a Pilot in Outsourced Cleaning](#), detailing the findings and learnings from a project piloting worker engagement in human rights due diligence (HRDD) for outsourced cleaning services.
- A Taskforce on Survivors of Trafficking in Immigration Detention briefing on [Building a better system for survivors of trafficking in immigration detention](#), with recommendations to ensure no victim of trafficking is detained under immigration powers.

We have also provided background information to numerous press pieces and featured in the media 63 times, including the following pieces:

- **Financial Times**, August 2024, [UK seafood industry cracks down on exploitation of overseas crew](#)
- **The Grocer**, 22 August 2024, [Uzbek seasonal workers barred from UK entry after scheme operator ban](#)
- **World Fishing**, 01 October 2024, [UK scheme launched to tackle labour abuse](#)
- **The Guardian**, 16 October 2024, [Lords committee calls on Labour to restore protections for modern slavery victims](#)
- **The Fishing Daily**, 23 October 2024, [Migrant Fishing Workers Need Urgent Attention, Experts Warn](#)
- **The Independent**, 14 November 2024, [Thousands left without protection from slavery in Employment Rights Bill loophole](#)
- **GBNews**, 18 December 2024, [Sadiq Khan funds new London project to help migrants 'securely' report abuse as part of £1.1m investment](#)
- **Big Issue**, 19 February 2025, [UK immigration policy is stuck in a race to the bottom – with human traffickers the only winners](#)

Financial review

The charity's income increased to £832,562 (2024: £711,911). The charity has been able to diversify income by working with companies to support their internal systems in relation to labour practices.

Total expenditure was £677,996 (2024: £616,262) resulting in a net surplus for the year of £154,566 and total reserves of £765,698. Unrestricted reserves (excluding designated) increased to £447,396 (2024: £273,103).

Investment powers and policy

The charity is seeking to build reserves in line with the charity's reserves policy (see below). As most of the charity's funds are to be spent in the short term there are currently no funds available for long-term investment. Investment income earned during the year relates to interest on the charity's bank account.

Reserves policy and going concern

The surplus for the year increased the charity's unrestricted reserves to £447,396. The Trustees designated £25,000 of unrestricted reserves to support enhanced paternal leave and sickness pay in 2022 and this remains in place at 31 March 2025. The unrestricted reserves are in line with the reserves target, to cover 3 months operating cost (£224,129).

The Trustees are confident that the charity has adequate resources to operate for the foreseeable future due the unrestricted reserves and the level of secured income for the next financial year.

Plans for future periods

FLEX's work plans for the period to 2026 will follow a new Strategic Plan covering 2025 to 2030. We expect this new period to focus on continue developing its unique expertise and approach to the prevention of labour exploitation at the national and international level, continue offering leadership and mobilising relevant stakeholders in the fight against labour exploitation, including workers, networks and institutions operating across civil society and statutory agencies.

Our plans include conducting rigorous research, developing policy recommendations, engaging people with lived experience, working with businesses and employers to identify concrete actions that respond to workers' priorities, increasing stakeholders' capacity to prevent, identify and address exploitation; and building networks and opportunities for international advocacy. For 2025/26, some of the key areas of focus for FLEX will include:

- Continuing evidencing the risks of the new immigration system and working to inform safer labour migration routes, actively advocating for improvements to current restrictive visas (e.g. Seasonal Worker Visa, Overseas Domestic Worker Visa), as well as new ones (e.g. fishing) to increase understanding of these risks and improve protections for workers;
- Engaging in key advocacy processes, including key Parliamentary enquiries, as well as the new government's legislative agenda;

- Continuing FLEX’s research and participatory work in high-risk labour sectors, including some of the most understudied groups, such as women working in agriculture, and migrant fishermen working in UK vessels;
- Producing a blueprint for safer and fairer migration routes into low-paid roles, outlining the risks created by the different immigration restrictions and identifying components that mitigate risk;
- Continuing to develop our networks and investing in increasing mutual capacity to jointly work towards preventing labour exploitation;
- Strengthening our engagement of experts by experience by implementing our pilot programmes in cleaning and fishing;
- Continuing developing our programme exploring mechanisms for a stronger worker engagement approach to corporate accountability;
- Continuing developing a blueprint for the introduction of secure reporting in London to provide mechanisms for migrants facing abuse to be able to report crimes without fear of immigration consequences;
- Increasing our visibility through high-profile strategic communications work;
- Conducting a full strategy review to assess our progress against the strategic aims of our current business plan and work with staff, trustees and a range of stakeholders, including workers, to refresh our strategy and identify new objectives that will guide our work in the coming period.

Reference and administrative details

Charity number (England and Wales): 1159611

Company number: 08451701

Registered and Principal Office: The Foundry, 17 Oval Way, London, SE11 5RR

Our advisors

Bankers Triodos Bank, Deanery Road, Bristol, BS1 5AS

The Co-operative Bank, 1 Balloon Street, Manchester, M60 4EP

Directors and trustees

The directors of the charitable company (the charity) are its trustees for the purpose of charity law.

The trustees and officers serving during the year and since the year end were as follows:

Chair	Adam Weiss
Elected Trustees	Peter Andrews
	Vaswati Arora
	Claire Falconer (resigned 12 March 2025)
	Rachel Hewitt
	Shereen Hussein
	Anushya Kulupana
	Ian Robinson

Key management personnel:

Chief Executive Lucila Granada

Structure, Governance and Management***Governing Document***

The organisation registered as a charity on 15 December 2014. The company was established under a Memorandum of Association which established the objects and powers of the charitable company and is governed under its Articles of Association. In the event of the company being wound up members are required to contribute an amount not exceeding £50.

Trustee induction and training

New trustees are inducted through a meeting with management. Trustees are provided with a copy of the FLEX Trustees Terms of Reference and the Charity Commission's introductory guidance for trustees. New trustees are also asked to complete a personal details form, a declaration of interests, and a skills audit to identify training needs. All trustees are regularly offered training on matters concerning governance.

Organisation

The trustees meet on a quarterly basis and oversee the strategic direction of the charity. The day to day operations and management is delegated to the Chief Executive Officer.

Related parties

None of our trustees receive remuneration or other benefit from their work with the charity.

Pay policy for senior staff

The Board's Remuneration Committee determines the salary of the Executive Director and sets pay scales for all staff. The FLEX Trustees Terms of Reference set out the Terms of Reference for the Remuneration Committee. The Committee includes the Treasurer and at least one other trustee, and meets once a year to review the salary of the Executive Director and pay scales, and make recommendations to the Board.

Risk management

The trustees have reviewed the major risks to which the charity is exposed. A risk register has been established which is updated annually. Where appropriate, systems or procedures have been established to mitigate the risks and these are periodically reviewed to ensure that they continue to meet the needs of the charity. The trustees deem that appropriate measures are currently in place to mitigate risk, particularly in the light of the on-going difficult economic environment.

Trustees' responsibilities in relation to the financial statements

The trustees (who are also the directors for the purpose of company law) are responsible for preparing the Annual Report and the financial statements in accordance with applicable law and regulations.

Company law requires the trustees to prepare financial statements for each financial year. Under that law the trustees must prepare the financial statements in accordance with United Kingdom Generally Accepted Accounting Practice (United Kingdom Accounting Standards and applicable law). Under company law the trustees must not approve the financial statements unless they are satisfied that

they give a true and fair view of the state of affairs of the charitable company and of the incoming resources and application of resources, including the income and expenditure, of the charitable company for that period.

In preparing these financial statements, the trustees are required to:

- a) select suitable accounting policies and then apply them consistently;
- b) observe the methods and principles in the Charities SORP;
- c) make judgments and accounting estimates that are reasonable and prudent;
- d) state whether applicable UK Accounting Standards have been followed, subject to any material departures disclosed and explained in the financial statements; and
- e) prepare the financial statements on the going concern basis unless it is inappropriate to presume that the charitable company will continue to operate.

The trustees are responsible for keeping adequate accounting records that are sufficient to show and explain the charitable company's transactions and disclose with reasonable accuracy at any time the financial position of the charitable company and enable them to ensure that the financial statements comply with the Companies Act 2006. They are also responsible for safeguarding the assets of the company and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.

The trustees are responsible for the maintenance and integrity of the corporate and financial information included on the charitable company's website. Legislation in the United Kingdom governing the preparation and dissemination of financial statements may differ from legislation in other jurisdictions.

The trustees confirm that so far as they are aware, there is no relevant audit information (as defined by section 418(3) of the Companies Act 2006) of which the charitable company's auditors are unaware. They have taken all the steps that they ought to have taken as trustees in order to make themselves aware of any relevant audit information and to establish that the charitable company's auditors are aware of that information.

By order of the board of trustees

Adam Weiss

DATE: 19 September 2025

Independent Examiner's Report to the trustees Focus on Labour Exploitation

I report to charity trustees on my examination of the accounts of the charity for the year ended 31 March 2025 which comprise the Statement of Financial Activities, the Balance Sheet and related notes.

This report is made solely to the charity's trustees, as a body, in accordance with section 145 of the Charities Act 2011. My work has been undertaken so that I might state to the charity's trustees those matters I am required to state to them in this report and for no other purpose. To the fullest extent permitted by law, I do not accept or assume responsibility to anyone other than the charity and the charity's trustees as a body, for my work, for this report, or for the opinions I have formed.

Responsibilities and basis of report

As the charity trustees of Focus on Labour Exploitation you are responsible for the preparation of the accounts in accordance with the requirements of the Companies Act 2006 ('the 2006 Act').

Having satisfied myself that the accounts of Focus on Labour Exploitation are not required to be audited under Part 16 of the 2006 Act and are eligible for independent examination, I report in respect of my examination of your charity's accounts as carried out under section 145 of the Charities Act 2011 ('the 2011 Act'). In carrying out my examination I have followed the Directions given by the Charity Commission under section 145(5)(b) of the 2011 Act.

An independent examination does not involve gathering all the evidence that would be required in an audit and consequently does not cover all the matters that an auditor considers in giving their opinion on the financial statements. The planning and conduct of an audit goes beyond the limited assurance that an independent examination can provide. Consequently I express no opinion as to whether the financial statements present a 'true and fair' view and my report is limited to those specific matters set out in the independent examiner's statement.

Independent examiner's statement

Since Focus on Labour Exploitation's gross income exceeded £250,000 your examiner must be a member of a body listed in section 145 of the 2011 Act. I confirm that I am qualified to undertake the examination because I am a member of ICAEW, which is one of the listed bodies.

I have completed my examination. I confirm that no material matters have come to my attention in connection with the examination giving me cause to believe that in any material respect:

1. accounting records were not kept in respect of Focus on Labour Exploitation as required by section 386 of the 2006 Act; or
2. the financial statements do not accord with those records; or
3. the financial statements do not comply with the accounting requirements of section 396 of the 2006 Act other than any requirement that the accounts give a 'true and fair view' which is not a matter considered as part of an independent examination; or
4. the financial statements have not been prepared in accordance with the methods and principles of the Statement of Recommended Practice for accounting and reporting by charities applicable to charities preparing their accounts in accordance with the Financial Reporting Standard applicable in the UK and Republic of Ireland (FRS 102).

I have no concerns and have come across no other matters in connection with the examination to which attention should be drawn in this report in order to enable a proper understanding of the accounts to be reached.

.....15 October 2025.....
Timothy Sullivan FCA
Field Sullivan Limited
9 Hare & Billet Road
Blackheath
SE3 0RB

Date:

Statement of Financial Activities for the year ending 31 March 2025

	Note	Unrestricted Funds £	Restricted Funds £	Total Funds 2025 £	Total Funds 2024 £
Income from:					
Donations	3	221,598	485,983	707,581	701,305
Other trading activities					
Consultancy fees		122,000	-	122,000	8,186
Investment income	4	2,981	-	2,981	2,420
Total income		346,579	485,983	832,562	711,911
Expenditure on:					
<i>Charitable activities</i>	5	172,286	505,710	677,996	616,262
Total expenditure		172,286	505,710	677,996	616,262
Net movement in funds for the year		174,293	(19,727)	154,566	95,649
Reconciliation of funds					
Total funds brought forward		298,103	313,029	611,132	515,483
Total funds carried forward		472,396	293,302	765,698	611,132

The statement of financial activities includes all gains and losses recognised in the year.
All income and expenditure derive from continuing activities.

Balance sheet as at 31 March 2025

	Note	2025 £	2024 £
Fixed assets			
Tangible assets	9	2,841	5,679
Total Fixed Assets		<u>2,841</u>	<u>5,679</u>
Current assets			
Debtors	10	24,527	3,399
Cash at bank and in hand		765,670	644,132
Total Current Assets		<u>790,197</u>	<u>647,531</u>
Liabilities			
Creditors falling due within one year	11	(27,338)	(42,078)
Net Current assets		<u>762,859</u>	<u>605,453</u>
Total assets		<u>765,698</u>	<u>611,132</u>
The funds of the charity:			
Designated funds		25,000	25,000
Unrestricted funds		447,396	273,103
Restricted funds	12	293,302	313,029
Total charity funds		<u>765,698</u>	<u>611,132</u>

For the financial year ending 31 March 2025 the charity was entitled to exemption from audit under section 447 of the Companies Act 2006 relating to small companies.

Directors' responsibilities:

- The members have not required the charity to obtain an audit of its accounts for the year in question in accordance with section 476; and
- The directors acknowledge their responsibilities for complying with the requirements of the Act with respect to accounting records and the preparation of accounts.

The notes at pages 24 to 32 form part of these accounts.

Adam Weiss, on behalf of the trustees

Approved by the trustees on 19 September 2025

Statement of Cash Flows for the year ended 31 March 2025

	2025	2024
	£	£
Net cash flows from operating activities:		
Net income/(expenditure) for the reporting period as per the statement of financial activities	154,566	95,649
Purchase of fixed assets	-	(8,515)
Depreciation	2,838	3,522
Net cash provided by investing activities	2,838	(4,993)
(Increase)/decrease in debtors	(21,128)	16,062
(Decrease)/increase in creditors	(14,740)	26,502
Net cash provided by operating activities	(35,868)	42,564
Change in cash and cash equivalents in the reporting period	121,538	133,220
Cash and cash equivalents at the beginning of the reporting period	644,132	510,912
Cash and cash equivalents at the end of the reporting period	<u>765,670</u>	<u>644,132</u>

Notes on the accounts

1 Accounting policies

1.1 Charity status

The charity is limited by guarantee, incorporated in England and Wales, and consequently does not have share capital. Each of the trustees is liable to contribute an amount not exceeding £50 towards the assets of the charity in the event of liquidation.

The address of its registered office is:

The Foundry
17 Oval Way
London
SE11 5RR

1.2 Basis of Preparation of the accounts

The financial statements have been prepared in accordance with the Accounting and Reporting by Charities: Statement of Recommended Practice applicable to charities preparing their accounts in accordance with the Financial Reporting Standard applicable in the UK and Republic of Ireland (FRS 102) (effective 1 January 2015) – (Charities SORP (FRS 102)), the Financial Reporting Standard applicable in the UK and Republic of Ireland (FRS 102) and the Companies Act 2006

Focus on Labour Exploitation meets the definition of a public benefit entity under FRS 102. Assets and liabilities are initially recognised at historical cost or transaction value unless otherwise stated in the relevant accounting policy note(s)

1.3 Preparation of the accounts on a going concern basis

The unrestricted reserves are above the reserves target, the charity has secured a good level of income for 2021-22 and has a positive cash flow. As a result the Trustees are confident that the charity has adequate resources to operate for the foreseeable future.

1.4 Income

Income is recognised when the charity has entitlement to the funds, any performance conditions attached to the item(s) of income have been met, it is probable that the income will be received and the amount can be measured reliably.

Gifts and services in kind are recognised on the basis of the value of the gift to the charity which is the amount the charity would have been willing to pay to obtain services or facilities of equivalent economic benefit on the open market; a corresponding amount is then recognised in expenditure in the period of receipt.

Grants are recognised in full in the Statement of Financial Activities in the year in which they are receivable or any requirement imposed on the grant is fulfilled.

Investment income is recognised on a receivable basis.

1.5 Expenditure and irrecoverable VAT

Expenditure is recognised once there is a legal or constructive obligation to make a payment to a third party, it is probable that settlement will be required and the amount of the obligation can be measured reliably. Expenditure is classified under the following activity headings:

Fundraising costs are those costs incurred in attracting voluntary income, in particular grant funding and the costs of maintaining the charity's profile within the sector.

Expenditure on charitable activities includes the cost of policy and research work undertaken to further the purposes of the charity and their associated support costs.

1.6 Tangible fixed assets and depreciation

Tangible fixed assets are stated at cost less depreciation. Depreciation is provided at rates calculated to write off the cost less estimated residual value of each asset over its expected useful life, as follows:

Fixtures & fittings	20% Straight line
Computer equipment	33% Straight line

1.7 Fund accounting

Unrestricted funds are general funds that are available for the use at the trustees' discretion in furtherance of the objectives of the charity.

Restricted funds are subject to specific conditions by donors as to how they may be used. The purposes and uses of the restricted funds are set out in the notes to the accounts.

1.8 Trade debtors

Trade debtors are amounts due from customers for merchandise sold or services performed in the ordinary course of business.

Trade debtors are recognised initially at the transaction price. They are subsequently measured at amortised cost using the effective interest method, less provision for impairment. A provision for the impairment of trade debtors is established when there is objective evidence that the charity will not be able to collect all amounts due according to the original terms of the receivables.

1.9 Cash and cash equivalents

Cash and cash equivalents comprise cash on hand and call deposits, and other short-term highly liquid investments that are readily convertible to a known amount of cash and are subject to an insignificant risk of change in value.

1.10 Trade creditors

Trade creditors are obligations to pay for goods or services that have been acquired in the ordinary course of business from suppliers. Accounts payable are classified as current liabilities if the charity does not have an unconditional right, at the end of the reporting period, to defer settlement of the creditor for at least twelve months after the reporting date. If there is an unconditional right to defer settlement for at least twelve months after the reporting date, they are presented as non-current liabilities.

Trade creditors are recognised initially at the transaction price and subsequently measured at amortised cost using the effective interest method.

2 Statement of Financial Activity – comparative figures to 31 March 2024

	Note	Unrestricted Funds £	Restricted Funds £	Total Funds 2024 £	Total Funds 2023 £
Income:					
Donations	3	95,030	606,275	701,305	612,271
Income from other trading activities:					
Consultancy fees		8,186	-	8,186	5,497
Investment income	4	2,420	-	2,420	668
Total income		105,636	606,275	711,911	618,436
Expenditure					
<i>Expenditure on charitable activities:</i>	5	85,565	530,697	616,262	469,189
Total expenditure		85,565	530,697	616,262	469,189
Net movement in funds for the year		20,071	75,578	95,649	149,247
Reconciliation of funds					
Total funds brought forward		278,032	237,451	515,483	366,236
Total funds carried forward		298,103	313,029	611,132	515,483

3. Donations

	2025	2024
	£	£
Barrow Cadbury Trust	24,500	13,900
Esmee Fairbairn Foundation	50,000	-
Trust for London	119,443	47,950
John Ellerman Foundation	-	37,868
Joseph Rowntree Charitable Foundation	45,600	48,710
Justice Together	132,000	137,500
The Oak Foundation	143,868	36,912
Unbound Philanthropy	50,000	50,000
Paul Hamlyn Foundation	57,090	-
City Bridge Trust	37,825	34,100
Humanity United	-	236,712
Ethical Consumer	19,525	19,525
AB Charitable Trust	20,000	20,000
University College London	4,377	-
University of Exeter	-	17,878
Other gifts	3,353	250
	<u>707,581</u>	<u>701,305</u>

Total donations were £707,581 (2024: £701,305) of which £221,598 (2024: £95,030) was unrestricted and £485,983 (2024: £606,275) was restricted.

4. Investment income

	2025	2024
	£	£
Interest received	2,981	2,420
	<u> </u>	<u> </u>

5. Analysis of expenditure on charitable activities

Description	Charitable Activities	2025	2024
	£	£	£
Direct costs	82,021	82,021	123,179
Direct salary costs	533,074	533,074	432,432
Depreciation	2,838	2,838	3,522
Support costs:			
<i>Rent</i>	29,765	29,765	28,322
<i>Financial consultancy</i>	6,765	6,765	6,585
<i>Other consultancy</i>	3,421	3,421	-
<i>Payroll and recruitment costs</i>	3,331	3,331	3,228
<i>Travel & accommodation</i>	4,620	4,620	3,521
<i>Insurance</i>	2,578	2,578	2,320
<i>General office</i>	7,680	7,680	10,901
<i>Audit/Independent examination</i>	1,902	1,902	2,250
Total	677,996	677,996	616,261

Expenditure on charitable activities was £677,996 (2024: £616,261) of which £172,286 (2024: £85,565) was unrestricted and £505,710 (2024: £530,697) was restricted.

The amount paid to the auditor for their external scrutiny was £1,902 (2024: £2,250).

6. Analysis of staff costs, trustee remuneration and expenses, and the cost of key management personnel

	2025	2024
	£	£
Salaries and wages	466,061	392,175
Social security costs	45,793	30,141
Pension costs	21,220	10,116
	<u>533,074</u>	<u>432,432</u>

One employee had employee benefits in excess of £60,000 (2024: 1).

The charity trustees were not paid or received any other benefits from employment with Focus on Labour Exploitation. No trustees were reimbursed expenses during the year and no trustees were reimbursed in the prior year. No charity trustee received payment for professional or other services supplied to the charity (2024: nil).

The key management personnel comprises the Chief Executive and their total benefits during the year were £66,848 (2024: £63,665).

7. Staff numbers

The average monthly head count was 12 (2024: 9 staff).

8. Corporation Taxation

The charity is exempt from tax on income and gains falling within section 505 of the Taxes Act 1988 or section 252 of the Taxation of Chargeable Gains Act 1992 to the extent that these are applied to its charitable objects.

9. Tangible fixed assets

	Fixtures and fittings £	Computer equipment £	Total £
Cost			
At 1 April 2024	1,038	13,413	14,451
At 31 March 2025	<u>1,038</u>	<u>13,413</u>	<u>14,451</u>
Depreciation			
At 1 April 2024	1,038	7,734	8,772
Charge for the year	-	2,838	2,838
At 31 March 2025	<u>1,038</u>	<u>10,572</u>	<u>11,610</u>
Net book value			
At 31 March 2025	<u>-</u>	<u>2,841</u>	<u>2,841</u>
At 31 March 2024	<u>-</u>	<u>5,679</u>	<u>5,679</u>

10. Debtors

	2025 £	2024 £
Trade Debtors	-	-
Prepayments and accrued income	<u>24,527</u>	<u>3,399</u>
	<u>24,527</u>	<u>3,399</u>

11. Creditors: amount falling due within one year

	2025 £	2024 £
Trade Creditors	6,932	7,278
Accruals	5,998	17,384
Taxation and social security	9,946	10,122
Other creditors	4,462	7,294
	<u>27,338</u>	<u>42,078</u>

12. Movement in funds

The income funds of the charity include restricted funds comprising the following unexpended balances of donations and grants held on trust for specific purposes:

Current period	Balance at 01-Apr 2024	Incoming resources	Resources expended	Balance at 31-Mar 2025
Restricted funds	£	£	£	£
Barrow Cadbury Trust	2,732	24,500	(27,091)	141
Trust for London	1,805	119,443	(100,872)	20,376
Paul Hamlyn Foundation	20,809	57,090	(77,899)	-
Unbound Philanthropy	35,448	50,000	(43,654)	41,794
Joseph Rowntree Charitable Foundation	-	45,600	(45,600)	-
City Bridge Trust	2,810	37,825	(33,145)	7,490
Justice Together	-	132,000	(68,065)	63,935
Humanity United	232,161	-	(73,663)	158,498
Ethical Consumer	17,264	19,525	(35,721)	1,068
Total restricted funds	313,029	485,983	(505,710)	293,302
Unrestricted				
General fund	273,103	346,579	(172,286)	447,396
Designated fund (Enhanced leave fund)	25,000	-	-	25,000
Total unrestricted funds	298,103	346,579	(172,286)	472,396
Total funds	611,132	832,562	(677,996)	765,698

The trustees designated a portion of unrestricted funds to be set aside to provide enhanced paternal and sick leave payments. The Trustees review and approve transfers to this fund at the year-end as required.

Prior period	Balance at 01-Apr 2023	Incoming resources	Resources expended	Balance at 31-Mar 2024
Restricted funds	£	£	£	£
Barrow Cadbury Trust	18,086	13,900	(29,255)	2,732
Trust for London	114	47,950	(46,259)	1,805
Paul Hamlyn Foundation	55,408	-	(34,599)	20,809
Unbound Philanthropy	27,307	50,000	(41,859)	35,448
Ethical Trading Initiative	822		(822)	-
University of Exeter	-	17,878	(17,878)	-
Joseph Rowntree Charitable Foundation	57,976	48,710	(106,686)	-
City Bridge Trust	14,530	34,100	(45,820)	2,810
Tides	23,410	-	(23,410)	-
Justice Together	39,798	137,500	(177,298)	-
Humanity United	-	236,712	(4,551)	232,161
Ethical Consumer	-	19,525	(2,261)	17,264
Total restricted funds	<u>237,451</u>	<u>606,275</u>	<u>(530,697)</u>	<u>313,029</u>
Unrestricted				
Unrestricted general fund	253,032	105,636	(85,565)	273,103
Unrestricted designated fund (Enhanced leave fund)	25,000	-	-	25,000
Total funds	<u>515,483</u>	<u>711,911</u>	<u>(616,262)</u>	<u>611,132</u>

The purpose of each restricted fund is as follows:

- Barrow Cadbury Trust: to support policy advocacy work
- Trust for London: to work in London to prevent trafficking and to promote best practice responses
- Paul Hamlyn Foundation: to support research into three high risk labour sectors for EEA workers
- Unbound Philanthropy: for research on the impact of Brexit on EEA workers vulnerability to exploitation
- Joseph Rowntree Charitable Foundation: to develop and pivot a worker-driven model for assessing corporate human rights due diligence and provide a trial
- City Bridge Trust: to build capacity of organisations supporting London communities at risk of labour exploitation, modern slavery and trafficking.
- Justice Together: funding to work to make current and future short-term work visas fairer and safer
- Humanity United and Ethical Consumer

13. Analysis of net assets between funds

	Unrestricted Funds £	Restricted Funds £	Total £
Funds balances at 31 March 2025 are represented by:			
Tangible Fixed Assets	2,841	-	2,841
Current Assets	496,895	293,302	790,197
Creditors: amounts falling due within one year	(27,338)	-	(27,338)
	<u>472,396</u>	<u>293,302</u>	<u>765,698</u>

	Unrestricted Funds £	Restricted Funds £	Total £
Funds balances at 31 March 2024 are represented by:			
Tangible Fixed Assets	5,679	-	5,679
Current Assets	334,502	313,029	647,531
Creditors: amounts falling due within one year	(42,078)	-	(42,078)
	<u>298,103</u>	<u>313,029</u>	<u>611,132</u>

FOCUS ON LABOUR EXPLOITATION

England & Wales - Charity number 1159611

Accounts

Focus on Labour Exploitation
(A company limited by guarantee)
Report and Financial Statements
For the year ended 31 March 2024

Charity registration no 1159611

Company registration no 08451701

Focus on Labour Exploitation

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Reference and administrative details

Trustees	Peter Andrews Vash Arora Claire Falconer Rachel Hewitt Shereen Hussein Ian Robinson Dora-Olivia Vicol (resigned 7 December 2023) Adam Weiss
Principal Office	The Foundry 17 Oval Way London SE11 5RR
Charity number	1159611
Company number	08451701
Bankers	Triodos Bank Deanery Road Bristol BS1 5AS The Co-operative Bank 1 Balloon Street Manchester M60 4EP
Independent Examiner	Field Sullivan Limited 9 Hare & Billet Road Blackheath SE3 0RB

Focus on Labour Exploitation

Report of the trustees for the year ending 31 March 2024

The trustees present their report and accounts for the year ended 31 March 2024.

The accounts have been prepared in accordance with the accounting policies set out in note 1 to the accounts and comply with the charity's memorandum and articles of association, the Charities Act 2011, the Companies Act 2006, the Charities and Trustee Investment (Scotland) Act 2005 and Accounting and Reporting by Charities: Statement of Recommended Practice applicable to charities preparing their accounts in accordance with the Financial Reporting Standard application in the UK and Republic of Ireland (FRS 102).

Our purposes and activities

Our charity's purpose as set out in the objects contained in the company's memorandum of association are:

To promote and advance the human rights of victims of human trafficking, and in particular, those trafficked for the purpose of labour exploitation, in the United Kingdom and throughout the world, by all or any of the following means:

- Monitoring abuses of the human rights of victims of human trafficking;
- Obtaining legal or other redress for abuses of the human rights of victims of human trafficking;
- Research into issues affecting the human rights of victims of human trafficking, and in particular, those trafficked for the purpose of labour exploitation;
- Providing technical guidance, both to Governments and organisations working with victims of human trafficking, on issues concerning the human rights of victims of human trafficking;
- Contributing to the sound administration of laws which protect the human rights of victims of trafficking;
- Commenting on the effect of proposed legislation on the human rights of victims of human trafficking;
- Raising awareness of, and promoting public support for, human rights issues affecting victims of human trafficking;
- Promoting respect for the human rights of victims of human trafficking amongst both individuals and corporations;
- International advocacy of the human rights of victims of human trafficking.

In shaping our objectives for the year and planning our activities, the trustees have considered the Charity Commission's guidance on public benefit, including the guidance 'public benefit: running a charity (PB2).

The company works to benefit both current and potential victims of trafficking for labour exploitation, in the UK and worldwide.

The trustees have considered this matter and concluded:

1. that the aims of the organisation continue to be charitable;
2. that the aims and the work done give identifiable benefits to the charitable sector and both indirectly and directly to individuals in need;
3. that the benefits are for the public, are not unreasonably restricted in any way and certainly not by ability to pay; and
4. that there is no detriment or harm arising from the aims or activities.

Achievements and performance

Throughout 2023/24, FLEX has built on its work to improve national and international responses to better protect and promote the rights of people facing or at risk of exploitation. Achievements are detailed below following the framework provided by FLEX's Strategic Plan 2020-25.

FLEX has a vision of a world free from all forms of labour exploitation, including forced labour and human trafficking. Our mission is to end labour exploitation by challenging and transforming the systems and structures that create vulnerabilities for workers. We do this by undertaking research, knowledge building, business engagement, and evidence-based advocacy aimed at preventing labour abuses, protecting the rights of those affected, and promoting best practice policy responses to labour exploitation. FLEX also conducts strategic comms work to inform the ways in which labour exploitation is spoken about and delivers bespoke training to supporting organisations directly in contact with workers at risk and to statutory agencies.

Our approach:

FLEX's work builds on the understanding that labour exploitation is situated at the extreme end of a spectrum ranging from labour compliance through to labour law violations, culminating at extreme exploitation in the form of offences such as forced labour and human trafficking for labour exploitation. These are at once serious crimes, human rights breaches and violations of labour law. Labour exploitation takes place in every country in the world, and whilst in recent years we have seen a boom of corporate social responsibility initiatives seeking to address risks in global supply chains, state surveillance and legislation remains weak, and exploitation taking place in national contexts remains largely under-researched and misunderstood. As a result, very few of the estimated millions of victims are ever identified and just a fraction of cases result in the prosecution of perpetrators or compensation for survivors.

FLEX recognises that workers at risk of poverty, destitution, discrimination and/or social exclusion are at higher risk of exploitation, and therefore pays particular attention to:

1. **Workers in low-paid and insecure work:** Struggling to make ends meet, low-paid workers are at high risk of falling into debt and facing destitution. Fear of losing work is a major deterrent to reporting abuse and many workers are willing to endure labour abuses and even exploitation. Insecure work arrangements, such as false self-employment and zero-hours contracts, create further instability as workers are not guaranteed an income and can more easily have their work terminated.

2. **Women workers:** Women face additional vulnerabilities related to gendered cultural and structural issues, such as unequal treatment at work, discrimination related to pregnancy and maternity, and gender-based violence and sexual harassment at work. Carrying a disproportionate care burden may push women into more casual employment and make them less able to leave abusive situations. Women are also disproportionately represented in low-paid and precarious work, where they may also face unequal treatment. FLEX's intersectional feminist approach recognises that gender inequality often intersects with other forms of disadvantage to increase women's risk of exploitation.
3. **Migrant Workers:** Migrant workers are also disproportionately represented in low-paid, precarious and informal work. They may also face additional situational vulnerabilities compared to non-migrants, including language barriers, limited support networks and lack of knowledge of labour rights or where to access support. Government policies affecting migrants, such as restrictions on accessing social protections (e.g., no recourse to public funds) create additional vulnerabilities for migrants. Undocumented migrants are particularly at risk of exploitation, especially in contexts where undocumented labour is criminalised.

