HEDDLU
GOGLEDD CYMRU
NORTH WALES
POLICE

Response Date:20/10/2026

2026/1010 - Modern slavery/trafficking

In response to your recent request for information regarding;

I am conducting research on modern slavery/trafficking in persons victims' use of the Section 45 defence of the Modern Slavery Act 2015.

Noting that the most recent (2026) Group of Experts on Action against Trafficking in Human Beings (GRETA) report noted at paragraph 244 that 'As of April 2025, police forces in England and Wales are required to use a new Section 45 identifier, which will provide investigators with a standard operating procedure to record when the statutory defence has been raised on a crime record, and should allow to extract data', I would like to have:

For each year for the period 2025 to 2026 (and earlier (from 2015), where data is available):

1. **How many individuals who claim that they are modern slavery/trafficking victims OR are suspected by your force to be victims, have been 1) arrested and 2) charges brought for administrative (immigration) and/or criminal offences that they were allegedly compelled to commit by human traffickers?**
   1a. How many of these individuals (#1) have explicitly raised the S 45 defence at the point of arrest or charging?
   1b. How many have been 1) arrested and 2) charges brought for administrative/immigration-related offences?
   1c. How many have been 1) arrested and 2) charges brought for less serious criminal offences?
   1d. How many have been 1) arrested and 2) charges brought for serious criminal offences?
   1e. What is the proportion of a) men, b) women, and c) children who make up the total number for #1?
   1f. What is the proportion of foreign nationals who make up the total number for #1?
2. **How many of the total number (#1) who allege that they are victims of trafficking have been referred by your force to the National Referral Mechanism (NRM)?**
3. **What percentage of the total number of cases (# 1) have had charges dropped by the force in light of the individual's potential (Reasonable Grounds Decision) or confirmed (Conclusive Grounds Decision) victim status?**
4. **What percentage of the total number of cases (#1) have had charges dropped by the force in response to their raising of the S 45 defence?**
5. **In what percentage or number of the total number of cases (#1) did the force proceed with recommending prosecution for the victims' alleged commission of offence/s?**

5a. Of this percentage or number (#5) what are the main offences for which the police have decided to pursue prosecution?
5b. Of this percentage or number (#5), how many individuals have been adult foreign females?

6. **If these questions cannot be answered, please provide a narrative summary of the force's engagement with potential modern slavery/trafficking in persons victims who are alleged to have committed administrative and/or criminal offences and who have raised the S 45 defence. Or an explanation of why data cannot be shared.**

Our information is set up and searchable for our policing purposes. To obtain the information in the format you have requested would involve manually reviewing each record on our force system. The cost of providing you with the information is above the amount to which we are legally required to respond i.e. the cost of retrieving the information exceeds the 'appropriate level' as stated in the Freedom of Information (FOI) Fees and Appropriate Limit regulations 2004.

Therefore, in accordance with the FOI Act 2000 the information you have requested is exempt under Section 12 (1), and this letter acts as a Refusal Notice under section 17 (5) of the legislation.

THIS INFORMATION HAS BEEN PROVIDED IN RESPONSE TO A REQUEST UNDER THE FREEDOM OF INFORMATION ACT 2000, AND IS CORRECT AS AT 19/10/2026