

Independent
Anti-Slavery
Commissioner



Every Child Protected
Against Trafficking



Child trafficking in the UK 2024: **a snapshot**



by ECPAT UK youth programme member.

ACKNOWLEDGEMENTS

ECPAT UK and the Independent Anti-Slavery Commissioner acknowledge the real life experiences of children and young people affected by trafficking everywhere and give thanks for your insight and contributions to identifying problems and solutions. This report is dedicated to you with a commitment from us to continue working with you to make things better.

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FOREWORDS

Eleanor Lyons, Independent Anti-Slavery Commissioner

As the UK's Independent Anti-Slavery Commissioner, my mission is to improve the UK's response to modern slavery and human trafficking by encouraging good practice in the prevention, detection, investigation and prosecution of slavery and human trafficking offences.

In the UK we are seeing worrying numbers of children in our National Referral Mechanism (NRM), the system the UK Government uses to identify and support people who have been victims of exploitation. Last year, of people who reported being exploited, 44% said that this happened when they were children. This is up an astounding 138% in the five years between 2018 and 2023. This must change.

As this report highlights, criminals are targeting children for sexual exploitation, criminal activities, forced marriage, labour exploitation and/or domestic servitude. It can be hard for children themselves to understand what is happening to them, particularly if criminals have used grooming techniques to gain their trust.

Trafficked children and those with an insecure immigration status are also particularly vulnerable. No child should be accommodated in a hotel or excluded from local authority care. Sadly, we have seen unaccompanied children, as young as 10, being

accommodated in hotels by the UK Home Office in the recent past and children in care placed in inappropriate placements without the stable and loving environments they deserve.

Criminals are ruthless in exploiting these vulnerabilities in targeting children. We must show the same resolve in our protection of children and prevent them from facing exploitation.

We must listen to and amplify children's voices so that legislators and policymakers hear what has not worked and what the solutions are. Every child has the right to have a childhood, protected from harm and we must work together to achieve this.

Multi-agency working is crucial to make sure no child slips through the system. These local partnerships can prevent children from being exploited and identify abuse early on before this exploitation amounts to child trafficking. They are equally important in ensuring that wrap-around and tailored support is available to all child victims of trafficking. This approach is needed across the prevention, protection, and prosecution pillars.

The new Government has an opportunity to reignite the political focus on modern slavery and human trafficking and to coordinate cross-government action to disrupt this criminal activity and prevent further harm and lifelong trauma to our children and young people.

Patricia Durr, ECPAT UK's CEO

ECPAT UK's Snapshot Report continues to be a flagship publication on child trafficking, providing a periodic overview of the main issues in the UK since 2010. In this 30th year of our charity, we are delighted to jointly produce our Snapshot Report once again in collaboration with the Independent Anti-Slavery Commissioner to provide analysis of the latest developments for practitioners and policymakers alike.

This joint report reflects the progress made towards better protecting and supporting children, as well as raising critical concerns about the UK's current response to child trafficking. We welcomed positive steps to accept most of the recommendations of the Independent Inquiry into Child Sexual Abuse and the passage of the Online Safety Act 2023. Despite this progress, I am very concerned that consecutive legislative measures and policy decisions have undermined the rights of children to protection and have led to huge safeguarding failures, not least by disqualifying children from the identification mechanism.

With these barriers to protection, I remain very concerned that we are letting children down badly and about the poor outcomes for children, particularly those who enter the UK irregularly or are subject to immigration control. The transition to adulthood for all child victims remains a pressing issue as well as the continued criminalisation of children for offences committed as a result of their exploitation.

Child trafficking requires a response that prioritises children's rights. Children tell us every day they need support, yet further barriers have now been placed on extremely vulnerable children leaving them at risk of re-trafficking. We encourage the UK Government to adopt our recommendations as the first step to ensure all children are free from exploitation.

EXECUTIVE SUMMARY

This Snapshot Report is a collaborative effort between the Independent Anti-Slavery Commissioner and ECPAT UK following our previous joint report in 2021 and ECPAT UK's previous snapshots starting in 2010 to mark the UK's first Anti-Slavery Day. The report provides an overview of child trafficking in the UK between 2022 and 2024, including the latest legislative and policy developments in prevention, protection, and prosecution. The report makes a series of practical recommendations aimed at key decision-makers, including 5 priority recommendations for urgent consideration.¹

The report highlights our key concerns for children at risk of and affected by trafficking which are outlined in the report using the framework of prevent, protect and prosecute.² These concerns include the harmful impacts of significant legislative changes which have created new barriers to the identification and protection of child victims. In the UK we are continuing to see high numbers of children in the National Referral Mechanism (NRM), the system the UK Government uses to identify and support people who have been victims of exploitation. In 2023, those potentially exploited as children accounted for 44% of all NRM referrals, the highest ever recorded. Furthermore, it is notable that NRM positive Reasonable Grounds decisions for potential child victims, an initial assessment to



determine whether there are Reasonable Grounds to believe the person may be a potential victim of trafficking, declined significantly with 10% negative decisions issued in 2022 compared to 26% in 2023. This increase in negative decisions is the result of legislative and policy changes brought into force in the first quarter of 2023 following the Nationality and Borders Act 2022.

The report considers the Government's efforts to prevent child trafficking in the UK. It highlights the Government's failure to meet its legal obligations under the Council of Europe Convention on Action against Trafficking in Human Beings (ECAT) to reduce children's vulnerability by creating a protective environment for them. These failures also incur high public service costs, requiring substantial

¹ [See our five priority recommendations here.](#)

² [Prevent, protect and prosecute.](#)

resources to address the aftermath. It calls for consideration of targeted strategies in education, community engagement and multi-agency cooperation to tackle the root causes of child trafficking helping to reduce spending on reactive crisis interventions.