FLEX works alongside other organisations committed to the rights of vulnerable workers and those working to combat labour exploitation. We are also guided by organisations working with people affected by, or at risk of labour exploitation in the UK, including trafficked persons. These organisations form FLEX's 'Labour Exploitation Advisory Group'.

FLEX is a member of UK-based and global networks of individuals and agencies that share its commitment and values. These include: the UK Anti-Trafficking Monitoring Group, the Ethical Trading Initiative, the Platform for International Cooperation on Undocumented Migrants, the Global Alliance against Traffic in Women, and La Strada International.

FLEX operates on the **values** of:

- **Respect** – for equality and recognition of the role of intersectionality, understood as overlapping or accumulated layers of discrimination, and systemic oppression in creating vulnerabilities and disadvantage.
- **Courage** – to explore, probe, and approach challenges with creativity.
- **Integrity** – thoroughness, rigour and reliability in how we use information to evidence the need for change.
- **Justice** – everything we do is aimed at achieving a more just society.
- **Accountability** – towards those affected by labour exploitation, whose safety, well-being and voice are central to our work.

Our working **principles** are: quality outputs; rigorous and accurate research and reporting; high ethical standards; reflection on our impact; collaborative approach; do no harm.

Top ten achievements we are most proud of this year:

1. We continued building a better understanding of the interactions between **the UK's immigration system and risk of exploitation** by providing government and key stakeholders with analysis and evidence-based research on experiences and drivers of exploitation in different sectors; directly informing the work of key statutory bodies, including the Migration Advisory Committee, the Independent Chief Inspector of Borders and Immigration, the Director of Labour Market Enforcement, and others.
2. FLEX's research findings on the **Seasonal Worker Scheme** and ongoing engagement with the Home Office, the Department for Environment, Food, and Rural Affairs, and Parliament continued to evidence the need for better governance of the scheme and improved conditions for workers and grievance mechanisms.
3. We continued to conduct **outreach to agricultural seasonal workers** with our research partners, ensuring that our research and policy recommendations are directly informed by workers' experiences. In 2023, we produced a series of three thematic reports based on the largest sample of seasonal workers reached by an independent study to date.
4. We have continued working to prevent risks for **Ukrainians in the UK** through different means: by working with partners to reach out to Ukrainian workers on the Seasonal Worker Visa to provide them with information and support; by advocating for the Ukraine schemes to also protect workers on the Seasonal Worker Visa; and by delivering a training programme for local authorities tasked with supporting Ukrainian guests under the Homes for Ukraine scheme.
5. We continued working with workers from high-risk sectors to **improve working conditions across supply chains**. In 2023, we engaged outsourced cleaners in developing a human rights due diligence assessment framework for domestic service sector supply chains. We also launched Europe's first Worker-driven Social Responsibility project; it is taking place in the UK fishing industry.
6. We continued delivering **bespoke training** for statutory bodies and front-line organisations supporting workers and communities represented in at-risk sectors, and trained 62 officials from local authorities across the UK on how to identify risks of exploitation on the Ukraine scheme, and 50 staff members, volunteers, and activists from 4 front line organisations working in London.
7. We continued to mobilise support for the introduction of **secure reporting** mechanisms to ensure that all workers are able to report abuse without fear, with more stakeholders adopting secure reporting recommendations, including parliamentarians, statutory bodies, academics, and NGOs from the anti-trafficking and migrants' rights sectors.
8. We maintained a **strong collaborative approach**, continued to expand our networks, and worked in formal partnerships with a wide range of key front-line organisations, trade unions, academic groups, public bodies, and other stakeholders, such as employers, law firms, and funders.
9. We continued to engage the **staff team in strategic work**. This year we conducted a joint assessment of our progress against our strategic aims. We also developed a Worker Engagement Strategy, which was informed by prior work, as well as objectives and priorities identified by the team.

10. Finally, to mark **FLEX's 10th Anniversary**, we hosted an in-person event attended by many friends and colleagues from across the sector, where we shared a panel with expert speakers and showcased an exhibition shining light over FLEX's top 10 impact areas and the voices of some of the workers who have been at the heart of FLEX's research over the past decade. We also published a visual presentation of the last 10 years, marking key moments in FLEX's own history alongside the historical and political events which have shaped the space in which we exist, and a blog from our CEO with '[Reflections on a decade working to end labour exploitation](#)'.

FLEX has completed the following work against its four core objectives over the past year:

Aim 1: To challenge and positively transform policies, attitudes and practices that drive labour exploitation.

Within this aim FLEX seeks to build understanding and evidence of drivers of labour exploitation, including government policies and business operating models and practices, and of structural inequalities, such as gender and racial discrimination. We also work to build awareness and understanding of drivers of exploitation among decision-makers and key stakeholders. Our media and communications work within this aim has the objective of increasing decision-makers' awareness and understanding of systemic and structural issues creating risks of labour exploitation by shifting media narratives.

The political and policy context has been very unstable during this period, with government, and the Home Secretary in particular, continuing to use anti-migration rhetoric and to promote increased immigration enforcement as a response to trafficking and modern slavery. This has impacted planning for policy and legislative work as government priorities change. FLEX has actively engaged in several legislative processes that took place this year, including those related to **the Victims & Prisoners Bill, the 'Illegal Migration' Act, and the Retained EU Law Act**. During this period, FLEX has also engaged in the now stalled Modern Slavery Strategy review and in challenging the Rwanda scheme, and continued to strengthen its engagement in international advocacy.

A. The 'Illegal Migration' Act

FLEX has facilitated weekly cross-sector civil society meetings on parliamentary advocacy to assist with sector-wide collaboration. Together with a number of other organisations, FLEX put forward a number of probing amendments regarding legal aid, long-term support, international compliance, and secure reporting; the Labour party tabled the long-term support amendment. Additionally, at the earlier stages of the Bill, FLEX worked behind the scenes to avoid 'carve out' clauses which would create a hierarchy of victims, including by coordinating a private letter to the Labour Front Bench from the anti slavery sector (20 organisations including Victim Care subcontractors and support providers) regarding the risks of unintended consequences from amendment 12 which sought to create an exemption for victims of sexual exploitation only.

FLEX has also promoted a wider international obligations amendment to ensure that the Bill does not contravene a number of international instruments including the European Convention Against Torture and the European Convention on Human Rights. FLEX has also produced a number of briefings,

including a joint-civil society master briefing that provided a thematic analysis of the impact of the Bill, which was relied upon by Peers in debate. FLEX has also presented at a number of spaces in relation to the impacts of the Bill on victims and survivors of trafficking, including to the GLA Emergency Summit, Equally Ours, a House of Lords Parliamentary meeting and the networks such as ELAN and MRAP.

We also dedicated significant resource to challenging rhetoric which undermines people who have been exploited, such as unevidenced claims of the UK's slavery systems being 'gamed'. In 2023, we also published a [joint report with UCL on looking back locally on the implementations of the UK's schemes](#).

B. Safer Labour Migration Routes

During this period, FLEX has continued to actively advocate for **safer labour migration routes** into the UK. We have done this by engaging in policy processes and advocacy platforms, as well as by conducting further research to evidence risks and effective impact of the changes on workers, and by identifying actionable solutions.

B1. Seasonal Worker Scheme

In April 2023, the government introduced changes to the **Seasonal Worker Scheme** for horticulture, including a minimum requirement of ensuring 32 hours of paid work a week. A guaranteed minimum income is something that FLEX has been calling for for years; however, the measure was introduced without adequate monitoring and consultation. There has been a lack of transparency on the scheme and a lack of government engagement with civil society. We have continued to highlight the experiences of workers who have been effectively stranded in the UK having incurred debts to migrate and then find themselves without work. The Migration Advisory Committee opened an inquiry into the Seasonal Worker Visa. FLEX have met with the MAC to inform the inquiry; we made a written submission and also met with the Scottish Government to inform their submission.

Together with other NGO partners, [we established the 'Worker Interest Group'](#) with wider general membership including Unite and the Trade Unions Congress (TUC). We have communicated our willingness to work with the industry led Seasonal Worker Taskforce on initiatives to improve the rights of workers on the scheme. We have contacted relevant government stakeholders to make them aware of the group and request regular engagement.

In May, FLEX gave oral evidence to the Lords Horticultural Committee on exploitation faced by workers on the scheme. The Horticultural Committee produced their report, which includes a section dedicated to labour shortages. [FLEX produced a statement](#) welcoming some of the recommendations such as on secure reporting pathways, ensuring access to redress for workers on the scheme and clarifying the responsibilities of government institutions for the scheme. Our subsequent blog on the report explains in more detail that while many of the recommendation by the Committee are welcome, the amount of confusion around the scheme means that some of the recommendations would not make sense in isolation and that [ultimately it is vital that the structural issues within the scheme which expose workers to risk need to be addressed](#).

In September FLEX gave oral evidence to the Joint Committee on Human Rights to inform their inquiry into Human Rights at Work. The Committee had particular interest in the effects of short term restrictive work visas. In January, FLEX gave oral evidence to the Environment, Food, and Rural Affairs Committee's inquiry into Fairness in the Food and Farming sector.

Finally, the FLEX team gave numerous presentations on the issues facing workers on the scheme, including at meetings with government delegations from several sourcing countries, at the Food Ethics Council, and elsewhere.

B2. Health and Care Worker visa

Following the increasing reports of labour exploitation of Health & Care Worker (H&CW) visa holders, FLEX has coordinated an informal coalition of organisations, academics and trade unions working with migrant care workers or migrant care work. This coalition submitted a response to the Independent Chief Inspector of Borders and Immigration (ICIBI) inquiry into adult social care in September 2023, and met with ICIBI officials conducting this inquiry. FLEX coordinated [a joint-position paper](#) on the risks of exploitation in the adult social care sector which contains a comprehensive set of recommendations. These recommendations have been relied upon by groups such as Unison, Citizens' Advice, and Care and Support Workers Organise (CaSWO). FLEX has also secured [media coverage](#) as a result of our letter to the Home Secretary regarding the impacts of government policy and the position paper. Additionally, FLEX's expertise has been sought by stakeholders, including prominent MPs, whose interventions in Parliament have relied heavily on FLEX briefings. FLEX has also sought to engage parliamentarians by asking parliamentarians to table written questions. The coalition has also been a valuable way to share information in the sector, and has allowed organisations to engage directly with each other for support.

In March 2024 FLEX gave oral evidence to the House of Lords Select Committee on the Modern Slavery Act 2015 inquiry in a session which focused on the adult social care sector. The inquiry had intended to report in November 2024 but with the calling of the General Election and dissolution of parliament the Committee ceased to exist.

B3. Overseas Domestic Worker visa

In March 2022 the government pledged, in response to a Low Pay Commission recommendation, and 'when parliamentary time allowed', to amend legislation which allows the Family Worker Exemption. The exemption in the National Minimum Wage Regulations allows live-in domestic workers to be paid little or nothing at all, where they are treated as 'a member of the family'. Over the years, it has been regularly used by abusive employers to exploit their workers and evade justice. Following coalition pressure led by domestic worker led and other specialist organisations including Nanny Solidarity Campaign, Voice of Domestic Workers, Kalayaan, Kanlungan and ATLEU, FLEX supported pressuring the government to make good on its commitment. The government have finally confirmed that the exemption would be removed in April 2024 with an amendment to the regulations having been laid before parliament with a commencement date of 1 April 2024.

C. Improving working conditions across supply chains

FLEX continues to advocate for safer corporate practices and mandatory human rights due diligence (mHREDD) legislation, both in the UK and the EU, by working with relevant networks, including by coordinating the Ethical Trading Initiative NGO Working Group that analysed the proposed EU Directive on mHREDD. As part of this aim, FLEX has also continued to engage in consultation spaces to highlight the impact of lack of accountability on outsourced service staff. For example, we provided written input to the Corporate Transparency Framework (CTF) review process for the Ethical Trading Initiative. Our recommendations included meaningful worker engagement to address the limitations of self-reporting and the importance of including the NGO caucus in assessing corporate members against the CTF.

D. Research

We have also conducted the following research under this aim:

D1. Seasonal workers in UK agriculture:

FLEX established partnerships with three frontline organisations, Rosmini Centre in Cambridgeshire, Citizens Advice in South Lincolnshire (CASL), and the Southeast and East Asian Centre (SEEAC) in London to carry out outreach and research with migrant seasonal agricultural workers. Data collection with workers was done in Russian, Romanian, Nepali, Bulgarian, and Bahasa Indonesia. A total of 403 survey forms and 68 interviews were completed, the largest independent sample of workers on the scheme. FLEX have also interviewed 15 stakeholders, including scheme operators, and has **visited a farm in Hereford** staffed by workers on the Seasonal Worker Visa, where we spoke with the farm manager, supervisors, and workers.

In addition, we attended the Modern Slavery Intelligence Network conference, an industry event attended by many retailers and labour providers, and an event led by a delegation from the Uzbekistan Agency for External Labour Migration, at which we gave a talk on the experiences of Uzbek workers on the Seasonal Worker Visa.

D2. UK agriculture and care visas and vulnerability to exploitation:

FLEX also joined a project led by the [University of Exeter](#), in partnership with the [University of Bristol](#), the [University of York](#), and the [University of Durham](#), as well as NGOs [Joint Council for the Welfare of Immigrants](#) (JCWI), SEEAC, and Kanlungan with support from [UNISON](#). The project aimed to shed light on the impact of recently introduced migration rules under the post-Brexit immigration system on people who migrated to the UK to work in the agriculture and care sectors and their vulnerability to exploitation and modern slavery. Data collection has been completed, including interviews with 20 Indonesian workers on the Seasonal Worker Visa. FLEX presented information about the methodology used in the project, including using a community based research model, at the Labour Law Research Network conference in Warsaw, Poland. A co-creation session with seasonal workers and support organisations to discuss recommendations and findings from the research was held in September 2023. The report, '[UK agriculture and care visas: worker exploitation and obstacles to redress](#)' was published in March 2024.

D3. Identifying structural causes of labour exploitation in the UK agricultural sector

FLEX wrote a chapter in a [report that was published on](#) 10 July by the Landworkers Alliance, which provides an overview of migrant worker's pay and conditions on the UK's Seasonal Worker Visa, with a focus on how to reduce the risk of labour exploitation for workers. This covers financial factors (pay, recruitment fees, etc) and the impact of new migration controls on agricultural workers.

D4. Research on risk of exploitation due to the end of free movement:

This project explores the risk of exploitation in sectors that have previously been highly reliant on migrant workers from the EU. FLEX conducted three focus groups with workers from various immigration and work statuses in the UK to identify risks in the current migration system both before moving to the UK and once in the UK, as well as identifying solutions to solving these problems. These will feed into a blueprint on safe and regular labour migration routes. FLEX also conducted a focus group with NGOs inside the UK to discuss what factors should be present in safe and fair migration routes.

We have also held meetings with expert organisations to discuss a briefing we are planning to write around the right to work for those in the asylum system. The briefing will focus on the application and impact of the current policy restricting asylum seekers' access to work. Data collection for this briefing included 9 interviews with asylum seekers and refugees, a focus group for feedback and validation, and interviews with asylum support caseworkers.

Finally, we have also reached out to businesses in the care, construction, hospitality and agriculture sectors for a briefing on employer practices in the UK's post Brexit immigration system. We wrote a report on shifting employer practices following the end of free movement, based on interviews with recruiters, specialists and trade associations from the care, agriculture and hospitality sectors combined with desk-based research. The report will offer a temperature check on employment in some of the sectors historically reliant on migrant labour.

Aim 2: Ensure that the enforcement of the full range of workers' rights forms part of national and international responses to labour exploitation.

Within this aim, FLEX works to build evidence about the links between severe labour abuses, exploitation and trafficking, and about the impact of labour market enforcement strategies and of the role of marginalised workers in preventing and addressing labour exploitation. We also seek to build understanding of the 'prevention' obligation in state responses to human trafficking for labour exploitation, by advocating for enforcement of labour standards as a central plank of effective anti-trafficking responses.

A. Single Enforcement Body:

FLEX continues to advocate for a stronger labour market enforcement system in the UK. During this period, several political parties have indicated strong support for a Single Enforcement Body (SEB), FLEX has engaged with these parties to inform the development of their policies in this area. For instance, in June 2023, FLEX met with the Liberal Democrat Party Home Affairs team to advise on an anti-trafficking motion for their party conference. This motion includes a recommendation to create

a Single Enforcement Body. LEAG arranged meetings with various Labour Market Enforcement Authorities and highlighted the need for a Single Enforcement Body. FLEX has continued to speak with Labour Party officials, advocating for the creation of a strong Single Enforcement Body. Labour has echoed this language in policy and interventions, including calling for the SEB to include secure reporting pathways. In December, FLEX produced a two-page briefing document outlining key priorities for a SEB for use in policy advocacy regarding the implementation of the SEB.

B. Secure reporting (LEAG):

FLEX has continued to highlight the need for secure reporting pathways for migrant victims with insecure immigration status with various stakeholders, such as the Director of Labour Market Enforcement (DLME), the ICIBI, government departments, and law enforcement (namely the City of London Police) as well as promote this as a key issue for the Home Office's Modern Slavery Stakeholder Engagement forum's prevention work.

Together with Hope for Justice, the Helen Bamber Foundation and the Anti Trafficking and Exploitation Unit (ATLEU), FLEX put forward an amendment on secure reporting for the 'Illegal Migration' Bill (tabled by Lord Alton). We have also supported Latin American Women's Rights Service (LAWRS)-led evidence submission to the Public Bill Committee inquiry on the Victims and Prisoners Bill which advocates for secure reporting pathways. Recommendations for secure reporting have been included in the Horticulture Committee's recommendations regarding the seasonal worker scheme.

LEAG arranged meetings with various Labour Market Enforcement Authorities to develop our understanding of how they engage with migrant workers and engage in soft advocacy regarding the continuum of exploitation and need for secure reporting. Together with LAWRS, FLEX met with the Deputy Mayor of London for Communities and Social Justice, to highlight the need for secure reporting pathways. LEAG has also arranged meetings with various political parties including the Liberal Democrat Party, the Labour Party and the Green Party to advocate for secure reporting policies (as well as other recommendations such as proactive labour market enforcement). LEAG also met with the Welsh Government to advocate for the establishment of secure reporting practices. In November 2022, LEAG submitted evidence to the Policing Priorities Inquiry of the Home Affairs Committee. In November 2023, the Committee published recommendations which included a recommendation for the establishment of secure reporting policies. FLEX has collaborated with JCWI, the Work Rights Centre and LAWRS on the production of a briefing for senior figures within the Labour home affairs team to encourage the adoption of secure reporting policies.

C. Continuum of exploitation (LEAG):

In February 2024, FLEX published a LEAG report entitled: ["So I decided to carry on...": The continuum of exploitation in practice](#) together with an executive summary. The report outlines the limitations of the modern slavery approach to exploitation, and calls for a preventative approach to be implemented. The publication was supported by the office of the Independent Anti-Slavery Commissioner (IASC) and consisted of a series of case studies, co-produced by 12 survivors of exploitation and the caseworker who supported them. The report was launched at a Parliamentary event with a panel including representatives from LEAG member organisations, Professor Virginia

Mantouvalou and Sam Ireland from the Gangmasters and Labour Abuse Authority (GLAA). The report will be used in advocacy for a preventative approach to exploitation.

In addition to this, FLEX has maintained ongoing engagement with a number of relevant stakeholders, including the GLAA, IASC, DLME, and others.

D. Research:

We have also conducted the following research under this aim:

D1. Participatory research and access to advice services for migrant workers in London

FLEX collaborated on a six month project led by the Young Foundation and funded by the GLA, which aimed to increase the understanding of the support and advice services on offer to migrant workers in London, and consequently develop a strategy to improve access to advice and support for migrant workers experiencing abuse and exploitation in London. This project used a Feminist Participatory Action Research (FPAR) approach. We assisted with hiring and training with six peer researchers across the adult social care, hospitality, and cleaning sectors. The report was launched on the 10th of June in London, with FLEX participating in the panel.

D2. Assessment of the nature and scale of labour market non-compliance in the UK (DLME/UCL project)

This project has been commissioned by the Director of Labour Market Enforcement to provide an assessment of the scale and nature of labour market non-compliance in the UK and to enable more evidence-informed policy and practice in this space. The research is being co-funded by the Department for Business, Energy and Industrial Strategy (BEIS) and the Economic and Social Research Council (ESRC). The study will run from June 2022 until December 2024 and will cover all four of the UK's nations. FLEX provides advice on worker engagement and is organising four worker advisory groups that will help inform the scope of the research, the design of the survey tool, and other elements of the project.

E. Improving working conditions across supply chains

E1. Piloting worker engagement in human rights due diligence - Cleaning

During this period, we recruited two company partners for this project. Focus groups with outsourced cleaners have been completed with reports capturing key points from the discussions produced after each session, which will inform the outputs of the pilot project.

E2. Establishing a Worker-driven Social Responsibility programme for UK Fishing

Worker-driven Social Responsibility is an exciting model for tackling labour abuses and exploitation in corporate supply chains, with more than a decade of proven results in industries ranging from agriculture to textiles. In February 2024, the pilot was officially launched. Project partners include: the International Transport Federation (ITF), the Coalition of Immokalee Workers (CIW), the Fair Food Standards Council (FFSC), Tufts University, Dr. Jess Sparks, and FLEX. This project will involve

collaboration among several key stakeholders including retailers, vessel owners, human rights experts and local community organisations.

Aim 3: To mobilise cooperation in addressing labour exploitation by providing leadership and expertise across sectors.

Within this aim FLEX has the following objectives: To develop methodologies for engagement with ‘experts by experience’ and foster recognition of their role as key for driving effective change; to develop awareness about labour exploitation and its prevention among key stakeholders, such as civil society networks and platforms; and to leverage national, international and global networks to hold governments to account and advocate for the rights of victims of trafficking for labour exploitation. Our media and communications work under this aim seeks to diversify the voices and actors represented in media coverage about labour exploitation and to support the empowerment of people affected, as well as to challenge unevidenced rhetoric around slavery and the UK’s systems being too generous or ‘abused’.

A. Improving worker engagement:

During this period, FLEX created a dedicated role for the development and implementation of an organisational-wide Worker Engagement Strategy. Drawing on FLEX’s prior experience and learnings, this strategy aims to identify areas and opportunities in FLEX’s work for greater, more streamlined worker engagement. This process involved:

- Mapping lived experience engagement models across the refugee & asylum, trafficking and migration sectors and reviewing related literature for lessons and examples to follow. As a result, 9 approaches were identified, which have been taken across 49 organisations. An initial assessment of why these have been effective or less effective depending on the context was also conducted, along with some informational interviews with those conducting such work at comparable organisations, as well as with FLEX staff to understand the context and approaches taken previously.
- Engagement with FLEX staff to build a collective understanding of, and approach to, worker engagement at FLEX.

In addition to this, we continued disseminating the learnings from our implementation of a Feminist Participatory Action research approach (FPAR) and encouraging others to explore ways to engage workers as Peer Researchers and to adopt more participatory research approaches.

B. Strengthening the Labour Exploitation Advisory Group (LEAG):

FLEX continued to support the implementation of LEAG’s strategy (see Aim 2). In addition, key outputs from LEAG during this period have included:

- Evidence submission to the Joint Committee on Human Rights inquiry on human rights at work.
- A series of advocacy meetings with various Labour Market Enforcement Authorities in order to develop relationships, build a better understanding of practices and advocate on key issues including secure reporting and the Single Enforcement Body.

- Advocacy meetings with the various political parties in the UK in order to encourage them to adopt a preventative approach to trafficking ahead of the next General Election.

During this period, FLEX has also started planning an evaluation of LEAG's first 10 years of work ahead of its anniversary in 2025.

C. Detention Taskforce:

The Taskforce continues to be Chaired by the Helen Bamber Foundation, who work closely with FLEX in our role to coordinate and host the Taskforce. The Detention Taskforce has been actively engaged in challenging the 'Illegal' Migration Bill. In March 2023, the Taskforce produced a briefing for the second reading of the Bill, and members have utilised this coalition in order to coordinate amendments and briefings, including amendments challenging indefinite detention and violations of the UK's international obligations. Further, the Taskforce has sought to share information relating to, and increase awareness of, the impacts of the Nationality and Border Act, such as the Public Order Disqualification within and across sectors. For instance, recognising the limited knowledge of the Public Order Disqualification among legal practitioners we are currently in conversation with the Network for Justice to share information with their network on this issue, and its impacts on victims and survivors of trafficking.

FLEX and the Helen Bamber Foundation produced a briefing on Taskforce priorities for the Independent Anti-Slavery Commissioner to encourage the IASC to undertake work on these areas. Additionally, the Taskforce produced an [evidence submission to the ICIBI's inspection on the Immigration Enforcement Competent Authority](#), building on its work of the 'Bad Decisions' briefing of 2021. The Taskforce also met with the ICIBI's office to highlight the issues that members have been seeing on the ground in relation to the IECA. The Detention Taskforce also started producing a policy asks document for use in campaigning during the General Election and to influence the Programme for Government following the election.

D. Training statutory bodies and front-line organisations to increase their capacity to identify and respond to labour exploitation:

FLEX delivers a bespoke **training programme for front line organisations** that aims to build their capacity to identify and support beneficiaries with employment issues across the continuum of exploitation, including employment rights issues, identifying and referring potential modern slavery, and accessing specialist advice and support.

This year, we trained over 50 staff, volunteers and activists across four partner organisations: Nanny Solidarity Campaign, St Mungo's, Room to Heal and Praxis. These organisations reflect this project's aim to work with those supporting groups of workers who are less likely to access mainstream support services on employment issues, such as migrant workers. All 48 training workshops for the three years have been completed and two new training resources were developed: a poster representing the continuum of exploitation, and an online resource about the National Referral Mechanism's changes over time.

During this period, we completed the delivery of our training programme for local authorities focused on identifying and dealing with **risks of labour exploitation for displaced Ukrainians** arriving or

remaining in the UK on the various schemes government opened in response to the invasion of the country. This training programme reached 62 participants from a range of local authorities and the police. We also delivered a presentation on risks of exploitation under the Homes for Ukraine scheme at a safeguarding webinar hosted by the Department of Levelling Up, Housing and Communities which was attended by almost 200 government employees. In person training was also delivered with North Northamptonshire council's communities and wellbeing team. Finally, FLEX has responded to training requests from other stakeholders.

Overall, our training programme engaged over 450 participants this year.

E. Supporting the wider movement:

FLEX is a member of key international advocacy networks, including the Global Alliance Against Trafficking in Women (GAATW), LaStrada International (LSI), and the Platform for International Cooperation on Undocumented Migrants (PICUM). In the UK, FLEX is a member of the Ethical Trading Initiative, the Corporate Justice Coalition (CJC), the Anti-trafficking Monitoring Group, the Human Trafficking Foundation forums, Trust for London's Employment Legal Advice Network (ELAN), the BME Anti-Slavery Network (BASNET), and the Crossborder Forum (CBF), and FLEX is a supporter of Unchecked UK. At the London level, FLEX is also a member of the Migration and Refugee Advisory Panel (MRAP), which operates as an expert panel to advise the work of the London Strategic Migration Partnership (LSMP) and the GLA's social integration team, and to inform other relevant GLA teams on issues related to migration, asylum and refugees. FLEX also sits at the Mayor's Equality Diversity and Inclusion Advisory Forum, representing the MRAP.

During this period, FLEX worked in collaboration with key partners on numerous joint advocacy actions in support of the wider movement for change, including 13 joint letters, and FLEX supported several statements led by others. For instance, FLEX was engaged by the TUC in relation to their response to the government's proposal to re-introduce fees at the Employment Tribunal. FLEX supported the drafting of the TUC statement and highlighted the impacts on at-risk workers. FLEX also worked to build wider engagement with the migrant justice sector and invited organisations to contribute to the joint statement. The Guardian produced an article on the back of the statement, which secured 48 signatures.

Aim 4: To ensure that FLEX is able to respond to the interests of actual and potential victims of human trafficking for labour exploitation.

During this period, we have continued working to progress the aims of FLEX's Business Plan 2020-2025. This objective relates to maintaining a healthy and productive working environment, for which this year we completed a review of all HR policies, including FLEX's policy on Family, Absence and Sickness, Safeguarding, etc. This review introduced several improvements, such as paid time off for dependents, bereavement leave, and a new Staff Wellbeing policy, among others. We have also held an in-person team building away day and an 'end of the year' dinner, where the staff team and trustees met to celebrate 2023, and we piloted a 'no meetings week' to support staff wellbeing and help reduce stress. FLEX has started transitioning its HR systems onto a software to facilitate HR processes. Finally, FLEX continued developing its internal capacity and, during this period, created the

following roles: HR and Ops Administrator, Worker Engagement Officer, Research Assistant, Communications Officer role, Outreach and Engagement Manager, and two Outreach Workers.

The team also held a Strategy Away Day, where we reflected on the progress made towards our four Strategic Aims, the changing political landscape, and identified key priorities for the following year.

During this period, we also celebrated FLEX's 10th Anniversary with an in-person event that brought together approximately 50 guests from across the anti-trafficking, migrant care and workers' rights sectors as well as partners from FLEX's research, policy and advocacy work, funders and businesses and statutory agencies. The evening included a panel of expert speakers including FLEX's CEO and Head of Policy, a Peer Researcher with lived experience, an investigative journalist with a significant portfolio of work on exploitation in UK agriculture and a guest speaker from the Detention Taskforce. The event included an exhibition to showcase the primary areas of FLEX's work over the past decade and highlighted the key focuses of our policy and research work, and presented quotes from workers and people with lived experience of exploitation who have participated in FLEX's research.

To mark its 10th anniversary, FLEX also launched its new website, which now includes direct links to our new Training Portal and publication browser, thematic pages by area of advocacy (e.g, labour migration, workers' rights, supply chain, etc.). The website also features our refreshed branding and colour palette.

This objective also related to our commitment in ensuring that our work is informed and accountable to people affected by or at risk of labour exploitation. During this period, FLEX created the above-mentioned 'Worker Engagement Officer' role dedicated to developing an internal strategy to improve the ways in which our team engages workers in its work, and to explore ways in which people affected by labour exploitation can influence and/or take part in our organisational decision-making process.

Finally, this objective relates to our sustainable funding strategy and over the past year FLEX has maintained its financial sustainability, developing existing work and new partnerships with the support of existing and new funders. We have worked hard to counterbalance the sustainability risks brought up by higher inflation rates and to diversify our income streams through statutory and corporate funding, as well as cross-sectoral partnerships.

We delivered formal partnership projects with a total of 19 organisations, including Rosmini Community Centre in Cambridgeshire, Citizens Advice South Lincolnshire (CASL), Landworkers Alliance, Unison, Southeast and East Asian Centre (SEEAC), IRMO, Asian Women Resource Centre, Voice of Domestic Workers, International Transport Federation (ITF), Coalition of Imokalee Workers, Tufts University, and various LEAG members working in London, including LAWRS, Work Rights Centre, and Kanlungan. We also delivered three partnership projects with academics from Nottingham University Rights Lab, Exeter University, and UCL. Finally, during this period FLEX continued exploring opportunities for income-generation, which will support its aim to continue building a robust and sustainable organisation. We are grateful to all our partners for their collaboration with FLEX.

In terms of our external communications, during this period **FLEX has provided background information to numerous press pieces and featured in the media 54 times, including the following pieces:**

- **Euro News**, 10 April 2023, [Britain's growing slavery problem fuelled by 'culture of fear', say experts.](#)
- **The Grocer**, 12 May 2023, ['Simplify Seasonal Worker scheme to limit abuse' say humans rights experts.](#)
- **Evening Standard**, 12 June 2023, ['Report reveals 'shocking' exploitation of migrant workers in London.](#)
- **Context News**, 14 July 2023, [Context Migrant Workers in UK trapped by Recruitment Bondage](#) (Thomson Reuters Foundation).
- **Open Democracy**, 19 July 2023 [Why have the Tories abandoned victims of Modern Slavery?](#)
- **Politics Home**, 19 December 2023, [Home Office warned migrant workers face exploitation risks.](#)
- **Financial Times**, 20 January 2024, [UK Seafood Industry Cracks Down on exploitation of overseas crew.](#)

We have posted 50 pieces on our website, including blogs, statements and responses to government reports, enquiry submissions, announcements, and guest blogs. Key pieces include:

- A [Briefing](#) from the Taskforce on the Illegal Migration Bill ahead of the Second Reading.
- An [analysis](#) of the UK country section of the US Trafficking in Persons Report.
- A [joint civil society briefing](#) on the Illegal Migration Bill.
- A [briefing](#) on the illegal Migration Bill ahead of Committee Stage .
- A FLEX [research report](#), Rights and Risks: Migrant labour exploitation in London.
- A [guest blog](#) written by an academic from Tufts University and the International Transport Workers Federation.
- A [Joint Statement](#) by 128 civil society orgs and FLEX, on the Supreme Court's Rwanda ruling.
- FLEX's full [response](#) to the House of Lords Horticultural Committee report, in the form of an explanatory blog piece by Kate Roberts and Jacob Bolton.
- FLEX's [submission to the Migration Advisory Committee \(MAC\)](#) on the Seasonal Worker Visa.
- A [blog piece](#) marking FLEX's 10 Year Anniversary, reflecting on the key achievements and challenges over the decade. We also published [our 10 Year History: A timeline](#) of FLEX's first 10 years, to mark FLEX's 10 year anniversary.
- A [Policy Briefing](#) on what an effective Single Enforcement Body looks like.
- A [Joint Letter](#) written and coordinated by FLEX to the Home Secretary on preventing the exploitation of workers on the Health & Care Worker Visa.
- A [blog](#) announcing the FLEX's joint launch of Europe's first Worker Driven Social Responsibility pilot.
- LEAG's [report](#) *'So I decided to carry on...':The continuum of exploitation in practice'*.

