Scottish Government
Riaghaltas na h-Alba

Scotland's Trafficking and Exploitation Strategy Delivery Plan 2026 – 2028

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Introduction

The revised Trafficking and Exploitation Strategy, published in July 2025, sets out a public health approach to human trafficking and exploitation. A public health approach works across three levels: primary prevention, secondary prevention and tertiary prevention. More information on this and the prevention continuum developed by Dr Liz Such and colleagues, can be found in the Trafficking and Exploitation Strategy.

This Delivery Plan operationalises the public health approach set out in the Trafficking and Exploitation Strategy by progressing actions across primary, secondary and tertiary prevention. These three levels are referred to in this Strategy in the following way:

- before harm occurs – primary prevention
- intervening early – secondary prevention
- treating harms and preventing retrafficking – tertiary prevention

While some actions focus on the immediate response and processes, others reflect the longer term, whole-system approach required to address the structural conditions that enable trafficking and exploitation. Delivery will be informed by lived experience, emerging evidence and governance arrangements which allow priorities to adapt over time.

The Strategy sets out four long-term outcomes:

Outcome 1

Child and adult victims are identified, protected and supported to safety and long-term recovery: the protection and support of child and adult victims remains an absolute priority for the Strategy. For this to be effective, early identification, access to co-ordinated services, legal entitlements and community integration opportunities are crucial. The voices of people with lived experience will continue to inform work in this area.

Outcome 2

Perpetrators are identified, their activities are disrupted and they are prosecuted: taking robust and swift action against perpetrators, be they individuals, businesses or organised crime groups, is essential in order to protect children, adults and communities against the harm caused by trafficking and exploitation. The identification and prosecution of those involved in serious organised crime continues to be an essential part of the Serious Organised Crime Strategy.

Outcome 3

Improved use of data, evidence and research informs strategy implementation: in order to understand the nature of trafficking and profile of victims and perpetrators in Scotland, it is vital that evidence and data use is improved. This is also important for learning from activities that have proven to be most effective and identifying areas for

improvement as well as keeping abreast of emerging trends in trafficking and changes across associated risk factors.

Outcome 4

Conditions that expose children, adults and communities in Scotland to increased risks of trafficking and retrafficking are addressed: this outcome aligns with the overall prevention framework of a Public Health approach as well as the existing Government strategies that seek to ensure a safer and fairer Scotland. Efforts directed towards the prevention of trafficking will continue to span local, Scottish, UK and international levels.

This delivery plan expands on the former strategy and the positive progress delivered since 2017. The plan is structured around the Outcomes above, and refreshed governance arrangements will enable an agile and responsive approach to the actions proposed below. The timeframe of actions and achieving outcomes will vary across short, medium and long term which is broadly set out below. For the medium and long-term timeframes, work will be ongoing during this time period but outcomes may only be achieved towards the end of this period:

Short-term: less than 18 months (to be achieved within 18 months)

Medium-term: 18 months – 3 years (this includes ongoing/continuing work)

Long-term: 3 years + (this includes ongoing and continuous work)

As the intention is to set up a Survivor Forum, it is our expectation that survivors will be embedded in the governance structure and will themselves decide which actions they will be directly involved in. The current version of the delivery plan therefore does not explicitly include survivors under the ‘Lead’ column as the Survivor Forum will prioritise their actions when constituted.

Outcome 1

Child and adult victims are identified, protected and supported to safety and long-term recovery: the protection and support of child and adult victims remains an absolute priority for the Strategy.

Actions		Principles	Leads	Timeframe
1.1	• We will work with local authorities to promote alignment where possible with other structures such as Adult Support and Protection (ASP) and Gender Based Violence (GBV) Leads and with wider public protection structures such as Public Protection Chief Officer Groups.	Multi-agency approach; Partnership working at local, Scottish, UK and International level	• Scottish Government • Local Authorities • Social Work Scotland • COSLA	Short
1.2	• We will review and update guidance and other materials relating to trafficking and exploitation on an ongoing basis to ensure full alignment with legislative developments relevant to Scotland and the evolving nature of current and emerging forms of harm, including the increasing use of online platforms to facilitate exploitation.	Multi-agency approach; Partnership working at local, Scottish, UK and International level	• Scottish Government • COSLA • Local authorities • Social Work Scotland • Police Scotland • Human trafficking victim support organisations • UKG and international partners • Police Scotland	Medium (and continuous actions)
1.3	• We will assess, consolidate and coordinate existing training resources and develop a prioritisation model to identify sectors, including health, local authorities and the justice system, with the highest likelihood of contact with victims.	Age-sensitive; Trauma-informed and culturally competent; Gender sensitive; Victim/ survivor informed; Human-rights based	• Scottish Government • Human trafficking victim support organisations • COSLA • Education Scotland • NHS Scotland	Medium (and continuous actions)