The report also considers the limited research available on the prevention methods currently being used in the UK and their effectiveness in protecting children from trafficking. This knowledge gap presents the new Government with a critical opportunity to increase its focus and financial investment in child-centred prevention work in the UK.

The UK Government's Safer Streets mission aims to reduce crime and create safer communities, providing a unique opportunity to break the cycle of exploitation early on and to disrupt those targeting the most vulnerable. We call on the Government to do this by integrating a proactive, prevention-focused approach to child trafficking into its Safer Streets programmes and in upcoming legislation including the Children's Wellbeing Bill.

The report details key steps that need to be made to improve the protection of child trafficking victims, including strengthening and expanding the Independent Child Trafficking Guardianship (ICTG) services across the UK and the need for confirmed child victims of trafficking to be granted immigration leave with a route to settlement in line with their best interests. Poor access to legal advice,

criminalisation and transition into adulthood also remain core protection challenges which we urge the Government to address urgently.

The report also considers prosecutions and convictions for child trafficking which are woefully low, with no improvement since the publication of our last report three years ago. Inconsistency in police support for victims, lack of awareness and prevention of exploitation remains. This means that child victims are falling through the gaps and are not being protected from harm. We call on the UK Government to review the barriers to bringing prosecutions for those who exploit children, including the provision of police training on identifying and investigating child trafficking.

Finally, this report highlights that while there has been a growth of research, data, and evidence into human trafficking in the UK in recent years, significant gaps remain in our knowledge and understanding of modern slavery in the UK including in the prevention of child trafficking. Some of these research gaps have been mapped to outline priority areas of focus which include child trafficking.³

The IASC and ECPAT UK urge the UK Government to consider the following priority recommendations and to ensure that the wider set of recommendations included in this report are implemented as part of a long-term approach to tackling child trafficking – ensuring that all children are protected from the devastating lifelong impacts of this abuse and crime.

³ Balch, A. et al. (2021). [Consultation on the Modern Slavery PEC's research priorities](#); Independent Anti-Slavery Commissioner. (2021). [IASC Research Priorities](#); Independent Anti-Slavery Commissioner. (2022). [Annual Report 2021/22](#); University of Nottingham Rights Lab. (2018). [Researching Modern Slavery in the UK](#).



Priority recommendations

1. The UK Government should invest in long-term prevention efforts with a cross-departmental UK-wide Child Exploitation Strategy that prioritises early prevention, protection, and care in the UK, to stop the exploitation of children.
2. The UK Government must urgently repeal the harmful provisions of recent legislation, particularly the Nationality and Borders Act 2022 and the Illegal Migration Act 2023, to remove barriers to protection and ensure all child victims of trafficking are identified and protected.
3. The Home Office must provide confirmed child victims of trafficking a grant of immigration leave of at least five years with a route to settlement, if in line with their best interests in compliance with the UK's international obligations.
4. The Department for Education and equivalent devolved bodies must commit to providing specialist support for child victims including safe accommodation and adequate standards of care. The Government must increase ring-fenced funding for local authority children's services to meet the needs of all children, retain more social workers, and boost placement capacity, which is at a record low.
5. The Home Office should expand the National Referral Mechanism Devolving Child Decision-Making Pilot Programme across the UK and commit to making the Independent Child Trafficking Guardians available to all local authorities in England and Wales.

ABOUT THE INDEPENDENT ANTI-SLAVERY COMMISSIONER

Eleanor Lyons is the UK's Independent Anti-Slavery Commissioner (IASC). Her role, established by the Modern Slavery Act 2015, is to encourage good practice sharing amongst all those with a role to play in tackling every aspect of modern slavery and human trafficking in the UK.

Prior to her appointment as the Independent Anti-Slavery Commissioner, Eleanor was Deputy Children's Commissioner, advocating and championing the rights of all children in England, particularly those that were vulnerable, in care or in contact with social services. Eleanor Lyons began

her three-year term as Commissioner in December 2023 with a mission to ensure tackling modern slavery remains at the top of the political agenda and a national priority.

The IASC's strategic plan is underpinned by two core themes – the inclusion of survivor voices into policy design and improving the knowledge base and understanding of modern slavery.

The Commissioner is accountable through their Strategic Plan and Annual Reports. These are laid before Parliament by the Home Secretary.

ABOUT ECPAT UK

ECPAT UK (Every Child Protected Against Trafficking) is a leading children's rights organisation working to ensure children can enjoy their rights to protection from trafficking and transnational exploitation. We campaign for and support children everywhere to uphold their rights to live free from abuse and exploitation through an integrated model involving research, policy, training, and direct practice.

Our vision is 'Children everywhere are free from exploitation, trafficking and modern slavery.' We promote and uphold children's rights to protection, provision, and participation in the UK and outside of the UK by:

- Informing, educating, and researching child trafficking and exploitation
- Increasing awareness of and campaigning to end child trafficking and exploitation
- Standing with children and young people affected by exploitation
- Working collaboratively for change

Our work is child-centred, trauma-informed and guided by the meaningful and ethical participation of the young people we support, centring every child's fundamental human right to be protected from trafficking and exploitation as outlined in national legislation and the international legal framework.

CHAPTER 1: WHAT IS CHILD TRAFFICKING?