Financial review

The charity's income increased to £711,911 (2023: £618,436). The charity was able to increase the number of grants in the year including working with new funders.

Total expenditure was £616,262 (2023: £469,189 (2022) resulting in a net surplus for the year of £95,649 and total reserves of £611,132. Unrestricted reserves increased to £273,103 (2023: £253,032).

Investment powers and policy

The charity is seeking to build reserves in line with the charity's reserves policy (see below). As most of the charity's funds are to be spent in the short term there are currently no funds available for long-term investment. Investment income earned during the year relates to interest on the charity's bank account.

Reserves policy and going concern

The surplus for the year increased the charity's unrestricted reserves to £273,103. The Trustees designated £25,000 of unrestricted reserves to support enhanced paternal leave and sickness pay in 2022 and this remains in place at 31 March 2024. The unrestricted reserves are in line with the reserves target, to cover 3 months operating cost (£198,634).

The Trustees are confident that the charity has adequate resources to operate for the foreseeable future due the unrestricted reserves and the level of secured income for the next financial year.

Plans for future periods

FLEX's work plans for the period to 2025 are derived from its Strategic Plan 2020-25, and are focussed on strengthening worker engagement and comms work to support the promotion of its unique expertise and approach to the prevention of trafficking for labour exploitation at the national and international level.

Our plans include conducting rigorous research, developing policy recommendations, engaging people with lived experience, working with businesses and employers to identify concrete actions that respond to workers' priorities, increasing stakeholders' capacity to prevent, identify and address exploitation; and building networks and opportunities for international advocacy. For 2024/25, some of the key areas of focus for FLEX will include:

- Continuing evidencing the risks of the new immigration system and working to inform safer labour migration routes, and actively engaging in advocacy work to increase understanding of these risks and improve protections for workers;
- Continuing FLEX's research and participatory work in high-risk labour sectors, including some of the most overlooked sectors, such as fishing and dark kitchens;
- Engaging in key advocacy processes, including key Parliamentary enquiries, as well as the new government's legislative agenda;
- Strengthening our engagement of experts by experience across all areas of FLEX's work by implementing our new Worker Engagement Strategy.

- Continuing to develop our networks and investing in increasing mutual capacity to jointly work towards preventing labour exploitation;
- Continuing delivering a project to explore mechanisms for a stronger worker engagement approach to corporate accountability;
- Launching Europe's first Worker-driven Social Responsibility programme in north-east Scotland.
- Increasing our visibility through high-profile strategic communications work.

Reference and administrative details

Charity number (England and Wales): 1159611

Company number: 08451701

Registered and Principal Office: The Foundry, 17 Oval Way, London, SE11 5RR

Our advisors

Bankers Triodos Bank, Deanery Road, Bristol, BS1 5AS

The Co-operative Bank, 1 Balloon Street, Manchester, M60 4EP

Directors and trustees

The directors of the charitable company (the charity) are its trustees for the purpose of charity law.

The trustees and officers serving during the year and since the year end were as follows:

Chair Adam Weiss

Elected Trustees
Peter Andrews
Vash Arora
Claire Falconer
Rachel Hewitt
Shereen Hussein
Ian Robinson

Key management personnel:

Chief Executive Lucila Granada

Structure, Governance and Management

Governing Document

The organisation registered as a charity on 15 December 2014. The company was established under a Memorandum of Association which established the objects and powers of the charitable company and is governed under its Articles of Association. In the event of the company being wound up members are required to contribute an amount not exceeding £50.

Trustee induction and training

New trustees are inducted through a meeting with management. Trustees are provided with a copy of the FLEX Trustees Terms of Reference and the Charity Commission's introductory guidance for trustees. New trustees are also asked to complete a personal details form, a declaration of interests, and a skills audit to identify training needs. All trustees are regularly offered training on matters concerning governance.

Organisation

The trustees meet on a quarterly basis and oversee the strategic direction of the charity. The day to day operations and management is delegated to the Chief Executive Officer.

Related parties

None of our trustees receive remuneration or other benefit from their work with the charity.

Pay policy for senior staff

The Board's Remuneration Committee determines the salary of the Executive Director and sets pay scales for all staff. The FLEX Trustees Terms of Reference set out the Terms of Reference for the Remuneration Committee. The Committee includes the Treasurer and at least one other trustee, and meets once a year to review the salary of the Executive Director and pay scales, and make recommendations to the Board.

Risk management

The trustees have reviewed the major risks to which the charity is exposed. A risk register has been established which is updated annually. Where appropriate, systems or procedures have been established to mitigate the risks and these are periodically reviewed to ensure that they continue to meet the needs of the charity. The trustees deem that appropriate measures are currently in place to mitigate risk, particularly in the light of the on-going difficult economic environment.

Trustees' responsibilities in relation to the financial statements

The trustees (who are also the directors for the purpose of company law) are responsible for preparing the Annual Report and the financial statements in accordance with applicable law and regulations.

Company law requires the trustees to prepare financial statements for each financial year. Under that law the trustees must prepare the financial statements in accordance with United Kingdom Generally Accepted Accounting Practice (United Kingdom Accounting Standards and applicable law). Under company law the trustees must not approve the financial statements unless they are satisfied that they give a true and fair view of the state of affairs of the charitable company and of the incoming resources and application of resources, including the income and expenditure, of the charitable company for that period.

In preparing these financial statements, the trustees are required to:

- a) select suitable accounting policies and then apply them consistently;
- b) observe the methods and principles in the Charities SORP;
- c) make judgments and accounting estimates that are reasonable and prudent;
- d) state whether applicable UK Accounting Standards have been followed, subject to any material departures disclosed and explained in the financial statements; and
- e) prepare the financial statements on the going concern basis unless it is inappropriate to presume that the charitable company will continue to operate.

The trustees are responsible for keeping adequate accounting records that are sufficient to show and explain the charitable company's transactions and disclose with reasonable accuracy at any time the financial position of the charitable company and enable them to ensure that the financial statements comply with the Companies Act 2006. They are also responsible for safeguarding the assets of the company and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.

The trustees are responsible for the maintenance and integrity of the corporate and financial information included on the charitable company's website. Legislation in the United Kingdom governing the preparation and dissemination of financial statements may differ from legislation in other jurisdictions.

The trustees confirm that so far as they are aware, there is no relevant audit information (as defined by section 418(3) of the Companies Act 2006) of which the charitable company's auditors are unaware. They have taken all the steps that they ought to have taken as trustees in order to make themselves aware of any relevant audit information and to establish that the charitable company's auditors are aware of that information.

By order of the board of trustees

Adam Weiss

DATE: 23rd September 2024

Independent Examiner's Report to the trustees Focus on Labour Exploitation

I report to charity trustees on my examination of the accounts of the charity for the year ended which comprise the Statement of Financial Activities, the Balance Sheet and related notes.

This report is made solely to the charity's trustees, as a body, in accordance with section 145 of the Charities Act 2011. My work has been undertaken so that I might state to the charity's trustees those matters I am required to state to them in this report and for no other purpose. To the fullest extent permitted by law, I do not accept or assume responsibility to anyone other than the charity and the charity's trustees as a body, for my work, for this report, or for the opinions I have formed.

Responsibilities and basis of report

As the charity trustees of Focus on Labour Exploitation you are responsible for the preparation of the accounts in accordance with the requirements of the Charities Act 2011 ('the Act').

I report in respect of my examination of the Focus on Labour Exploitation's accounts carried out under section 145 of the 2011 Act and in carrying out my examination I have followed all the applicable Directions given by the Charity Commission under section 145(5)(b) of the Act.

An independent examination does not involve gathering all the evidence that would be required in an audit and consequently does not cover all the matters that an auditor considers in giving their opinion on the financial statements. The planning and conduct of an audit goes beyond the limited assurance that an independent examination can provide. Consequently I express no opinion as to whether the financial statements present a 'true and fair' view and my report is limited to those specific matters set out in the independent examiner's statement.

Independent examiner's statement

I have completed my examination. I confirm that no material matters have come to my attention in connection with the examination giving me cause to believe that in any material respect:

1. accounting records were not kept in respect of Focus on Labour Exploitation as required by section 130 of the Act; or
2. the financial statements do not accord with those records; or
3. the financial statements do not comply with the accounting requirements concerning the form and content of accounts set out in the Charities (Accounts and Reports) Regulations 2008 other than any requirement that the accounts give a 'true and fair view' which is not a matter considered as part of an independent examination.

I have no concerns and have come across no other matters in connection with the examination to which attention should be drawn in this report in order to enable a proper understanding of the accounts to be reached.

.....
Timothy Sullivan FCA
ICAEW

9 Hare & Billet Road
Blackheath
SE3 0RB

Date: 1 October 2024

Statement of Financial Activities for the year ending 31 March 2024

	Note	Unrestricted Funds £	Restricted Funds £	Total Funds 2024 £	Total Funds 2023 £
Income:					
Donations	3	95,030	606,275	701,305	612,271
Income from other trading activities:					
Consultancy fees		8,186	-	8,186	5,497
Investment income	4	2,420	-	2,420	668
Total income		105,636	606,275	711,911	618,436
Expenditure					
<i>Expenditure on charitable activities:</i>	5	85,565	530,697	616,262	469,189
Total expenditure		85,565	530,697	616,262	469,189
Net movement in funds for the year		20,071	75,578	95,649	149,247
Reconciliation of funds					
Total funds brought forward		278,032	237,451	515,483	366,236
Total funds carried forward		298,103	313,029	611,132	515,483

The statement of financial activities includes all gains and losses recognised in the year.
All income and expenditure derive from continuing activities.

Balance sheet as at 31 March 2024

	Note	2024 £	2023 £
Fixed assets			
Tangible assets	9	5,679	686
Total Fixed Assets		<u>5,679</u>	<u>686</u>
Current assets			
Debtors	10	3,399	19,461
Cash at bank and in hand		644,132	510,912
Total Current Assets		<u>647,531</u>	<u>530,373</u>
Liabilities			
Creditors falling due within one year	11	(42,078)	(15,576)
Net Current assets		<u>605,453</u>	<u>514,797</u>
Total assets		<u>611,132</u>	<u>515,483</u>
The funds of the charity:			
Designated funds		25,000	25,000
Unrestricted funds		273,103	253,032
Restricted funds	12	313,029	237,451
Total charity funds		<u>611,132</u>	<u>515,483</u>

For the financial year ending 31 March 2024 the charity was entitled to exemption from audit under section 447 of the Companies Act 2026 relating to small companies.

Directors' responsibilities:

- The members have not required the charity to obtain an audit of its accounts for the year in question in accordance with section 476; and
- The directors acknowledge their responsibilities for complying with the requirements of the Act with respect to accounting records and the preparation of accounts.

These accounts have been prepared in accordance with the provisions applicable to companies subject to the small companies regime.

The notes at pages 27 to 35 form part of these accounts

Adam Weiss, on behalf of the trustees

Approved by the trustees on 23rd September 2024

Notes on the accounts

1 Accounting policies

1.1 Charity status

The charity is limited by guarantee, incorporated in England and Wales, and consequently does not have share capital. Each of the trustees is liable to contribute an amount not exceeding £50 towards the assets of the charity in the event of liquidation.

The address of its registered office is:

The Foundry
17 Oval Way
London
SE11 5RR

1.2 Basis of Preparation of the accounts

The financial statements have been prepared in accordance with the Accounting and Reporting by Charities: Statement of Recommended Practice applicable to charities preparing their accounts in accordance with the Financial Reporting Standard applicable in the UK and Republic of Ireland (FRS 102) (effective 1 January 2015) – (Charities SORP (FRS 102)), the Financial Reporting Standard applicable in the UK and Republic of Ireland (FRS 102) and the Companies Act 2006

Focus on Labour Exploitation meets the definition of a public benefit entity under FRS 102. Assets and liabilities are initially recognised at historical cost or transaction value unless otherwise stated in the relevant accounting policy note(s)

1.3 Preparation of the accounts on a going concern basis

The unrestricted reserves are above the reserves target, the charity has secured a good level of income for 2021-22 and has a positive cash flow. As a result the Trustees are confident that the charity has adequate resources to operate for the foreseeable future.

1.4 Income

Income is recognised when the charity has entitlement to the funds, any performance conditions attached to the item(s) of income have been met, it is probable that the income will be received and the amount can be measured reliably.

Gifts and services in kind are recognised on the basis of the value of the gift to the charity which is the amount the charity would have been willing to pay to obtain services or facilities of equivalent economic benefit on the open market; a corresponding amount is then recognised in expenditure in the period of receipt.

Grants are recognised in full in the Statement of Financial Activities in the year in which they are receivable or any requirement imposed on the grant is fulfilled.

Investment income is recognised on a receivable basis.

1.5 Expenditure and irrecoverable VAT

Expenditure is recognised once there is a legal or constructive obligation to make a payment to a third party, it is probable that settlement will be required and the amount of the obligation can be measured reliably. Expenditure is classified under the following activity headings:

Fundraising costs are those costs incurred in attracting voluntary income, in particular grant funding and the costs of maintaining the charity's profile within the sector.

Expenditure on charitable activities includes the cost of policy and research work undertaken to further the purposes of the charity and their associated support costs.

1.6 Exemption from preparing a cash flow statement

The charity opted to early adopt Bulletin 1 published on 2 February 2016 and have therefore not included a cash flow statement in these financial statements.

1.7 Tangible fixed assets and depreciation

Tangible fixed assets are stated at cost less depreciation. Depreciation is provided at rates calculated to write off the cost less estimated residual value of each asset over its expected useful life, as follows:

Fixtures & fittings	20% Straight line
Computer equipment	33% Straight line

1.8 Fund accounting

Unrestricted funds are general funds that are available for the use at the trustees' discretion in furtherance of the objectives of the charity.

Restricted funds are subject to specific conditions by donors as to how they may be used. The purposes and uses of the restricted funds are set out in the notes to the accounts.

1.9 Trade debtors

Trade debtors are amounts due from customers for merchandise sold or services performed in the ordinary course of business.

Trade debtors are recognised initially at the transaction price. They are subsequently measured at amortised cost using the effective interest method, less provision for impairment. A provision for the impairment of trade debtors is established when there is objective evidence that the charity will not be able to collect all amounts due according to the original terms of the receivables.

1.10 Cash and cash equivalents

Cash and cash equivalents comprise cash on hand and call deposits, and other short-term highly liquid investments that are readily convertible to a known amount of cash and are subject to an insignificant risk of change in value.

1.11 Trade creditors

Trade creditors are obligations to pay for goods or services that have been acquired in the ordinary course of business from suppliers. Accounts payable are classified as current liabilities if the charity does not have an unconditional right, at the end of the reporting period, to defer settlement of the creditor for at least twelve months after the reporting date. If there is an unconditional right to defer settlement for at least twelve months after the reporting date, they are presented as non-current liabilities.

Trade creditors are recognised initially at the transaction price and subsequently measured at amortised cost using the effective interest method.

2 Statement of Financial Activity – comparative figures to 31 March 2023

	Note	Unrestricted Funds £	Restricted Funds £	Total Funds 2023 £	Total Funds 2022 £
Income:					
Donations	3	94,652	517,619	612,271	452,792
Income from other trading activities:					
Consultancy fees		5,497	-	5,497	14,235
Investment income	4	668	-	668	92
Total income		100,817	517,619	618,436	467,119
Expenditure					
<i>Expenditure on charitable activities:</i>	5	75,796	393,393	469,189	386,310
Total expenditure		75,796	393,393	469,189	386,310
Net movement in funds for the year		25,021	124,226	149,247	80,809
Reconciliation of funds					
Total funds brought forward		253,011	113,225	366,236	285,427
Total funds carried forward		278,032	237,451	515,483	366,236

3. Donations

	2024	2023
	£	£
Barrow Cadbury Trust	13,900	31,000
Esmee Fairbairn Foundation	-	55,000
Trust for London	47,950	32,225
John Ellerman Foundation	37,868	36,603
Joseph Rowntree Charitable Foundation	48,710	95,492
Justice Together	137,500	145,304
The Oak Foundation	36,912	38,640
Unbound Philanthropy	50,000	40,000
Paul Hamlyn Foundation	-	54,890
Ethical Trading Initiative	-	3,290
City Bridge Trust	34,100	37,129
The Landworkers' Alliance	-	7,500
Humanity United	236,712	-
Ethical Consumer	19,525	-
The Scottish Ministers	-	17,056
AB Charitable Trust	20,000	-
University of Exeter	17,878	15,093
Other gifts	250	3,349
	<u>701,305</u>	<u>612,571</u>

Total donations were £701,305 (2023: £612,571) of which £95,030 (2023: £94,952) was unrestricted and £606,275 (2023: £517,619) was restricted.

4. Investment income

	2024	2023
	£	£
Interest received	2,420	668
	<u> </u>	<u> </u>

5. Analysis of expenditure on charitable activities

Description	Charitable Activities	2024	2023
	£	£	£
Direct costs	123,179	123,179	93,156
Direct salary costs	432,432	432,432	332,197
Depreciation	3,522	3,522	950
Support costs:			
<i>Rent</i>	28,322	28,322	24,498
<i>Financial consultancy</i>	6,585	6,585	5,228
<i>Payroll and recruitment costs</i>	3,228	3,228	551
<i>Travel & accommodation</i>	3,521	3,521	3,047
<i>Insurance</i>	2,320	2,320	1,900
<i>General office</i>	10,901	10,901	5,985
<i>Independent examination/Audit fee</i>	2,250	2,250	1,980
Total	616,261	616,261	469,490

Expenditure on charitable activities was £616,261 (2023: £469,490) of which £85,565 (2023: £28,032) was unrestricted and £530,697 (2023: £358,278) was restricted.

The amount paid to the auditor for their external scrutiny was £2,250 (2023: £1,650).

6. Analysis of staff costs, trustee remuneration and expenses, and the cost of key management personnel

	2024	2023
	£	£
Salaries and wages	392,175	303,432
Social security costs	30,141	21,715
Pension costs	10,116	7,050
	<u>432,432</u>	<u>332,197</u>

One employee had employee benefits in excess of £60,000 (2023: nil).

The charity trustees were not paid or received any other benefits from employment with Focus on Labour Exploitation. No trustees were reimbursed expenses during the year and no trustees were reimbursed in the prior year. No charity trustee received payment for professional or other services supplied to the charity (2023: nil).

The key management personnel comprises the Chief Executive and their total benefits during the year were £63,665 (2023: £59,500).

7. Staff numbers

The average monthly head count was 9 (2023: 9.5 staff).

8. Corporation Taxation

The charity is exempt from tax on income and gains falling within section 505 of the Taxes Act 1988 or section 252 of the Taxation of Chargeable Gains Act 1992 to the extent that these are applied to its charitable objects.

9. Tangible fixed assets

	Fixtures and fittings £	Computer equipment £	Total £
Cost at 31 March 2023	1,038	5,790	6,828
Additions	-	8,515	8,515
Disposals	-	(892)	(892)
Cost at 31 March 2024	<u>1,038</u>	<u>13,413</u>	<u>14,451</u>
Depreciation			
At 31 March 2023	1,038	5,104	6,142
Charge for the year	-	3,522	3,522
Disposals		(892)	(892)
At 31 March 2024	<u>1,038</u>	<u>7,734</u>	<u>8,772</u>
Net book value			
At 31 March 2024	<u>-</u>	<u>5,679</u>	<u>5,679</u>
At 31 March 2023	<u>-</u>	<u>686</u>	<u>686</u>

10. Debtors

	2024 £	2023 £
Trade Debtors	-	15,093
Prepayments and accrued income	<u>3,399</u>	<u>4,368</u>
	<u>3,399</u>	<u>19,461</u>

11. Creditors: amount falling due within one year

	2024 £	2023 £
Trade Creditors	7,278	1,462
Accruals	17,384	7,230
Taxation and social security	10,122	5,115
Other creditors	7,294	1,769
	<u>42,078</u>	<u>15,576</u>

12. Movement in funds

The income funds of the charity include restricted funds comprising the following unexpended balances of donations and grants held on trust for specific purposes:

Current period	Balance at 01-Apr 2023	Incoming resources	Resources expended	Balance at 31-Mar 2024
Restricted funds	£	£	£	£
Barrow Cadbury Trust	18,086	13,900	(29,255)	2,732
Trust for London	114	47,950	(46,259)	1,805
Paul Hamlyn Foundation	55,408	-	(34,599)	20,809
Unbound Philanthropy	27,307	50,000	(41,859)	35,448
Ethical Trading Initiative	822		(822)	-
University of Exeter	-	17,878	(17,878)	-
Joseph Rowntree Charitable Foundation	57,976	48,710	(106,686)	-
City Bridge Trust	14,530	34,100	(45,820)	2,810
Tides	23,410	-	(23,410)	-
Justice Together	39,798	137,500	(177,298)	-
Humanity United	-	236,712	(4,551)	232,161
Ethical Consumer	-	19,525	(2,261)	17,264
Total restricted funds	237,451	606,275	(530,697)	313,029
Unrestricted				
Unrestricted general fund	253,032	105,636	(85,565)	273,103
Unrestricted designated fund (Enhanced leave fund)	25,000	-	-	25,000
Total funds	515,483	711,911	(616,262)	611,132

The trustees designated a portion of unrestricted funds to be set aside to provide enhanced paternal and sick leave payments. The Trustees review and approve transfers to this fund at the year-end as required.

Prior period	Balance at 01-Apr 2022	Incoming resources	Resources expended	Transfer	Balance at 31-Mar 2023
	£	£	£	£	£
Restricted funds					
Barrow Cadbury Trust	21,006	31,000	(33,920)	-	18,086
Trust for London	-	32,225	(32,111)	-	114
Paul Hamlyn Foundation	42,578	54,890	(42,060)	-	55,408
Unbound Philanthropy	26,828	40,000	(39,521)	-	27,307
Ethical Trading Initiative	825	3,290	(3,293)	-	822
University of Exeter	-	15,093	(15,093)	-	-
Joseph Rowntree Charitable Foundation	13,744	95,492	(51,260)	-	57,976
City Bridge Trust	8,244	37,129	(30,843)	-	14,530
Tides	-	38,640	(15,230)	-	23,410
Justice Together	-	145,304	(105,506)	-	39,798
The Scottish Ministries		17,056	(17,056)	-	-
The Landworkers Alliance		7,500	(7,500)	-	-
				-	-
Total restricted funds	113,225	517,619	(393,393)		237,451
Unrestricted					
Unrestricted general fund	228,011	100,817	(69,757)	(6,039)	253,032
Unrestricted designated fund (Enhanced leave fund)	25,000	-	(6,039)	6,039	25,000
Total funds	366,236	617,644	469,489	-	515,483

The purpose of each restricted fund is as follows:

- Barrow Cadbury Trust: to support policy advocacy work
- Trust for London: to work in London to prevent trafficking and to promote best practice responses
- Paul Hamlyn Foundation: to support research into three high risk labour sectors for EEA workers
- Unbound Philanthropy: for research on the impact of Brexit on EEA workers vulnerability to exploitation
- The Scottish Minsters: for outreach to workers in farms to provide support and gather evidence of the experiences of workers in the horticulture sector.
- Ethical Trading Initiative: to participate in ETI activities.
- Esmee Fairbairn Foundation: to support core operational costs and delivery of capacity building for local authorities.
- Joseph Rowntree Charitable Foundation: to develop and pivot a worker-driven model for assessing corporate human rights due diligence and provide a trial
- City Bridge Trust: to build capacity of organisations supporting London communities at risk of labour exploitation, modern slavery and trafficking.

- Oak Foundation: funding to support the cost of the annual audit
- Justice Together: funding to work to make current and future short-term work visas fairer and safer
- University of Exeter: funding to research into immigration rules and labour policies
- Landworkers' Alliance: funding to research structural causes for poor working conditions in the conventional agricultural sector
- Humanity United and Ethical Consumer:

13. Analysis of net assets between funds

	Unrestricted Funds £	Restricted Funds £	Total £
Funds balances at 31 March 2024 are represented by:			
Tangible Fixed Assets	5,679	-	5,679
Current Assets	334,502	313,029	647,531
Creditors: amounts falling due within one year	(42,078)	-	(42,078)
	<u>298,103</u>	<u>313,029</u>	<u>611,132</u>

	Unrestricted Funds £	Restricted Funds £	Total £
Funds balances at 31 March 2023 are represented by:			
Tangible Fixed Assets	686	-	686
Current Assets	287,822	242,551	530,373
Creditors: amounts falling due within one year	(15,576)	-	(15,576)
	<u>272,932</u>	<u>242,551</u>	<u>515,483</u>

FOCUS ON LABOUR EXPLOITATION

England & Wales - Charity number 1159611

Accounts

Focus on Labour Exploitation
(A company limited by guarantee)
Report and Financial Statements
For the year ended 31 March 2023

Charity registration no 1159611

Company registration no 08451701

Focus on Labour Exploitation

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Reference and administrative details

Trustees	Peter Andrews Vash Arora Claire Falconer Rachel Hewitt Shereen Hussein (appointed 21 September 2022) Ian Robinson Dora-Olivia Vicol Adam Weiss
Principal Office	The Foundry 17 Oval Way London SE11 5RR
Charity number	1159611
Company number	08451701
Bankers	Triodos Bank Deanery Road Bristol BS1 5AS The Co-operative Bank 1 Balloon Street Manchester M60 4EP
Independent Examiner	Field Sullivan Limited 9 Hare & Billet Road Blackheath SE3 0RB

Focus on Labour Exploitation

Report of the trustees for the year ending 31 March 2023

The trustees present their report and accounts for the year ended 31 March 2023.

The accounts have been prepared in accordance with the accounting policies set out in note 1 to the accounts and comply with the charity's memorandum and articles of association, the Charities Act 2011, the Companies Act 2006, the Charities and Trustee Investment (Scotland) Act 2005 and Accounting and Reporting by Charities: Statement of Recommended Practice applicable to charities preparing their accounts in accordance with the Financial Reporting Standard application in the UK and Republic of Ireland (FRS 102).

Our purposes and activities

Our charity's purpose as set out in the objects contained in the company's memorandum of association are:

To promote and advance the human rights of victims of human trafficking, and in particular, those trafficked for the purpose of labour exploitation, in the United Kingdom and throughout the world, by all or any of the following means:

- Monitoring abuses of the human rights of victims of human trafficking;
- Obtaining legal or other redress for abuses of the human rights of victims of human trafficking;
- Research into issues affecting the human rights of victims of human trafficking, and in particular, those trafficked for the purpose of labour exploitation;
- Providing technical guidance, both to Governments and organisations working with victims of human trafficking, on issues concerning the human rights of victims of human trafficking;
- Contributing to the sound administration of laws which protect the human rights of victims of trafficking;
- Commenting on the effect of proposed legislation on the human rights of victims of human trafficking;
- Raising awareness of, and promoting public support for, human rights issues affecting victims of human trafficking;
- Promoting respect for the human rights of victims of human trafficking amongst both individuals and corporations;
- International advocacy of the human rights of victims of human trafficking.

In shaping our objectives for the year and planning our activities, the trustees have considered the Charity Commission's guidance on public benefit, including the guidance 'public benefit: running a charity (PB2).

The company works to benefit both current and potential victims of trafficking for labour exploitation, in the UK and worldwide.

The trustees have considered this matter and concluded:

1. that the aims of the organisation continue to be charitable;
2. that the aims and the work done give identifiable benefits to the charitable sector and both indirectly and directly to individuals in need;
3. that the benefits are for the public, are not unreasonably restricted in any way and certainly not by ability to pay; and
4. that there is no detriment or harm arising from the aims or activities.

Achievements and performance

Throughout 2022/23, FLEX has built on its work to improve national and international responses to better protect and promote the rights of people facing or at risk of exploitation. Achievements are detailed below following the framework provided by FLEX's Strategic Plan 2020-25:

FLEX has a vision of a world free from all forms of labour exploitation, including forced labour and human trafficking.

Our mission is to end labour exploitation by challenging and transforming the systems and structures that create vulnerabilities for workers. We do this by undertaking research, knowledge building, business engagement, and evidence-based advocacy aimed at preventing labour abuses, protecting the rights of those affected, and promoting best practice policy responses to labour exploitation. FLEX also conducts strategic comms work to inform the ways in which labour exploitation is spoken about and delivers bespoke training to supporting organisations directly in contact with workers at risk and to statutory agencies.

Our approach:

FLEX' work builds on the understanding that labour exploitation is situated at the extreme end of a spectrum ranging from labour compliance through to labour law violations, culminating at extreme exploitation in the form of offences such as forced labour and human trafficking for labour exploitation. These are at once serious crimes, human rights breaches and violations of labour law. Labour exploitation takes place in every country in the world, and whilst in recent years we have seen a boom of corporate social responsibility initiatives seeking to address risks in global supply chains, state surveillance and legislation remains weak, and exploitation taking place in national contexts remain largely under-researched and misunderstood. As a result, very few of the estimated millions of victims are ever identified and just a fraction of cases result in the prosecution of perpetrators or compensation for survivors.

FLEX recognises that workers at risk of poverty, destitution, discrimination and/or social exclusion are at higher risk of exploitation, and therefore pays particular attention to:

1. **Workers in low-paid and insecure work:** Struggling to make ends meet, low-paid workers are at high risk of falling into debt and facing destitution. Fear of losing work is a major deterrent to reporting abuse and many workers are willing to endure labour abuses and even exploitation. Insecure work arrangements, such as false self-employment and zero-hours contracts, create further instability as workers are not guaranteed an income and can more easily have their work terminated.

2. **Women workers:** Women face additional vulnerabilities related to gendered cultural and structural issues, such as unequal treatment at work, discrimination related to pregnancy and maternity, and gender-based violence and sexual harassment at work. Carrying a disproportionate care burden may push women into more casual employment and make them less able to leave abusive situations. Women are also disproportionately represented in low-paid and precarious work, where they may also face unequal treatment. FLEX's intersectional feminist approach recognises that gender inequality often intersects with other forms of disadvantage to increase women's risk of exploitation.
3. **Migrant Workers:** Migrant workers are also disproportionately represented in low-paid, precarious and informal work. They may also face additional situational vulnerabilities compared to non-migrants, including language barriers, limited support networks and lack of knowledge of labour rights or where to access support. Government policies affecting migrants, such as restrictions on accessing social protections (e.g., no recourse to public funds) create additional vulnerabilities for migrants. Undocumented migrants are particularly at risk of exploitation, especially in contexts where undocumented labour is criminalised.

FLEX works alongside other organisations committed to the rights of vulnerable workers and those working to combat labour exploitation. We are also guided by organisations working with people affected by, or at risk of labour exploitation in the UK, including trafficked persons, who form FLEX's 'Labour Exploitation Advisory Group'.

FLEX is a member of UK-based and global networks of individuals and agencies that share its commitment and values. These include: the UK Anti-Trafficking Monitoring Group, the Ethical Trading Initiative, the Platform for International Cooperation on Undocumented Migrants, the Global Alliance against Traffic in Women, and La Strada International.

FLEX operates on the **values** of:

- **Respect** – for equality and recognition of the role of intersectionality, understood as overlapping or accumulated layers of discrimination, and systemic oppression in creating vulnerabilities and disadvantage.
- **Courage** – to explore, probe, and approach challenges with creativity.
- **Integrity** – thoroughness, rigour and reliability in how we use information to evidence the need for change.
- **Justice** – everything we do is aimed at achieving a more just society.
- **Accountability** – towards those affected by labour exploitation, whose safety, well-being and voice are central to our work.

Our working **principles** are: quality outputs; rigorous and accurate research and reporting; high ethical standards; reflection on our impact; collaborative approach; do no harm.