Actions		Principles	Leads	Timeframe
			• Local authorities • Police Scotland • Scotland Against Modern Slavery • Social Work Scotland • Independent Child Trafficking Guardianship Service • CSE Aware	
1.4	• We will deliver a strategic, survivor-informed, trauma-informed and culturally competent approach to training and work with existing learning frameworks for prioritised sectors to ensure appropriate links to relevant training.	Age-sensitive; Trauma-informed and culturally competent; Gender sensitive; Victim/ survivor informed; Human-rights based	• Scottish Government • Human trafficking victim support organisations • NHS GG&C– Glasgow Psychological Trauma Service • COSLA • Education Scotland • NHS Scotland • Local authorities • Police Scotland • Scotland Against Modern Slavery • Social Work Scotland • Independent Child Trafficking Guardianship Service • CSE Aware	Medium
1.5	• We will analyse local partnership arrangements, drawing on good practice to develop a coherent model for	Age-sensitive; Gender sensitive; Victim/survivor informed; Human Rights;	• Scottish Government • Human trafficking victim support organisations	Medium

Actions		Principles	Leads	Timeframe
	local networks across Scotland.		• NHS GGC – Glasgow Psychological Trauma Service • COSLA • Local authorities	
1.6	• We will continue to provide trauma-informed support to victims in their recovery journey, supporting them to meet their needs and rights through the human trafficking support framework and other sectors in Scotland	Age-sensitive; Trauma-informed and culturally competent; Gender sensitive; Victim/survivor informed; Human-rights based	• Scottish Government • COSLA • Local Authorities • Human trafficking victim support organisations • NHS GGC – Glasgow Psychological Trauma Service • Independent Child Trafficking Guardianship Service	Medium (and continuous actions)
1.7	• We will review key transition points for adult and child victims of trafficking and exploitation in the recovery journey and explore the mitigation of risks by improving awareness and knowledge of human trafficking in active collaboration with other relevant sectors	Trauma-informed and culturally competent; Gender-sensitive; Age-sensitive; Partnership working at local, Scottish, UK and International level	• Scottish Government • COSLA • Human trafficking victim support organisations • Independent Child Trafficking Guardianship Service • Social Work Scotland • SPS	Medium
1.8	• We will publish guidance on adult victim support under the Human Trafficking and Exploitation (Scotland) Act 2015	Age-sensitive; Trauma-informed and culturally competent; Gender sensitive;	• Scottish Government	Short

Actions		Principles	Leads	Timeframe
		Victim/survivor informed; Human-rights based		
1.9	• We will develop and publish guidance for prison staff to support them in identifying victims of human trafficking and exploitation within SPS care	Trauma-informed and culturally competent; Gender sensitive	• Scottish Government • SPS • Human trafficking victim support organisations	Medium
1.10	• We will continue to monitor the rollout of the Home Office National Referral Mechanism devolved-decision making pilot and identify opportunities to share learning and improved practice across Scotland	Trauma-informed; Multi-agency approach; Age-sensitive; Partnership working at local, Scottish, UK and international levels	• Scottish Government • Local authorities • Social Work Scotland • Police Scotland • NHS Scotland • Home Office • Human trafficking victim support organisations • Third sector	Medium
1.11	• We will work to prevent the criminalisation of exploited children and direct them to appropriate alternative supports, informed by the ongoing delivery of Scotland's Youth Justice vision and the Whole Systems Approach	Human-rights based; Trauma-informed; Age-sensitive; gender sensitive	• COPFS • SCRA • Social Work Scotland • Scottish Government • Police Scotland • Children's Hearings Scotland • Third sector	Medium (and continuous actions)
1.12	• We will embed the survivor voice in our governance structure through the development of a Survivor Advisory Forum. The Forum will have oversight and scope to drive delivery	Trauma-informed and culturally competent; Victim/survivor informed;	• Scottish Government • Human trafficking victim support organisations	Medium

Actions		Principles	Leads	Timeframe
	of the actions within this plan.			

Outcome 2

Perpetrators are identified, their activities are disrupted, and they are prosecuted. Taking robust and swift action against all perpetrators, be they individuals, businesses or organised crime groups, is essential in order to protect children, adults and communities against the harm caused by trafficking and exploitation.