Definitions

Child trafficking is defined in the United Nations (UN) Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children as the “recruitment, transportation, transfer, harbouring or receipt” of a child under 18 years of age for the purpose of exploitation. The definition recognises that a child cannot consent to their own exploitation, regardless of whether he or she seemingly agrees to any element or genuinely understands the situation. The definition of child trafficking differs from that of adults, which requires an additional element to be present – the ‘means’ of trafficking. Although the ‘means’ element is not required for the legal definition of child trafficking, it may still be a feature of the abuse. The ‘means’ element refers to the “threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person”⁴

Child trafficking is child abuse and a human rights violation which must be treated as such within a child protection context. The transportation of victims may occur anywhere: internally within the UK and/or across international borders. A child may solely be transported

to the room next door with the intention to exploit them or in some cases, transportation may not occur at all, but they may have been recruited and/or harboured. The exploitation faced may be for domestic servitude, labour exploitation, sexual exploitation, criminal exploitation, organ harvesting, slavery and slavery-like practices

The UK Government is obligated under a range of international human rights instruments to uphold the rights of children and to take action to combat child trafficking and exploitation.⁵ Children who are victims of trafficking have a right to specific assistance, support and protective measures in line with international standards.⁶ In the UK, local authorities have a duty to promote and safeguard the welfare of children in need in their area under the child protection frameworks.

Child trafficking in the UK

In the UK in 2023, 7,432 children were identified as potential victims of trafficking, accounting for 44% of all referrals to the National Referral Mechanism, the country’s framework for identifying victims of modern slavery and human trafficking. Most child victims were British nationals (78%), followed by children from Albania, Sudan, and Eritrea. Most cases involved criminal exploitation, including drug-related crimes

⁴ Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention against Transnational Organized Crime.

⁵ Convention on the Rights of the Child; The Optional Protocol to the Convention on the sale of children, child prostitution and child pornography.

⁶ Council of Europe Convention on Action against Trafficking in Human Beings

often linked to “County Lines” exploitation. The number of child referrals has surged by 138% in five years.

Despite this surge, the number of children being formally recognised as victims of child trafficking has decreased. Those receiving a ‘reasonable grounds’ decision, determining that there are sufficient indicators someone may be a victim of modern slavery, decreased to 74% in 2023 from 90% in 2022. Those confirmed as victims with a positive conclusive grounds decision decreased to 80% from 92%.⁷ This rise in negative NRM decisions is a result of provisions in the Nationality and Borders Act 2022 and is further discussed in [Chapter 2](#) of this report.

Awareness of child trafficking in the UK remains low, with many unaware that British children are also victims. Both UK nationals and foreign children face various forms of this abuse, including sexual, labour and criminal exploitation. Socioeconomic inequalities and technological advancements have expanded traffickers’ reach. Exploiters prey on children’s dependence and trust, often manipulating them through threats or emotional control, especially targeting those in poverty, abuse, or neglect.

The consequences for trafficked children are severe, stripping them of their rights and inflicting lasting physical, emotional, and psychological harm. Many victims suffer from malnutrition, neglect, and severe mental health challenges, including Post Traumatic Stress Disorder (PTSD), depression, and anxiety. The

trauma often persists into adulthood, impacting their trust in others and their ability to lead stable lives. Trafficked children are also frequently denied educational opportunities, trapping them in cycles of exploitation and robbing them of prospects. This lack of education and societal inclusion not only harms individuals but also affects communities and social stability.

Poor data collation and sharing hinder understanding of the problem and responses to it. Research highlights inconsistencies in local data collection and reporting, pointing to significant gaps in the UK’s child protection response. The Department for Education (DfE) recorded only 2,710 cases of trafficking yet reported 15,020 instances of child sexual exploitation and 14,420 of child criminal exploitation.⁸ These figures suggest a disconnect between local assessments and NRM data.

Further data was requested from the Home Office and Crown Prosecution Service (CPS) by the Independent Anti-Slavery Commissioner (IASC) concerning the outcomes and efforts related to child trafficking cases.⁹ Although requested in July, the final official responses were not received until November. The Home Office and CPS told us respectively that they were either unable to provide certain data owing to technical issues or because they did not hold certain data. Data inconsistencies, limited transparency and delays in official responses remain a barrier to comprehensive understanding and intervention.

⁷ Home Office. (2024). [Modern Slavery: National Referral Mechanism and Duty to Notify Statistics UK, end of year summary 2023](#).

⁸ Department for Education. (2023). [Children in Need Statistics](#). C3 Factors Identified at the end of assessment by local authority.

⁹ The Independent Anti-Slavery Commissioner (IASC) under the Modern Slavery Act 2015, has the power to request data from public authorities to support their functions in monitoring the UK’s response to modern slavery.

CHAPTER 2: KEY DEVELOPMENTS

Recent legislation and policy in the UK have significantly impacted child victims. While some measures have improved safeguarding, others have created barriers to identification and increased vulnerabilities to exploitation.

This section examines the latest legislative changes, their broader implications for child victims, and the challenges that arise when policies fail to consider the complexities of vulnerable children's needs.

The Online Safety Act 2023

The Online Safety Act 2023 seeks to enhance protection for children, it relies on companies to self-regulate and does not always require robust age verification. This legislation imposes strict regulations on online platforms, including social media, messaging apps, search engines, and user-generated content sites. Companies must prevent illegal content, such as child sexual abuse material, terrorism-related content, and hate speech, and remove legal but harmful material like cyberbullying and self-harm promotion. Ofcom, the UK's communications regulator, is tasked with ensuring compliance, conducting investigations, and imposing fines of up to £18 million or 10% of a company's global revenue.

