FOCUS ON LABOUR EXPLOITATION

Focus on Labour Exploitation

(A company limited by guarantee)

Report and Financial Statements

For the year ended 31 March 2026

Charity registration no 1159611

Scottish charity registration no SC053008

Company registration no 08451701

Focus on Labour Exploitation

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Reference and administrative details

Trustees	Peter Andrews Rachel Hewitt Shereen Hussein Anushya Kulupana Ian Robinson Adam Weiss
Principal Office	The Foundry 17 Oval Way London SE11 5RR
Charity number	1159611
Scottish charity number	SC053008
Company number	08451701
Bankers	Triodos Bank Deanery Road Bristol BS1 5AS
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 2026

The trustees present their report and accounts for the year ended 31 March 2026.

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 2025/26, 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.

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, engaging with people with lived experience of the issue as well as those directly providing support to impacted groups. 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 pilot 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, La Strada International, and others.

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. **Influencing understanding of the links between immigration policy and labour exploitation:** Our analysis and evidence continued to shape understanding among 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 Independent Anti-Slavery Commissioner, the Fair Work Agency, and others.
2. **Strengthening the case for safer and fairer labour migration:** Our research, advocacy and worker engagement on the **Seasonal Worker Scheme,** the **Overseas Domestic Worker visa** and on **fishing** demonstrated the exploitation risks created by restrictive or inadequate migration routes, helped prevent the expansion of the short-term visa model, and advanced alternatives that better protect workers.
3. **Putting workers' voice at the centre of policy change:** We put workers' experiences at the centre of our research, creating opportunities for workers to shape the evidence, analysis and recommendations that drive change. This year, over 700 workers participated in our research on short term visa routes and high-risk sectors, including over 600 agricultural seasonal workers in Kyrgyzstan and Kazakhstan, 24 fishers in the Philippines, workers in dark kitchens, domestic work, gig economy, cleaning and other high-risk sectors. This work was also informed by over 80 stakeholders, including decision-makers, businesses and industry groups, and civil society.
4. **Influencing the development of the Fair Work Agency:** The creation of a Single Enforcement Body for labour market enforcement, a long-standing FLEX demand, can significantly improve workers' access to redress and mitigate risks for workers if appropriately equipped and run. Close to its launch, we helped shape the debate around its powers, remit, resources and practices. We are continuing to engage to influence its implementation including the need to ensure secure reporting mechanisms, to focus on high-risk sectors and to understand and address the risks created by the immigration system.
5. **Taking secure reporting from policy to practice:** We developed a blueprint for a secure reporting pilot for London, bringing together migrant workers, support organisations and statutory agencies to identify the concrete steps needed to ensure workers can report crime without fear of immigration consequences. This multi-year pilot project was commissioned by the Greater London Authority and will be implemented in partnership with participating local authorities in the following year.
6. **Demonstrating what worker-centred corporate accountability can look like:** Our outsourced services project moved from piloting worker-informed human rights due diligence to developing practical tools and approaches that can be applied across cleaning, logistics and other outsourced sectors, with workers directly shaping the research, risk assessment and recommendations.
7. **Building new approaches to tackling exploitation in fishing:** We piloted the introduction of a Worker-driven Social Responsibility programme for UK fishing, building relationships with workers and local stakeholders, and bringing retailers and processors into discussions about their responsibility for working conditions. FLEX's ongoing work on fishing continues to bring

attention to the working conditions in UK fishing, the experiences of migrant fishers, and the avenues to introduce a more sustainable and fair labour migration route for the sector.

8. **Strengthening the capacity of organisations to identify and respond to exploitation:** We delivered nine training workshops to over 100 staff, volunteers and activists across five front line organisations in London. We also embarked on a strategic review that will take this programme to the next level.
9. **Growing and strengthening the movement for change:** Through LEAG, the Detention Taskforce and our wider networks and partnerships, we brought together frontline organisations, trade unions, researchers, public bodies and other stakeholders to advance shared priorities including secure reporting, workplace justice and stronger corporate accountability. We also delivered formal partnership projects with 25 national and international organisations.
10. **Our strategy for a fairer world of work for all**: We completed a major strategy review, developing a refreshed Theory of Change and a new five-year strategy with staff, trustees and wider stakeholders.

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 scrutinising the impact of 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 has the objective of increasing decision-makers' awareness and understanding of systemic and structural issues creating risks of labour exploitation by shifting media narratives.

1. 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 through direct advocacy work and by actively engaging in networks and platforms. In addition we have conducted further research to evidence risks and effective impact of the changes on workers, and identified actionable solutions.

1.1. UK's agricultural Seasonal Worker visa:

This year, we published two key research outputs:

- Uneven fields: Women Workers Experiences of the Seasonal Worker Scheme (August 2025). A briefing that examines risks of exploitation resulting from the combination of the design of the scheme and structural gender inequalities. In order to reach a wider audience, we published an accompanying open in OpenDemocracy and a short video with the Fuller Project, and the briefing was also used by IOM in Kyrgyzstan to help inform a new training module for workers interested in joining the scheme.