Actions		Principles	Leads	Timeframe
2.1	• We will continue to support victims to engage in the justice process, ensuring they are aware of their rights and able to access all appropriate protections.	Human-rights based; Trauma-informed and culturally competent; Multi-agency approach; Based on partnership working at local, Scottish, UK and international levels	• Scottish Government • Police Scotland • Human trafficking victim support organisations • Third sector	Short (and continuous actions)
2.2	• We will continue to use the offences in the Human Trafficking and Exploitation (Scotland) Act 2015 to disrupt trafficking and exploitation and bring perpetrators to justice.	Multi-agency approach; Based on partnership working at local, Scottish, UK and international levels	• Police Scotland • COPFS	Short (and continuous actions)
2.3	• We will continue to engage with law enforcement agencies within and outwith Scotland to disrupt and prevent offending.	Multi-agency approach; Based on partnership working at local, Scottish, UK and international levels	• Police Scotland • COPFS	Short (and continuous actions)
2.4	• We will raise awareness of human trafficking indicators and the Lord Advocate's Instructions for non-prosecution of victims of human trafficking	Multi-agency approach;	• COPFS • Scottish Government • Human trafficking victim support organisations • COSLA	Short (and continuous actions)

Actions		Principles	Leads	Timeframe
	within the justice sector and other key areas to reduce the risk of criminalisation of both child and adult victims of trafficking and exploitation.		• SCRA • Law Society of Scotland	
2.5	• We will implement new measures in the Crime and Policing Act. We will assess what guidance and awareness raising materials may be needed for law enforcement partners and others to support implementation. We will monitor the use of these measures, once brought into force, to understand the scale of these exploitative practices in Scotland and the efficacy of the offences and orders at disrupting it.	Gender sensitive; Age sensitive	• Scottish Government • Police Scotland • COPFS • Social Work Scotland	Short
2.6	• Section 38 (Duty to Notify) of the Human Trafficking and Exploitation (Scotland) Act 2015 will come into force on 1 February 2027, and we will support implementation across named public bodies.	Multi-agency approach;	• Scottish Government • NHS Scotland • Police Scotland • COSLA	Short (and continuous actions)
2.7	• We will strengthen knowledge of TEPO and TERO across the human trafficking support organisations and wider sector.	Multi-agency approach	• Police Scotland • COPFS	Medium
2.8	• We will work across the anti-trafficking sector to review and, if necessary, seek	Human-rights based; Age-sensitive;	• Police Scotland • COPFS • Scottish Government	Medium (and continuous actions)

Actions		Principles	Leads	Timeframe
	improvements in the flow of information between the justice sector, social work, health and specialist support agencies to improve the quality and consistency of the safeguarding response for victims and strengthen efforts to disrupt perpetrators.	Multi-agency approach	• Human trafficking victim support organisations • Independent Child Trafficking Guardianship Service • SCRA • Local authorities • Social Work Scotland	

Outcome 3

Improved use of data, evidence and research informs strategy implementation. In order to understand the nature of trafficking and exploitation and the profile of victims and perpetrators in Scotland, it is vital that evidence and data use is improved and shared across all partnership groups.

Actions		Principles	Leads	Timeframe
3.1	• We will establish a data-focused working group, bringing together key policy and academic knowledge to inform anti-trafficking interventions, building on data work across wider policy and public protection areas.	Multi-agency approach; Based on partnership working at local, Scottish, UK and international levels	• Scottish Government	Short
3.2	• We will explore the need for improved GDPR compliant data sharing between key agencies in Scotland and where necessary support changes to data-sharing rules or guidance to improve the survivor journey.	Multi-agency approach	• Police Scotland • COSLA • Local authorities • Human trafficking victim support organisations	Medium
3.3	• We will explore the requirement for practical information sharing advice and good practice for use across the anti-trafficking sector.	Multi-agency approach	• Scottish Government • COSLA • Local authorities • Police Scotland • Human trafficking victim support organisations • Independent Child Trafficking Guardianship Service	Medium
3.4	• We will assess the findings from the National Review into	Age sensitive; Gender sensitive	• Inspection agencies	Medium

Actions		Principles	Leads	Timeframe
	group-based child sexual abuse and exploitation, alongside Police Scotland's case review work and the statutory public inquiry into group-based child sexual abuse, to inform future improvements in preventing and responding to child exploitation.		• Scottish Government • Police Scotland • Local authorities • Social Work Scotland	
3.5	• We will continue to work alongside academia to access and utilise the latest research into trafficking and exploitation including on emerging forms of exploitation, lesser-known aspects of human trafficking and specific identified policy challenges.	Based on partnership working at local, Scottish, UK and international levels	• Scottish Government	Long (and continuous actions)
3.6	• We will map existing data sources in Scotland relevant to human trafficking and exploitation to provide a greater evidence base for future interventions.	Multi-agency approach; Based on partnership working at local, Scottish, UK and international levels	• Data-focused working group	Long
3.7	• We will collaborate with partners to develop proportionate monitoring and evaluation tools to measure the effectiveness of activities and interventions and to continuously improve implementation.	Based on partnership working at local, Scottish, UK and international levels	• Outcome 3 implementation group	Long (and continuous actions)

Outcome 4

Conditions that expose children, adults and communities in Scotland to increased risks of trafficking and retrafficking are addressed.