This legislation also introduces new duties for platforms to empower and safeguard users, including options to verify identities, block anonymous accounts, and filter harmful content. Platforms must also offer user-friendly reporting mechanisms and protect freedom of expression, especially for journalistic content and democratic discourse. Senior company managers could face criminal liability for non-compliance. This Act is a significant step in balancing online safety, particularly for children, with the protection of free speech and privacy rights.

However, the Act largely relies on companies to self-regulate, raising concerns about their commitment to enforcement. This level of prevention is inadequate as the Act does not fully embrace child safety by design principles which require robust age verification for all social media platforms, risking children's access to inappropriate content.¹⁰ Additionally, it inadequately addresses encrypted messaging services, which can be exploited to share child sexual abuse material without stricter monitoring requirements.

¹⁰ 5 Rights Foundation. (2024). [Child Rights by Design](#).

The Illegal Migration Act 2023

The Illegal Migration Act 2023 raises serious concerns about the UK's obligations to children under the Refugee Convention, the Convention on the Rights of the Child and the Children Act 1989. The previous Government claimed that increased risks to vulnerable children are "justified and proportionate" to control migration and reduce crime.¹¹ Although the new Government has abolished the proposal to remove people from Rwanda¹², it has not committed to repealing harmful provisions in the Act or to clarifying the future direction of immigration policy and its impact on vulnerable children.

The Act disqualifies unaccompanied children from asylum consideration and mandates their removal upon turning 18.¹³ It also reverses prior measures that ended the mass detention of children for immigration purposes, granting broad discretion to detain both unaccompanied children and children with families indefinitely. These provisions have not been commenced and it is unclear if they will be by the new Government.

Additionally, the Act allows the Home Office to accommodate unaccompanied children outside the care system—a practice deemed unlawful, and which resulted in many children going missing from Home Office-run hotels.¹⁴ It also weakens

protections for victims of modern slavery and trafficking, granting broader powers to disqualify children from the National Referral Mechanism (NRM), leaving them vulnerable to exploitation and unable to access essential support.

The Nationality and Borders Act 2022

Provisions within the Nationality and Borders Act 2022 have increased the risk of child exploitation, trafficking, and criminalisation. Many organisations like ECPAT UK opposed the legislation due to its negative impact on children. Despite advocacy efforts, measures creating serious protection weaknesses and challenges were implemented in January 2023.

The Act allowed the Government to alter, via statutory guidance, the evidentiary threshold for reasonable grounds (RG) decisions, previously set lower to assist victims in acknowledging the complexity of identification, particularly for children as a result of trauma.¹⁵ This change heightens the risk of re-trafficking, with it becoming more likely that essential support will be denied. Following a legal challenge, the July 2023 Statutory Guidance was amended so that decision-makers must consider "whether it is reasonable in all the circumstances" to expect supporting evidence for corroborating information, but the changes continue to have a legacy impact on NRM decision-making.¹⁶

¹¹ Home Office. (2023). Illegal Migration Bill: children factsheet.

¹² BBC. (2024). Starmer confirms Rwanda deportation plan 'dead'.

¹³ Illegal Migration Act, Section 5.

¹⁴ R (ECPAT UK) v Kent CC, SSHD [2024] EWHC 1353 (Admin).

¹⁵ Davis, M. (2024). Identifying Victims of Human Trafficking: The Legal Issues, Challenges and Barriers.

¹⁶ Magugliani, N. et al. (2024). Assessing the Modern Slavery Impacts of the Nationality and Borders Act: One Year On.

Negative RG decisions for children increased significantly as these provisions came into force – from 10% negative decisions issued in 2022 to 26% in 2023. Cases where exploitation occurred in whole or in part overseas were particularly impacted by stricter evidentiary requirements. Children at this stage rarely, if ever, receive access to legal advice to support the process by providing expert reports or witness statements leading to rejections which have a significant impact on them.

This legislation also disqualifies individuals from protection if they have served custodial sentences of more than a year or have been prosecuted for certain offences.¹⁷ This is particularly problematic for child victims of criminal exploitation, used for drug trafficking or other criminal activities. Following a legal challenge, the Government was forced to withdraw this policy, introducing a new standard in Version 3.6 of the Statutory Guidance in January 2024, which includes a mandatory assessment of the risk of re-trafficking – yet this remains a troubling provision for children.¹⁸ Recent research found that these decisions on disqualification were frequently issued to victims of criminal exploitation.¹⁹ The report also found decisions were often made without reference to anything other than sentencing remarks and very limited documents.²⁰ 65% of all disqualified potential victims exploited as children were

acknowledged as having an element of criminal exploitation in their case. All children at the age of referral who have been disqualified have criminal exploitation as a listed type in the NRM. By not recognising these children as victims of exploitation, the Act risks criminalising them for actions directly resulting from their exploitation, denying them the protection and support they deserve.

Additionally, the Act's provisions on immigration leave for trafficking victims do not align with international protocols, such as the UN Convention on the Rights of the Child (UNCRC), failing to prioritise children's best interests and jeopardising their recovery. See further analysis of the grant of immigration leave for child victims in [Chapter 4](#) of this report.

The Act also affects age assessments for children by introducing the National Age Assessment Board (NAAB), launched in March 2023 to "strengthen and improve processes" for assessing age. Children are now subjected to stressful and potentially traumatic assessments, increasing the risk that some are incorrectly classified as adults and/or having two separate age determinations (one to access children's services and another for immigration purposes). This misclassification could also lead to their placement in environments that

¹⁷ Nationality and Borders Act 2023, Section 63.