- **Rooted in Justice**(November 2025). A briefing that applies the principles outlined in FLEX's 'Blueprint on Safer and Fairer Migration' to propose a positive alternative labour migration route for UK agriculture, as well as alternative migration models for system change.

In addition, during this period, we started collecting evidence with workers who have returned home, two of the main countries of origin represented in the scheme: Kyrgyzstan and Kazakhstan. The aim of this work is to understand the long-term impact of the UK agriculture scheme for workers. We collected over 600 surveys and 49 interviews with workers, and conducted stakeholder interviews with support organisations, scheme operators, and Government agencies. The reports were published in Autumn 2026.

In terms of our policy work, we continued to actively advocate for highly restrictive visa schemes to be overhauled through direct advocacy to government and via various networks and forums. As a founding member of the Seasonal Worker Interest Group, FLEX has been meeting monthly with Defra and the Home Office to raise issues and discuss improvements to the scheme. As part of our work in this area:

- In January we spoke about work visas including the SWV at the APPG on trafficking event on the Modern Slavery Act 2015 Committee's report. We also highlighted ongoing issues on the visa on several panels convened by an organisation supporting Chilean workers who are making Employment Tribunal Claims, the Green Party Trade Unions, and Social Scientists Against the Hostile Environment.
- Following sustained pressure on the risks posed to workers by scheme migration debts, Industry and Defra commissioned a study on the feasibility for introducing the Employer Pays Principle. The study set out models for implementing EPP (and includes models for payment schemes which are not EPP). FLEX, together with other Seasonal Worker Interest Group (SWIG) members, responded to the study, reiterating the importance of committing to implement EPP, and reminding readers that until this happens workers, who are the actors in the supply chain least able to bear these costs, are the ones paying.
- While the seasonal worker visa scheme has been confirmed for agriculture until 2029, it has remained under scrutiny as continues to be recognised as high risk for workers. Our ongoing building of evidence into the structural shortcomings of the scheme combined with advocacy work has been key to preventing the model being expanded into other sectors. There is an ongoing need for this work, to improve the conditions for workers on that scheme and because the implementation of the 2025 Immigration White Paper will increase the pressure for routes outside of the Skilled Worker visa for other sectors. The White paper restricts the Skilled Worker visa route to roles at RQF6 and above (or graduate level) and will abolish the Immigration Salary List (with a Temporary Shortage list restricted to building critical infrastructure).

- **1.2. Fishing:**

FLEX has developed significant policy expertise in this sector through conducting dedicated immigration policy analysis and research with workers in the Philippines, as well as through the learnings from our work with ITF and the Fair Food Programme, which sought to establish a Worker-driven Social Responsibility programme for UK fishing in Northeast Scotland. Our work in this area has

focused on the intersection between immigration status and access to rights for migrant fishers in the context of the misuse of the Code 7 'in-transit' loophole and the issues with recruiting migrant fishers on the Skilled Worker visa.

Our advocacy in this area has called attention to the cliff edge faced by the sector with the implementation of the Immigration White Paper 2025 which will abolish access to a visa for migrant fishers in practice. We are calling for a fishing work visa to ensure migrant fishers are recognised as workers and able to access UK employment law. With the misuse of the Code 7 loophole already widespread (public data on numbers is not available despite multiple FOI requests) the closure of any formal immigration route is only likely to increase the misuse of the loophole to employ migrant fishers. This would leave those fishers without permission to work inside UK territorial waters and far less able to challenge exploitation or access workplace rights.

During this period:

- We worked to develop relationships with allies and to develop strategies to push for alternatives which will keep migrant fishers recognised as workers, within scope of UK labour market enforcement and able to access rights in practice.
- We published **Unravelling the Nets** (December 2025), a report that examines the seafarer visa policies and their impact on migrant fishers in the UK, looking at the legal and practical implications of the different entry pathways for migrant fishers to the UK. The report provides an analysis of the fragmented seafarer visa policies and fishing-related immigration rules and its impact on the recruitment, working conditions and access to remedies of migrant fishers coming to work in the UK. The report was launched at an event in Parliament, hosted by Lord Watson, with a panel that included Alistair Carmichael MP, the Chair of the EFRA Committee and Fishing APPG, Eleonor Lyon, the UK's Independent Anti-Slavery Commissioner, Elysia McCaffery, the CEO of the Gangmasters and Labour Abuse Authority, Shu Shin Luh, a Barrister from Doughty Street Chambers who has represented migrant fishers, and closing remarks by Baroness Frances O'Grady (post event blog).
- We also supported Lord Watson to table an amendment to the Border Security, Immigration and Asylum Bill at Committee state calling for a review of migration routes and their intersection with exploitation in the fishing sector. Lord Watson continues to advocate for improved scrutiny of the sector as the amendment did not pass.
- We have made the case for a fishing work visa to ensure migrant fishers are recognised as workers and able to access UK employment law. Our arguments for a visa which maintains employment standards and enables workers to access rights in practice has been informed by our understanding of and learning from the risks created by short term visas such as the agricultural Seasonal Worker visa scheme as well as the Overseas Domestic Worker visa