Top ten achievements we are most proud of this year:

1. We continued increasing understanding of the interactions between the **UK's immigration** system and risk of exploitation by providing Government and key stakeholders with analysis and evidence-based research on experiences and drivers of exploitation in social care and agriculture; directly informing the work of key statutory bodies, including the Migration Advisory Committee, the Independent Chief Inspector of Borders and Immigration, the Director of Labour Market Enforcement, and others.
2. FLEX's research findings on the **Seasonal Worker Scheme** and ongoing engagement with the Home Office and DEFRA continued to evidence the need for better governance of the scheme and improved conditions for workers and grievance mechanisms. In February 2022, the UK Government introduced the requirement to guarantee at least 32 hours of paid work a week to workers on the scheme.
3. We continued to engage workers in our research through strengthening our **Peer Researcher model**, an innovative participatory action research methodology involving workers in the research process and advocacy and strategic comms work, and supported two external research teams to adopt this methodology.
4. We have proactively responded to labour exploitation risks in the UK arising from **the war in Ukraine** by working with partners to reach out to Ukrainian workers on the Seasonal Worker Visa to provide them with information and support, by advocating for the Ukraine schemes to also protect works on this route, and by developing a bespoke training programme for local authorities tasked with supporting Ukrainian guests under the Home for Ukraine scheme. In March, the Government announced the introduction of the Ukraine Extension Scheme, which offered many Ukrainians, including those on the Seasonal Worker Visa, the ability to work in any sector, access public funds and to study. This extension option will do much to prevent exploitation.
5. We started implementing a **new corporate accountability pilot project** that will engage workers in the development of a human rights due diligence assessment framework for domestic service sector supply chains.
6. **We continued developing our training offer** for statutory bodies and front-line organisations supporting workers and communities represented in at-risk sectors, and trained 40 officials from local authorities across the UK on how to identify risks of exploitation on the Ukraine scheme, and 54 staff members and volunteers from 4 front line organisations working in London.
7. We continued to mobilise support for the introduction of **secure reporting** mechanisms to ensure that all workers are able to report abuse without fear, with recommendations on secure reporting included in the Justice Committee's pre-legislative scrutiny of the Victims Bill, and submissions to the US State Department, the UN Special Rapporteur on migrants, and the OSCE Special Representative for Combating Trafficking in Human Beings. Secure reporting was adopted by several key stakeholders, including academics, statutory offices, and NGOs from the anti-trafficking and migrants' rights sectors.
8. We maintained a **strong collaborative approach**, continued to expand our networks, and worked in formal partnerships with a wide range of key front-line organisations, trade unions,

academic groups, public bodies, and other stakeholders, such as employers, law firms, and funders.

9. We continued to engage the **staff team in strategic work**. This year we developed a Staff Wellbeing policy and introduced an Employee Assistant Programme (EAP). We conducted a review of our 'Diversity and Inclusion Strategy' to assess the progress made and identify new targets. We also reviewed most of our HR policies and introduced significant improvements to our working conditions related to annual leave entitlements and TOIL; occupational sick pay; enhanced maternity, paternity and adoption pay; pension contribution and others.
10. Finally, to mark **FLEX's 10th Anniversary**, we refreshed our image and launched our **new website**, with thematic pages on our different areas of focus, an improved search tool to browse our publications more easily, and a brand-new training portal with learning resources for workers and training participants.

FLEX has completed the following work against its four core objectives over the past year:

Aim 1: To challenge and positively transform policies, attitudes and practices that drive labour exploitation.

Within this aim FLEX seeks to build understanding and evidence of drivers of labour exploitation, including Government policies and business operating models and practices, and structural inequalities, such as gender and racial discrimination. We also work to build awareness and understanding of drivers of exploitation among decision-makers and key stakeholders. Our media and communications work within this aim has the objective of increasing decision-makers' awareness and understanding of systemic and structural issues creating risks of labour exploitation by shifting media narratives.

The political and policy context has been considerably unstable during this period, with government, and the Home Secretary in particular, continuing to use anti migration rhetoric and to promote increased immigration enforcement as a response to trafficking and modern slavery. This has impacted planning for policy and legislative work as government priorities change. There has been no legislative progress on the expected Employment Bill, Victims Bill, and Modern Slavery Bill; while the Bill of Rights and the development of the new Modern Slavery Strategy has been put on hold after months of stakeholder engagement. During this period, FLEX has strengthened its engagement in international advocacy by providing evidence to the Universal Periodic Review, the US Trafficking in Persons report, the UK's consultation event on the Global Compact on Migration, and by engaging with various UN Special Repertoires.

A. Advocating for safer labour migration routes into the UK:

During this period, FLEX has continued to actively advocate for **safer labour migration routes** into the UK. We have done this by engaging in policy processes and advocacy platforms, as well as by conducting further research to evidence risks and effective impact of the changes on workers, and by identifying actionable solutions. This work has involved maintaining our engagement in advocacy platforms and groups, including the Home Office-led Vulnerability Advisory Group (VAG), currently

the Future Border and Immigration System (FBIS) Advisory Groups, an expert panel set up to provide advice on the development and implementation of the UK's post-Brexit immigration system; as well as the Home Office's Overseas Domestic Worker stakeholder group, which was set up to identify opportunities to mitigate risks on this route. Disappointingly the group has not met since October 2023 and Home Office officials have not replied to any emails regarding the group since this time. We have continued to work with colleagues including Voice of Domestic Workers, Kalayaan, Nanny Solidarity Campaign and ATLEU to ensure that the government fulfils its commitment made in March 2022 to scrap the Family Worker Exemption.

In December 2022, the UK Government announced the expansion of the Seasonal Worker Visa (SWV) allocation to 45,000 visas for 2023, together with a possible 10,000 additional visas providing certain criteria are met, and with another 2,000 even shorter-term visas for poultry. The rapid growth of the scheme remains a concern due to its speed, the lack of checks and balances or redress for workers.

During this period, FLEX continued monitoring the impact of the risks on seasonal agricultural workers through a partnership project conducted with two frontline organisations: Rosmini Centre, in Cambridgeshire, and Citizens Advice South Lincolnshire. The project involves conducting outreach to workers, providing support and documenting their experiences as seasonal workers. FLEX has also conducted a series of interviews with relevant stakeholders. We have also joined two additional projects focusing on mitigating risk factors in this scheme: one led by an academic team looking to compare the newly introduced routes into agriculture and social care; and another one led by a small farmers' association focusing on supply chain dynamics in the agricultural sector and the legal discriminations faced by migrant workers.

On the other hand, FLEX has also started researching the risk of exploitation in sectors that have previously been highly reliant on workers from the EU, but which are no longer able to recruit migrants due to the end of free movement. As part of this project, we published an academic journal article entitled 'The making of irregular migration: post-Brexit immigration policy and risk of labour exploitation', which was published in the *Journal of Poverty and Social Justice*.

Drawing on this evidence we have actively engaged in advocacy work and submitted written evidence to several enquiries and consultations, including the EFRA Committee's inquiry into labour shortage, to the Independent Chief Inspector of Border and Immigration (ICIBI), Migration Advisory Committee (MAC), and to the UN Special Repertoire on Slavery to inform their report on the informal economy. This work resulted in the following key outcomes:

- The MAC's Annual Report 2022 included a chapter on risk of exploitation resulting from policy design and cited concerns with the Seasonal Agricultural Scheme. This follows ongoing work and engagement from FLEX, including presenting to MAC commissioners on how immigration policy can create risks of labour exploitation. The MAC will conduct an inquiry into the Seasonal Worker visa (SWV) in the coming year.
- The 2022 ICIBI's report on their inspection of the immigration system as it relates to agriculture highlighted significant issues around communication between the Home Office and relevant stakeholders, as well as issues of compliance with scheme rules. It also identified

a lack of clarity around responsibility for the scheme and failure to follow up on reports of abuse made by workers.

- In February 2022, government introduced the requirement to guarantee at least 32 hours paid work a week to workers on the SWV route.

B. Responding to labour exploitation risks in the UK arising from the war in Ukraine:

Following the invasion of Ukraine, FLEX coordinated a letter to the Home Secretary and the Minister, co-signed by members of the then VAG, highlighting risks to Ukrainian nationals on the SWV. At the time the government had announced they would work with employers to extend the visas of all Ukrainians on the SWV until December 2022. However, the visas would remain in the same terms. This meant that there would be no recourse to public funds, no option to switch employment to outside of the scheme or option to bring family members to safety. We noted that 19,920 SW visas issued in 2021 (67% of the total) were to Ukrainian nationals. On 29th March, the Government announced the introduction of the Ukraine Extension Scheme, which offered many Ukrainians, including those on the Seasonal Worker Visa, the ability to work in any sector, access public funds and to study will do much to prevent exploitation.

We have also started reaching out to Ukrainian nationals on the seasonal workers visa to provide information and support and identify emerging risks, such as risk of irregularity due to workers leaving the farms while unable to switch onto a different visa route. In response to the risks associated with other routes, we developed and started delivering a training programme aimed at increasing local authorities understanding for the risks of exploitation in the Ukraine Schemes, in order to ensure that the teams conducting home visits are well equipped to identify indicators of modern slavery. In addition, FLEX was invited to join the Home Office's Safeguarding group for the Homes for Ukraine Scheme. This time limited group, which met when the Scheme was 6 months old, allowed us to inform safeguarding and the future of the Homes for Ukraine sponsorship scheme.

C. Mitigating the impact of the Nationality and Borders Bill on vulnerable groups:

The regulations for the Nationality and Borders Act were rapidly drafted and put to parliament in July 2022. These concerned the definition of 'victim'. FLEX briefed parliamentarians on the importance of compliance with international ECAT definitions and the risks of an increased threshold. The regulations passed but there was strong concern regarding these points raised in the Lords who passed a motion of regret, securing a commitment that the regulations would be reviewed regularly.

The new statutory guidance requires potential victims of trafficking to have 'objective evidence' of their trafficking ahead of an initial identification decision. This raising of the initial evidence threshold will shut victims out from accessing any support and risk people being trapped in exploitation or even discredited due to receiving a negative decision. It will mean in practice that it is far less likely that any victims are identified if they don't have independent support. This evidence requirement compounds the longer-term issue of there being too few non statutory First Responder organisations able to refer into the UK's identification system. The increased threshold will mean more unfunded work prior to an initial referral and mean fewer individuals can be supported or referred in practice. We have raised

this in a blog and through the Detention Taskforce and supported LEAG member Kalayaan to highlight how this will compound the already pressing issue of First Responders' capacity.

D. Engaging in the Modern Slavery Strategy Review:

All NGO co-Chairs of the Home Office's Modern Slavery Strategy Implementation Groups and the usual functioning of these groups were put on hold for the Home Office to engage with stakeholders in the development of the new Modern Slavery Strategy, which has not been published yet.

E. Universal Periodic Review:

FLEX coordinated an anti-trafficking sector submission for UK Universal Periodic Review. We have worked with the Global Alliance Against Trafficking in Women and ASI to produce fact sheets for their influencing work in Geneva in September. The review took place in November and several recommendations from our joint submission were included within the stakeholder report in relation to ODWs and seasonal workers, the need for a Business Human Rights & Environment Act, poor labour market enforcement and the number of victims of trafficking in immigration detention. In total, 27 states made recommendations for the UK to strengthen the protections for migrant workers, 18 specifically recommended that the UK ratify the Migrant Workers Convention, and 13 states made recommendations about combating trafficking in persons. This includes a recommendation from the US that the UK *"take[s] steps to ensure migrant workers are not left vulnerable to abuse and exploitation from employers and the UK visa system."* The UK confirmed its support for this recommendation in its response to the recommendations published 24th February 2023.

F. Working towards a stronger corporate accountability framework in the UK:

During this period, FLEX worked in support of the Business, Human rights and Environment Act, also known as mHREDD law, with liability provisions based on the 'failure to prevent' model. We also started advocating for mandatory worker engagement in any future laws introduced by the UK Government in response to the Transparency in Supply Chains consultation (2020). Finally, we continue to work as an active member of the Ethical Trading Initiative and joined the Corporate Justice Coalition's Campaign and Advocacy Group to engage in discussions related to strategy and political advocacy to introduce UK binding legislation on corporate transparency.

Aim 2: Ensure that the enforcement of the full range of workers' rights forms part of national and international responses to labour exploitation.

Within this aim, FLEX works to build evidence about the links between severe labour abuses, exploitation and trafficking, and about the impact of labour market enforcement strategies and of the role of marginalised workers in preventing and addressing labour exploitation. We also seek to build understanding of the 'prevention' obligation in state responses to human trafficking for labour exploitation, by advocating for enforcement of labour standards as a central plank of effective anti-trafficking responses.

A. Participatory action research in high-risk sectors evidencing the need for better enforcement of labour rights:

FLEX worked with academics from Nottingham Rights Lab, London School of Hygiene and Tropical Medicine and University of Kent in a participatory research project with migrant live-in care workers and personal assistants in London. FLEX has provided guidance on the implementation of the Peer Researcher model, through which the project is engaging care workers as paid and trained peer researchers. The project also worked with employers, trade unions and specialist organisations. The report '[The vulnerability of paid migrant live-in care workers in London to modern slavery](#)', was published in August 2022 and received a lot of media and policy interest. FLEX also shared initial findings with the Migration Advisory Committee, who included them in their report to the government on immigration policy for the social care sector. In exit interviews, Peer Researchers have spoken about how much they have enjoyed the research process and have all expressed an interest to engage in sharing the findings with policy makers and participating in future research.

During this period, FLEX also started working in collaboration with the Young Foundation on a participatory research project on access to advice services for migrant workers in London, commissioned by the Greater London Authority. The aim of this project is to increase understanding of the support and advice services on offer to migrant workers in London, and consequently develop a strategy to improve access to advice and support for migrant workers experiencing abuse and exploitation in London. This project uses a Feminist Participatory Action Research (FPAR) approach. FLEX assisted with hiring and training six peer researchers across the adult social care, hospitality, and cleaning. The report will be published in 2023.

B. Advocating for the strengthening of the UK's labour market enforcement system:

During this period, we continued to engage in advocacy work towards improving the UK's labour market enforcement system, including by informing the strategy of the newly appointed Director of Labour Market Enforcement (DLME), as well as via ongoing advocacy work with the Gangmasters and Labour Abuse Authority.

The expected Employment Bill was not included in the legislative timetable. However, the issue of Labour Market Enforcement is key in the context of the continued use and expansion of short-term visas, the terms of which prevent the exercising of many employment rights, and international recruitment which brings issues around international jurisdiction and accountability. FLEX engaged in a research project on the creation of a Single Enforcement Body by Rights Lab and the Office of the Independent Anti-slavery Commissioner, which resulted in a report published in February 2023, which includes a number of recommendations for a Single Enforcement Body. FLEX also met with the Shadow Minister on Immigration where they highlighted the need for a SEB and challenges with the current labour market enforcement system in the UK.

FLEX started working with an academic team from UCL on a project aiming to conduct an assessment of the nature and scale of labour market non-compliance in the UK, which was commissioned by the UK's Director of Labour Market Enforcement (DLME). This project aims to enable more evidence-informed policy and practice in this space and will run from June 2022 until December 2024 and will cover all of the UK's four nations. The research is being co-funded by the Department for Business, Energy and Industrial Strategy (BEIS) and the Economic and Social Research Council (ESRC). FLEX's role

is to advise and facilitate worker engagement by organising worker advisory groups that will help inform the scope of the research, the design of the survey tool, and other elements of the project.

C. Secure reporting:

LEAG conducted meetings with various Labour Market Enforcement Authorities to develop our understanding of how they currently engage with migrant workers and to engage in soft advocacy on the need for secure reporting. We have also continued to advance the need for secure reporting in conversations with Labour parliamentarians and party officials such as in meetings with the Labour Home Affairs team and various MPs.

Wider secure reporting advocacy has included submissions to the US State Department, the UN Special Rapporteur on migrants as well as during the academic event Between Modern Slavery and Decent Work. In October, recommendations on secure reporting were included in the Justice Committee's pre-legislative scrutiny of the Victims Bill following the submission of evidence in June 2022. FLEX raised the need for secure reporting with the OSCE Special Representative for Combating Trafficking in Human Beings in November.

LEAG has also worked with others to ensure a collective call for secure reporting. For instance, the Rights Lab and IASC report on a potential Single Enforcement Body contains a section on the need for secure reporting. In November, Hope for Justice circulated the joint FLEX/LAWRS guide for police and local authorities to community engagement and training teams. LEAG also added its name to a JCWI led briefing on secure reporting which will be used for advocacy purposes, and published in December 2022. The briefing contains extensive reference to FLEX and LEAG's work on secure reporting.

Finally, LEAG has been working on a publication that aims to illustrate the concept of the 'continuum' or the link between severe forms of labour exploitation and less severe forms of workplace abuse. The publication was supported by the Independent Anti-slavery Commissioner and will consist of a series of case studies, co-produced by survivors of exploitation and their caseworker.

D. Taskforce on Victims of Trafficking in Immigration Detention (Detention Taskforce)

During this period, the Detention Taskforce, Chaired by Helen Bamber Foundation, and coordinated by FLEX, continued to challenge and unpick unevidenced government claims around victims of trafficking 'misusing' the UK's modern slavery systems with alleged 'fraudulent trafficking claims'.

In December, the Taskforce submitted its response to the Joint Committee on Human Rights' inquiry on the human rights of asylum seekers highlighting gaps in data, the impact of detention on victims of trafficking, and raising concerns about the GPS tagging of victims of trafficking preventing access to safehouses.

E. Working with businesses to strengthen corporate responsibility practice:

FLEX is leading a new project seeking to pilot worker engagement in human rights due diligence assessments. The project will develop a corporate human rights due diligence framework for domestic service sector supply chains, which will be informed by workers' experiences.

During this period, FLEX examined over 40 publicly available assessment tools developed for different industries with the aim of developing a tool to identify, prevent, mitigate and account for risks and impacts in service sector supply chains. We also worked with the Latin American Women's Rights Service to engage outsourced migrant and ethnic minority women working in cleaning, and held meetings with various companies procuring cleaning services. Two corporate partners were recruited as pilot participants.

Aim 3: To mobilise cooperation in addressing labour exploitation by providing leadership and expertise across sectors.

Within this aim FLEX has the following objectives: To develop methodologies for engagement with 'experts by experience' and foster recognition of their role as key for driving effective change; to develop awareness about labour exploitation and its prevention among key stakeholders, such as civil society network and platforms; and to leverage national, international and global networks to hold governments to account and advocate for the rights of victims of trafficking for labour exploitation. Our media and communications work under this aim seeks to diversify the voices and actors represented in media coverage about labour exploitation and to support the empowerment of people affected, as well as to challenge unevidenced rhetoric around slavery and the UK's systems being too generous or 'abused'.

A. Engaging workers in developing knowledge

FLEX developed and implemented a Peer Researcher model, a feminist participatory action research (FPAR) approach to investigate drivers of labour exploitation and to develop better informed policy, working 'with' rather than 'on' the community being researched. Through this model, we have worked with a network of paid peer researchers at every stage, from research design to data collection, analysis and advocacy. Peer researchers received training on research methods, ethics, safeguarding and signposting, as well as ongoing support.

During this period, we continued disseminating the learnings from this work and encouraging others to explore ways to engage workers as Peer Researchers. We partnered with two research teams to guide and support their use of this methodology. The first project focused on migrant live-in care workers and personal assistants in London, and was conducted with academics from Nottingham Rights Lab, London School of Hygiene and Tropical Medicine and Oxford Brookes University. The other project was led by the Young Foundation and focused on improving access to advice and support for migrant workers experiencing abuse and exploitation in London.

B. Strengthening the Labour Exploitation Advisory Group (LEAG):

FLEX secured an additional grant to implement LEAG's plans to produce a report compiling case studies that could help document the spectrum of experiences workers may face in the labour market, evidencing the links between more severe forms of abuse and lower level issues of non compliance with labour laws and standards (see Aim 2 for more information about LEAG's work).

During this period, FLEX joined the Mayor's Equality Diversity and Inclusion Advisory Group in representation of the MRAP (the Mayor of London's Migration and Refugee Advisory Panel). The EDI seeks to shape, influence and guide the delivery of the Mayor's EDI strategy through consultation with key stakeholders.

C. Working Group on Women Workers, focusing on sexual harassment:

The Working Group on Women Workers is a 'task and finish' stakeholder group made up of academics, trade unions, legal experts, migrant community organisations, and other civil society actors. The group is dedicated to understanding and addressing specific workplace risks and types of gender-related abuse that can put women workers at risk of exploitation.

During this period, the group was convened to discuss gaps in enforcement of sexual harassment rules. This work resulted in the publication of a position paper and several joint advocacy meetings with different labour market enforcement bodies. The position paper is available [here](#).

D. Training statutory bodies and front-line organisations to increase their capacity to identify and respond to labour exploitation:

FLEX delivers a bespoke **training programme for front line organisations** that aims to build their capacity to identify and support beneficiaries with employment issues across the continuum of exploitation, including employment rights issues, identifying and referring potential modern slavery, and accessing specialist advice and support.

This year, we trained four partner organisations: Indoamerican Refugee and Migrant Support Organisation (IRMO), Asian Women's Resource Centre (AWRC), Helen Bamber Foundation, and The Voice of Domestic Workers. These organisations reflect this project's aim to work with those supporting groups of workers who are less likely to access mainstream support services on employment issues, such as migrant workers.

In addition, following our **awareness raising project focusing on the cleaning sector**, delivered in partnership with the EERC and LAWRS, with the support of the GLAA, FLEX produced a video which the GLAA has incorporated into their accredited learning models on how to prevent labour exploitation, which is offered to young people completing vocational training via colleges. Learnings from this project were shared at a roundtable with senior GLAA staff, including its CEO, and presented to the GLAA's NGO worker forum with a view to developing practical processes to increase prevention work, including through clear reporting pathways.

During this period, we also developed and launched a new training project for local authorities focused on identifying and dealing with **risks of labour exploitation for displaced Ukrainians** arriving or remaining in the UK on the various schemes government opened in response to the invasion of the country. In preparation for this work, we held various listening sessions with local authority staff, police, NGO representatives and others engaged in support for Ukrainians. Many local authorities are overwhelmed with Ukrainians requiring their support and there is a need for increased understanding of risks of exploitation in this context.

Finally, FLEX has responded to training requests from local authorities and the Greater London Authority.

E. Supporting the wider movement:

FLEX is member of key international advocacy networks, including GAATW, LaStrada International, and PICUM. In the UK, FLEX is a member of the Ethical Trading Initiative, the Corporate Justice Coalition, the Anti-trafficking Monitoring Group, the Human Trafficking Foundation forums, Trust for London's Employment Legal Advice Network (ELAN), the BME Anti-Slavery Network (BASNET), and a supporter of Unchecked UK.

During this period, FLEX worked in collaboration with key partners on numerous joint advocacy actions in support of the wider movement for change, including 25 joint letters. For instance, FLEX joined over 50 leading human rights organisations led by Liberty, Human Rights Watch and the Trade Union Congress in response to Governments' new anti-strikes laws.

During this period, FLEX took a more proactive role in coordinating efforts across sectors in response to key emerging issues and concerns. For instance, we have worked with Anti-slavery International to respond to the call of the UN Special Rapporteur on the human rights of migrants on [how to expand and diversify regularization mechanisms and programs to enhance protections](#). We also worked with nine other organisations, including the ATMG, ATLEU, Hope for Justice and others to produce a joint anti-trafficking sector response to the Ministry of Justice's Immigration Legal Aid consultation on new fees for new services, and with four partners to produce a response to their Legal Aid Means Test review.

Aim 4: To ensure that FLEX is able to respond to the interests of actual and potential victims of human trafficking for labour exploitation.

During this period, we have continued working to progress the aims of FLEX's Business Plan 2020-2025 and have conducted a review of our 'Diversity and Inclusion Strategy' to assess the progress made and identify new targets. In this period, this work included reviewing several policies including in FLEX's Staff Handbook; introducing a new Staff Wellbeing policy and an Employee Assistance Programme (EAP); delivering in-house training on safeguarding; diversifying our Board of Trustees; and developing collaborations with organisations working with under-represented groups.

This objective also relates to ensuring a healthy and productive working environment for FLEX staff. To this end, during this period a review of most HR policies contained in the FLEX Staff Handbook and introduced significant improvements to our working conditions related to annual leave entitlements and TOIL; occupational sick pay; enhanced maternity, paternity and adoption pay; pension contribution and others. We have also set up a new Staff Wellbeing Working group, made of four staff members, to discuss ways in which the organisation can better support the wellbeing of the team. The work of this group resulted in a new Staff Wellbeing policy.

In terms of our external communications, during this period we introduced a new Communications Officer role, which has allowed us to significantly increase our audiences. During this period, **FLEX has**

provided background information to numerous press pieces and featured in the media 30 times, including the following pieces:

- **The Grocer**, 10.06.22: '[Concerns over criminals using seasonal worker visa to exploit labourers](#)'
- **Byline Times**, 06.09.22: '[Modern Slavery Victims have been Pawns in Government's Anti-Asylum Seeker Campaigns](#)'
- **The Observer**, 13.11.22: '[Seasonal fruit pickers left thousands in debt after being sent home early from UK farms](#)'
- **Financial Times**, 19.12.22: '[Investors warn food companies about risk of forced labour on UK farms](#)'
- **The Guardian**, 12.02.23: '[Modern slavery survivors could be re-trafficked in UK, charities warn](#)'
- **The Guardian**, 22.02.23: '[Farm workers on UK seasonal visas to be guaranteed 32 hours a week](#)'
- **BBC World Service**, 02.03.23: '[A story of Modern Slavery in the UK](#)'

We have also published two pieces authored by FLEX, one co-authored with a spokesperson from the Voice of Domestic Workers:

- **Politics Home**, 09.02.22: '[The UK is failing victims of Modern Slavery](#)'. Article written by FLEX's Training Officer and a representative from the Voice of Domestic Workers).
- **Open Democracy**, 21.10.22: '[The UK government is undermining decades of anti-slavery efforts](#)'. Op-ed written by FLEX's Head of Policy.

We have posted 32 blogs and news pieces on our website, including 6 guest blogs (Southeast and East Asian Centre, LAWRS, UK BME Anti-Slavery Network, Filipino Domestic Workers Association, Helen Bamber Foundation, and the International Transport Workers Federation) and **a series of blogs for 16 days of activism against gender-based violence** showcasing the **testimonies from 6 women** working in hospitality, cleaning and app-base delivery work **on the issue of sexual harassment at work**.

In March 2023, to mark FLEX's 10th Anniversary, we refreshed our image and launched our **new website**, which includes thematic pages on our different areas of focus, as well as resources for workers, a brand-new training portal with learning resources for training participants, and improved search options allowing users to browse our publications more easily.

Finally, this objective relates to our sustainable funding strategy and over the past year FLEX has maintained its financial sustainability, developing existing work and new partnerships with the support of existing and new funders. We have worked hard to counterbalance the sustainability risks brought up by the COVID-19 pandemic and to diversify our income streams through statutory funding and cross-sectors partnerships.

We developed new partnership projects with 16 organisations, including Rosmini Community Centre in Cambridgeshire, Citizens Advice South Lincolnshire (CASL), Landworkers Alliance, Unison, Southeast and East Asian Centre (SEEAC), IRMO, Asian Women Resource Centre, Voice of Domestic Workers, and

various LEAG members working in London, including LAWRS, Work Rights Centre, and Kanlungan. We also delivered three partnership projects with academics from Nottingham University Rights Lab, Exeter University, and UCL.

Financial review

The charity's income increased to £618,436 (2021: £467,119). The charity was able to increase the number of grants in the year including working with new funders.

Total expenditure was £469,189 (2022: £386,310) resulting in a net surplus for the year of £149,247 and total reserves of £515,483. Unrestricted reserves increased to £253,032 (2022: £228,011).

Investment powers and policy

The charity is seeking to build reserves in line with the charity's reserves policy (see below). As most of the charity's funds are to be spent in the short term there are currently no funds available for long-term investment. Investment income earned during the year relates to interest on the charity's bank account.

Reserves policy and going concern

The surplus for the year increased the charity's unrestricted reserves to £253,032. The Trustees designated £25,000 of unrestricted reserves to support enhanced paternal leave and sickness pay in the prior year and this remains in place at 31 March 2023. The unrestricted reserves are in line with the reserves target, to cover 3 months operating cost (£115,982).

The Trustees are confident that the charity has adequate resources to operate for the foreseeable future due the unrestricted reserves and the level of secured income for the next financial year.

Plans for future periods

FLEX's work plans for the period to 2024 are derived from its Strategic Plan 2020-25, and are focussed on strengthening worker engagement and our comms work to support the promotion of its unique expertise and approach to the prevention of trafficking for labour exploitation at the national and international level.

Our plans include conducting rigorous research, developing policy recommendations, engaging people with lived experience, working with businesses and employers to identify concrete actions that respond to workers' priorities, increasing stakeholders' capacity to prevent, identify and address exploitation; and building networks and opportunities for international advocacy. For 2023/24, some of the key areas of focus for FLEX will include:

- Continuing evidencing the risks of the new immigration system and working to inform safer labour migration routes, and actively engaging in advocacy work to increase understanding of these risks and improve protections for workers;

- Continuing FLEX's research and participatory work in high-risk labour sectors, including those impacted by labour shortages and the end of free movement, such as agriculture and social care;
- Engaging in key advocacy processes, including parliamentary work around the Nationality and Borders Bill, the Illegal Immigration Bill, and the Human Rights Act; as well as on the National Referral Mechanism and the off-shoring of asylum seekers to Rwanda;
- Strengthening our engagement of experts by experience across all areas of FLEX's work by creating a new Worker Engagement Officer role.
- Continuing to develop our networks and investing in increasing mutual capacity to jointly work towards preventing labour exploitation;
- Continuing delivering a pilot project to explore mechanisms for a stronger worker engagement approach to corporate accountability;
- Increasing our visibility through high-profile strategic communications work and celebrating FLEX's 10th Anniversary.

Reference and administrative details

Charity number (England and Wales): 1159611

Company number: 08451701

Registered and Principal Office: The Foundry, 17 Oval Way, London, SE11 5RR

Our advisors

Bankers Triodos Bank, Deanery Road, Bristol, BS1 5AS

The Co-operative Bank, 1 Balloon Street, Manchester, M60 4EP

Directors and trustees

The directors of the charitable company (the charity) are its trustees for the purpose of charity law.

The trustees and officers serving during the year and since the year end were as follows:

Chair	Adam Weiss
Elected Trustees	Peter Andrews
	Vash Arora
	Claire Falconer
	Rachel Hewitt
	Shereen Hussein
	Ian Robinson
	Dora-Olivia Vicol

Key management personnel:

Chief Executive Lucila Granada

Structure, Governance and Management

Governing Document

The organisation registered as a charity on 15 December 2014. The company was established under a Memorandum of Association which established the objects and powers of the charitable company and is governed under its Articles of Association. In the event of the company being wound up members are required to contribute an amount not exceeding £50.

Trustee induction and training

New trustees are inducted through a meeting with management. Trustees are provided with a copy of the FLEX Trustees Terms of Reference and the Charity Commission's introductory guidance for trustees. New trustees are also asked to complete a personal details form, a declaration of interests, and a skills audit to identify training needs. All trustees are regularly offered training on matters concerning governance.

Organisation

The trustees meet on a quarterly basis and oversee the strategic direction of the charity. The day to day operations and management is delegated to the Chief Executive Officer.

Related parties

None of our trustees receive remuneration or other benefit from their work with the charity.

Pay policy for senior staff

The Board's Remuneration Committee determines the salary of the Executive Director and sets pay scales for all staff. The FLEX Trustees Terms of Reference set out the Terms of Reference for the Remuneration Committee. The Committee includes the Treasurer and at least one other trustee, and meets once a year to review the salary of the Executive Director and pay scales, and make recommendations to the Board.

Risk management

The trustees have reviewed the major risks to which the charity is exposed. A risk register has been established which is updated annually. Where appropriate, systems or procedures have been established to mitigate the risks and these are periodically reviewed to ensure that they continue to meet the needs of the charity. The trustees deem that appropriate measures are currently in place to mitigate risk, particularly in the light of the on-going difficult economic environment.

Trustees' responsibilities in relation to the financial statements

The trustees (who are also the directors for the purpose of company law) are responsible for preparing the Annual Report and the financial statements in accordance with applicable law and regulations.

Company law requires the trustees to prepare financial statements for each financial year. Under that law the trustees must prepare the financial statements in accordance with United Kingdom Generally Accepted Accounting Practice (United Kingdom Accounting Standards and applicable law). Under company law the trustees must not approve the financial statements unless they are satisfied that they give a true and fair view of the state of affairs of the charitable company and of the incoming resources and application of resources, including the income and expenditure, of the charitable company for that period.