¹⁸ Matrix Chambers. (2024). [SSHD withdraws Public Order Disqualification policy](#).

¹⁹ Magugliani, N. et al. (2024). [Assessing the Modern Slavery Impacts of the Nationality and Borders Act: One Year On](#).

²⁰ *Ibid.*

are not suitable for children, exposing them to further danger and exploitation. Children are now also at risk of being wrongly convicted for crimes of illegal entry or facilitating illegal entry under the same Act,²¹ with 18 children already identified by Humans for Rights Network wrongly charged and 14 of these spending periods in adult prisons.²²

Overall, the Nationality and Borders Act 2022 weakens the identification, protection, and support systems for trafficked children, increasing their risks of exploitation, re-trafficking, and criminalisation.

Slavery and Human Trafficking (Definition of Victim) Regulations 2022

The Government's 'Definition of Victim' regulations narrow the definition of a victim of trafficking and do not align with international law. These regulations were brought under Section 69 of the Nationality and Borders Act 2022 and introduced new definitions for victims of trafficking and modern slavery, reducing the likelihood of identifying and supporting children who have experienced exploitation. They do not align with international law, such as the European Convention Against Trafficking (ECAT) and the Palermo Protocol, creating potential gaps in the protections provided to children.

The regulations led to changes in the definition of a victim in the Modern Slavery Statutory guidance published in January 2023. These regulations fail to distinguish adequately between adult and child victims, treating age as merely a "circumstance" rather than recognising children's unique vulnerabilities to human trafficking, and modern slavery. These new definitions risk children not being identified as victims – they are inconsistent with international standards and should be repealed.

The UK Government must urgently repeal the harmful provisions addressed in this report in the Nationality and Borders Act 2022 and the Illegal Migration Act 2023, to remove barriers to protection and ensure all child victims of trafficking are identified and protected.

²¹ Humans for Rights Network. (2024). [No such thing as justice here: The criminalisation of people arriving to the UK on small boats.](#)

²² The Nationality and Borders Act 2022 amended sections 24 and 25 of the Immigration Act 1971 making arrival without entry clearance and entry without leave as criminal offences.

POLICY

Unaccompanied children accommodated in Home Office run hotels

Unaccompanied children were placed in Home Office-run hotels from July 2021 to January 2024, outside the care of children's services. This unlawful practice began when Kent County Council (Kent CC) declared it had reached capacity.²³ ECPAT UK legally challenged the use of these hotels in June 2023. On 27 July 2023, the court ruled that Kent CC acted unlawfully by failing to accommodate all children when notified by the Home Office, which was also found to have acted unlawfully by routinely placing unaccompanied children in hotels, denying them local authority protection.²⁴ By January 2024, all 7 hotels had closed, but the impact on over 5,400 housed children who did not receive proper care or housing from children's services was significant and continues. Research by ECPAT UK and University College London found that hotel use increased trafficking and exploitation risks.²⁵

Between July 2021 and September 2023, there were 467 incidents of children going missing from hotels, with 147 unfound²⁶ and 90 still missing as of 30 October 2024.²⁷ Reports revealed emotional abuse and degrading treatment by hotel staff. The Chief Inspector of Borders and Immigration highlighted significant safeguarding failures,²⁸ while the Children's Commissioner noted that children as young as 12 went missing, with only 17% referred to the National Referral Mechanism as potential victims of modern slavery.²⁹ We are deeply concerned for the missing children and have called for a statutory independent inquiry into the use of hotel accommodation.

The Government should conduct a statutory inquiry into the disappearance of children from Home Office-run hotels to ensure such a catastrophic child protection failure never happens again. Working closely with law enforcement partners, the Government must urgently step up efforts to locate the 90 missing children.

²³ BBC News. (2021). [Kent to turn away lone child migrants from Monday due to "extreme pressure"](#).

²⁴ *R (ECPAT UK) v Kent CC, SSHD [2023] EWHC 1953 (Admin)*.

²⁵ XAyeb-Karlsson, S. et al. (2024). [Behind Closed Doors: A Storytelling Legal and Empirical Analysis of Human Trafficking Risks in Home Office Hotels Compared to Other Accommodation for Unaccompanied Children and Young People Seeking Asylum in the UK](#).

²⁶ Independent Chief Inspector of Borders and Immigration. (2024). [A re-inspection of the use of hotels for housing unaccompanied asylum-seeking children](#).

²⁷ House of Lords. (2024). [Unaccompanied Migrant Children](#).

²⁸ Independent Chief Inspector of Borders and Immigration. (2024). [A re-inspection of the use of hotels for housing unaccompanied asylum-seeking children](#).

²⁹ Children's Commissioner for England. (2023). [Unaccompanied children in need of care](#).

Crucially, the Government must increase ring-fenced funding for local authority children's services to meet the needs of all children, retain more social workers, and boost placement capacity, which is at a record low.

Government response to the Independent Inquiry into Child Sexual Abuse

The Independent Inquiry into Child Sexual Abuse released its final report on 20 October 2022, detailing how institutions across England and Wales failed to protect children from sexual abuse and exploitation. It made urgent recommendations, including mandatory reporting laws for professionals, a national redress scheme for survivors in England and Wales, and the establishment of a Child Protection Authority (CPA). Other recommendations included unified data collection on child abuse, appointing a Cabinet Minister for Children, launching awareness campaigns, and banning pain compliance techniques in custody.³⁰

The report also called for better legal protections for children in care, improved compliance with reporting obligations, and stronger online child protection measures. It urged the removal of the three-year limitation on personal injury claims for abuse victims and proposed reforms to the Criminal Injuries Compensation Authority (CICA).