1.3. Health and Care Worker visa

The UK government officially closed the visa route for new care workers and senior care workers on July 22, 2025. This was following widespread examples of exploitation of workers exploited on the route, FLEX has continued to use the example of the vulnerabilities created by the structure of the Health and Care worker visa combined with the fragmentation and lack of oversight or regulation of the care sector to highlight the need to provide safe and fair routes for workers in the UK which allow

them to challenge exploitation and access redress. The experiences of Health and Care workers have also informed our wider work on safer migration routes including the blueprint for safe and fair migration, secure reporting pathways, a UK workplace justice visa and responses to the government proposals for changes to settlement.

1.4. Overseas Domestic Worker visa

FLEX has continued to partner closely with the by and for group, Voice of Domestic Workers and LEAG member Kalayaan to support the domestic worker led campaign to reinstate the rights for migrant domestic workers which were contained in the original Overseas Domestic Worker visa.

During this reporting period the Overseas Domestic Worker visa has been 'under review' by the government. The stated aims of the review are to review the purpose of the route with a view to addressing exploitation. Together with domestic workers, and Unite, their union, we have shared evidence on how a short term restrictive visa has created risks for domestic workers on the Overseas Domestic Worker visa and how reinstating basic rights for this particularly vulnerable group including to change employer and apply to renew the visa is key to addressing exploitation. We have also had to address the suggestion that scrapping the route would reduce exploitation, evidencing how this would instead criminalise workers brought to the UK irregularly and drive their exploitation underground. During this period we have engaged with the Migration Advisory Committee to inform their annual report, with the Home Office, with the IASC and with the Fair Work Agency. The last has included working with Voice of Domestic Workers to create a briefing on how the Fair Work Agency can be accessible to migrant domestic workers. We were also proud to be invited to join Voice of Domestic Workers members on their Sunday meetings at Unite several times during the year including to brief on legislation such as the Employment Rights Act (then Bill) and the Border Security Act (then Bill) and to run training on employment rights, as well as during solidarity and celebratory events such as the International Domestic Workers Day picnic, one of the most fun events of the year.

1.5. Risk of exploitation due to the end of free movement

Research:

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:

- This year, we looked at the experiences of people working in **'dark kitchens'**, also called 'ghost' or 'cloud' kitchens). Given the growth of this work in recent years and the potential for risks of exploitation that accompany these more hidden workplaces, we interviewed seven people with experience working in dark kitchen to understand what conditions are like and where there might be risks.

During this period, we also published FLEX's **Blueprint for Safer and Fairer Migration for low-paid Work**. The Blueprint maps out the interactions between immigration restrictions and risk factors to identify the essential components and considerations needed to build a safer system. The design framework focuses on the migrant worker and how to equip them with essential protections consisting of workable and practical options (provisions).

2. Legislation:

2.1. Border Security, Immigration and Asylum Bill: FLEX responded to a Home Affairs Select Committee inquiry into the changes to settlement, expressing our concern that they will increase the pool of labour in precarity in the UK; make migrant workers more liable to exploitation; increase the burden on minoritised communities and undermine the aims of the forthcoming Employment Rights Act and new Fair Work Agency.

2.2. Employment Rights Bill: We worked with Baroness Hamweek (LD) to support her to table an amendment on secure reporting for the former, with a Workplace Justice visa amendment unfortunately deemed out of scope in attempts in both the Commons and the Lords.

D. Improving working conditions across supply chains:

FLEX continues 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. To help progress support on improved outsourcing regulation, FLEX identified advocacy opportunities for companies and is including them in the pilot as key recommendations for action.

We remain active members of the Ethical Trading Initiative (ETI) NGO Caucus. Through this network, we helped shape its position on advocacy work towards mandatory Human Rights Due diligence (mHRDD) legislation in the UK, as well as the potential import bans to prohibit the sale, import and export of goods made using forced labour. In 2025, we convened a working group of NGOs and civil society actors on mandatory Human Rights and Environmental Due Diligence (mHREDD) in the UK. Through this forum, we have ensured that worker-informed perspectives are central to discussions on legislation and responsible business conduct. Our contributions influenced the adoption of the majority of our recommendations, strengthening worker-focused principles within ETI's guidance. As part of the Corporate Justice Coalition, we supported the drafting of the Business, Human Rights and Environment Act, which calls for mandatory human rights due diligence in the UK, civil and criminal liability for failing to prevent corporate abuses, and an increase in worker engagement to identify, prevent and remediate impacts.