In preparing these financial statements, the trustees are required to:

- a) select suitable accounting policies and then apply them consistently;
- b) observe the methods and principles in the Charities SORP;
- c) make judgments and accounting estimates that are reasonable and prudent;
- d) state whether applicable UK Accounting Standards have been followed, subject to any material departures disclosed and explained in the financial statements; and
- e) prepare the financial statements on the going concern basis unless it is inappropriate to presume that the charitable company will continue to operate.

The trustees are responsible for keeping adequate accounting records that are sufficient to show and explain the charitable company's transactions and disclose with reasonable accuracy at any time the financial position of the charitable company and enable them to ensure that the financial statements comply with the Companies Act 2006. They are also responsible for safeguarding the assets of the

company and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.

The trustees are responsible for the maintenance and integrity of the corporate and financial information included on the charitable company's website. Legislation in the United Kingdom governing the preparation and dissemination of financial statements may differ from legislation in other jurisdictions.

The trustees confirm that so far as they are aware, there is no relevant audit information (as defined by section 418(3) of the Companies Act 2006) of which the charitable company's auditors are unaware. They have taken all the steps that they ought to have taken as trustees in order to make themselves aware of any relevant audit information and to establish that the charitable company's auditors are aware of that information.

By order of the board of trustees

Adam Weiss

DATE: 28 September 2023

Independent Examiner's Report to the trustees Focus on Labour Exploitation

I report to charity trustees on my examination of the accounts of the charity for the year ended which comprise the Statement of Financial Activities, the Balance Sheet and related notes.

This report is made solely to the charity's trustees, as a body, in accordance with section 145 of the Charities Act 2011. My work has been undertaken so that I might state to the charity's trustees those matters I am required to state to them in this report and for no other purpose. To the fullest extent permitted by law, I do not accept or assume responsibility to anyone other than the charity and the charity's trustees as a body, for my work, for this report, or for the opinions I have formed.

Responsibilities and basis of report

As the charity trustees of Focus on Labour Exploitation you are responsible for the preparation of the accounts in accordance with the requirements of the Charities Act 2011 ('the Act').

I report in respect of my examination of the Focus on Labour Exploitation's accounts carried out under section 145 of the 2011 Act and in carrying out my examination I have followed all the applicable Directions given by the Charity Commission under section 145(5)(b) of the Act.

An independent examination does not involve gathering all the evidence that would be required in an audit and consequently does not cover all the matters that an auditor considers in giving their opinion on the financial statements. The planning and conduct of an audit goes beyond the limited assurance that an independent examination can provide. Consequently I express no opinion as to whether the financial statements present a 'true and fair' view and my report is limited to those specific matters set out in the independent examiner's statement.

Independent examiner's statement

I have completed my examination. I confirm that no material matters have come to my attention in connection with the examination giving me cause to believe that in any material respect:

1. accounting records were not kept in respect of Focus on Labour Exploitation as required by section 130 of the Act; or
2. the financial statements do not accord with those records; or
3. the financial statements do not comply with the accounting requirements concerning the form and content of accounts set out in the Charities (Accounts and Reports) Regulations 2008 other than any requirement that the accounts give a 'true and fair view' which is not a matter considered as part of an independent examination.

I have no concerns and have come across no other matters in connection with the examination to which attention should be drawn in this report in order to enable a proper understanding of the accounts to be reached.

.....
Timothy Sullivan FCA
ICAEW

9 Hare & Billet Road
Blackheath
SE3 0RB

Date: 18 October 2023

Statement of Financial Activities for the year ending 31 March 2023

	Note	Unrestricted Funds £	Restricted Funds £	Total Funds 2023 £	Total Funds 2022 £
Income:					
Donations	3	94,652	517,619	612,271	452,792
Income from other trading activities:					
Consultancy fees		5,497	-	5,497	14,235
Investment income	4	668	-	668	92
Total income		100,817	517,619	618,436	467,119
Expenditure					
<i>Expenditure on charitable activities:</i>	5	75,796	393,393	469,189	386,310
Total expenditure		75,796	393,393	469,189	386,310
Net movement in funds for the year		25,021	124,226	149,247	80,809
Reconciliation of funds					
Total funds brought forward		253,011	113,225	366,236	285,427
Total funds carried forward		278,032	237,451	515,483	366,236

The statement of financial activities includes all gains and losses recognised in the year.
All income and expenditure derive from continuing activities.

Balance sheet as at 31 March 2023

	Note	2023 £	2022 £
Fixed assets			
Tangible assets	9	686	1,636
Total Fixed Assets		<u>686</u>	<u>1,636</u>
Current assets			
Debtors	10	19,461	73,045
Cash at bank and in hand		510,912	348,094
Total Current Assets		<u>530,373</u>	<u>421,139</u>
Liabilities			
Creditors falling due within one year	11	(15,576)	(56,539)
Net Current assets		<u>514,797</u>	<u>364,600</u>
Total assets		<u>515,483</u>	<u>366,236</u>
The funds of the charity:			
Designated funds		25,000	25,000
Unrestricted funds		253,032	228,011
Restricted funds	12	237,451	113,225
Total charity funds		<u>515,483</u>	<u>366,236</u>

For the financial year ending 31 March 2023 the charity was entitled to exemption from audit under section 447 of the Companies Act 2026 relating to small companies.

Directors' responsibilities:

- The members have not required the charity to obtain an audit of its accounts for the year in question in accordance with section 476; and
- The directors acknowledge their responsibilities for complying with the requirements of the Act with respect to accounting records and the preparation of accounts.

These accounts have been prepared in accordance with the provisions applicable to companies subject to the small companies regime.

The notes at pages 25 to 33 form part of these accounts

Adam Weiss, on behalf of the trustees

Approved by the trustees on 28 September 2023

Notes on the accounts

1 Accounting policies

1.1 Charity status

The charity is limited by guarantee, incorporated in England and Wales, and consequently does not have share capital. Each of the trustees is liable to contribute an amount not exceeding £50 towards the assets of the charity in the event of liquidation.

The address of its registered office is:

The Foundry
17 Oval Way
London
SE11 5RR

These financial statements were authorised for issue by the trustees on 22 September 2021.

1.2 Basis of Preparation of the accounts

The financial statements have been prepared in accordance with the Accounting and Reporting by Charities: Statement of Recommended Practice applicable to charities preparing their accounts in accordance with the Financial Reporting Standard applicable in the UK and Republic of Ireland (FRS 102) (effective 1 January 2015) – (Charities SORP (FRS 102)), the Financial Reporting Standard applicable in the UK and Republic of Ireland (FRS 102) and the Companies Act 2006

Focus on Labour Exploitation meets the definition of a public benefit entity under FRS 102. Assets and liabilities are initially recognised at historical cost or transaction value unless otherwise stated in the relevant accounting policy note(s)

1.3 Preparation of the accounts on a going concern basis

The unrestricted reserves are above the reserves target, the charity has secured a good level of income for 2021-22 and has a positive cash flow. As a result the Trustees are confident that the charity has adequate resources to operate for the foreseeable future.

1.4 Income

Income is recognised when the charity has entitlement to the funds, any performance conditions attached to the item(s) of income have been met, it is probable that the income will be received and the amount can be measured reliably.

Gifts and services in kind are recognised on the basis of the value of the gift to the charity which is the amount the charity would have been willing to pay to obtain services or facilities of equivalent economic benefit on the open market; a corresponding amount is then recognised in expenditure in the period of receipt.

Grants are recognised in full in the Statement of Financial Activities in the year in which they are receivable or any requirement imposed on the grant is fulfilled.

Investment income is recognised on a receivable basis.

1.5 Expenditure and irrecoverable VAT

Expenditure is recognised once there is a legal or constructive obligation to make a payment to a third party, it is probable that settlement will be required and the amount of the obligation can be measured reliably. Expenditure is classified under the following activity headings:

Fundraising costs are those costs incurred in attracting voluntary income, in particular grant funding and the costs of maintaining the charity's profile within the sector.

Expenditure on charitable activities includes the cost of policy and research work undertaken to further the purposes of the charity and their associated support costs.

1.6 Exemption from preparing a cash flow statement

The charity opted to early adopt Bulletin 1 published on 2 February 2016 and have therefore not included a cash flow statement in these financial statements.

1.7 Tangible fixed assets and depreciation

Tangible fixed assets are stated at cost less depreciation. Depreciation is provided at rates calculated to write off the cost less estimated residual value of each asset over its expected useful life, as follows:

Fixtures & fittings	20% Straight line
Computer equipment	33% Straight line

1.8 Fund accounting

Unrestricted funds are general funds that are available for the use at the trustees' discretion in furtherance of the objectives of the charity.

Restricted funds are subject to specific conditions by donors as to how they may be used. The purposes and uses of the restricted funds are set out in the notes to the accounts.

1.9 Trade debtors

Trade debtors are amounts due from customers for merchandise sold or services performed in the ordinary course of business.

Trade debtors are recognised initially at the transaction price. They are subsequently measured at amortised cost using the effective interest method, less provision for impairment. A provision for the impairment of trade debtors is established when there is objective evidence that the charity will not be able to collect all amounts due according to the original terms of the receivables.

1.10 Cash and cash equivalents

Cash and cash equivalents comprise cash on hand and call deposits, and other short-term highly liquid investments that are readily convertible to a known amount of cash and are subject to an insignificant risk of change in value.

1.11 Trade creditors

Trade creditors are obligations to pay for goods or services that have been acquired in the ordinary course of business from suppliers. Accounts payable are classified as current liabilities if the charity does not have an unconditional right, at the end of the reporting period, to defer settlement of the creditor for at least twelve months after the reporting date. If there is an unconditional right to defer settlement for at least twelve months after the reporting date, they are presented as non-current liabilities.

Trade creditors are recognised initially at the transaction price and subsequently measured at amortised cost using the effective interest method.

2 Statement of Financial Activity – comparative figures to 31 March 2022

	Unrestricted Funds £	Restricted Funds £	Total Funds 2021 £
Income:			
Donations	134,756	318,036	452,792
Income from other trading activities:			
Consultancy fees	14,235	-	14,235
Investment income	92	-	92
Total income	149,083	318,036	467,119
Expenditure			
<i>Expenditure on charitable activities:</i>	28,032	358,278	386,310
Total expenditure	28,032	358,278	386,310
Net movement in funds for the year	121,051	(40,242)	80,809
Reconciliation of funds			
Total funds brought forward	131,960	153,467	285,427
Total funds carried forward	253,011	113,225	366,236

3. Donations

	2023	2022
	£	£
Barrow Cadbury Trust	31,000	31,500
Esmee Fairbairn Foundation	55,000	-
Trust for London	32,225	20,025
John Ellerman Foundation	36,603	37,656
Joseph Rowntree Charitable Foundation	95,492	32,720
Justice Together	145,304	2,195
The Oak Foundation	38,640	72,216
Unbound Philanthropy	40,000	40,000
Paul Hamlyn Foundation	54,890	49,200
Ethical Trading Initiative	3,290	3,293
City Bridge Trust	37,129	18,420
The Landworkers' Alliance	7,500	-
MOPAC	-	23,518
The Home Office	-	75,050
The Scottish Ministers	17,056	10,000
Ethos Foundation	-	10,000
AB Charitable Trust	-	20,000
Kickstart grant	-	6,565
University of Exeter	15,093	-
Other gifts	3,349	434
	<u>612,571</u>	<u>452,792</u>

Total donations were £612,571 (2022: £452,792) of which £94,952 (2022: £134,756) was unrestricted and £517,619 (2022: £318,036) was restricted.

4. Investment income

	2023	2022
	£	£
Interest received	668	92
	<u> </u>	<u> </u>

5. Analysis of expenditure on charitable activities

Description	Charitable Activities	2023	2022
	£	£	£
Direct costs	93,156	93,156	93,804
Direct salary costs	332,197	332,197	251,480
Depreciation	950	950	1,247
Support costs:			
<i>Rent</i>	24,498	24,498	24,457
<i>Financial consultancy</i>	5,228	5,228	5,200
<i>Payroll and recruitment costs</i>	551	551	
<i>Travel & accommodation</i>	3,047	3,047	227
<i>Insurance</i>	1,900	1,900	1,742
<i>General office</i>	5,985	5,985	3,153
<i>Independent examination/Audit fee</i>	1,980	1,980	5,000
Total	469,490	469,490	386,310

Expenditure on charitable activities was £469,490 (2022: £386,310) of which £28,032 (2021: £71,585) was unrestricted and £358,278 (2021: £244,667) was restricted.

The amount paid to the auditor for their external scrutiny was £1,650 (2022: £4,800).

6. Analysis of staff costs, trustee remuneration and expenses, and the cost of key management personnel

	2022	2022
	£	£
Salaries and wages	303,432	228,306
Social security costs	21,715	17,972
Pension costs	7,050	5,202
	<u>332,197</u>	<u>251,480</u>

No employee had employee benefits in excess of £60,000 (2020: nil).

The charity trustees were not paid or received any other benefits from employment with Focus on Labour Exploitation. No trustees were reimbursed expenses during the year and no trustees were reimbursed in the prior year. No charity trustee received payment for professional or other services supplied to the charity (2022: nil).

The key management personnel comprises the Chief Executive and their total benefits during the year were £59,500 (2022 - £57,613).

7. Staff numbers

The average monthly head count was 9.5 staff (2022: 7 staff).

8. Corporation Taxation

The charity is exempt from tax on income and gains falling within section 505 of the Taxes Act 1988 or section 252 of the Taxation of Chargeable Gains Act 1992 to the extent that these are applied to its charitable objects.

9. Tangible fixed assets

	Fixtures and fittings £	Computer equipment £	Total £
Cost at 31 March 2022	1,038	10,069	11,107
Disposals	-	(4,279)	(4,279)
Cost at 31 March 2023	<u>1,038</u>	<u>5,790</u>	<u>6,828</u>
Depreciation			
At 31 March 2022	1,038	8,433	9,471
Charge for the year	-	950	950
Disposals		(4,279)	(4,279)
At 31 March 2023	<u>1,038</u>	<u>5,104</u>	<u>6,142</u>
Net book value			
At 31 March 2023	<u>-</u>	<u>686</u>	<u>686</u>
At 31 March 2022	<u>-</u>	<u>1,636</u>	<u>1,636</u>

10. Debtors

	2023 £	2022 £
Trade Debtors	15,093	14,250
Prepayments and accrued income	<u>4,368</u>	<u>58,995</u>
	<u>19,461</u>	<u>73,045</u>

11. Creditors: amount falling due within one year

	2023 £	2022 £
Trade Creditors	1,462	40,608
Accruals	7,230	5,150
Taxation and social security	5,115	7,101
Other creditors	1,769	3,680
	<u>15,576</u>	<u>56,539</u>

12. Movement in funds

The income funds of the charity include restricted funds comprising the following unexpended balances of donations and grants held on trust for specific purposes:

Current period	Balance at 01-Apr 2022	Incoming resources	Resources expended	Transfer	Balance at 31-Mar 2023
	£	£	£	£	£
Restricted funds					
Barrow Cadbury Trust	21,006	31,000	(33,920)		18,086
Trust for London	-	32,225	(32,111)		114
Paul Hamlyn Foundation	42,578	54,890	(42,060)		55,408
Unbound Philanthropy	26,828	40,000	(39,521)		27,307
Ethical Trading Initiative	825	3,290	(3,293)		822
University of Exeter	-	15,093	(15,093)		
Joseph Rowntree Charitable Foundation	13,744	95,492	(51,260)		57,976
City Bridge Trust	8,244	37,129	(30,843)		14,530
Tides	-	38,640	(15,230)		23,410
Justice Together	-	145,304	(105,506)		39,798
The Scottish Ministries		17,056	(17,056)		
The Landworkers Alliance		7,500	(7,500)		
Total restricted funds	113,225	517,619	(393,393)		237,451
Unrestricted					
Unrestricted general fund	228,011	100,817	(69,757)	(6,039)	253,032
Designated					
Enhanced leave fund	25,000		(6,039)	6,039	25,000
Total funds	366,236	617,644	469,489	-	515,483

The designated fund is used to provide enhanced paternal and sick leave payments. The Trustees approved the transfer in the year following payments from the designation.

Prior period	Balance at 01-Apr 2021	Incoming resources	Resources expended	Transfer	Balance at 31-Mar 2022
Restricted funds	£	£	£	£	£
Barrow Cadbury Trust	19,825	31,500	(30,319)	-	21,006
Trust for London	13,867	20,025	(33,892)	-	-
Paul Hamlyn Foundation	37,509	49,200	(44,131)	-	42,578
Unbound Philanthropy	17,130	40,000	(30,302)	-	26,828
The Scottish Ministers	-	10,000	(10,000)	-	-
Ethical Trading Initiative	1,100	3,293	(3,568)	-	825
Esmee Fairbairn Foundation	29,500		(29,500)	-	-
COVID 19	21,464		(21,464)	-	-
MOPAC	-	23,518	(23,518)	-	-
The Home Office	-	75,050	(75,050)	-	-
Joseph Rowntree Charitable Foundation	-	32,720	(18,976)	-	13,744
City Bridge Trust	13,072	18,420	(23,248)	-	8,244
Oak Foundation	-	5,550	(5,550)	-	-
Kickstart grant	-	6,565	(6,565)	-	-
Justice Together	-	2,195	(2,195)	-	-
Total restricted funds	153,467	318,036	358,278	-	113,225
Unrestricted					
Unrestricted general fund	131,960	149,083	(28,032)	(25,000)	228,011
Designated					
Enhanced leave fund	-	-	-	25,000	25,000
Total funds	285,427	467,119	330,246	-	366,236

The purpose of each restricted fund is as follows:

- Barrow Cadbury Trust: to support policy advocacy work
- Trust for London: to work in London to prevent trafficking and to promote best practice responses
- Paul Hamlyn Foundation: to support research into three high risk labour sectors for EEA workers
- Unbound Philanthropy: for research on the impact of Brexit on EEA workers vulnerability to exploitation
- The Scottish Ministers: for outreach to workers in farms to provide support and gather evidence of the experiences of workers in the horticulture sector.
- Ethical Trading Initiative: to participate in ETI activities.
- Esmee Fairbairn Foundation: to support core operational costs and delivery of capacity building for local authorities.
- The COVID 19 project was funding by donations from Paul Hamlyn, Unbound Philanthropy and Trust for London and impact of the COVID-19 pandemic on workers in low pay.
- MOPAC: to provide training to ensure professional are able to spot the signs of modern slavery and human trafficking

- Home Office: to provide an awareness raising campaign for the cleaning industry
- Joseph Rowntree Charitable Foundation: to develop and pivot a worker-driven model for assessing corporate human rights due diligence and provide a trial
- City Bridge Trust: to build capacity of organisations supporting London communities at risk of labour exploitation, modern slavery and trafficking.
- Oak Foundation: funding to support the cost of the annual audit
- Kickstart grant: funding towards the salary of an apprentice
- Justice Together: funding to work to make current and future short-term work visas fairer and safer
- University of Exeter: funding to research into immigration rules and labour policies
- Landworkers' Alliance: funding to research structural causes for poor working conditions in the conventional agricultural sector

13. Analysis of net assets between funds

	Unrestricted Funds £	Restricted Funds £	Total £
Funds balances at 31 March 2023 are represented by:			
Tangible Fixed Assets	686	-	686
Current Assets	287,822	242,551	530,373
Creditors: amounts falling due within one year	(15,576)	-	(15,576)
	<u>272,932</u>	<u>242,551</u>	<u>515,483</u>

	Unrestricted Funds £	Restricted Funds £	Total £
Funds balances at 31 March 2022 are represented by:			
Tangible Fixed Assets	1,636	-	1,636
Current Assets	268,064	153,075	421,139
Creditors: amounts falling due within one year	(16,689)	(39,850)	(56,539)
	<u>253,011</u>	<u>113,225</u>	<u>366,236</u>

FOCUS ON LABOUR EXPLOITATION

England & Wales - Charity number 1159611

Accounts

Focus on Labour Exploitation
(A company limited by guarantee)
Report and Financial Statements
For the year ended 31 March 2022

Charity registration no 1159611

Company registration no 08451701

Focus on Labour Exploitation

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Reference and administrative details

Trustees	Peter Andrews Vash Arora Jane Ellis (resigned 24 th March 2022) Claire Falconer Rachel Hewitt Ian Robinson Dora-Olivia Vicol (appointed 24 th March 2022) Adam Weiss
Principal Office	The Foundry 17 Oval Way London SE11 5RR
Charity number	1159611
Company number	08451701
Bankers	Triodos Bank Deanery Road Bristol BS1 5AS The Co-operative Bank 1 Balloon Street Manchester M60 4EP
Auditor	Field Sullivan Limited 9 Hare & Billet Road Blackheath SE3 0RB

Focus on Labour Exploitation

Report of the trustees for the year ending 31 March 2022

The trustees present their report and accounts for the year ended 31 March 2022.

The accounts have been prepared in accordance with the accounting policies set out in note 1 to the accounts and comply with the charity's memorandum and articles of association, the Charities Act 2011, the Companies Act 2006, the Charities and Trustee Investment (Scotland) Act 2005 and Accounting and Reporting by Charities: Statement of Recommended Practice applicable to charities preparing their accounts in accordance with the Financial Reporting Standard application in the UK and Republic of Ireland (FRS 102).

Our purposes and activities

Our charity's purpose as set out in the objects contained in the company's memorandum of association are:

To promote and advance the human rights of victims of human trafficking, and in particular, those trafficked for the purpose of labour exploitation, in the United Kingdom and throughout the world, by all or any of the following means:

- Monitoring abuses of the human rights of victims of human trafficking;
- Obtaining legal or other redress for abuses of the human rights of victims of human trafficking;
- Research into issues affecting the human rights of victims of human trafficking, and in particular, those trafficked for the purpose of labour exploitation;
- Providing technical guidance, both to Governments and organisations working with victims of human trafficking, on issues concerning the human rights of victims of human trafficking;
- Contributing to the sound administration of laws which protect the human rights of victims of trafficking;
- Commenting on the effect of proposed legislation on the human rights of victims of human trafficking;
- Raising awareness of, and promoting public support for, human rights issues affecting victims of human trafficking;
- Promoting respect for the human rights of victims of human trafficking amongst both individuals and corporations;
- International advocacy of the human rights of victims of human trafficking.

In shaping our objectives for the year and planning our activities, the trustees have considered the Charity Commission's guidance on public benefit, including the guidance 'public benefit: running a charity (PB2).

The company works to benefit both current and potential victims of trafficking for labour exploitation, in the UK and worldwide.

The trustees have considered this matter and concluded:

1. that the aims of the organisation continue to be charitable;
2. that the aims and the work done give identifiable benefits to the charitable sector and both indirectly and directly to individuals in need;
3. that the benefits are for the public, are not unreasonably restricted in any way and certainly not by ability to pay; and
4. that there is no detriment or harm arising from the aims or activities.

Achievements and performance

Throughout 2021/22, FLEX has built on its work to improve national and international responses to better protect and promote the rights of people facing or at risk of exploitation. Achievements are detailed below following the framework provided by FLEX's Strategic Plan 2020-25:

FLEX has a vision of a world free from all forms of labour exploitation, including forced labour and human trafficking.

Our mission is to end labour exploitation by challenging and transforming the systems and structures that create vulnerabilities for workers. We do this by undertaking research, knowledge building and evidence-based advocacy aimed at preventing labour abuses, protecting the rights of those affected, and promoting best practice policy responses to labour exploitation.

Our approach:

FLEX' work builds on the understanding that labour exploitation is situated at the extreme end of a spectrum ranging from labour compliance through to labour law violations, culminating at extreme exploitation in the form of offences such as forced labour and human trafficking for labour exploitation. These are at once serious crimes, human rights breaches and violations of labour law. Labour exploitation takes place in every country in the world, and whilst in recent years we have seen a boom of corporate social responsibility initiatives seeking to address risks in global supply chains, state surveillance and legislation remains weak, and exploitation taking place in national contexts remain largely under-researched and misunderstood. As a result, very few of the estimated millions of victims are ever identified and just a fraction of cases result in the prosecution of perpetrators or compensation for survivors.

FLEX recognises that workers at risk of poverty, destitution, discrimination and/or social exclusion are at higher risk of exploitation, and therefore pays particular attention to:

1. **Workers in low-paid and insecure work:** Struggling to make ends meet, low-paid workers are at high risk of falling into debt and facing destitution. Fear of losing work is a major deterrent to reporting abuse and many workers are willing to endure labour abuses and even exploitation. Insecure work arrangements, such as false self-employment and zero-hours contracts, create further instability as workers are not guaranteed an income and can more easily have their work terminated.
2. **Women workers:** Women face additional vulnerabilities related to gendered cultural and structural issues, such as unequal treatment at work, discrimination related to pregnancy and maternity, and gender-based violence and sexual harassment at work. Carrying a disproportionate

care burden may push women into more casual employment and make them less able to leave abusive situations. Women are also disproportionately represented in low-paid and precarious work, where they may also face unequal treatment. FLEX's intersectional feminist approach recognises that gender inequality often intersects with other forms of disadvantage to increase women's risk of exploitation.

3. **Migrant Workers:** Migrant workers are also disproportionately represented in low-paid, precarious and informal work. They may also face additional situational vulnerabilities compared to non-migrants, including language barriers, limited support networks and lack of knowledge of labour rights or where to access support. Government policies affecting migrants, such as restrictions on accessing social protections (e.g., no recourse to public funds) create additional vulnerabilities for migrants. Undocumented migrants are particularly at risk of exploitation, especially in contexts where undocumented labour is criminalised.

FLEX works alongside other organisations committed to the rights of vulnerable workers and those working to combat labour exploitation. FLEX is also guided by organisations working with people affected by, or at risk of labour exploitation in the UK, including trafficked persons, who form FLEX's 'Labour Exploitation Advisory Group'.

FLEX is a member of UK-based and global networks of individuals and agencies that share its commitment and values. These include: the UK Anti-Trafficking Monitoring Group, the Ethical Trading Initiative, the Platform for International Cooperation on Undocumented Migrants, the Global Alliance against Traffic in Women, and La Strada International.

FLEX operates on the **values** of:

- **Respect** – for equality and recognition of the role of intersectionality, understood as overlapping or accumulated layers of discrimination, and systemic oppression in creating vulnerabilities and disadvantage.
- **Courage** – to explore, probe, and approach challenges with creativity.
- **Integrity** – thoroughness, rigour and reliability in how we use information to evidence the need for change.
- **Justice** – everything we do is aimed at achieving a more just society.
- **Accountability** – towards those affected by labour exploitation, whose safety, well-being and voice are central to our work.

Our working **principles** are: quality outputs; rigorous and accurate research and reporting; high ethical standards; reflection on our impact; collaborative approach; do no harm.

Top ten things we are most proud of this year:

1. We continued increasing understanding of the interactions between the **UK's immigration** system and risk of exploitation by providing Government and key stakeholders with analysis and evidence-based research on experiences and drivers of exploitation in hospitality and app-based delivery work, during Covid-19, and affecting women and young people in low-paid jobs; as well as the numbers of potential victims of trafficking being held in immigration detention.
2. FLEX's research findings on the **Seasonal Worker Scheme** prompted the Scottish Government to establish an independent helpline for agricultural workers, to maintain up-to-date informative tools for workers, to work with local authorities to increase caravan inspections on farm sites, and to commit to strengthening relevant legislation. In April 2021, the UK Government updated its guidance for pilot operators to ban the use of zero-hour contracts on the scheme.
3. We continued to engage workers in our research through strengthening our **Peer Researcher model**, an innovative participatory action research methodology involving workers in the research process and advocacy and strategic comms work, and supported others to adopt this methodology. Our research projects provided support to 643 workers during the pandemic and we also **engaged 626 workers** from under-researched high-risk sectors in research aimed at informing policy and practice in the areas of immigration, labour market enforcement, social protection, and business outsourcing practices and platform work.
4. We worked closely with the UK Director of Labour Market Enforcement (DLME) to promote the enforcement of labour rights as part of the national response to human trafficking, with the DLME's annual strategies for [2020/21](#) and [2021/22](#) highlighting the intersection between immigration policy and risk of labour exploitation for the first time and explicitly referencing FLEX's work.
5. Our parliamentary work around the Nationality and Borders Bill helped secure significant support from Peers around the importance of introducing secure reporting mechanisms to prevent exploitation and abuse and reinstating the rights of Overseas Domestic Worker visa holders. We also supported three key amendments that were voted in at Lord's Committee Stage, and informed Peers on the unintended consequences linked to a problematic proposed amendment to the bill, which was effectively dropped.
6. We have significantly increased our capacity to work on improving corporate accountability practices in the UK and started working on a pilot that will develop a corporate human rights due diligence framework for domestic service sector supply chains, which will be informed by workers' experiences during the pandemic.
7. We reinstated **FLEX's bespoke training programme** for statutory bodies and front-line organisations supporting workers and communities represented in at-risk sectors, and trained 96 officials from 31 local authorities in London, 35 Metropolitan police officers, and 66 staff members and volunteers from 27 different supporting organisations working in London, Birmingham, Edinburgh and Manchester, which received strong positive feedback.
8. We continued to engage with key national and international stakeholders on the need to introduce secure reporting mechanisms to ensure that all workers are able to report abuse

without fear, and published a practical guide for police and labour inspectors to take proactive steps towards its implementation.

9. We maintained a strong collaborative approach, continued to expand our networks, and worked in formal partnerships with a wide range of key front-line organisations, trade unions, academic groups, public bodies, and other stakeholders, such as employers, law firms, and funders.
10. We continued to engage the staff team in strategic work and have made excellent progress towards meeting the objectives of our 'Diversity and Inclusion Strategy', including by increasing our team capacity in the area, reviewing our organisational policies, conducting internal assessments, creating a paid Trainee position for a young person on welfare benefits, and strengthening our work with organisations supporting communities at risk.

FLEX has completed the following work against its four core objectives over the past year:

Aim 1: To challenge and positively transform policies, attitudes and practices that drive labour exploitation.

Within this aim FLEX seeks to build understanding and evidence of drivers of labour exploitation, including Government policies and business operating models and practices, and structural inequalities, such as gender and racial discrimination. We also work to build awareness and understanding of drivers of exploitation among decision-makers and key stakeholders. Our media and communications work within this aim has the objective of increasing decision-makers' awareness and understanding of systemic and structural issues creating risks of labour exploitation by shifting media narratives.

A. Advocating for safer labour migration routes into the UK:

During this period, FLEX has continued to actively advocate for **safer labour migration routes** into the UK, following the end of free movement with the EU and the opening of new temporary migration programmes. We have done this by actively engaging in policy processes and advocacy platforms, as well as by conducting research to evidence risks and effective impact of the changes on workers, and by identifying actionable solutions. This work has involved maintaining our engagement in advocacy platforms and groups, including the Home Office-led Vulnerability Advisory Group (VAG), an expert panel set up to provide advice on the development and implementation of the UK's post-Brexit immigration system.

The Government's 2018 Immigration White Paper included the **Seasonal Worker Pilot (SWP)**, a temporary migration programme recruiting migrant workers to work in UK farms for six months. Temporary migration programmes of this kind often place significant restrictions on workers' access to and mobility within the labour market, and often lead to worker exploitation. Following publication of FLEX-FMF's [*Assessment of the risks of human trafficking for forced labour on the UK Seasonal Workers Pilot*](#) in March 2021, the Scottish Government established an independent helpline for agricultural workers, maintained up-to-date informative tools for workers, worked with local authorities to inspections on caravans in farms, and committed to strengthening legislation on inspections. FLEX also secured a standalone Vulnerability Advisory Group session on the Seasonal Worker's Pilot and, in April 2021, the UK Government updated its guidance for pilot operators to ban

the use of zero-hour contracts on the scheme. The Home Office also committed to developing a comprehensive response to the report's recommendations.

On 24th December 2021, Government published the long-awaited review of the first year of the SWP. In January 2022, we published [FLEX's response to the review](#), including concerns related to its findings, the review process, and the general lack of data and poor monitoring of this route. In March 2022, we also wrote a [Letter to Home Office outlining our concerns on risks to Ukrainian nationals on Seasonal Workers' Visa](#). In January 2022, FLEX launched a new project to continue monitoring the impact of the risks on seasonal agricultural workers in England. The project will involve two frontline partners, Rosmini Centre in Cambridgeshire and Citizens Advice in South Lincolnshire.

FLEX has also started researching the risk of exploitation in sectors that have previously been highly reliant on workers from the EU, but which are no longer able to recruit migrants due to the end of free movement. As part of this project, we wrote a journal article on how Brexit-related immigration policy changes are likely to lead to increased irregularity (to be published in June 2022).