In May 2023, the Government responded, agreeing to act on most recommendations but disappointing many survivors and children's rights organisations, who call for full adoption of all recommendations.³¹

The Government's reform strategy for children's social care

The independent review of children's social care in England, published in May 2022, resulted in the Government's response, 'Stable Homes, Built on Love' in February 2023.³² The review made 72 recommendations focused on improving relationships and support for children in need; the need to tackle harms outside of the home with improved child protection responses; and improving experiences of care. Yet without adequate funding, proposed changes could further obscure children's right to protection.

The review recognised the specific vulnerabilities of non-British children reflected in Home Office policies which have created insecurity and sanctions but inadequately addressed issues facing child victims of modern slavery. This latter group of children is only addressed once in the review within the context of the devolved NRM panels, with no recommendations being made regarding the care they receive from children's social services. Recommendations aimed at enhancing care quality and reducing exploitation risk included better long-term care and smoother transitions to adulthood.

³⁰ Independent Inquiry into Child Sexual Abuse. (2022). [The Report of the Independent Inquiry into Child Sexual Abuse](#).

³¹ Home Office. (2023). [Response to the final report of the Independent Inquiry into Child Sexual Abuse](#).

³² Department for Education. (2023). [Children's social care: stable homes, built on love](#).

New standards for accommodation for 16- and 17-year-olds

In 2021, the Government mandated that children aged 15 and under must reside in accommodation where they receive care but did not extend this to 16- and 17-year-olds.³³ New standards introduced in October 2023 require accommodation providers to register with Ofsted, however, these remain placements without care, allowing children to live with adult strangers and in mobile settings, which can include caravans, boats and even tents. Inspection arrangements are weaker than in children's homes and managers are not required to have experience of working with children. These changes have created a two-tier system of care, disproportionately affecting unaccompanied children.

Research indicates that trafficked and unaccompanied children are at high risk of going missing shortly after placement, many within 48 hours. In 2020, one in three trafficked children went missing from local authority care (a rise of 25% since 2018) and a trafficked child is 1.2 times more likely to go missing from care than other children in care.³⁴ The findings highlight inadequacies in placement decision-making, which is often influenced by budget constraints and scarcity of suitable placements, rather than child safety.

Children's social care funding crisis

Children's social care is facing a funding crisis, leading to inadequate support for trafficked children. Most councils in England exceed their budgets, with increased spending primarily directed at crisis intervention. This leaves early support for at-risk children lacking, often resulting in exploitation before intervention occurs. In England, local authority spending on children's services increased by £800 million for 2021–22, with 81% of this increase going to crisis intervention services.³⁵ There needs to be a fundamental shift from a crisis response to upstream prevention.

The social care overspend is largely attributable to higher residential care and agency staff costs. In real terms, there was a 66.2% increase in spending on children's residential care from 2015/16 to 2021/22.³⁶ This has been driven by reliance on private providers and insufficient local placements. Accommodation for children with the most complex needs is the scarcest, with no secure placements available at all in London or the West Midlands. This results in trafficked children being placed far from their support networks, increasing their vulnerability.

While there are some positive aspects to recent policy developments such as the Government's updated Working Together to Safeguard Children 2023 Statutory Guidance,³⁷ they require adequate

³³ Department for Education. (2021). [Reforms to unregulated provision for children in care and care leavers](#).

³⁴ ECPAT UK and Missing People. (2022). [When Harm Remains](#).

³⁵ The Children's Society. (2023). [The Well-Worn Path](#).

³⁶ Institute for Government. (2023). [Performance Tracker 2023: Children's Social Care](#).

³⁷ The Working together to safeguard children 2023 statutory guidance outlines the framework for professionals and organisations to ensure effective safeguarding procedures for children.

funding if they are to be implemented effectively. The updated guidance aims to enhance multi-agency cooperation and clarifies safeguarding partner roles and the need for consultation with the charity sector. It also aligns efforts with the strategy set out in 'Stable Homes, Built on Love'³⁸ and sets new standards for the response to children facing the risk of harm outside the home, including through online abuse.

While reactive, short-term interventions such as accommodation and healthcare are critical to addressing any immediate threats and harms to child victims of trafficking, implementing long-term, preventative measures are equally important to enable a proactive, timely and child-centred approach to child trafficking.³⁹ Notwithstanding current government budgetary and spending pressures, investment in preventing modern slavery will decrease the risk of child trafficking and cut the social and economic costs of modern slavery in the UK.⁴⁰

National Referral Mechanism

The National Referral Mechanism (NRM) for identifying trafficking victims lacks child-specific provisions and is complex to navigate. Along with the changes introduced through the Nationality and Borders Act 2022, recent revisions to the NRM reconsideration policy have exacerbated the process for children, making it harder to challenge negative

NRM decisions. Some positive steps have been made to better adapt the NRM process to children's needs, notably the 'Devolving Child Decision Making Pilot Programme' launched in 2021, following recommendations in an ECPAT UK and IASC report.⁴¹

The Devolving Child Decision-Making Programme has piloted shifting decision-making on child trafficking cases from the Home Office to local authorities working with multi-agency safeguarding partners and directly responsible for the child's welfare. This has expanded from ten to twenty sites, after an evaluation demonstrated quicker conclusive grounds (CG) decisions (especially for children in limbo due to their immigration status or those in the criminal justice system); increased understanding of the NRM process and modern slavery within local authorities; and better multi-agency working. **The Home Office should expand the Devolving Child Decision-Making Pilot Programme across the UK and consider including children who are within 100 days of turning 18, that are currently excluded from the pilot.**

In February 2024 the Home Office revised its reconsideration policy for negative NRM decisions, reducing the timeline for a reconsideration submission from three months to one month, narrowing the criteria that must be met for reconsideration, and an increased emphasis on new and substantial evidence to justify a

³⁸ Department for Education. (2023). [Working Together to Safeguard Children 2023: Summary of changes](#).