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 of the links between severe labour abuses, exploitation and trafficking, the impact of labour market enforcement strategies and of the role of marginalised workers in preventing and addressing labour exploitation.

1. A Fair Work Agency:

The development of the Fair Work Agency (FWA) remains a key policy priority for FLEX and opportunity for positive work. With the new Single Enforcement Body being launched in April 2026, and a first year of operation including developmental work around implementation there is significant opportunity for positive influence. We have proactively engaged with the FWA at leadership and operational levels. Advocacy in this area has included for the FWA to be properly resourced, to develop

secure reporting mechanisms, and to be able to issue or recommend bridging visas and prevent visas being cancelled where relevant.

FLEX was part of a research project led by University College London (UCL) and commissioned by the Director of Labour Market Enforcement (DLME) to support their statutory obligation to provide an assessment of the scale and nature of labour market non-compliance in the UK. The research was co-funded by the Department for Business, Energy and Industrial Strategy (BEIS) and the Economic and Social Research Council (ESRC). The study ran from 2022 until April 2026 and covered all four nations of the UK. FLEX's role within this project was to advise on worker engagement and to coordinate the worker advisory group that helped inform the scope of the research, the design of the survey tool, and other elements of the project. The project report was launched in 2026 at a FWA-UCL event.

In addition, as part of our work in this area, during this period:

- We have 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.
- We supported the tabling of an amendment to the Employment Rights Bill to include secure reporting in the FWA, which was debated in June 2025, with a similar one tabled for the Borders Security, Asylum and Immigration Bill.
- We participated in a Centre for London and Trust for London parliamentary event that sought to influence important policy and political stakeholders on the development of the Fair Work Agency.
- We also actively advocate for the FWA to cover the fishing sector, currently virtually outside of all labour market inspection.
- We participated in a seminar held by the Office of the Director of Labour Market Enforcement, the office responsible for developing the UK's labour market enforcement strategy of three key agencies, and Lancaster University on Decent Work, where we presented on decent immigration routes, drawing on our Blueprint (see Aim 1, 1.3).

2. Pilot: Secure reporting in London:

FLEX successfully advocated for and bid for a Greater London Authority pilot project to produce a blueprint for the implementation of a secure reporting pilot in London. This is a groundbreaking project in the UK and a major milestone in the wider call for a firewall protecting migrants' ability to report crimes without fear of immigration enforcement. During this period:

- We produced a pilot project plan and identified key delivery partners for the year 1 phase of the pilot. Partners involved included LEAG members, Kalayaan, Latin American Women's Rights Services (LAWRS), Work Rights Centre and the East European Resource Centre; as well as non-LEAG members Human Trafficking Foundation and South East and East Asia Women Association.
- We also set up an Advisory Group, with representation from key stakeholder groups (e.g. labour market enforcement agencies, a law firm, an advisory sector organisation, etc.).
- We collected evidence with migrant workers, support services and statutory agencies, and examined how migrants' personal data was being shared with immigration enforcement at the instance of reporting crime or seeking help from statutory practitioners. This work resulted in a

first draft of a Secure Reporting Blueprint for London, which we will use in the upcoming year as a basis for the 'implementation' phase with participating local authorities.

3. Pilot: Worker engagement in human rights due diligence for outsourced services

This project engages outsourced cleaners as partners in developing a worker-centred approach to human rights due diligence (HRDD), ensuring that workers' insights help shape corporate policies, operational practices and engagement mechanisms. During this period, we completed the initial pilot with a participating company and began expanding the approach into other outsourced sectors, including logistics and security..

During this period, our team focused on:

- Developing a safeguarding protocol to support safe, independent and ongoing worker participation;
- Working with a participating company to strengthen management systems for tracking and responding to labour rights risks; and;
- Supporting a participating company to embed worker-centred HRDD into its operational practices, including through policy reviews and independent worker engagement.

The impact of this work has included:

- **Changes to procurement and supplier management:** Workers' analysis highlighted how procurement decisions can affect working conditions, including through cost pressures and contract requirements. This helped inform changes to how cleaning contractors are selected and managed, with greater attention to issues including health and safety, worker communication, training and working conditions in tender processes.
- **Improvements to workplace conditions:** Workers highlighted the importance of access to suitable places to rest, eat and drink during shifts. In response, a participating company revised plans for new workplaces to include dedicated rest facilities for outsourced cleaners.
- **Stronger routes for raising concerns:** Workers identified barriers and risks associated with raising workplace concerns. This contributed to a participating company expanding access to its multilingual complaints mechanism, giving outsourced cleaners an additional route to raise concerns where issues are not resolved by their employer.
- **More accessible information:** Workers identified difficulties accessing contracts and workplace information, including where information was provided only in English. This contributed to improvements in communication, including translated contracts and workplace information and more accessible training.