Finally, during this period, FLEX also joined a coalition of organisations coordinated by Walk Free to carry out joint advocacy on Brexit and the risk of modern slavery during and after the end of the Transition Period. We led a sub-group on addressing risks and vulnerabilities of migrant workers, which focused on the lack of regular and safe immigration routes for low-paid workers post-Brexit and the risks associated with new short-term work visas. The group has now turned into an information-sharing network. In March 2022, FLEX was invited to join the Home Office's new Overseas Domestic Worker stakeholder group.

B. Advocating for improved protection of low-paid workers during and after COVID-19:

We developed a one-year partnership project with two grassroots unions organising precarious workers: the Independent Workers' Union of Great Britain (IWGB) and United Voices of the World (UVW), which resulted in the publication of [No viable alternatives: Social \(in\)security and risk of labour exploitation during Covid-19](#) in October 2021. The report explores the experiences of migrant workers in low-paid and insecure work during the Covid-19 pandemic, focusing on barriers to accessing employment rights and social protections, and the associated risks of labour abuse and exploitation.

We brought findings from this report to two Human Trafficking Foundation's Modern Slavery Leads Forum meetings and were invited to join as advisory partner to Nottingham Rights Lab research on the impact of Covid-19 on victims of trafficking. FLEX was invited to review and comment on draft employment protection provisions within Liberty's Coronavirus (Rights and Support) proposed bill. FLEX signed the Clean Clothes Campaign and Labour Behind the Label ['PayYourWorkers' campaign](#) which called on fashion brands to honour pre-Covid-19 orders, contribute to a severance guarantee fund for workers in their supply chains and commit to continue paying workers during the pandemic.

C. Mitigating the impact of the Nationality and Borders Bill on vulnerable groups:

FLEX submitted [written evidence](#) to the House of Commons Public Bill Committee, raising concerns around clauses relating to modern slavery identification and support which will make it harder for people to be identified as trafficked and access support. FLEX's submission highlighted the risks of

muddling immigration with victim identification and support measures, the incompatibility with the Modern Slavery Act 2015 and lack of clarity over how this legislative process fits with the ongoing creation of a new Modern Slavery Strategy. We also engaged with the APPG on Trafficking and Slavery, produced parliamentary briefings, and worked with the Detention Taskforce coalition, the Human Trafficking Foundation, and various other stakeholders to brief parliamentarians, the IASC, and other relevant actors.

FLEX worked with partners to support Peers to table amendments to the Bill including around secure reporting and reinstating the rights of Overseas Domestic Worker visa holders which received considerable support, in spite of not being pushing to a vote. It also got on record the opposition to the Government's new Immigration Enforcement Victim's Protocol. FLEX also coordinated a private briefing for the Joint Committee on Human Rights on 'mixed exploitation', highlighting the risks of unintended consequences linked to another proposed amendment to the Bill. Finally, FLEX supported several amendments aimed at mitigating the negative impact of the Bill, including three which were voted in at Lords Committee Stage.

D. Engaging in the Modern Slavery Strategy Review:

Through its role as co-Chairs of the Home Office's Modern Slavery Strategy Implementation Group on Prevention, FLEX continued to advocate in meetings for the role of labour inspection in addressing exploitation and for prevention to be a key part of the forthcoming new Modern Slavery Strategy. FLEX submitted a [written response](#) to the MS Strategy Review consultation, highlighting the importance of focusing on preventing exploitation rather than on averting stated concerns about abuse of the 'system' and the need for an effective strategy to look at the barriers to reporting crimes and to create options for facilitating secure reporting as well as NRM referrals.

E. Working towards a stronger corporate accountability framework in the UK:

FLEX has increased its capacity to work on corporate accountability with the aim of helping ensure that workers inform developments in this area. We have engaged with key stakeholders, including the Office of the High Commissioner for Human Rights (OHCHR) Access to Remedy Project and the European Institute for Crime Prevention and Control, and have increased participation with existing networks such as the Ethical Trade Initiative (ETI) and the Corporate Justice Coalition (CJC). FLEX has signed on to the CJC's call for mandatory human rights due diligence (mHRDD) in the UK and submitted responses to the OHCHR, ETI and the British Standards Initiative consultations on issues related to supply chain risk management and exploitation.

Aim 2: Ensure that the enforcement of the full range of workers' rights forms part of national and international responses to labour exploitation.

Within this aim, FLEX works to build evidence about the links between severe labour abuses, exploitation and trafficking, and about the impact of labour market enforcement strategies and of the role of marginalised workers in preventing and addressing labour exploitation. We also seek to build understanding of the 'prevention' obligation in state responses to human trafficking for labour exploitation, by advocating for enforcement of labour standards as a central plank of effective anti-trafficking responses.

A. Participatory action research in three high-risk sectors (hospitality, app-based deliveries, and social care) evidencing the need for better enforcement of labour rights:

During this reporting period we have produced several publications evidencing the need for increased oversight of high-risk sectors by labour inspection authorities, highlighting immigration policy as a risk factor for exploitation, and drawing attention to experiences of gendered and racial discrimination at work. This work has included two participatory research working papers and a briefing expanding the available evidence base on experiences and drivers of exploitation in hospitality and app-based delivery work,:

- FLEX 2021 working paper, [*"To help workers, I would tell the Government to..." Participatory Research with Workers in the UK Hospitality Sector;*](#)
- FLEX 2021 working paper, [*"The gig is up": Participatory research with couriers in the UK app-based delivery sector;*](#)
- FLEX 2021 briefing: [*Experiences and Drivers of Labour Exploitation for Young Migrant Workers.*](#)

FLEX has also worked with academics from Nottingham Rights Lab, London School of Hygiene and Tropical Medicine and University of Kent in a participatory research with migrant live-in care workers and personal assistants in London. FLEX has provided guidance on the implementation of the Peer Researcher model, through which the project is engaging care workers as paid and trained peer researchers. The project also works with employers, trade unions and specialist organisations.

B. Advocating for the strengthening of the UK's labour market enforcement system:

In 2019, the UK Government announced its plans to develop a single enforcement body (SEB) to amalgamate and replace the current plural system and run a consultation on these plans. To inform this process, FLEX has continued to work closely with the Office of the Director of Labour Market Enforcement (ODLME), the Gangmasters and Labour Abuse Authority (GLAA), the Low Pay Commission (LPC), the Independent Anti-Slavery Commissioner (IASC) and the Home Office Vulnerability Advisory Group (VAG), sharing our research findings and highlighting the ways in which immigration status and characteristics such as race and gender affect workers' ability to access and enforce their rights.

We secured a meeting of the Home Office Vulnerability Advisory Group (HO VAG) which involved staff from the ODLME in a discussion on immigration-related risks and the need to separate labour market enforcement from immigration enforcement. We continued to work to inform the ODLME by presenting research findings and discussing policy priorities at bi-monthly meetings.

In December 2021, the DLME's annual strategies for [2020/21](#) and [2021/22](#) were published, both highlighting the intersection between immigration policy and risk of labour exploitation, making recommendations on this topic for the first time, and explicitly referencing FLEX's work. Specifically, the 2021/22 strategy calls for the Home Office and the BEIS to commit to 1) regular and ongoing monitoring of the impact of the new immigration system on labour market compliance, and 2) reviewing the interaction between labour market and immigration policies to "ensure sufficient protections for migrant workers and improve intelligence flows via safe reporting structures", and for this thinking to inform the SEB.

In January 2022, we worked with the Gangmasters and Labour Abuse Authority (GLAA) as part of a pilot project in partnership with two frontline organisations (East European Resource Centre and the Latin American Women's Rights Service) (see Aim 3 below).

Finally, during this period we have continued to advocate for increased funding for the UK's severely under resourced labour market enforcement agencies. In October 2021, we published a joint briefing with Unchecked UK on gaps in UK labour market enforcement resulting from under-resourcing, which calls for evidence-based funding to support proactive inspections and draws on our research in cleaning, construction, hospitality, and agriculture.

C. Secure reporting:

In May 2021, following the joint investigation report on the first ever police super-complaint, FLEX was invited to an Immigration Enforcement-led consultation on the Government's response to the super-complaint findings. As part of this engagement, FLEX secured a pro bono legal 'note' from Doughty Street Chambers, which was shared with the Home Office to inform their advice to the Minister, as well as with the IASC. In September, FLEX also featured in a [documentary](#) showing the devastating effects of data-sharing between police and immigration enforcement on trafficking and domestic abuse victims (658 views). The review findings were published by the Government in December 2021, where they announced their decision not to introduce secure reporting. They instead introduced an Immigration Enforcement Victims Protocol, which would pause data sharing while the police investigate cases. Along with partner organisation in the domestic abuse and anti-trafficking sectors, we have roundly rejected the Protocol and claims of safeguarding in [press releases](#), a [joint letter](#) and a [blog](#).

In February 2022, we published [Preventing and Addressing Abuse and Exploitation: A Guide for Police and Labour Inspectors Working with Migrants](#), which outlines practical strategies to increase trust between these agencies and migrant communities to enable migrants to securely report abuse and exploitation and agencies to access valuable intelligence to prevent and address these crimes.

D. Victims of trafficking in immigration detention:

In November 2021, the Home Office created a new body, the Immigration Enforcement Competent Authority (IECA). FLEX coordinated a statement from the Detention Taskforce and wider signatories, condemning the change, which was made without consultation and means that many victims of modern slavery in the UK who lack secure immigration status will not be appropriately identified, protected or supported, and will therefore fear coming forward to the authorities to seek help.

The coalition published a [briefing](#) based on data from an FOI submitted by FLEX shows that 90% of all referrals made on behalf of potential victims of trafficking from immigration detention centres in the last few years have received positive reasonable grounds decisions, with some of the negative decisions later being reconsidered which further increases the positive outcomes. This shows that the Home Office's claims that the support system for victims is being abused is unfounded and demonstrates a pattern of increased detention of trafficking victims since 2017 and more positive decisions being made.

E. Working with businesses to strengthen corporate responsibility practice:

FLEX launched a new project seeking to pilot worker engagement in human rights due diligence assessments. The project will develop a corporate human rights due diligence framework for domestic service sector supply chains, which will be informed by workers' experiences during the pandemic. FLEX will work with the Latin American Women's Rights Service to engage outsourced migrant and ethnic minority women working in cleaning to inform the design of various outputs.

FLEX was also invited to join the Apparel and General Merchandising Public and Private Protocol, a multi-stakeholder group led by the GLAA and the Association of Labour Providers (ALP), set up in response to the cases of exploitation uncovered in the garment sector in Leicester. FLEX is a member of three workstreams (workplace rights, intervention mechanisms and regulation) and has also co-ordinated a sub-group on approaches to undocumented workers with the GLAA and the Home Office's Immigration Enforcement team. FLEX's advocacy engagement has focused on labour inspection.

F. Tackling the UK enforcement gap of sexual harassment rules – FLEX's Working Group on Women Workers (WGWW)

The Working Group on Women Workers is a group of frontline organisations, academics and employment lawyers set up by FLEX to tackle the issue of sexual harassment and gender-based violence in low-paid and insecure sectors. In March 2022, FLEX published a [position paper](#) on gaps in enforcement of sexual harassment rules, which was informed by the views and work of the Working Group on Women Workers.

Aim 3: To mobilise cooperation in addressing labour exploitation by providing leadership and expertise across sectors.

Within this aim FLEX has the following objectives: To develop methodologies for engagement with 'experts by experience' and foster recognition of their role as key for driving effective change; to develop awareness about labour exploitation and its prevention among key stakeholders, such as civil society network and platforms; and to leverage national, international and global networks to hold governments to account and advocate for the rights of victims of trafficking for labour exploitation. Our media and communications work under this aim seeks to diversify the voices and actors represented in media coverage about labour exploitation and to support the empowerment of people affected.

A. Engaging workers in developing knowledge

We continued implementing our Peer Researcher model, a feminist participatory action research (FPAR) approach to investigate drivers of labour exploitation and to develop better informed policy, working 'with' rather than 'on' the community being researched. Through this model, we have worked with a network of paid peer researchers at every stage, from research design to data collection, analysis and advocacy. Peer researchers received training on research methods, ethics, safeguarding and signposting, as well as ongoing support (see Objective 1).

We have also worked on disseminating the learnings from this work and encouraging others to explore ways to engage workers as Peer Researchers. We have delivered a number of presentations in this area, including one in May 2021, delivered as part of [a series of five webinars](#) on the topic of labour migration from an intersectional feminist lens, which FLEX co-organised with GAATW, Solidarity Centre, [Women in Migration Network](#) and [AWID](#).

B. Strengthening the Labour Exploitation Advisory Group (LEAG):

In May 2021, we welcomed three new LEAG members: Glass Door Homeless Charity, the UK's largest open-access network of emergency winter shelters and support services for people affected by homelessness; the Work Rights Centre, which supports individuals to exit precarious work and equip them with the tools to access fair and lawful employment; and Kanlungan, a frontline service provider and network of frontline organisations supporting East and South East Asian migrants in the UK. We also worked with members to update the LEAG strategy.

C. Training statutory bodies and front-line organisations to increase their capacity to identify and respond to labour exploitation:

During this period, we delivered FLEX's first 'train the trainer' programme for London police officers and local authorities on risk and indicators of Modern Slavery. This work has involved developing a number of resources, including a FLEX Modern Slavery Handbook 2021, an essential document for First Responders.

We have also developed FLEX's bespoke training programme and worked with three front-line organisations supporting communities at risk of exploitation: Roma Support Group, South East and East Asian Centre (SEEAC); and Kanlungan Filipino Consortium. We trained a total of 36 participants through 14 training sessions covering a range of topics, including: employment status, basic employment rights, discrimination, sexual harassment, and identifying and supporting victims of modern slavery, which included information on the National Referral Mechanism. Feedback shows that 82% of participants felt that they've increased their ability to identify cases of labour abuse and exploitation and self-assessed their ability to provide this support and advice as either as good, very good, or excellent as a result of the training. All respondents reported that after the training they had a good, very good or excellent ability to identify potential labour exploitation.

In January 2022, FLEX started delivering a [pilot project](#) in partnership with two frontline organisations (East European Resource Centre and the Latin American Women's Rights Service), with the support of the Gangmasters and Labour Abuse Authority (GLAA), which aimed to improve understanding of labour exploitation in the cleaning sector among frontline organisations supporting workers, the GLAA, and workers themselves, as well as to increase collaboration between frontline organisations and the GLAA. FLEX delivered in-person training sessions to community organisations, statutory services and trade unions and worked with the GLAA Prevention Team to engage local officers from their four syndicate areas in outreach to these groups in London, Birmingham, Manchester and Edinburgh. This work involved producing training resources and establishing an online learning platform, while project partners delivered a [digital campaign](#) to workers in cleaning in various languages. Participants reported improved understanding of labour exploitation in cleaning and greater awareness of the GLAA's role and remit.

D. Supporting the wider movement:

FLEX is member of key international advocacy networks, including GAATW, LaStrada International, and PICUM. In the UK, FLEX is a member of the Ethical Trading Initiative, the Corporate Justice Coalition, the Anti-trafficking Monitoring Group, the Human Trafficking Foundation forums, Trust for London's Employment Legal Advice Network, the BME Anti-Slavery Network (BASNET), and a supporter of Unchecked UK.

During this period, FLEX worked in collaboration with key partners on 16 advocacy campaigns and joined actions in support of the wider movement for change. For instance, FLEX and HTF co-wrote a letter to London's Mayoral candidates inviting them to commit to prioritising the prevention and responses to human trafficking, as well as five key action points, including the delivery of the first ever dedicated strategy to tackle exploitation in the capital and promotion of secure reporting, among other asks. The pledge was signed by all five main mayoral candidates in London, including Sadiq Khan who was re-elected.

As part of our work with PICUM, we contributed to their Work Permit Schemes brochure and to the work of their Labour Rights Taskforce, feeding into their strategy. During this period, we also joined the BME Anti-Slavery Network (BASNET) and provided feedback to BASNET's Equality, Diversity and Inclusion Strategy for the anti-trafficking sector. As members of ELAN, we engaged with Trust for London on the development of a secondment at the GLA (London), which focuses on migrant workers' labour exploitation.

We worked with trade unions, international organisations, and with funders to increase understanding of the impact of Covid-19 and the new immigration system on workers in low pay. We also joined 140+ groups calling on the Department of Health and Social Care to take further action to ensure that everyone, regardless of immigration status, can access the Covid-19 vaccine.

Objective 4: To ensure that FLEX is able to respond to the interests of actual and potential victims of human trafficking for labour exploitation.

The FLEX team held a strategy day to reflect on the progress made towards the aims of its Business Plan 2020-2025 and the contextual changes affecting its work. We also continued working towards meeting the objectives of our 'Diversity and Inclusion Strategy', which in this period included receiving training; reviewing our organisational policies; conducting assessments and identifying internal diversity targets; creating a paid Trainee position for a young person on welfare benefits; and developing and fundraising for a number of new projects working jointly with organisations supporting communities at risk, including via FLEX's new training programme.

This objective also relates to ensuring a healthy and productive working environment for FLEX staff. To this end, during this period we initiated a FLEX Wellbeing at Work Working Group with the aim of developing a new mental health policy and continued reflecting on and responding to the impact of COVID-19 on staff wellbeing. We also created and recruited for three new roles: a Training Officer, a Business Accountability and Engagement Lead, and a Policy Trainee.

FLEX has provided background information to numerous press pieces and featured in the media 23 times, including the following pieces:

- [The Ferret](#) – 18.04.21 – on the decision of a supermarket chain to carry out welfare checks on migrant farm workers
- [The Grocer](#) – 02.07.21 – on the impact of labour shortages on workers' safety
- [Morning Star](#) – 13.07.21 - on exploitation in the hospitality sector
- [BBC Countryfile](#) – 3.10.21 - investigation into risks of exploitation in agriculture.
- [The Guardian](#) 12.10.21 – on the lack of safe labour migration routes and labour shortages
- [Sky News](#) – 29.10.21 – Exclusive on FLEX report on Covid-19 ([article](#) and [news segment](#))
- [Independent](#) - 12.11.21 - on the new Immigration Enforcement Competent Authority.
- [Guardian](#) – 26.01.22 – on the rise in number of trafficking victims in UK immigration detention
- [Independent](#) 03.03.22 – on Ukrainians facing risk of exploitation by human traffickers.
- [Byline Times](#) – 08.03.22 – on victims of crime being referred to Immigration Enforcement.
- [Guardian](#) – 28.03.22 – on our joint call for help for Ukrainian seasonal workers.

We have posted 23 blogs and news pieces on our website, including 5 guest blogs written by front line organisations (Work Rights Centre, Glass Door, LAWRS, Kalayaan and Voice of Domestic Workers), and direct testimonies from 3 people with lived experience (two former agricultural workers and a survivor identified through research). Working with a comms expert and consulting with internal and external contacts, we developed a more comprehensive Comms Strategy. In January 2022, we began working on the development of a new website, which will include more resources for stakeholders, as well as a new training platform.

Finally, this objective relates to our sustainable funding strategy and over the past year FLEX has maintained its financial sustainability, progressing projects into their new phase and developing new partnerships with the support of existing and new funders. We have worked hard to counterbalance the sustainability risks brought up by the COVID-19 pandemic and to diversify our income streams through statutory funding and cross-sectors partnerships.

We developed new partnership projects with over 12 organisations, including the East European Resource Centre, the grassroots trade unions Independent Workers of Great Britain (IWGB) and the United Voices of the Word (UVW), and various LEAG members working in London; Rosmini Community Centre in Cambridgeshire, and Fife Migrants Forum in Scotland. We also joined four partnership projects with academics from Nottingham University Rights Lab, Exeter University, and UCL.

Financial review

The charity's income increased to £467,119 (2021: £413,831). The charity was able to increase the number of grants in the year including working with new funders.

Total expenditure was £386,310 (2021: £316,252) resulting in a net surplus for the year of £80,809 and total reserves of £336,236. Unrestricted reserves increased to £253,011 (2021: £131,960).

Investment powers and policy

The charity is seeking to build reserves in line with the charity's reserves policy (see below). As most of the charity's funds are to be spent in the short term there are currently no funds available for long-term investment. Investment income earned during the year relates to interest on the charity's bank account.

Reserves policy and going concern

The surplus for the year increased the charity's unrestricted reserves to £253,011. The Trustees designated £25,000 of unrestricted reserves to support enhanced paternal leave and sickness pay. The remaining unrestricted reserves are £228,011, which is in line with the reserves target, to cover 3 months operating cost (£96,456). The unrestricted reserves have increased in the current year due to grants providing contributions towards core costs, these grants also cover costs in the 2022-23 financial year.

The Trustees are confident that the charity has adequate resources to operate for the foreseeable future due to the unrestricted reserves and the level of secured income for the next financial year.

Plans for future periods

FLEX's work plans for the period to 2023 are derived from its Strategic Plan 2020-25, and are focussed on building its evidence-base and networks to support the promotion of its unique perspective and approach to the prevention of trafficking for labour exploitation at the national and international level.

This includes conducting rigorous research, developing policy recommendations, engaging people with lived experience, increasing stakeholders capacity to prevent, identify and address exploitation; and building networks and opportunities for international advocacy. For 2022/23, some of the key areas of focus for FLEX will include:

- Continuing evidencing the risks of the new immigration system and working to inform safer labour migration routes, and actively engaging in advocacy work to increase understanding of these risks and improve protections for workers;
- Continuing FLEX's research and participatory work in high-risk labour sectors, including those impacted by labour shortages and the end of free movement, such as agriculture and social care;
- Engaging in key advocacy processes, including the Modern Slavery Strategy review, ad-hoc schemes for Ukrainian nationals, the Human Rights Act and the proposed off-shoring of asylum seekers to Rwanda;
- Continuing to develop our networks outside of London and investing in increasing mutual capacity to jointly work towards preventing labour exploitation;
- Piloting a project to explore mechanisms for a stronger worker engagement approach to corporate accountability;
- Increasing our visibility through high-profile strategic communications work and celebrating FLEX's 10th Anniversary!

Reference and administrative details

Charity number (England and Wales): 1159611

Company number: 08451701

Registered and Principal Office: The Foundry, 17 Oval Way, London, SE11 5RR

Our advisors

Bankers Triodos Bank, Deanery Road, Bristol, BS1 5AS

The Co-operative Bank, 1 Balloon Street, Manchester, M60 4EP

Directors and trustees

The directors of the charitable company (the charity) are its trustees for the purpose of charity law.

The trustees and officers serving during the year and since the year end were as follows:

Chair Adam Weiss

Elected Trustees Peter Andrews
Vash Arora
Claire Falconer
Rachel Hewitt
Ian Robinson
Jane Ellis (resigned 24th March 2022)
Dora-Olivia Vicol (appointed 24th March 2022)

Key management personnel:

Chief Executive Lucila Granada

Structure, Governance and Management

Governing Document

The organisation registered as a charity on 15 December 2014. The company was established under a Memorandum of Association which established the objects and powers of the charitable company and is governed under its Articles of Association. In the event of the company being wound up members are required to contribute an amount not exceeding £50.

Trustee induction and training

New trustees are inducted through a meeting with management. Trustees are provided with a copy of the FLEX Trustees Terms of Reference and the Charity Commission's introductory guidance for trustees. New trustees are also asked to complete a personal details form, a declaration of interests, and a skills audit to identify training needs. All trustees are regularly offered training on matters concerning governance.

Organisation

The trustees meet on a quarterly basis and oversee the strategic direction of the charity. The day to day operations and management is delegated to the Chief Executive Officer.

Related parties

None of our trustees receive remuneration or other benefit from their work with the charity.

Pay policy for senior staff

The Board's Remuneration Committee determines the salary of the Executive Director and sets pay scales for all staff. The FLEX Trustees Terms of Reference set out the Terms of Reference for the Remuneration Committee. The Committee includes the Treasurer and at least one other trustee, and meets once a year to review the salary of the Executive Director and pay scales, and make recommendations to the Board.

Risk management

The trustees have reviewed the major risks to which the charity is exposed. A risk register has been established which is updated annually. Where appropriate, systems or procedures have been established to mitigate the risks and these are periodically reviewed to ensure that they continue to meet the needs of the charity. The trustees deem that appropriate measures are currently in place to mitigate risk, particularly in the light of the on-going difficult economic environment.

Trustees' responsibilities in relation to the financial statements

The trustees (who are also the directors for the purpose of company law) are responsible for preparing the Annual Report and the financial statements in accordance with applicable law and regulations.

Company law requires the trustees to prepare financial statements for each financial year. Under that law the trustees must prepare the financial statements in accordance with United Kingdom Generally Accepted Accounting Practice (United Kingdom Accounting Standards and applicable law). Under company law the trustees must not approve the financial statements unless they are satisfied that they give a true and fair view of the state of affairs of the charitable company and of the incoming resources and application of resources, including the income and expenditure, of the charitable company for that period.

In preparing these financial statements, the trustees are required to:

- a) select suitable accounting policies and then apply them consistently;
- b) observe the methods and principles in the Charities SORP;
- c) make judgments and accounting estimates that are reasonable and prudent;
- d) state whether applicable UK Accounting Standards have been followed, subject to any material departures disclosed and explained in the financial statements; and
- e) prepare the financial statements on the going concern basis unless it is inappropriate to presume that the charitable company will continue to operate.

The trustees are responsible for keeping adequate accounting records that are sufficient to show and explain the charitable company's transactions and disclose with reasonable accuracy at any time the financial position of the charitable company and enable them to ensure that the financial statements comply with the Companies Act 2006. They are also responsible for safeguarding the assets of the

company and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.

The trustees are responsible for the maintenance and integrity of the corporate and financial information included on the charitable company's website. Legislation in the United Kingdom governing the preparation and dissemination of financial statements may differ from legislation in other jurisdictions.

The trustees confirm that so far as they are aware, there is no relevant audit information (as defined by section 418(3) of the Companies Act 2006) of which the charitable company's auditors are unaware. They have taken all the steps that they ought to have taken as trustees in order to make themselves aware of any relevant audit information and to establish that the charitable company's auditors are aware of that information.

By order of the board of trustees

Adam Weiss

DATE: 21 September 2022

Independent Auditor's Report to the Trustees and Members of Focus on Labour Exploitation

Opinion

We have audited the financial statements of Focus on Labour Exploitation (the 'charitable company') for the year ended 31 March 2022 which comprise Statement of financial activities, balance sheet, cash flow statement and notes to the financial statements, including a summary of significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Accounting Standards, including Financial Reporting Standard 102 *The Financial Reporting Standard applicable in the UK and Republic of Ireland* (United Kingdom Generally Accepted Accounting Practice).

In our opinion, the financial statements:

- give a true and fair view of the state of the charitable company's affairs as at 31 March 2022 and of its incoming resources and application of resources, including its income and expenditure, for the 31 March 2022 then ended;
- have been properly prepared in accordance with United Kingdom Generally Accepted Accounting Practice; and
- have been prepared in accordance with the requirements of the Companies Act 2006.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the financial statements section of our report. We are independent of the charitable company in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Conclusions relating to going concern

In auditing the financial statements, we have concluded that the trustees' use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the entity's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

Our responsibilities and the responsibilities of the trustees with respect to going concern are described in the relevant sections of this report.

Other information

The trustees are responsible for the other information. The other information comprises the information included in the annual report other than the financial statements and our auditor's report thereon. Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon. In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the financial statements or a material misstatement of the other information. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.

Opinions on other matters prescribed by the Companies Act 2006

In our opinion, based on the work undertaken in the course of the audit:

- the information given in the trustees' report, which includes the directors' report prepared for company law purposes, for the financial year for which the financial statements are prepared is consistent with the financial statements; and
- the directors' report included within the trustees' report has been prepared in accordance with applicable legal requirements.

Matters on which we are required to report by exception

In the light of the knowledge and understanding of the charitable company and its environment obtained in the course of the audit, we have not identified material misstatements in the trustees' report.

We have nothing to report in respect of the following matters in relation to which the Companies Act 2006 requires us to report to you if, in our opinion:

- adequate accounting records have not been kept, or returns adequate for our audit have not been received from branches not visited by us; or
- the financial statements are not in agreement with the accounting records and returns; or
- certain disclosures of trustees' remuneration specified by law are not made; or
- we have not received all the information and explanations we require for our audit.

Responsibilities of trustees

As explained more fully in the trustees' responsibilities statement set out on page 15 the trustees (who are also the directors of the charitable company for the purposes of company law) are responsible for the preparation of the financial statements and for being satisfied that they give a true and fair view, and for such internal control as the trustees determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the trustees are responsible for assessing the charitable company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the trustees either intend to liquidate the charitable company or to cease operations, or have no realistic alternative but to do so.

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect material misstatements in respect of irregularities, including fraud. The extent to which our procedures are capable of detecting irregularities, including fraud is detailed below:

Discussions were held with the directors with a view to identifying those laws and regulations that could be expected to have a material impact on the financial statements.

The following laws and regulations were identified as being of significance to the entity:

- Those laws and regulations considered to have a direct effect on the financial statements include UK financial reporting standards and Company Law and Charity Law.
- It is considered that there are no laws and regulations for which non-compliance may be fundamental to the operating aspects of the business.

Audit procedures undertaken in response to the potential risks relating to irregularities (which include fraud and non-compliance with laws and regulations) comprised of: inquiries of management and those charged with governance as to whether the entity complies with such laws and regulations; enquiries with the same concerning any actual or potential litigation or claims; inspection of relevant legal correspondence; review of board minutes; testing the appropriateness of entries in the nominal ledger, including journal entries; reviewing transactions around the end of the reporting period; and the performance of analytical procedures to identify unexpected movements in account balances which may be indicative of fraud.

No instances of material non-compliance were identified. However, the likelihood of detecting irregularities, including fraud, is limited by the inherent difficulty in detecting irregularities, the effectiveness of the entity's controls, and the nature, timing and extent of the audit procedures performed. Irregularities that result from fraud might be inherently more difficult to detect than irregularities that result from error. As explained above, there is an unavoidable risk that material misstatements may not be detected, even though the audit has been planned and performed in accordance with ISAs (UK).

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at: <https://www.frc.org.uk/auditorsresponsibilities>. This description forms part of our auditor's report.

Use of our report

This report is made solely to the charitable company's members, as a body, in accordance with Chapter 3 of Part 16 of the Companies Act 2006. Our audit work has been undertaken so that we might state to the charitable company's members those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the charitable company and the charitable company's members as a body, for our audit work, for this report, or for the opinions we have formed.

Timothy Sullivan (Senior Statutory Auditor)
For and on behalf of Field Sullivan Limited, Statutory Auditor
9 Hare & Billet Road
Blackheath
SE3 0RB

Date: 13 October 2022

Statement of Financial Activities for the year ending 31 March 2022

	Note	Unrestricted Funds £	Restricted Funds £	Total Funds 2022 £	Total Funds 2021 £
Income:					
Donations	3	134,756	318,036	452,792	405,450
Income from other trading activities:					
Consultancy fees		14,235	-	14,235	8,288
Investment income	4	92	-	92	93
Total income		149,083	318,036	467,119	413,831
Expenditure					
<i>Expenditure on charitable activities:</i>	5	28,032	358,278	386,310	316,252
Total expenditure		28,032	358,278	386,310	316,252
Net movement in funds for the year		121,051	(40,242)	80,809	97,579
Reconciliation of funds					
Total funds brought forward		131,960	153,467	285,427	187,848
Total funds carried forward		253,011	113,225	366,236	285,427

The statement of financial activities includes all gains and losses recognised in the year.
All income and expenditure derive from continuing activities.

Balance sheet as at 31 March 2022

	Note	2022 £	2021 £
Fixed assets			
Tangible assets	9	1,636	833
Total Fixed Assets		<u>1,636</u>	<u>833</u>
Current assets			
Debtors	10	73,045	70,690
Cash at bank and in hand		348,094	235,409
Total Current Assets		<u>421,139</u>	<u>306,099</u>
Liabilities			
Creditors falling due within one year	11	(56,539)	(21,505)
Net Current assets		<u>364,600</u>	<u>284,594</u>
Total assets		<u>366,236</u>	<u>285,427</u>
The funds of the charity:			
Designated funds		25,000	-
Unrestricted funds		228,011	131,960
Restricted funds	12	113,225	153,467
Total charity funds		<u>366,236</u>	<u>285,427</u>

The accounts are prepared in accordance with the Companies Act 2006 and the Charities Act 2011. These accounts are prepared in accordance of the special provisions of Part 15 of the Companies Act relating to small companies and constitute the annual accounts required by the Companies Act 2006 and are for circulation to members of the company.

The notes at pages 22 to 30 form part of these accounts

Adam Weiss, on behalf of the trustees

Approved by the trustees on 22 September 2022

Notes on the accounts

1 Accounting policies

1.1 Charity status

The charity is limited by guarantee, incorporated in England and Wales, and consequently does not have share capital. Each of the trustees is liable to contribute an amount not exceeding £50 towards the assets of the charity in the event of liquidation.

