

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)
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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
	<hr/>	<hr/>
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
	<hr/>	<hr/>
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
	<hr/>	<hr/>
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	<u>611,132</u>	<u>832,562</u>	<u>(677,996)</u>	<u>765,698</u>

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>