The project also demonstrated the importance of making worker participation a two-way process. Workers were not only asked about their experiences, but supported to analyse the issues affecting their work, identify where responsibility lies and help shape practical solutions. Findings were shared back with workers in accessible formats, enabling them to see how their contributions had informed the work and supporting an ongoing relationship rather than a one-off consultation.

The learning from this programme has laid the foundation for FLEX's wider responsible outsourcing work and the development of practical tools that can be adopted across multiple sectors. It has also strengthened our understanding of how worker participation can contribute to corporate accountability and inform changes beyond the original cleaning pilot, including our work with outsourced workers and businesses in logistics and security.

4. Pilot: A Worker-driven Social Responsibility Programme for UK Fishing:

During this period, we delivered a pilot project that sought to implement a Worker-driven Social Responsibility programme for UK fishing. This work was done in partnership with the Fair Food Programme from Florida (ie. The Coalition of Immokalee Workers and the Fair Food Standards Council), and the International Transport Federation (ITF). Whereas this pilot had to be ended in November 2025 (see blog here), it resulted in significant learnings that will continue to support future work both in fishing and the implementation of WSR programmes elsewhere. As a result of this work:

- FLEX gained significant policy expertise in the situation of migrant fishers and the precarity of current immigration routes used to recruit workers into the sector.
- We deployed an Outreach and Engagement Team in North East Scotland, who started engaging with local stakeholders and groups supporting migrant fishers in local port towns, we also developed a robust safeguarding framework for safe engagement of workers.
- We have brought attention to the systemic issues affecting workers in fishing (e.g. Fishers sleeping on vessels while at ports, depending on skippers to be granted permission to leave the port to, for instance, seek medical support or advice, verbal and physical abuse at sea, limited access to the Internet, etc.).
- We brought retailers and fish product processors' attention to the systemic issues in this industry and their share of responsibility to mitigate the risks experienced by workers (e.g. FLEX run a series of working group sessions with industry stakeholders, and led an eight-might industry engagement action plan to reach out to retailers and producers with key issues and recommendations).
- We worked with a supply chain research consultant to provide targeted input and identify opportunities for intervention.
- Other policy and research outcomes listed above (See Aim 1, fishing).

Beyond this pilot, FLEX has continued to highlight the need for secure reporting pathways for migrant victims with insecure immigration status with key stakeholders and in relevant legislative processes.

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

As part of this aim, FLEX works to develop methodologies for engagement with 'experts by experience' and foster recognition of their role as key for driving effective change. We also work to develop awareness about labour exploitation and its prevention among key stakeholders, actively engaging in civil society networks and platforms, including our own LEAG and Detention Taskforce (DTF).

1. Labour Exploitation Advisory Group (LEAG)

LEAG is a coalition of frontline, research and policy organisations which promotes discussion, information-sharing and collaboration among organisations working directly with people who have experienced or are at risk of labour exploitation in the UK. Last year, LEAG celebrated its 10th anniversary, for which we decided to conduct a full strategy review. We successfully applied to receive pro bono support from Cranfield Trust and worked with a consultant who supported this process, we are currently working on identifying priorities and reviewing our membership for the upcoming period.

During this period, LEAG's work has continued to focus on secure reporting. Together, we produced an updated simple briefing explaining what secure reporting is and why it is important. We have also written to the Fair Work Agency introducing ourselves and asking to meet.

In March, LEAG published a briefing on what the UK can learn from Australia's Workplace Justice Visa. We plan to build on this and continue to advocate for a UK WJV and make clear the need for mechanisms which allow workers to come forward about exploitation and abuse without risking their migration status.

2. Victims of trafficking in immigration detention

FLEX's 'Detention Taskforce' is currently Chaired by Medical Justice. The positioning of the Taskforce is pertinent in the context of the use of immigration detention within the UK - France 'one in, one out' agreement and increased concerns about restricting options for disclosing trafficking or accessing Article 12 entitlements. During this period, we supported both Detention Taskforce and LEAG to respond to the Home Office consultation on identification of victims of trafficking, exposing the realities of immigration processing and options for disclosing exploitation in response to narrative about late disclosures. As part of this work, we have worked closely with the IASC office and the APPGs on trafficking and on immigration detention to plan an event for parliamentarians on this issue. In March, we produced a briefing paper 'Barriers to Disclosure: A survivor of trafficking's journey through the immigration process'.

3. 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 9 workshops attended by 100 participants, including staff, volunteers and activists across five partner organisations: the Single Homelessness Project, South London Refugee Association, and Young Roots. Additionally, in coordination with Citizens UK, we delivered a "Know your rights" training to community members of a majority Goan Catholic Church in Southall. We also delivered training to members of the Unison Trade Union.