Actions		Principles	Leads	Timeframe
4.1	• We will undertake a mapping exercise to identify online and local environments and communities at high-risk of human trafficking and exploitation.	Victim/Survivor informed; Age-sensitive; Gender-sensitive; Multi-agency approach; Partnership working at local, Scottish, UK and International level	• Scottish Government • Police Scotland • COSLA • Child Protection Committees • Human trafficking victim support organisations • Independent Child Trafficking Guardianship Service • Ofcom	Medium
4.2	• We will collaborate across different sectors, including Child Protection, Violence Against Women and Girls, Education, Adult Support and Protection, in Scotland and the wider UK to develop our response to the risks of online harms and exploitation.	Victim/Survivor informed; Age-sensitive; Gender-sensitive; Multi-agency approach; Partnership working at local, Scottish, UK and International level	• Scottish Government • Third sector • Ofcom	Medium (and continuous actions)
4.3	• We will further embed a Contextual Safeguarding approach across local practice in Scotland to help prevent trafficking and exploitation.	Age-sensitive; Gender-sensitive; Multi-agency approach;	• Scottish Government • Child Protection Committees • Child Protection Committees Scotland • Police Scotland • Ofcom	Medium

Actions		Principles	Leads	Timeframe
			• Education Scotland • Independent Child Trafficking Guardianship Service • Third sector	
4.4	• We will strengthen the existing Trafficking and Exploitation Strategy governance structure in order to improve the focus on delivery	Victim/Survivor-informed; Multi-agency approach; Based on partnership working at local, Scottish, UK and international levels	• Scottish Government • COSLA	Medium
4.5	• We will deliver improved knowledge of human trafficking and retrafficking risks in active collaboration with other sectors, including Fair Work, Getting It Right For Every Child (GIRFEC), Child Poverty, The Promise, Education, Housing, Homelessness, Health and Social Care, Adult Support and Protection, Serious Organised Crime, Community Safety, and Violence Against Women and Girls.	Trauma-informed and culturally competent; Gender-sensitive; Age-sensitive;	• Scottish Government	Long (and continuous actions)
4.6	• We will focus on strengthening prevention activity within sectors at high-risk of labour exploitation working alongside existing enforcement	Trauma-informed and culturally competent; Gender-sensitive; Age-sensitive;	• Scottish Government • Representative organisations • Worker Support Centre • COSLA • Regulators	Long (and continuous actions)

Actions		Principles	Leads	Timeframe
	frameworks. We will engage with relevant oversight bodies and regulators about guidance and tools for issues such as risk assessment, identification and good practice.	Multi-agency approach; Based on partnership working at local, Scottish, UK and international levels	• Industry associations	
4.7	• We will work with key source countries, including relevant law enforcement agencies and support services, to assist in developing preventative victim-focused mitigations at source.	Multi-agency approach; Based on partnership working at local, Scottish, UK and international levels	• Scottish Government • COSLA • Police Scotland • Human trafficking victim support organisations • UKG	Long (and continuous actions)
4.8	• We will engage with the business community to develop awareness and build knowledge of human trafficking and exploitation and strengthen practice and efficacy of supply chain monitoring,	Multi-agency approach; Based on partnership working at local, Scottish, UK and international levels	• Scottish Government • Trade Unions • Scotland Against Modern Slavery • Worker Support Centre • Chambers of Commerce • Business representative organisations	Medium
4.9	• We will develop and regularly update resources and public facing campaigns with partners to raise general awareness of trafficking and exploitation, improve recognition of the signs of harm, and promote clear pathways for reporting concerns to relevant agencies. This will include materials, resources and	Trauma-informed and culturally competent; Gender-sensitive; Age-sensitive; Multi-agency approach; Based on partnership working at local, Scottish, UK and international levels	• Scottish Government • Police Scotland • Local authorities • Third Sector	Long (and continuous actions)

Actions		Principles	Leads	Timeframe
	campaigns aimed at groups known to be at specific and high risk of exploitation. Where possible we will work in collaboration to build on existing resources.			

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Any enquiries regarding this publication should be sent to us at

The Scottish Government
St Andrew's House
Edinburgh
EH1 3DG

ISBN: 978-1-80775-395-5 (web only)

Published by The Scottish Government, August 2026

Produced for The Scottish Government by APS Group Scotland, 21 Tennant Street, Edinburgh EH6 5NA
PPDAS1766866 (08/26)