The address of its registered office is:

The Foundry
17 Oval Way
London
SE11 5RR

These financial statements were authorised for issue by the trustees on 22 September 2021.

1.2 Basis of Preparation of the accounts

The financial statements have been prepared in accordance with the Accounting and Reporting by Charities: Statement of Recommended Practice applicable to charities preparing their accounts in accordance with the Financial Reporting Standard applicable in the UK and Republic of Ireland (FRS 102) (effective 1 January 2015) – (Charities SORP (FRS 102)), the Financial Reporting Standard applicable in the UK and Republic of Ireland (FRS 102) and the Companies Act 2006

Focus on Labour Exploitation meets the definition of a public benefit entity under FRS 102. Assets and liabilities are initially recognised at historical cost or transaction value unless otherwise stated in the relevant accounting policy note(s)

1.3 Preparation of the accounts on a going concern basis

The unrestricted reserves are above the reserves target, the charity has secured a good level of income for 2021-22 and has a positive cash flow. As a result the Trustees are confident that the charity has adequate resources to operate for the foreseeable future.

1.4 Income

Income is recognised when the charity has entitlement to the funds, any performance conditions attached to the item(s) of income have been met, it is probable that the income will be received and the amount can be measured reliably.

Gifts and services in kind are recognised on the basis of the value of the gift to the charity which is the amount the charity would have been willing to pay to obtain services or facilities of equivalent economic benefit on the open market; a corresponding amount is then recognised in expenditure in the period of receipt.

Grants are recognised in full in the Statement of Financial Activities in the year in which they are receivable or any requirement imposed on the grant is fulfilled.

Investment income is recognised on a receivable basis.

1.5 Expenditure and irrecoverable VAT

Expenditure is recognised once there is a legal or constructive obligation to make a payment to a third party, it is probable that settlement will be required and the amount of the obligation can be measured reliably. Expenditure is classified under the following activity headings:

Fundraising costs are those costs incurred in attracting voluntary income, in particular grant funding and the costs of maintaining the charity's profile within the sector.

Expenditure on charitable activities includes the cost of policy and research work undertaken to further the purposes of the charity and their associated support costs.

1.6 Exemption from preparing a cash flow statement

The charity opted to early adopt Bulletin 1 published on 2 February 2016 and have therefore not included a cash flow statement in these financial statements.

1.7 Tangible fixed assets and depreciation

Tangible fixed assets are stated at cost less depreciation. Depreciation is provided at rates calculated to write off the cost less estimated residual value of each asset over its expected useful life, as follows:

Fixtures & fittings	20% Straight line
Computer equipment	33% Straight line

1.8 Fund accounting

Unrestricted funds are general funds that are available for the use at the trustees' discretion in furtherance of the objectives of the charity.

Restricted funds are subject to specific conditions by donors as to how they may be used. The purposes and uses of the restricted funds are set out in the notes to the accounts.

1.9 Trade debtors

Trade debtors are amounts due from customers for merchandise sold or services performed in the ordinary course of business.

Trade debtors are recognised initially at the transaction price. They are subsequently measured at amortised cost using the effective interest method, less provision for impairment. A provision for the impairment of trade debtors is established when there is objective evidence that the charity will not be able to collect all amounts due according to the original terms of the receivables.

1.10 Cash and cash equivalents

Cash and cash equivalents comprise cash on hand and call deposits, and other short-term highly liquid investments that are readily convertible to a known amount of cash and are subject to an insignificant risk of change in value.

1.11 Trade creditors

Trade creditors are obligations to pay for goods or services that have been acquired in the ordinary course of business from suppliers. Accounts payable are classified as current liabilities if the charity does not have an unconditional right, at the end of the reporting period, to defer settlement of the creditor for at least twelve months after the reporting date. If there is an unconditional right to defer settlement for at least twelve months after the reporting date, they are presented as non-current liabilities.

Trade creditors are recognised initially at the transaction price and subsequently measured at amortised cost using the effective interest method.

2 Statement of Financial Activity – comparative figures to 31 March 2021

	Unrestricted Funds £	Restricted Funds £	Total Funds 2021 £
Income:			
Donations	103,331	302,119	405,450
Income from other trading activities:			
Consultancy fees	8,288	-	8,288
Investment income	93	-	93
Total income	111,712	302,119	413,831
Expenditure			
<i>Cost of raising funds:</i>	-	-	-
<i>Expenditure on charitable activities:</i>	71,585	244,667	316,252
Total expenditure	71,585	244,667	316,252
Net movement in funds for the year	40,127	57,452	97,579
Reconciliation of funds			
Total funds brought forward	91,833	96,015	187,848
Total funds carried forward	131,960	153,467	285,427

3. Donations

	2022	2021
	£	£
Barrow Cadbury Trust	31,500	30,000
Esmee Fairbairn Foundation	-	63,150
Trust for London	20,025	52,000
John Ellerman Foundation	37,656	-
Joseph Rowntree Charitable Foundation	32,720	-
Justice Together	2,195	-
The Oak Foundation	72,216	66,668
Unbound Philanthropy	40,000	45,000
Paul Hamlyn Foundation	49,200	70,000
Ethical Trading Initiative	3,293	3,100
City Bridge Trust	18,420	18,420
Awards for All	-	10,000
MOPAC	23,518	-
The Home Office	75,050	-
The Scottish Ministers	10,000	33,192
Ethos Foundation	10,000	10,000
AB Charitable Trust	20,000	-
Kickstart grant	6,565	-
Government grant	-	1,594
Other gifts	434	2,326
	<u>452,792</u>	<u>405,450</u>

Total donations were £452,792 of which £134,756 (2021: £103,331) was unrestricted and £318,036 (2021: £302,119) was restricted.

4. Investment income

	2022	2021
	£	£
Interest received	92	93
	<u> </u>	<u> </u>

5. Analysis of expenditure on charitable activities

Description	Charitable Activities	2022	2021
	£	£	£
Direct costs	93,804	93,804	76,634
Direct salary costs	251,480	251,480	195,557
Depreciation	1,247	1,247	1,246
Support costs:			
<i>Rent</i>	24,457	24,457	23,308
<i>Financial consultancy</i>	5,200	5,200	4,979
<i>Other consultancy</i>			2,325
<i>Payroll and recruitment costs</i>			506
<i>Travel & accommodation</i>	227	227	21
<i>Insurance</i>	1,742	1,742	655
<i>General office</i>	3,153	3,153	4,520
<i>Audit fee/Independent examination</i>	5,000	5,000	6,500
Total	386,310	386,310	316,252

Expenditure on charitable activities was £386,310 of which £28,032 (2021: £71,585) was unrestricted and £358,278 (2021: £244,667) was restricted.

The amount paid to the auditor for their external scrutiny was £4,800 (2021: £4,800).

6. Analysis of staff costs, trustee remuneration and expenses, and the cost of key management personnel

	2022	2021
	£	£
Salaries and wages	228,306	178,263
Social security costs	17,972	13,285
Pension costs	5,202	4,009
	<u>251,480</u>	<u>195,557</u>

No employee had employee benefits in excess of £60,000 (2020: nil).

The charity trustees were not paid or received any other benefits from employment with Focus on Labour Exploitation. No trustees were reimbursed expenses during the year and no trustees were reimbursed in the prior year. No charity trustee received payment for professional or other services supplied to the charity (2021: nil).

The key management personnel comprises the Chief Executive and their total benefits during the year were £57,613 (2021 - £56,500).

7. Staff numbers

The average monthly head count was 7 staff (2021: 6 staff) and the average monthly number of full-time equivalent employees (including casual and part-time staff) during the year was 7 (2021: 6)

8. Corporation Taxation

The charity is exempt from tax on income and gains falling within section 505 of the Taxes Act 1988 or section 252 of the Taxation of Chargeable Gains Act 1992 to the extent that these are applied to its charitable objects.

9. Tangible fixed assets

	Fixtures and fittings £	Computer equipment £	Total £
Cost at 31 March 2021	1,038	8,019	9,057
Additions	-	2,050	2,050
Cost at 31 March 2022	<u>1,038</u>	<u>10,069</u>	<u>11,107</u>
Depreciation			
At 31 March 2021	1,038	7,186	8,224
Charge for the year	-	1,247	1,247
At 31 March 2022	<u>1,038</u>	<u>8,433</u>	<u>9,471</u>
Net book value			
At 31 March 2022	<u>-</u>	<u>1,636</u>	<u>1,636</u>
At 31 March 2021	<u>-</u>	<u>833</u>	<u>833</u>

10. Debtors

	2022 £	2021 £
Trade Debtors	14,250	300
Prepayments and accrued income	<u>58,995</u>	<u>70,390</u>
	<u>73,045</u>	<u>70,690</u>

11. Creditors: amount falling due within one year

	2022 £	2021 £
Trade Creditors	40,608	1,370
Accruals	5,150	14,156
-Taxation and social security	7,101	4,935
Other creditors	3,680	1,044
	<u>56,539</u>	<u>21,505</u>

12. Movement in funds

The income funds of the charity include restricted funds comprising the following unexpended balances of donations and grants held on trust for specific purposes:

Current period	Balance at 01-Apr 2021	Incoming resources	Resources expended	Transfer	Balance at 31-Mar 2022
	£	£	£	£	£
Restricted funds					
Barrow Cadbury Trust	19,825	31,500	(30,319)	-	21,006
Trust for London	13,867	20,025	(33,892)	-	-
Paul Hamlyn Foundation	37,509	49,200	(44,131)	-	42,578
Unbound Philanthropy	17,130	40,000	(30,302)	-	26,828
The Scottish Ministers	-	10,000	(10,000)	-	-
Ethical Trading Initiative	1,100	3,293	(3,568)	-	825
Esmée Fairbairn Foundation	29,500		(29,500)	-	-
COVID 19	21,464		(21,464)	-	-
MOPAC	-	23,518	(23,518)	-	-
The Home Office	-	75,050	(75,050)	-	-
Joseph Rowntree Charitable Foundation	-	32,720	(18,976)	-	13,744
City Bridge Trust	13,072	18,420	(23,248)	-	8,244
Oak Foundation	-	5,550	(5,550)	-	-
Kickstart grant	-	6,565	(6,565)	-	-
Justice Together	-	2,195	(2,195)	-	-
Total restricted funds	153,467	318,036	358,278	-	113,225
Unrestricted					
Unrestricted general fund	131,960	149,083	(28,032)	(25,000)	228,011
Designated					
Enhanced leave fund	-	-	-	25,000	25,000
Total funds	285,427	467,119	330,246	-	366,236

The trustees approved the designating of £25,000 during the year. This fund will be used to provide enhanced paternal and sick leave payments.

Prior period	Balance at	Incoming	Resources	Balance at
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	01-Apr 2020	resources	expended	31-Mar 2021
Restricted funds	£	£	£	£
Barrow Cadbury Trust	10,289	30,000	(20,464)	19,825
Trust for London	13,328	32,000	(31,461)	13,867
Paul Hamlyn Foundation	23,879	50,000	(36,370)	37,509
Unbound Philanthropy	22,130	20,000	(25,000)	17,130
The Scottish Ministers	-	33,192	(33,192)	-
Ethical Trading Initiative	1,250	3,100	(3,250)	1,100
Esmee Fairbairn Foundation	25,139	40,407	(36,046)	29,500
COVID 19	-	65,000	(43,536)	21,464
Awards for All	-	10,000	(10,000)	-
City Bridge Trust	-	18,420	(5,348)	13,072
Total restricted funds	96,015	302,119	(244,667)	153,467
Unrestricted				
Unrestricted general fund	91,833	111,712	(71,585)	131,960
Total funds	187,848	413,831	(316,252)	285,427

The purpose of each restricted fund is as follows:

- Barrow Cadbury Trust: to support policy advocacy work
- Trust for London: to work in London to prevent trafficking and to promote best practice responses
- Paul Hamlyn Foundation: to support research into three high risk labour sectors for EEA workers
- Unbound Philanthropy: for research on the impact of Brexit on EEA workers vulnerability to exploitation
- The Scottish Ministers: for outreach to workers in farms to provide support and gather evidence of the experiences of workers in the horticulture sector.
- Ethical Trading Initiative: to participate in ETI activities.
- Esmee Fairbairn Foundation: to support Feminist Participatory Action Research in three high risk labour sectors
- The COVID 19 project was funding by donations from Paul Hamlyn, Unbound Philanthropy and Trust for London and impact of the COVID-19 pandemic on workers in low pay.
- MOPAC: to provide training to ensure professional are able to spot the signs of modern slavery and human trafficking
- Home Office: to provide an awareness raising campaign for the cleaning industry
- Joseph Rowntree Charitable Foundation: to develop and pivot a worker-driven model for assessing corporate human rights due diligence and provide a trial
- City Bridge Trust: to build capacity of organisations supporting London communities at risk of labour exploitation, modern slavery and trafficking.
- Oak Foundation: funding to support the cost of the annual audit
- Kickstart grant: funding towards the salary of an apprentice
- Justice Together: to fund work to make current and future short-term work visas fairer and safer

13. Analysis of net assets between funds

Unrestricted	Restricted	Total
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	Funds £	Funds £	£
Funds balances at 31 March 2022 are represented by:			
Tangible Fixed Assets	1,636	-	1,636
Current Assets	268,064	153,075	421,139
Creditors: amounts falling due within one year	(16,689)	(39,850)	(56,539)
	<u>253,011</u>	<u>113,225</u>	<u>366,236</u>

	Unrestricted Funds £	Restricted Funds £	Total £
Funds balances at 31 March 2021 are represented by:			
Tangible Fixed Assets	833	-	833
Current Assets	145,125	160,674	306,099
Creditors: amounts falling due within one year	(13,998)	(7,507)	(21,505)
	<u>131,960</u>	<u>153,467</u>	<u>285,427</u>

FOCUS ON LABOUR EXPLOITATION

England & Wales - Charity number 1159611

Accounts

Focus on Labour Exploitation
(A company limited by guarantee)
Report and Financial Statements
For the year ended 31 March 2021

Charity registration no 1159611

Company registration no 08451701

Focus on Labour Exploitation

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Reference and administrative details

Trustees	Peter Andrews Vash Arora Jane Ellis Claire Falconer Rachel Hewitt Ian Robinson Adam Weiss
Principal Office	The Foundry 17 Oval Way London SE11 5RR
Charity number	1159611
Company number	08451701
Bankers	Triodos Bank Deanery Road Bristol BS1 5AS The Co-operative Bank 1 Balloon Street Manchester M60 4EP
Auditor	Field Sullivan Limited 70 Royal Hill Greenwich SE10 8RF

Focus on Labour Exploitation

Report of the trustees for the year ending 31 March 2021

The trustees present their report and accounts for the year ended 31 March 2021.

The accounts have been prepared in accordance with the accounting policies set out in note 1 to the accounts and comply with the charity's memorandum and articles of association, the Charities Act 2011, the Companies Act 2006, the Charities and Trustee Investment (Scotland) Act 2005 and Accounting and Reporting by Charities: Statement of Recommended Practice applicable to charities preparing their accounts in accordance with the Financial Reporting Standard application in the UK and Republic of Ireland (FRS 102).

Our purposes and activities

Our charity's purpose as set out in the objects contained in the company's memorandum of association are:

To promote and advance the human rights of victims of human trafficking, and in particular, those trafficked for the purpose of labour exploitation, in the United Kingdom and throughout the world, by all or any of the following means:

- Monitoring abuses of the human rights of victims of human trafficking;
- Obtaining legal or other redress for abuses of the human rights of victims of human trafficking;
- Research into issues affecting the human rights of victims of human trafficking, and in particular, those trafficked for the purpose of labour exploitation;
- Providing technical guidance, both to Governments and organisations working with victims of human trafficking, on issues concerning the human rights of victims of human trafficking;
- Contributing to the sound administration of laws which protect the human rights of victims of trafficking;
- Commenting on the effect of proposed legislation on the human rights of victims of human trafficking;
- Raising awareness of, and promoting public support for, human rights issues affecting victims of human trafficking;
- Promoting respect for the human rights of victims of human trafficking amongst both individuals and corporations;
- International advocacy of the human rights of victims of human trafficking.

In shaping our objectives for the year and planning our activities, the trustees have considered the Charity Commission's guidance on public benefit, including the guidance 'public benefit: running a charity (PB2).

The company works to benefit both current and potential victims of trafficking for labour exploitation, in the UK and worldwide.

The trustees have considered this matter and concluded:

1. that the aims of the organisation continue to be charitable;
2. that the aims and the work done give identifiable benefits to the charitable sector and both indirectly and directly to individuals in need;
3. that the benefits are for the public, are not unreasonably restricted in any way and certainly not by ability to pay; and
4. that there is no detriment or harm arising from the aims or activities.

Achievements and performance

Throughout 2020/21, FLEX has built on its work to improve national and international responses to better protect and promote the rights of people facing or at risk of exploitation. Achievements are detailed below following the framework provided by FLEX's Strategic Plan 2020-25:

FLEX has a vision of a world free from all forms of labour exploitation, including forced labour and human trafficking.

Our mission is to end labour exploitation by challenging and transforming the systems and structures that create vulnerabilities for workers. We do this by undertaking research, knowledge building and evidence-based advocacy aimed at preventing labour abuses, protecting the rights of those affected, and promoting best practice policy responses to labour exploitation.

Our approach:

FLEX' work builds on the understanding that labour exploitation is situated at the extreme end of a spectrum ranging from labour compliance through to labour law violations, culminating at extreme exploitation in the form of offences such as forced labour and human trafficking for labour exploitation. These are at once serious crimes, human rights breaches and violations of labour law. Labour exploitation takes place in every country in the world, and whilst in recent years we have seen a boom of corporate social responsibility initiatives seeking to address risks in global supply chains, state surveillance and legislation remains weak, and exploitation taking place in national contexts remain largely under-researched and misunderstood. As a result, very few of the estimated millions of victims are ever identified and just a fraction of cases result in the prosecution of perpetrators or compensation for survivors.

FLEX recognises that workers at risk of poverty, destitution, discrimination and/or social exclusion are at higher risk of exploitation, and therefore pays particular attention to:

1. **Workers in low-paid and insecure work:** Struggling to make ends meet, low-paid workers are at high risk of falling into debt and facing destitution. Fear of losing work is a major deterrent to reporting abuse and many workers are willing to endure labour abuses and even exploitation. Insecure work arrangements, such as false self-employment and zero-hours contracts, create further instability as workers are not guaranteed an income and can more easily have their work terminated.
2. **Women workers:** Women face additional vulnerabilities related to gendered cultural and structural issues, such as unequal treatment at work, discrimination related to pregnancy and maternity, and gender-based violence and sexual harassment at work. Carrying a disproportionate

care burden may push women into more casual employment and make them less able to leave abusive situations. Women are also disproportionately represented in low-paid and precarious work, where they may also face unequal treatment. FLEX's intersectional feminist approach recognises that gender inequality often intersects with other forms of disadvantage to increase women's risk of exploitation.

3. **Migrant Workers:** Migrant workers are also disproportionately represented in low-paid, precarious and informal work. They may also face additional situational vulnerabilities compared to non-migrants, including language barriers, limited support networks and lack of knowledge of labour rights or where to access support. Government policies affecting migrants, such as restrictions on accessing social protections (e.g., no recourse to public funds) create additional vulnerabilities for migrants. Undocumented migrants are particularly at risk of exploitation, especially in contexts where undocumented labour is criminalised.

FLEX works alongside other organisations committed to the rights of vulnerable workers and those working to combat labour exploitation. FLEX is also guided by organisations working with people affected by, or at risk of labour exploitation in the UK, including trafficked persons, who form FLEX's 'Labour Exploitation Advisory Group'.

FLEX is a member of UK-based and global networks of individuals and agencies that share its commitment and values. These include: the UK Anti-Trafficking Monitoring Group, the Ethical Trading Initiative, the Platform for International Cooperation on Undocumented Migrants, the Global Alliance against Traffic in Women, and La Strada International.

FLEX operates on the **values** of:

- **Respect** – for equality and recognition of the role of intersectionality, understood as overlapping or accumulated layers of discrimination, and systemic oppression in creating vulnerabilities and disadvantage.
- **Courage** – to explore, probe, and approach challenges with creativity.
- **Integrity** – thoroughness, rigour and reliability in how we use information to evidence the need for change.
- **Justice** – everything we do is aimed at achieving a more just society.
- **Accountability** – towards those affected by labour exploitation, whose safety, well-being and voice are central to our work.

Our working **principles** are: quality outputs; rigorous and accurate research and reporting; high ethical standards; reflection on our impact; collaborative approach; do no harm.

Top ten things we are most proud of this year:

1. We continued providing analysis and evidence-based research to Government and to key stakeholders to inform a safer post-Brexit UK immigration system, playing a key role in ensuring that potential victims of modern slavery are allowed to submit late applications to the EU Settlement Scheme.
2. We published FLEX and FMF '*Assessment of the Risks of Human Trafficking for Forced Labour on the UK Seasonal Workers Pilot*', which provides unique independent evidence on the risks

associated with the agricultural Seasonal Worker Pilot. As a result of this work the Scottish Government commissioned a dedicated helpline to provide information and casework support to workers, produced informative materials on workers' rights and COVID-19 rules, and is currently looking into strengthening standards and inspections of caravan accommodation.

3. We worked closely with the Home Office, with devolved administrations, and with the UK Director of Labour Market Enforcement to promote the enforcement of labour rights as part of the national response to human trafficking, including by informing the development of the Single Enforcement Body, a FLEX recommendation from 2017.
4. We provided prompt analysis on the potential impact of the new rules allowing the removal of migrants rough sleepers on increased risk of exploitation among the wider homeless population. Over 150 organisations supported our joint statement, which led several local authorities across the country announced that they will not cooperate in enforcing these new rules.
5. We increasing the awareness of key stakeholders about the need for secure reporting mechanisms to ensure that workers with insecure immigration status are able to report abuse without fear, including the Office for the Director of Labour Market Enforcement, the Gangmasters Licensing and Abuse Authority, the Independent Anti-Slavery Commissioner, the Greater London Authority, MOPAC, and the London Metropolitan Police.
6. We developed FLEX's 'Peer Researcher' model, an innovative participatory action research methodology through which we engaged workers from high-risk sectors in all areas of the research process and in advocacy and strategic comms work.
7. We developed informative material for workers in London low-paid sectors and for EU and temporary workers in agriculture, in 16 different languages and in partnership with supporting organisations to give visibility to the sources of support.
8. We developed a range of partnership projects across sectors, including with key front-line organisations and trade unions organising precarious workers, public bodies, and academics.
9. We engaged staff members in developing strategic work and continued to strengthen the organisation by reviewing policies and monitoring tools, as well as by increasing the representation of experts by experience as part of our staff team.
10. Lastly, we managed to overcome the many challenges posed by the COVID-19 pandemic, adapt our operations to work remotely, and evolve as an organisation by investing in protecting the wellbeing of our staff and developing a more supportive environment.

FLEX has completed the following work against its four core objectives over the past year:

FLEX Strategic Objective 1: To challenge and positively transform policies, attitudes and practices that drive labour exploitation.

Within this aim FLEX seeks to build understanding and evidence of drivers of labour exploitation, including Government policies and business operating models and practices, and structural inequalities, such as gender and racial discrimination. We also work to build awareness and understanding of drivers of exploitation among decision-makers and key stakeholders. Our media and communications work within this aim has the objective of increasing decision-makers' awareness and

understanding of systemic and structural issues creating risks of labour exploitation by shifting media narratives.

Work over the past year has resulted in the following key outcomes:

Following the outbreak of COVID-19 in the UK, FLEX began monitoring the impact of the pandemic on low-paid workers, focusing on those with insecure employment arrangements, migrants and women. In April 2020, we published a briefing titled 'No Worker Left Behind: Protecting Vulnerable Workers from Exploitation During and After the Coronavirus Pandemic'. The briefing highlighted the failure to designate labour inspectors as essential workers and provided a number of recommendations to government and labour inspectorates. As a result, FLEX was approached by the London's Migration and Integration lead to inform their response to COVID-19. FLEX briefing was also picked up by the Independent Anti-slavery Commissioner, who hosted two meetings with NGOs, trade unions and labour inspectorates to discuss concerns around their response during COVID-19 and inform the work of the GLAA during the pandemic.

In response to the pandemic, we also developed a project that seeks to identify barriers to accessing employment rights and social protections in the context of the pandemic. This 1-year project is being delivered in partnership with two grassroots trade unions organising workers in low pay sectors: United Voices of the World and the Independent Workers of Great Britain. The partnership provides support and advice to workers affected by the pandemic and applies quantitative and qualitative methods to carry out research and document the situation to develop worker-informed recommendations.

During this period, FLEX has been actively engaged in **advocating for a safe post-Brexit immigration system for labour migration**. We have done this by actively engaging in policy processes and advocacy platforms, as well as by conducting research to evidence risks and effective impact of the changes on workers, as well as actionable solutions. This work has involved maintaining active engagement through advocacy platforms and groups, including two Home Office-led groups: the EU Settlement Scheme Vulnerable User Group, which monitored the impact of the scheme aimed at providing EEA Nationals already residing in the UK with regular status post-Brexit; and the Vulnerability Advisory Group, an expert panel set up to provide advice on the development and implementation of the UK's post-Brexit immigration system.

In April 2020, we co-organised an event with the All-Party Parliamentary Group on Migration titled *The Impact of Britain's Future Immigration Policy on Decent Work in Low-Paid Sectors*. The panel included Matthew Taylor, Director of Labour Market Enforcement (DLME); and representatives from the Latin American Women's Rights Service (LAWRS); the Recruitment and Employment Confederation; London First; and FLEX. The panel discussed the potential impact of Government's plans and the lack of a general route for migration into low-paid work.

We engaged in parliamentary work, as well as in joint advocacy with numerous organisations. We also wrote an article for the **Journal of Poverty and Social Justice** on the likely increase in irregular migration post-Brexit, and the associated risk of labour exploitation. The article outlines the different

ways in which people can end up with an irregular immigration status post-Brexit and what this will mean in terms of their rights and vulnerability to exploitation. The article will be published in 2021.

In March 2020, we started conducting an outreach and research into Scottish farms, which we delivered in partnership with Fife Migrant Forum (FMF), a front-line migrant-led organisation providing support to workers. The research sought to assess the risks of forced labour for workers on the Tier 5 Seasonal Worker Visa and was carried out in key languages spoken by workers in the sector (Bulgarian, English, Lithuanian, Romanian, Ukrainian, Russian, Latvian, Moldavian). As part of this project, we also produced guidance for both workers in the Seasonal Work Pilot and EU workers, in partnership with the Scottish Government, FMF, and Just Rights Scotland. The final report, *'Assessment of the Risks of Human Trafficking for Forced Labour on the UK Seasonal Workers Pilot'*, was published in March 2021. Key findings were presented to key Scottish Government policy teams and COSLA, as well as to the pilot operators, employers and relevant civil society organisations.

In June 2020 FLEX submitted evidence to the Department of Business, Energy and Industrial Strategy's 'Reforming Regulation Initiative'. Highlighting findings from FLEX participatory research with cleaners, the submission highlighted the impact that the extensive use of outsourcing can have on workers' wages and working conditions, including the intensification of workloads leading to unpaid working time and dangerous working conditions. The submission recommended better regulation of outsourcing through, for example, licensing of cleaning companies and joint and several liability legislation.

In November 2020, FLEX was invited to provide evidence of the impact of COVID-19 on victims of trafficking and on insecure workers to the UN Special Rapporteur on Slavery.

In December 2020, we wrote a letter to the Home Secretary, and the ministers for Housing and Safeguarding, in collaboration with Anti-Slavery International, the Anti-Trafficking Monitoring Group, Doughty Street Chambers and Hope for Justice, warning them about the risks of increased exploitation linked to a new rule that allows the deportation of visa holders who are sleeping rough. The letter was signed by 151 charities, unions, lawyers and councils. It received significant media attention and informed the responses from various key stakeholders, including various local authorities, the Greater London Authority and the Independent Anti-Slavery Commissioner (IASC).

In March 2021, in we worked in collaboration with the Human Trafficking Foundations to co-lead a coalition of 30 anti-trafficking NGOs to commit London Mayoral candidates to prioritise tackling modern slavery, as identification numbers drop in the capital for the first time in eight years despite increased risk of exploitation. As a result of this joint work, the elected Mayor of London, Sadiq Khan, Conservative candidate, Shaun Bailey, Liberal Democrat candidate Luisa Porritt, Green Party candidate Siân Berry and Women's Equality Party candidate Mandu Reid have agreed to sign a pledge.

FLEX Objective 2: Ensure that the enforcement of the full range of workers' rights forms part of national and international responses to labour exploitation.

Within this aim FLEX works to build evidence of the links between severe labour abuses, exploitation and trafficking; and about the impact of labour market enforcement strategies and of the role of marginalised workers in preventing and addressing labour exploitation. We also seek to build

understanding of the ‘prevention’ obligation in state’s responses to human trafficking for labour exploitation, by advocating for enforcement of labour standards as a central plank of effective anti-trafficking responses.

During this period, FLEX has made good progress on meeting this objective. We have worked closely with UK labour market enforcement bodies, with devolved administrations, with the Home Office and with the UK Director of Labour Market Enforcement. As we await Government’s response to the consultation, we continued working to inform discussions about the future **UK Single Enforcement Body**, particularly by engaging in advocacy meetings with the ODLME. Our key recommendations include calling for evidence-based funding, the development of a comprehensive prevention strategy that recognises the links between labour abuses and criminal forms of labour exploitation, the development of a gender-responsive approach to enforcement, and the introduction of secure reporting.

In April 2020, we launched the Labour Exploitation Advisory Group (LEAG, see Aim three) report on secure reporting, *‘Opportunity Knocks: improving responses to labour exploitation with secure reporting’*, which calls for an end to the data sharing of migrants information by the police and labour inspectorates, for immigration enforcement purposes. We developed an advocacy plan to target specific stakeholders. Work on this area involved a number of key advocacy activities, including co-hosting a virtual event with LAWRS, which was chaired by the London Victims’ Commissioner and had presentations from police officers from the New York City Police Department, Amsterdam Police and the UK Independent Anti-Slavery Commissioner, and attended by key stakeholders (police forces, ODLME, IASC, London MOPAC, etc.). As a result of FLEX and LEAG’s work, a number of key stakeholders have expressed support for secure reporting in order to ensure that all workers are able to report abuse. We continue to engage in discussions with key stakeholders.

In 2019, FLEX set up the Taskforce on Victims of Human Trafficking in Immigration Detention (Human Trafficking Foundation, Unseen, Bail for Immigration Detainees, and others), which advocates for the end to the detention of victims of trafficking. In May 2020, the Detention Taskforce submitted evidence to the Home Secretary’s review of the current policies related to victims of trafficking in immigration detention, following a successful legal challenge by solicitors from Taskforce member Duncan Lewis. Following the outbreak of COVID-19, a high number of detainees were released from Immigration Removal Centres into the community. During this period, FLEX has engaged with the office of the Independent Chief Inspector of Borders and Immigration (ICIBI) on this matter and has been invited to inform the Home Office’s proposed new policy on victims of trafficking in detention.

Finally, in January 2021, FLEX published the report *“If I Could Change Anything About My Work...” Participatory Research With Cleaners In The UK*. The report, which found that 61% of participants experienced issues with their pay, 60% of respondents experienced dangerous working conditions, and 86% suffered work-related health issues, is being used to inform a potential pilot project with the GLAA, which will focus on cleaning, as well as FLEX engagement with relevant businesses. This research project supported the development of FLEX **‘Peer Researcher’ model** (see Aim three), through which we implemented a feminist participatory action research approach (FPAR) to involve workers as peer-researchers in every stage of the research process. FLEX team of paid peer researchers completed

interviews and facilitated focus groups with cleaning and hospitality workers. We have also carried out a survey, which was responded by 204 workers. Published.

Objective 3: To mobilise cooperation in addressing labour exploitation by providing leadership and expertise across sectors.

Within this aim FLEX has the following objectives: To develop methodologies for engagement with ‘experts by experience’ and foster recognition of their role as key for driving effective change; to develop awareness about labour exploitation and its prevention among key stakeholders, such as civil society network and platforms; and to leverage national, international and global networks to hold governments to account and advocate for the rights of victims of trafficking for labour exploitation. Our media and communications work under this aim seeks to diversify the voices and actors represented in media coverage about labour exploitation and to support the empowerment of people affected.