4. Supporting the wider movement:

We engage in joint initiatives from across various sectors in order to ensure we contribute to wider efforts for social change. 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), the Migration Coalition (co-Chair), the Seasonal Workers Interest Group (co-Chair), 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 is also an active member of the Voice of Domestic Workers and Kalayaan's Stakeholders Group on Overseas Domestic Workers and we continue to collaborate with trade unions, including with UNISON in relation to discussions on sectoral sponsorship, Unite on migrant domestic workers and the TUC on the agricultural Seasonal Worker visa.

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, as well as sector-wide initiatives to strengthen the migrants' rights sector.

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

This objective relates to maintaining a healthy and productive working environment. This year, we maintained our Employee Support Assistance Programme and the practice of having two no-meetings weeks ahead of the summer and end of the year break, an initiative that aims to help staff secure dedicated time for focused work to better manage workload and reduce stress. We also held our usual 'end of the year' dinner, where the staff team and trustees met to celebrate and meet in person as a team. In addition to this, and 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, which involved staff and trustees. The audit identified a number of opportunities for improvement of both existing resources and practices, as well as new ones. During this period, we also completed the process of voluntary trade union recognition, signed a Collective Bargaining Agreement, and started its implementation. In terms of the staff structure, this year we created a new Director of Operations role and renewed our secondment placement at the Greater London Authority.

During this period, we also started a full strategy review cycle, which involved reviewing the results of our work against our previous strategic aim, the development of a refreshed Theory of Change, and the identification of new aims for our strategy. This work involved a long consultation process with staff and the Board of Trustees.

This objective also relates 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 delivered a partnership project with ITF and the US-based Fair Food Programme to launch Europe's first Worker-driven Social Responsibility pilot for UK fishing, which sought to establish a mechanism through which migrant fishers can shape and monitor compliance in this high-risk sector and engaged regularly with by and for domestic worker groups to

support their campaigns, policy and advocacy work. We also continued investing resources in working closely with migrant and community-led groups via our advocacy coalitions, our research and capacity building programmes, and to implement the actions identified in our EDI strategy.

Finally, this objective relates to our sustainable funding strategy. Over the past year FLEX has maintained its financial sustainability, developing existing work. This has been a more challenging year when it comes to fundraising, given the impact of the cost-of-living crisis on funders, with many closing their grants to existing grantees. We continued to work on diversifying our income streams through statutory and corporate funding, as well as cross-sectoral partnerships.

We delivered formal partnership projects with a total of 25 national and international organisations including SEEAC, Insan-Leilak, Human Trafficking Foundation, International Transport Federation (ITF), Coalition of Imokalee Workers, Fair Food Standards Council, and various organisations currently participating in our networks and coalitions, including Glassdoor, East European Resource Centre, and Work Rights Centre. We also completed the delivery of a partnership project with academics from UCL. Finally, during this period FLEX continued developing its income-generation stream, which supports 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 **published a total of 55 pieces on our website,** including blogs and guest blogs, statements and responses to government reports, enquiry submissions, and announcements. **We have also provided background information to numerous press pieces and featured in the media 21 times** Key pieces include:

- A short video on Why the Employment Rights Bill must tackle restrictive visas, published in April 2025
- A number of briefings to relevant parliamentary processes, including the Border Security, Asylum and Immigration Bill (on secure reporting here and here, on fishing, and on the Workplace Justice Visa); as well as the EFRA committee's inquiry into Fairness in the Supply Chain (here).
- A report on the experiences of workers in 'dark kitchens': "You get burnt out, you get exhausted": An initial exploration of workers' experiences in dark kitchens, published in July 2025.
- A briefing on the experiences of migrant women in UK agriculture: Uneven fields: women workers' experiences of the Seasonal Worker Scheme, published in August 2025.
- A briefing on what a better alternative to the Seasonal Worker Scheme could look like: Rooted in justice: Reimagining migration into UK agriculture, published in November 2025.
- A report entitled Unravelling the Nets: An examination of the seafarer visa policies and their impact on migrant fishers in the UK, published December 2026.
- An article by **The Grocer**, from 22 January 2026, Visa system broken for fishing workers, FLEX report finds
- A briefing on how the Australian Workplace Justice Visa could support access to workers' rights in the UK, published in March 2026
- An article by **Big Issue**, from 19 February 2025, UK immigration policy is stuck in a race to the bottom – with human traffickers the only winners
- An article by **Open Democracy**, from 31 October 2025, Kavin came here to work. He ended up a modern slave

With social media in a transitional period due to the major platform we have used breaking down, we strengthened our newsletter and issued a total **of 21 campaigns to 582 subscribers**.

Financial review

The charity's income decreased to £523,912 (2025: £832,562), much of the fall is related to timing of grant agreements and payments.

Total expenditure was £751,285 (2025: £677,996) resulting in a net deficit of £227,373 (2025: surplus £154,566) and total reserves of £538,325 (2025: £765,698). Unrestricted reserves (excluding designated) decreased to £355,834 (2025: £447,396).

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 deficit for the year decreased the charity's unrestricted reserves to £380,834. 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 2026. The unrestricted reserves are in line with the reserves target, to cover 3 months operating cost (£197,071).