³⁹ The need for a prevention approach is discussed further in chapter 3.

⁴⁰ Modern Slavery and Human Rights Policy an Evidence Centre. (2024). [Modern Slavery Policy in the UK: evidence-informed priorities for the UK Government](#).

⁴¹ ECPAT UK & IASC. (2020). [Child Trafficking in the UK 2020: A Snapshot](#).

reconsideration. The Competent Authority made decisions on 824 reconsideration requests in the first three quarters of 2024 of both potential adult and child victims of which 34% (278) remained negative or disqualified. We urge the Home Office to reconsider this policy as it imposes unrealistic deadlines on children and those who support them and sets a 'trauma deadline' for new evidence to emerge. Concerningly, there was no consultation with first responders ahead of this change, causing confusion and negatively impacting children's NRM journeys.

Opportunities for policy reform

As outlined in Chapter 2, the past three years have seen a continual reframing of modern slavery as an immigration issue rather than a protection issue – in narrative, legislation, and policy. This has diverted attention away from protection measures, which have resulted in the legal rights of child trafficking victims being overlooked, the understanding of root causes neglected. This has all been happening against a backdrop of children's services being cut drastically over the last decade. The current Government's Safer Streets mission and its sub-programmes offer an opportunity to bring a greater focus on prevention, protection, and prosecution in relation to modern slavery.

Safer Streets

The Government's Safer Streets mission aims to reduce crime and create safer communities.⁴²

By integrating a proactive, prevention-focused approach to child trafficking into its Safer Streets programmes and in upcoming legislation including the Children's Wellbeing Bill, the Government can break the cycle of exploitation early on and disrupt criminal actors targeting the most vulnerable, which will be critical to achieving the broader Safer Streets mission.⁴³

Halving the level of Violence Against Women and Girls (VAWG)

Modern slavery and human trafficking are some of the most severe forms of Violence Against Women and Girls (VAWG). Across the UK, women and girls are being exploited, with criminals profiting off a culture of impunity and acceptance.

The number of women and girls referred into the NRM for all exploitation types, increased by 40% between 2021– 2023. While there was a larger increase for women (47%) during this period compared to girls (32%) these increased by nearly a third. Additionally, the number of girls referred into the NRM for sexual exploitation increased by over a fifth (21%) between 2021–2023.

⁴² Labour Party. (2023). [Make Britain's Streets Safe](#).

⁴³ HM Government. (2024). [The King's Speech](#).

Sexual exploitation has long been the most frequently reported form of all exploitation of girls;⁴⁴ however, there is significant underreporting of exploitation cases involving children, especially girls, which may lead to a skewed understanding of the issue.

Furthermore, girls with multiple overlapping needs, such as homelessness, or mental health issues, can be at particular risk of exploitation. A multi-agency safeguarding approach is required to ensure that early intervention, including at school, can take place before any harm occurs.

The Government's pledge to tackle misogyny in schools is critical to help prevent exploitative behaviour early on. Teaching young people about healthy relationships, self-esteem, and consent can help prevent exploitative behaviour and equip them with the necessary knowledge to recognise any early signs of abuse. This is crucial for safeguarding and building girls' confidence to speak out and seek help. It can be difficult for parents and carers to identify abuse and even more challenging for children and young people to acknowledge they are being exploited.

There needs to be a cross-Government strategy to tackle the root causes of VAWG, focused on prevention to stop the sexual exploitation of girls and to ensure that children are adequately

protected from all forms of exploitation, not just those that are most visible.

Halving the incidents of knife crime

The Government's plan to halve knife crime and intervene early offers a framework for addressing the root causes of child exploitation. Young people carrying knives are likely victims of criminal exploitation. A stronger focus on child trafficking prevention within the broader anti-violence strategy could be achieved by expanding services for young people, such as youth hubs, mental health support, and dedicated child protection resources. By intervening early and identifying young people at risk, the Government can ensure that child trafficking victims receive the protection they need, helping to dismantle criminal networks that exploit children and reducing the number of young lives lost to violence.

Young Futures hubs

The UK Government has pledged to intervene earlier to prevent young people from becoming involved in crime by establishing a "young futures unit" and a network of youth hubs staffed by youth workers, mental health professionals, and career advisers.⁴⁵ This proactive approach prioritises the mental health and well-being of young people, recognising that their needs extend beyond mere crime reduction.

⁴⁴ Home Office. (2023). [Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2023](#) – GOV.UK (www.gov.uk).

⁴⁵ Labour Party. (2024). [Labour's Manifesto: Take Back Our Streets](#); The Independent. (2024). [Labour to establish specialist unit dedicated to preventing crime among young people](#).

Youth services are crucial for preventing crime, safeguarding vulnerable children, and identifying exploitation risks. However, universal access to these services is necessary to improve a range of outcomes and to protect all children and young people.

Local authorities are facing funding challenges, with some spending up to 80% of their budgets on social care, leaving services like youth clubs and Sure Start centres at risk of being cut.⁴⁶ These seemingly “nice to have” services are, in fact, essential for providing early intervention, prevention and safeguarding.