During this period, FLEX developed and implemented its Peer Researcher model, a feminist participatory action research (FPAR) approach to investigate drivers of labour exploitation and to develop better informed policy. Like other participatory approaches, FLEX’s Peer Researcher Model seeks to work ‘with’ rather than ‘on’ the community being researched. It is directed by the two core principles of FPAR: that research should enable the empowerment of those most affected by an issue to generate knowledge that can bring about social change and that, for this reason, it should be community-led. Through this model, we have worked with a network of paid peer researchers – workers from the sector being researched – at every stage, from research design to data collection, analysis and advocacy. Peer researchers were consulted on the design of data collection tools (interview templates, focus group design and survey questions) and received training on research methods, ethics, safeguarding and signposting, as well as ongoing support. In March 2021, we published the handbook *‘Experts by Experience: Conducting Feminist Participatory Action Research with Workers in High-risk Sectors’*, which has received significant interest from key statutory and civil society stakeholders, including the ODLME and several academic research teams.

In May 2020, FLEX worked with the Mayor of London’s team to produce a video about labour exploitation, as part of their online campaign to provide migrants with information about their employment rights during COVID-19. This was an opportunity to bring together the labour standards and anti-trafficking services into one informative video targeting at-risk workers. The video was filmed in 11 languages (available at the Mayor’s Employment Rights Hub and YouTube).

In December 2020, FLEX run the first meeting of this stakeholder group, made up of frontline organisations, and academics. The aim of this group is to develop a joint position paper on the issue of workplace sexual harassment enforcement gaps, with a particular focus on low-paid workers. Building on findings from our participatory research in cleaning and hospitality, the working group will develop recommendations to support policymakers to close this enforcement gap.

In January 2021, FLEX launched its ‘Train the Trainer’ programme for London-based police and local authorities on their responsibilities to victims of modern slavery. With the overall aim of improving knowledge and awareness of modern slavery and legal duties among these First Responder

organisations, this training programme focuses on ensuring knowledge is passed on through subsequent internal training. FLEX also launched a new bespoke training programme for community-based organisations on human trafficking for forced labour, with the aim of improving their ability to identify and respond to risk of labour exploitation, as well voice related concerns via joint advocacy work.

FLEX is member of key international advocacy networks, including GAATW, LaStrada International, and PICUM. During this period, FLEX worked in collaboration with key partners on 16 advocacy and campaigns joined actions in support of the wider movement for change. For instance, in April 2020 we joined Rights of Women Advisory Group on Sexual Harassment in the Workplace in signing a letter calling on the Lord Chancellor to extend the 3-month time limit for discrimination and harassment claims to 6 months given the circumstances of the pandemic. In July, we became official ‘supporters’ of Unchecked UK, a group that advocates for ‘common-sense protections which help keep people safe and allow businesses to thrive’, including labour market regulations. In August, we co-signed a Letter to Home Secretary Priti Patel, drafted by JCWI calling government to introduce safe and legal routes of entry to the UK, including by introducing Humanitarian Visas, expanding the Family Reunification Rules, and properly funding and extending the Vulnerable Persons Resettlement Scheme. In September we joined a statement of UK civil society organisations and trade unions, coordinated by Labour Behind the Label, responding to the Independent Review of The Boohoo Group’s Leicester Supply Chain. We also helped promote a petition to Parliament, initiated by the Voice of Domestic Workers, which seeks to reinstate the original Overseas Domestic Worker visa.

Objective 4: To ensure that FLEX is able to respond to the interests of actual and potential victims of human trafficking for labour exploitation.

During this period, FLEX developed its new Business Plan 2020-2025 through a process that involved staff, trustees and key external contacts. The new Business Plan presents our focus on workers in low-paid and insecure work, women workers, and migrant workers, and expresses our commitment to integrate two key cross-cutting themes in our work (Power and Voice, and Diversity and gender Equality). The business plan informed FLEX Operational Plan 2020-21. We also implemented a new model for organisational cultural change, which involves staff in leading strategic processes. During this year, a working group led by FLEX Networks and Impact Officer, made up of three other members of staff and working in consultation with a trustee and the CEO, developed FLEX ‘Diversity and Inclusion’ strategy. This new strategy covers organizational capacity and policies, representation, operational delivery and communications.

This objective relates to ensuring a healthy and productive working environment for FLEX staff. To this end, we created and recruited for three new roles: an Operations and Comms Assistant, carrying out administrative and communications-related tasks; a Training Officer, a role which has allowed FLEX to reinstate a new version of its training and outreach programme; and a Peer Coordinator, a worker from our Peer Researchers team who has joined our staff team to support the coordination of our Peer Researchers network and to support our data collection on gig economy couriers and delivery drivers. In response to the potential impact of COVID-19 on FLEX team and work, the Board of Trustees

held two extraordinary meetings to provide strategic support and explore any necessary ad-hoc measures, including reviewing key HR policies.

During this period, FLEX consolidated its work on strategic comms by engaging in a consultancy support programme and by increasing staff capacity in this area. This work resulted in **increased media engagement and over 43 media appearances, including the following key ones:**

- Financial Times, 14.04.20 – Regarding migrant workers and impact of pandemic
- Politics Home – 25.09.20 – Regarding labour exploitation and the pandemic
- Reuters – 01.12.20 – Op-ed on deportation of rough sleepers and risk of trafficking (letter to the Home Secretary signed by 151 organisations)
- Independent – 01.12.20 – An exclusive covering letter to Home secretary on deportation of rough sleepers and risk of trafficking
- Financial Times, – 18.01.21 – On sexual harassment enforcement gaps
- Financial Times – 16.03.21 – An exclusive on the findings of our research report on the risks of forced labour for workings on the Seasonal Worker Visa.

In July, FLEX hosted the online event ‘Messaging Modern Slavery: expert panel and discussion’ which was attended by over 100 people, viewed 278 times on YouTube and received overwhelming positive feedback from journalists, academics, funders and practitioners. This event discussed the media’s role in shaping our understanding of the causes and solutions of labour exploitation and included a journalist, academics and an activist with lived experience of human trafficking. We have also posted 22 blogs and news pieces on our website, including a blog written by FLEX Peer Coordinator, a former gig economy worker, and two blogs authored by the research assistants who conducted fieldwork on Scottish farms, both with seasonal agricultural work experience.

Finally, this objective relates to our sustainable funding strategy and over the past year FLEX has maintained its financial sustainability, progressing projects into their new phase and developing new partnerships with the support of existing and new funders. We have worked hard to counterbalance the sustainability risks brought up by the COVID-19 pandemic and to diversify our income streams through statutory funding and cross-sectors partnerships.

Financial review

The charity’s income increased to £413,831 (2020: £325,325). The charity received additional funds to specifically support work in relation to the impact of COVID 19.

Total expenditure was £316,252 (2020: £279,573) resulting in a net surplus for the year of £97,579 and total reserves of £285,427. Unrestricted reserves increased to £131,960 (2020: £91,833).

Investment powers and policy

The charity is seeking to build reserves in line with the charity’s reserves policy (see below). As most of the charity’s funds are to be spent in the short term there are currently no funds available for long-term investment. Investment income earned during the year relates to interest on the charity’s bank account.

Reserves policy and going concern

The surplus for the year increased the charity's unrestricted reserves to £131,960 which is in line with the reserves target, to cover 3 months operating cost (£78,168). Despite the challenges of the funding environment the Trustees are confident that the charity can maintain unrestricted reserves.

The Trustees are confident that the charity has adequate resources to operate for the foreseeable future due the unrestricted reserves and the level of secured income for the next financial year.

Plans for future periods

FLEX's work plans for the period to 2022 are derived from its Strategic Plan 2020-25, and are focussed on building its evidence-base and networks to support the promotion of its unique perspective and approach to the prevention of trafficking for labour exploitation at the national and international level.

This includes conducting rigorous research, developing policy recommendations and building networks and opportunities for international advocacy. For 2021/22, some of the key areas of focus for FLEX will include:

- Continuing evidencing the impact of unsafe labour migration routes, as well as of the COVID-19 pandemic, on workers in high-risk sectors, and actively engaging in advocacy work to increase understanding of the risk factors and increase protections for workers;
- Continuing FLEX's research and participatory engagement in high-risk labour sectors, hospitality, cleaning and logistics;
- Engaging in key advocacy processes, including the Modern Slavery Strategy review and the proposed UK Single Labour Inspectorate;
- Expanding and diversifying our networks and investing in increasing mutual capacity to jointly help prevent labour exploitation;
- Reviewing the potential for worker-led approaches to corporate accountability;
- Increasing our visibility through high-profile strategic communications work; and
- Deepening our contacts with international bodies and key progressive governments who can act as ambassadors for FLEX approaches to preventing human trafficking for labour exploitation.

Reference and administrative details

Charity number (England and Wales): 1159611

Company number: 08451701

Registered and Principal Office: The Foundry, 17 Oval Way, London, SE11 5RR

Our advisors

Bankers Triodos Bank, Deanery Road, Bristol, BS1 5AS

The Co-operative Bank, 1 Balloon Street, Manchester, M60 4EP

Directors and trustees

The directors of the charitable company (the charity) are its trustees for the purpose of charity law.

The trustees and officers serving during the year and since the year end were as follows:

Chair Adam Weiss (from May 2021)

Elected Trustees Peter Andrews
Vash Arora (appointed 8 July 2020)
Paul Blomfield (resigned 14 July 2020)
Claire Falconer
Rachel Hewitt
Ian Robinson
Emma Townsend (resigned 22 October 2020)
Jane Ellis (Chair until May 2021)

Key management personnel:

Chief Executive Lucila Granada

Structure, Governance and Management

Governing Document

The organisation registered as a charity on 15 December 2014. The company was established under a Memorandum of Association which established the objects and powers of the charitable company and is governed under its Articles of Association. In the event of the company being wound up members are required to contribute an amount not exceeding £50.

Trustee induction and training

New trustees are inducted through a meeting with management. Trustees are provided with a copy of the FLEX Trustees Terms of Reference and the Charity Commission's introductory guidance for trustees. New trustees are also asked to complete a personal details form, a declaration of interests, and a skills audit to identify training needs. All trustees are regularly offered training on matters concerning governance.

Organisation

The trustees meet on a quarterly basis and oversee the strategic direction of the charity. The day to day operations and management is delegated to the Chief Executive Officer.

Related parties

None of our trustees receive remuneration or other benefit from their work with the charity.

Pay policy for senior staff

The Board's Remuneration Committee determines the salaries of senior staff. The FLEX Trustees Terms of Reference set out the Terms of Reference for the Remuneration Committee. The Committee includes the Treasurer and at least one other trustee, and meets once a year to review the salaries of senior staff and make recommendations to the Board. The Committee is also responsible for developing and reviewing FLEX's general remuneration policy and principles, and ensuring those principles are being applied.

Risk management

The trustees have reviewed the major risks to which the charity is exposed. A risk register has been established which is updated annually. Where appropriate, systems or procedures have been established to mitigate the risks and these are periodically reviewed to ensure that they continue to meet the needs of the charity. The trustees deem that appropriate measures are currently in place to mitigate risk, particularly in the light of the on-going difficult economic environment.

Trustees' responsibilities in relation to the financial statements

The trustees (who are also the directors for the purpose of company law) are responsible for preparing the Annual Report and the financial statements in accordance with applicable law and regulations.

Company law requires the trustees to prepare financial statements for each financial year. Under that law the trustees must prepare the financial statements in accordance with United Kingdom Generally Accepted Accounting Practice (United Kingdom Accounting Standards and applicable law). Under company law the trustees must not approve the financial statements unless they are satisfied that they give a true and fair view of the state of affairs of the charitable company and of the incoming resources and application of resources, including the income and expenditure, of the charitable company for that period.

In preparing these financial statements, the trustees are required to:

- a) select suitable accounting policies and then apply them consistently;
- b) observe the methods and principles in the Charities SORP;
- c) make judgments and accounting estimates that are reasonable and prudent;
- d) state whether applicable UK Accounting Standards have been followed, subject to any material departures disclosed and explained in the financial statements; and
- e) prepare the financial statements on the going concern basis unless it is inappropriate to presume that the charitable company will continue to operate.

The trustees are responsible for keeping adequate accounting records that are sufficient to show and explain the charitable company's transactions and disclose with reasonable accuracy at any time the financial position of the charitable company and enable them to ensure that the financial statements comply with the Companies Act 2006. They are also responsible for safeguarding the assets of the company and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.

The trustees are responsible for the maintenance and integrity of the corporate and financial information included on the charitable company's website. Legislation in the United Kingdom governing the preparation and dissemination of financial statements may differ from legislation in other jurisdictions.

The trustees confirm that so far as they are aware, there is no relevant audit information (as defined by section 418(3) of the Companies Act 2006) of which the charitable company's auditors are unaware. They have taken all the steps that they ought to have taken as trustees in order to make themselves aware of any relevant audit information and to establish that the charitable company's auditors are aware of that information.

By order of the board of trustees

Adam Weiss

22 September 2021

Independent Auditor's Report to the Trustees and Members of Focus on Labour Exploitation

Opinion

We have audited the financial statements of Focus on Labour Exploitation (the 'charitable company') for the year ended 31 March 2021 which comprise Statement of financial activities, balance sheet, cash flow statement and notes to the financial statements, including a summary of significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Accounting Standards, including Financial Reporting Standard 102 *The Financial Reporting Standard applicable in the UK and Republic of Ireland* (United Kingdom Generally Accepted Accounting Practice).

In our opinion, the financial statements:

- give a true and fair view of the state of the charitable company's affairs as at 31 March 2021 and of its incoming resources and application of resources, including its income and expenditure, for the 31 March 2021 then ended;
- have been properly prepared in accordance with United Kingdom Generally Accepted Accounting Practice; and
- have been prepared in accordance with the requirements of the Companies Act 2006.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the financial statements section of our report. We are independent of the charitable company in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Conclusions relating to going concern

In auditing the financial statements, we have concluded that the trustees' use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the entity's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

Our responsibilities and the responsibilities of the trustees with respect to going concern are described in the relevant sections of this report.

Other information

The trustees are responsible for the other information. The other information comprises the information included in the annual report other than the financial statements and our auditor's report thereon. Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon. In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the financial statements or a material misstatement of the other information. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.

Opinions on other matters prescribed by the Companies Act 2006

In our opinion, based on the work undertaken in the course of the audit:

- the information given in the trustees' report, which includes the directors' report prepared for company law purposes, for the financial year for which the financial statements are prepared is consistent with the financial statements; and
- the directors' report included within the trustees' report has been prepared in accordance with applicable legal requirements.

Matters on which we are required to report by exception

In the light of the knowledge and understanding of the charitable company and its environment obtained in the course of the audit, we have not identified material misstatements in the trustees' report.

We have nothing to report in respect of the following matters in relation to which the Companies Act 2006 requires us to report to you if, in our opinion:

- adequate accounting records have not been kept, or returns adequate for our audit have not been received from branches not visited by us; or
- the financial statements are not in agreement with the accounting records and returns; or
- certain disclosures of trustees' remuneration specified by law are not made; or
- we have not received all the information and explanations we require for our audit.

Responsibilities of trustees

As explained more fully in the trustees' responsibilities statement set out on page 15 the trustees (who are also the directors of the charitable company for the purposes of company law) are responsible for the preparation of the financial statements and for being satisfied that they give a true and fair view,

and for such internal control as the trustees determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the trustees are responsible for assessing the charitable company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the trustees either intend to liquidate the charitable company or to cease operations, or have no realistic alternative but to do so.

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect material misstatements in respect of irregularities, including fraud. The extent to which our procedures are capable of detecting irregularities, including fraud is detailed below:

Discussions were held with the directors with a view to identifying those laws and regulations that could be expected to have a material impact on the financial statements.

The following laws and regulations were identified as being of significance to the entity:

- Those laws and regulations considered to have a direct effect on the financial statements include UK financial reporting standards and Company Law and Charity Law.
- It is considered that there are no laws and regulations for which non-compliance may be fundamental to the operating aspects of the business.

Audit procedures undertaken in response to the potential risks relating to irregularities (which include fraud and non-compliance with laws and regulations) comprised of: inquiries of management and those charged with governance as to whether the entity complies with such laws and regulations; enquiries with the same concerning any actual or potential litigation or claims; inspection of relevant legal correspondence; review of board minutes; testing the appropriateness of entries in the nominal ledger, including journal entries; reviewing transactions around the end of the reporting period; and the performance of analytical procedures to identify unexpected movements in account balances which may be indicative of fraud.

No instances of material non-compliance were identified. However, the likelihood of detecting irregularities, including fraud, is limited by the inherent difficulty in detecting irregularities, the effectiveness of the entity's controls, and the nature, timing and extent of the audit procedures performed. Irregularities that result from fraud might be inherently more difficult to detect than irregularities that result from error. As explained above, there is an unavoidable risk that material

misstatements may not be detected, even though the audit has been planned and performed in accordance with ISAs (UK).

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at: <https://www.frc.org.uk/auditorsresponsibilities>. This description forms part of our auditor's report.

Use of our report

This report is made solely to the charitable company's members, as a body, in accordance with Chapter 3 of Part 16 of the Companies Act 2006. Our audit work has been undertaken so that we might state to the charitable company's members those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the charitable company and the charitable company's members as a body, for our audit work, for this report, or for the opinions we have formed.

Timothy Sullivan (Senior Statutory Auditor)
For and on behalf of Field Sullivan Limited, Statutory Auditor
70 Royal Hill
Greenwich
SE10 8RF

Date: 19 October 2021

Statement of Financial Activities for the year ending 31 March 2021

	Note	Unrestricted Funds £	Restricted Funds £	Total Funds 2021 £	Total Funds 2020 £
Income:					
Donations	3	103,331	302,119	405,450	313,800
Income from other trading activities:					
Consultancy fees		8,288	-	8,288	11,456
Investment income	4	93	-	93	69
Total income		111,712	302,119	413,831	325,325
Expenditure					
<i>Cost of raising funds:</i>		-	-	-	320
<i>Expenditure on charitable activities:</i>	5	71,585	244,667	316,252	279,253
Total expenditure		71,585	244,667	316,252	279,573
Net movement in funds for the year		40,127	57,452	97,579	45,752
Reconciliation of funds					
Total funds brought forward		91,833	96,015	187,848	142,096
Total funds carried forward		131,960	153,467	285,427	187,848

The statement of financial activities includes all gains and losses recognised in the year.
All income and expenditure derive from continuing activities.

Balance sheet as at 31 March 2021

	Note	2021 £	2020 £
Fixed assets			
Tangible assets	9	833	1,279
Total Fixed Assets		<u>833</u>	<u>1,279</u>
Current assets			
Debtors	10	70,690	85,930
Cash at bank and in hand		235,409	119,701
Total Current Assets		<u>306,099</u>	<u>205,631</u>
Liabilities			
Creditors falling due within one year	11	(21,505)	(19,062)
Net Current assets		<u>284,594</u>	<u>186,569</u>
Total assets		<u>285,427</u>	<u>187,848</u>
The funds of the charity:			
Unrestricted funds		131,960	91,833
Restricted funds	12	153,467	96,015
Total charity funds		<u>285,427</u>	<u>187,848</u>

The notes at pages 22 to 30 form part of these accounts

The opinion of the directors is that the company is entitled to the exemptions conferred by Section 477 of the Companies Act 2006 relating to small companies.

The directors acknowledge the following responsibilities:

1. The members have not required the company to obtain an audit of its accounts for the year in question in accordance with section 476,
2. The directors acknowledge their responsibilities for complying with the requirements of the Act with respect to accounting records and the preparation of accounts

These accounts have been prepared in accordance with the special provisions applicable to small companies subject to the small companies' regime.

Adam Weiss, on behalf of the trustees

Approved by the trustees on 22 September 2021

Notes on the accounts

1 Accounting policies

1.1 Charity status

The charity is limited by guarantee, incorporated in England and Wales, and consequently does not have share capital. Each of the trustees is liable to contribute an amount not exceeding £50 towards the assets of the charity in the event of liquidation.

The address of its registered office is:

The Foundry
17 Oval Way
London
SE11 5RR

These financial statements were authorised for issue by the trustees on 22 September 2021.

1.2 Basis of Preparation of the accounts

The financial statements have been prepared in accordance with the Accounting and Reporting by Charities: Statement of Recommended Practice applicable to charities preparing their accounts in accordance with the Financial Reporting Standard applicable in the UK and Republic of Ireland (FRS 102) (effective 1 January 2015) – (Charities SORP (FRS 102)), the Financial Reporting Standard applicable in the UK and Republic of Ireland (FRS 102) and the Companies Act 2006

Focus on Labour Exploitation meets the definition of a public benefit entity under FRS 102. Assets and liabilities are initially recognised at historical cost or transaction value unless otherwise stated in the relevant accounting policy note(s)

1.3 Preparation of the accounts on a going concern basis

The unrestricted reserves are above the reserves target, the charity has secured a good level of income for 2021-22 and has a positive cash flow. As a result the Trustees are confident that the charity has adequate resources to operate for the foreseeable future.

1.4 Income

Income is recognised when the charity has entitlement to the funds, any performance conditions attached to the item(s) of income have been met, it is probable that the income will be received and the amount can be measured reliably.

Gifts and services in kind are recognised on the basis of the value of the gift to the charity which is the amount the charity would have been willing to pay to obtain services or facilities of equivalent economic benefit on the open market; a corresponding amount is then recognised in expenditure in the period of receipt.

Grants are recognised in full in the Statement of Financial Activities in the year in which they are receivable or any requirement imposed on the grant is fulfilled.

Investment income is recognised on a receivable basis.

1.5 Expenditure and irrecoverable VAT

Expenditure is recognised once there is a legal or constructive obligation to make a payment to a third party, it is probable that settlement will be required and the amount of the obligation can be measured reliably. Expenditure is classified under the following activity headings:

Fundraising costs are those costs incurred in attracting voluntary income, in particular grant funding and the costs of maintaining the charity's profile within the sector.

Expenditure on charitable activities includes the cost of policy and research work undertaken to further the purposes of the charity and their associated support costs.

1.6 Exemption from preparing a cash flow statement

The charity opted to early adopt Bulletin 1 published on 2 February 2016 and have therefore not included a cash flow statement in these financial statements.

1.7 Tangible fixed assets and depreciation

Tangible fixed assets are stated at cost less depreciation. Depreciation is provided at rates calculated to write off the cost less estimated residual value of each asset over its expected useful life, as follows:

Fixtures & fittings	20% Straight line
Computer equipment	33% Straight line

1.8 Fund accounting

Unrestricted funds are general funds that are available for the use at the trustees' discretion in furtherance of the objectives of the charity.

Restricted funds are subject to specific conditions by donors as to how they may be used. The purposes and uses of the restricted funds are set out in the notes to the accounts.

1.9 Trade debtors

Trade debtors are amounts due from customers for merchandise sold or services performed in the ordinary course of business.

Trade debtors are recognised initially at the transaction price. They are subsequently measured at amortised cost using the effective interest method, less provision for impairment. A provision for the impairment of trade debtors is established when there is objective evidence that the charity will not be able to collect all amounts due according to the original terms of the receivables.

1.10 Cash and cash equivalents

Cash and cash equivalents comprise cash on hand and call deposits, and other short-term highly liquid investments that are readily convertible to a known amount of cash and are subject to an insignificant risk of change in value.

1.11 Trade creditors

Trade creditors are obligations to pay for goods or services that have been acquired in the ordinary course of business from suppliers. Accounts payable are classified as current liabilities if the charity does not have an unconditional right, at the end of the reporting period, to defer settlement of the creditor for at least twelve months after the reporting date. If there is an unconditional right to defer settlement for at least twelve months after the reporting date, they are presented as non-current liabilities.

Trade creditors are recognised initially at the transaction price and subsequently measured at amortised cost using the effective interest method.

2 Statement of Financial Activity – comparative figures to 31 March 2020

	Unrestricted Funds £	Restricted Funds £	Total Funds 2020 £
Income:			
Donations	69,316	244,484	313,800
Income from other trading activities:			
Consultancy fees	11,456	-	11,456
Investment income	69	-	69
Total income	80,841	244,484	325,325
Expenditure			
<i>Cost of raising funds:</i>	320	-	320
<i>Expenditure on charitable activities:</i>	52,130	227,123	279,253
Total expenditure	52,450	227,123	279,573
Net movement in funds for the year	28,391	17,361	45,752
Reconciliation of funds			
Total funds brought forward	63,442	78,654	142,096
Total funds carried forward	91,833	96,015	187,848

3. Donations

	2021	2020
	£	£
Barrow Cadbury Trust	30,000	40,000
Esmée Fairbairn Foundation	63,150	45,486
Trust for London	52,000	37,500
Freedom Fund	-	20,000
The Oak Foundation	66,668	66,666
Unbound Philanthropy	45,000	30,000
Paul Hamlyn Foundation	70,000	50,000
Ethical Trading Initiative	3,100	5,000
City Bridge Trust	18,420	-
Awards for All	10,000	-
MOPAC		2,805
The Scottish Ministers	33,192	13,693
Reemiklane Foundation	10,000	-
Government grant	1,594	
Other gifts	2,326	2,650
	<u>405,450</u>	<u>313,800</u>

Total donations were £405,450 of which £103,331 (2020: £69,316) was unrestricted and £302,119 (2020: £244,484) was restricted.

4. Investment income

	2021	2020
	£	£
Interest received	93	69
	<u> </u>	<u> </u>

5. Analysis of expenditure on charitable activities

Description	Fundraising costs	Charitable Activities	2021	2020
	£	£	£	£
Direct costs	-	76,634	76,634	45,339
Direct salary costs	-	195,557	195,557	182,466
Depreciation	-	1,246	1,246	1,187
Support costs:				
<i>Rent</i>	-	23,308	23,308	23,371
<i>Financial consultancy</i>	-	4,979	4,979	5,175
<i>Other consultancy</i>	-	2,325	2,325	1,988
<i>Payroll and recruitment costs</i>	-	506	506	11,340
<i>Travel & accommodation</i>	-	21	21	2,245
<i>Insurance</i>	-	655	655	487
<i>General office</i>	-	4,520	4,520	4,475
<i>Audit fee/Independent examination</i>	-	6,500	6,500	1,500
Total	-	316,252	316,252	279,573

Expenditure on charitable activities was £316,262 of which £71,585 (2020: £51,130) was unrestricted and £244,667 (2020: £227,123) was restricted.

6. Analysis of staff costs, trustee remuneration and expenses, and the cost of key management personnel

	2021	2020
	£	£
Salaries and wages	178,263	164,960
Social security costs	13,285	13,631
Pension costs	4,009	3,875
	<u>195,557</u>	<u>182,466</u>

No employee had employee benefits in excess of £60,000 (2020: nil).

The charity trustees were not paid or received any other benefits from employment with Focus on Labour Exploitation. No trustees were reimbursed expenses during the year and no trustees were reimbursed in the prior year. No charity trustee received payment for professional or other services supplied to the charity (2020: nil).

The key management personnel comprises the Chief Executive and their total benefits during the year were £56,500 (2020 - £52,458).

7. Staff numbers

The average monthly head count was 6 staff (2020: 5.5 staff) and the average monthly number of full-time equivalent employees (including casual and part-time staff) during the year was 6 (2020: 5)

8. Corporation Taxation

The charity is exempt from tax on income and gains falling within section 505 of the Taxes Act 1988 or section 252 of the Taxation of Chargeable Gains Act 1992 to the extent that these are applied to its charitable objects.

9. Tangible fixed assets

	Fixtures and fittings £	Computer equipment £	Total £
Cost at 31 March 2020	1,038	7,219	8,257
Additions	-	800	800
Cost at 31 March 2021	<u>1,038</u>	<u>8,019</u>	<u>9,057</u>
Depreciation			
At 31 March 2020	1,038	5,940	6,978
Charge for the year	-	1,246	1,246
At 31 March 2021	<u>1,038</u>	<u>7,186</u>	<u>8,224</u>
Net book value			
At 31 March 2021	<u>-</u>	<u>833</u>	<u>833</u>
At 31 March 2020	<u>-</u>	<u>1,279</u>	<u>1,279</u>

10. Debtors

	2021 £	2020 £
Trade Debtors	300	2,000
Prepayments and accrued income	<u>70,390</u>	<u>83,930</u>
	<u>70,690</u>	<u>85,930</u>

11. Creditors: amount falling due within one year

	2021	2020
	£	£
Trade Creditors	1,370	7,493
Accruals	14,156	6,152
-Taxation and social security	4,935	4,494
Other creditors	1,044	923
	<u>21,505</u>	<u>19,062</u>

12. Restricted Funds

The income funds of the charity include restricted funds comprising the following unexpended balances of donations and grants held on trust for specific purposes:

Current period	Movement in funds			
	Balance at 1 April 2020	Incoming resources	Resources expended	Balance at 31 March 2021
	£	£	£	£
Barrow Cadbury Trust	10,289	30,000	(20,464)	19,825
Trust for London	13,328	32,000	(31,461)	13,867
Paul Hamlyn Foundation	23,879	50,000	(36,370)	37,509
Unbound Philanthropy	22,130	20,000	(25,000)	17,130
The Scottish Ministers	-	33,192	(33,192)	-
Ethical Trading Initiative	1,250	3,100	(3,250)	1,100
Esmee Fairbairn Foundation	25,139	40,407	(36,046)	29,500
COVID 19	-	65,000	(43,536)	21,464
Awards for All	-	10,000	(10,000)	-
City Bridge Trust	-	18,420	(5,348)	13,072
Total	<u>96,015</u>	<u>302,119</u>	<u>(244,667)</u>	<u>153,467</u>

Previous period

	Balance at 1 April 2019	Incoming resources	Resources expended	Balance at 31 March 2020
	£	£	£	£
Barrow Cadbury Trust	3,538	40,000	(33,249)	10,289
Trust for London	-	37,500	(24,172)	13,328
Freedom Fund	-	20,000	(20,000)	-
Paul Hamlyn Foundation	23,007	50,000	(49,128)	23,879
Unbound Philanthropy	21,825	30,000	(29,695)	22,130
The Scottish Ministers	-	13,693	(13,693)	-
Ethical Trading Initiative	625	5,000	(4,375)	1,250
Esmee Fairbairn Foundation	29,659	45,486	(50,006)	25,139
MOPAC	-	2,805	(2,805)	-
Total	78,654	244,484	(227,123)	96,015

The purpose of each restricted fund is as follows:

- Barrow Cadbury Trust: to support policy advocacy work
- Trust for London: to work in London to prevent trafficking and to promote best practice responses
- Freedom Fund: to enhance supply chain transparency
- Paul Hamlyn Foundation: to support research into three high risk labour sectors for EEA workers
- Unbound Philanthropy: for research on the impact of Brexit on EEA workers vulnerability to exploitation
- The Scottish Ministers: for outreach to workers in farms to provide support and gather evidence of the experiences of workers in the sector.
- The Awards for All grant was co-funding towards the Scottish Ministers project.
- Ethical Trading Initiative: to participate in ETI activities.
- Esmee Fairbairn Foundation: to support Feminist Participatory Action Research in three high risk labour sectors
- The COVID 19 project was funding by donations from Paul Hamlyn, Unbound Philanthropy and Trust for London and impact of the COVID-19 pandemic on workers in low pay.
- City Bridge Trust: to build capacity of organisations supporting London communities at risk of labour exploitation, modern slavery and trafficking.

13. Analysis of net assets between funds

	Unrestricted Funds £	Restricted Funds £	Total £
Funds balances at 31 March 2021 are represented by:			
Tangible Fixed Assets	833	-	833
Current Assets	145,125	160,674	306,099
Creditors: amounts falling due within one year	(13,998)	(7,507)	(21,505)
	<u>131,960</u>	<u>153,467</u>	<u>285,427</u>

	Unrestricted Funds £	Restricted Funds £	Total £
Funds balances at 31 March 2020 are represented by:			
Tangible Fixed Assets	1,279	-	1,279
Current Assets	104,964	100,667	205,631
Creditors: amounts falling due within one year	(14,410)	(4,652)	(19,062)
	<u>91,833</u>	<u>96,015</u>	<u>187,848</u>

14. COVID

In response to the COVID 19 outbreak, FLEX developed a bespoke contingency plan to adapt its operations to remote working and regularly adjust timelines and budgets to the evolving situation. This plan included a number of actions aimed at ensuring the successful delivery of our existing projects, which included adapting our timelines and delivery plans to the new circumstances and equipping ourselves to work remotely. In addition, we responded to the impact of COVID-19 on our beneficiaries by developing a dedicated project that involved providing support to affected groups, as well as documenting the impact of the pandemic on workers at risk of exploitation. Finally, we took a number of steps to protect the wellbeing of our staff, including consulting with our team on a regular basis, reviewing FLEX flexible working and sick leave policy, organising socials online, and setting up a new mental health working group, among others.

Focusing on diversifying donors in recent years helped financial resilience during this challenging period. In addition, some donors allowed greater flexibility in use of funds, and provided additional funding for Covid-response projects, for which we are very grateful.