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

Our plans for 2026/27 will focus on strengthening workers' power, challenging the systems and practices that create the conditions for labour exploitation, and securing lasting improvements in protection and accountability. We will continue to combine rigorous research, policy advocacy and worker participation with practical engagement with employers, enforcement bodies and other stakeholders. We will build evidence and alliances to influence safer and fairer labour migration, strengthen labour market enforcement and access to protection, increase corporate accountability, and ensure that workers' experiences and priorities shape the policies and systems that affect them. We will also continue to develop opportunities for strategic litigation, international advocacy and collaboration with worker- and community-led organisations. For 2026/27, some of the key areas of focus for FLEX will include:

- Finalising the strategy review seeking input from staff, trustees and a range of stakeholders, including workers, funders and sector partners, to build together a picture of what our team should aim to achieve in the coming period, building on FLEX's existing work and expertise but also responding to a changing political and economic context.
- Creating a new 'Community Partnerships and Engagement' role to strengthen our worker engagement work;
- Advocating for alternatives to restrictive labour migration routes, highlighting risks in current approaches and providing recommendations to improve protections for workers by applying the FLEX Blueprint for Safer and Fairer migration routes into low-paid roles

- Continuing to engage 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 by conducting Feminist Participatory Action Research;
- Continuing to develop our networks and investing in increasing mutual capacity to jointly work towards preventing labour exploitation;
- Continuing developing our due diligence programme for outsourced service sectors with workers;
- 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;
- Explore potential areas for growth to better support our mission.

Reference and administrative details

Charity number (England and Wales): 1159611
Scottish charity registration no SC053008
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

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 (resigned 18 December 2025)
	Rachel Hewitt
	Shereen Hussein
	Anushya Kulupana
	Ian Robinson

Key management personnel:
Chief Executive Lucila Granada
Director of Operations Katie Vivian

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 United Kingdom Accounting Standards (United Kingdom Generally Accepted Accounting Practice), including FRS 102 "The Financial Reporting Standard applicable in the UK and Republic of Ireland".

Company law requires the trustees to prepare financial statements for each financial year. 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 its 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 accounting standards, comprising FRS 102 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 proper accounting records that can 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 charitable 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 governing the preparation and dissemination of financial statements may differ from legislation in other jurisdictions.

Small companies provision statement

This report has been prepared in accordance with the small companies regime under the Companies Act 2006.

By order of the board of trustees

Adam Weiss
DATE:16th September 2026

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 2026 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.

……..

Timothy Sullivan FCA
Field Sullivan Limited
9 Hare & Billet Road
Blackheath
SE3 0RB

Date: 5th October 2026

Statement of Financial Activities for the year ending 31 March 2026

	Note	Unrestricted Funds £	Restricted Funds £	Total Funds 2026 £	Total Funds 2025 £
Income from:					
Donations	3	36,475	382,861	419,336	707,581
Other trading activities					
Consultancy fees		101,187	-	101,187	122,000
Investment income	4	3,389	-	3,389	2,981
Total income		141,051	382,861	523,912	832,562
Expenditure on:					
Charitable activities	5	232,613	518,672	751,285	677,996
Total expenditure		232,613	518,672	751,285	677,996
Net movement in funds for the year		**(91,562)**	**(135,811)**	**(227,373)**	**154,566**
Reconciliation of funds					
Total funds brought forward		472,396	293,302	765,698	611,132
Total funds carried forward		**380,834**	**157,491**	**538,325**	**765,698**

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 2026

	Note	2026	2025
		£	£
Fixed assets			
Tangible assets	9	995	2,841
Total Fixed Assets		995	2,841
Current assets			
Debtors	10	6,241	24,527
Cash at bank and in hand		561,511	765,670
Total Current Assets		567,752	790,197
Liabilities			
Creditors falling due within one year	11	(30,422)	(27,340)
Net Current assets		537,330	762,857
Total assets		538,325	765,698
The funds of the charity:			
Designated funds		25,000	25,000
Unrestricted funds		355,834	447,396
Restricted funds	12	157,491	293,302
Total charity funds		538,325	765,698

For the financial year ending 31 March 2026 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 16th September 2026

Statement of Cash Flows for the year ended 31 March 2026

	2026	2025
	£	£
Net cash flows from operating activities:		
Net income/(expenditure) for the reporting period as per the statement of financial activities	(227,373)	154,566
Purchase of fixed assets	(1,491)	-
Depreciation	3,337	2,838
Net cash provided by investing activities	**1,846**	**2,838**
Decrease/(increase) in debtors	18,286	(21,128)
(Decrease)/increase in creditors	3,082	(14,740)
Net cash provided by operating activities	**21,368**	**(35,868)**
Change in cash and cash equivalents in the reporting period	(204,159)	121,538
Cash and cash equivalents at the beginning of the reporting period	765,670	644,132
Cash and cash equivalents at the end of the reporting period	561,511	765,670

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 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:					
Charitable activities	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**

3. Donations

	2026	2025
	£	£
Barrow Cadbury Trust	25,500	24,500
Esmee Fairbairn Foundation	-	50,000
Trust for London	97,464	119,443
Joseph Rowntree Charitable Foundation	66,666	45,600
Justice Together	88,000	132,000
The Oak Foundation	25,989	143,868
Unbound Philanthropy	50,000	50,000
Paul Hamlyn Foundation	-	57,090
City Bridge Trust	39,175	37,825
Ethical Consumer	2,055	19,525
AB Charitable Trust	20,000	20,000
University College London	-	4,377
Other gifts	4,487	3,353
	419,336	707,581

Total donations were £419,336 (2025:£707,581) of which £36,475 (2025: £221,598) was unrestricted and £382,861 (2025: £485,983) was restricted.

4. Investment income

	2026	2025
		£
Interest received	3,389	2,981

5. Analysis of expenditure on charitable activities

Description	Charitable Activities	2026	2025
	£	£	£
Direct costs	109,415	109,415	82,021
Direct salary costs	559,637	559,637	533,074
Depreciation	3,337	3,337	2,838
Irrecoverable VAT	14,516	14,516	
Support costs:			
Rent	24,776	24,776	29,765
Financial consultancy	7,118	7,118	6,765
Other consultancy	6,945	6,945	3,421
Payroll and recruitment costs	6,586	6,586	3,331
Travel & accommodation	3,923	3,923	4,620
Insurance	2,966	2,966	2,578
General office	9,954	9,954	7,680
Audit/Independent examination	2,112	2,112	1,902
Total	751,285	751,285	677,996

Expenditure on charitable activities was £751,285 (2025: £677,996) of which £232,613 (2025: £172,286) was unrestricted and £518,672 (2025: £505,710) was restricted.

The amount paid to the independent examiner for their external scrutiny was £2,112 (2025: £1,902).

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

	2026	2025
	£	£
Salaries and wages	476,206	466,061
Social security costs	60,147	45,793
Pension costs	23,284	21,220
	559,637	533,074

One employee had employee benefits in excess of £60,000 (2025: 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 (2025: nil).

The key management personnel comprises the Chief Executive and the Director of Operations and their total benefits during the year were £96,739 (2025: £66,848).

7. Staff numbers

The average monthly head count was 13 (2025: 12 staff).

8. Corporation Taxation

The charity is exempt from tax on income and gains failing 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 2025	1,038	13,413	14,451
Additions	-	1,491	1,491
Disposal		(2,047)	(2,047)
At 31 March 2026	1,038	12,857	13,895
Depreciation			
At 1 April 2025	1,038	10,572	11,610
Charge for the year	-	3,337	3,337
Disposal		(2,047)	(2,047)
At 31 March 2026	1,038	11,862	12,900
Net book value			
At 31 March 2026	-	995	995
At 31 March 2025	-	2,841	2,841

10. Debtors

	2026	2025
	£	£
Prepayments and accrued income	6,241	24,527
	6,241	24,527

11. Creditors: amount falling due within one year

	2026	2025
	£	£
Trade Creditors	1,975	6,932
Accruals	7,517	5,998
Taxation and social security	16,762	9,946
Other creditors	4,168	4,464
	30,422	27,340

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 2025	Incoming resources	Resources expended	Balance at 31-Mar 2026
Restricted funds	£	£	£	£
Barrow Cadbury Trust	141	25,500	(18,389)	7,252
Trust for London	20,376	97,464	(111,543)	6,297
Unbound Philanthropy	41,794	50,000	(56,705)	35,089
Joseph Rowntree Charitable Foundation	-	66,666	(54,555)	12,111
City Bridge Trust	7,490	39,175	(21,183)	25,482
Oak Foundation	-	14,000	(2,216)	11,784
Justice Together	63,935	88,000	(134,647)	17,288
Humanity United	158,498	-	(116,309)	42,189
Ethical Consumer	1,068	2,055	(3,123)	-
Total restricted funds	293,302	382,861	(518,672)	157,491
Unrestricted				
General fund	447,396	141,051	(232,613)	355,834
Designated fund (Enhanced leave fund)	25,000	-	-	25,000
Total unrestricted funds	472,396	141,051	(232,613)	380,834
Total funds	765,698	523,912	(751,285)	538,325

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 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 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
- Swiss Philanthropy/Oak Foundation: to support external consultancy and a training budget for the recruitment and development of a new Director of Operations
- 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 2026** are represented by:			
Tangible Fixed Assets	995	-	995
Current Assets	410,261	157,491	567,752
Creditors: amounts falling due within one year	(30,422)	-	(30,422)
	380,834	157,491	538,325

	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	(27,340)	-	(27,340)
	472,396	293,302	765,698