The Government’s strategy to identify at-risk young people through local prevention partnerships is an important step forward, as early intervention is key to preventing involvement in violence.⁴⁷ Placing youth workers and mentors in Accident & Emergency units and Pupil Referral Units demonstrates a forward-thinking commitment to reaching young people where they are and to offering immediate support which must include means of identification for those who are being exploited. This holistic approach not only helps identify child victims of trafficking but empowers young people to build brighter futures and represents a significant shift towards a more compassionate and effective strategy for supporting young people and creating safer communities.

By investing in universal youth services for children and young people the Government can prevent exploitation, strengthen communities, and fulfil its responsibility to uphold the rights and well-being of all children—not just those at immediate risk of criminal exploitation.

New offence of child criminal exploitation

The Government has also committed to introduce a new offence of criminal exploitation (CCE) of children “to go after the gangs who are luring young people into violence and crime”.⁴⁸ While law enforcement agencies must be equipped with effective tools to tackle youth crime, the Government should first provide clear guidance and definitions to safeguarding professionals to help them identify child victims of trafficking more broadly.

Definitions of child criminal exploitation (CCE) and child sexual exploitation (CSE) are currently inaccurate and unclear. There is also inconsistent application and understanding of terms like “trafficking” and “exploitation”. This means levels of understanding among practitioners and the support available is inconsistent and varies regionally.

⁴⁶ The Guardian. (2024). [Rising cost of social services in England putting arts and youth services at risk, say councils | Local government.](#)

⁴⁷ Labour Party. (2024). [Change, Labour Party Manifesto.](#)

⁴⁸ Labour Party. (2024). [Labour Party policy on crime and antisocial behaviour: How we will take back our streets.](#)



Government guidance including the Modern Slavery Statutory Guidance, Care of Unaccompanied Migrant Children and Child Victims of Modern Slavery Statutory Guidance, and the Child Sexual Exploitation Statutory Guidance and their equivalents in devolved governments need to be updated to include clear and consistent definitions of CCE and CSE and "trafficking" and "exploitation".

The development of a new CCE offence must align with the international law definition of child trafficking which recognises that a child cannot consent to their own exploitation.⁴⁹ In consequence there should be no coercion or "means" within the drafting of this offence.

The Government can ensure that all forms of exploitation are addressed and in line with international law by incorporating these factors into the new CCE offence. This is vital for the protection of vulnerable children. Focusing solely on criminal exploitation without acknowledging the complexities of trafficking risks leaving gaps in protection and fails to address the myriad methods that traffickers use to exploit young people. Any new legislation must reflect the nuances of child trafficking to effectively combat these crimes and safeguard the rights and well-being of all children.

The Government should introduce statutory definitions of CCE and a definition for CSE which are compliant with international law to enable safeguarding professionals and law enforcement agencies to readily identify and protect victims. Any definitions should make clear that a child cannot consent to their own exploitation. A broad definition of child exploitation would ensure children are treated as children first and that the interrelatedness of different forms of exploitation are captured.

⁴⁹ Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children.

CHAPTER 3: PREVENTING EXPLOITATION OF CHILD VICTIMS OF MODERN SLAVERY

Introduction

The last five years have seen a 138% increase in referrals to the NRM for child trafficking. Trafficking causes severe physical, emotional, and psychological harm to children, leading to long-term trauma, mental health challenges, and limited opportunities. The UK has a legal obligation to reduce children's vulnerability to child trafficking,⁵⁰ failing to meet this not only causes detrimental long-term harm to children but also incurs high public service costs, requiring substantial resources to address the aftermath. Implementing preventative measures can help prevent exploitation and reduce these costs.

Targeted strategies in, education, community engagement, and multi-agency cooperation are needed to prevent child trafficking and tackle its root causes and will reduce spending on crisis interventions. All children, on account of age alone, reliant on adult authority and direction, have increased risks of trafficking and abuse.⁵¹ Children with unstable homes and experiencing bullying,

abuse, isolation, and mental health challenges have significantly heightened risks.

Too often, children are not taught about their rights to be and feel safe and to challenge power imbalances and things that make them feel uncomfortable. This can limit their comprehension of abuse that may be happening to them, and their ability to speak up, identify it or know where to seek help. This can mean that adults and professionals struggle to acknowledge or recognise that they are victims of exploitation.

In addition to the myriad challenges of identifying and protecting child victims, UK national victims are often falling through the gaps in support. UK nationals, particularly children, are consistently one of the most common nationalities referred to the National Referral Mechanism. However, research has found that public understanding of modern slavery is limited with many people conflating it with immigration issues.⁵² But modern slavery is happening within our communities, in the UK.

⁵⁰ The Council of Europe Convention Against Trafficking in Human Beings (ECAT) specifically sets out in Article 5.5 that "each Party shall take specific measures to reduce children's vulnerability to trafficking, notably by creating a protective environment for them".

⁵¹ Celiksoy, E. et al. (2024). [Prevention and identification of children and young adults experiencing, or at risk of, modern slavery in the UK.](#)

⁵² Hestia. (2024). [On our streets The changing face of modern slavery in London.](#)

What interventions are needed?

Training, guidance, and awareness

Early intervention measures including specialised training and awareness for frontline professionals are required to reduce children's vulnerability to child trafficking. Too many safeguarding professionals are failing to identify child trafficking. Several barriers hinder the early identification of children at risk of exploitation including a lack of sufficient training and awareness, leading to key indicators being missed. As emphasised in a recent report by HM Inspectorate of Probation, "Practitioners need access to specialised training and a range of safeguarding tools, and they need to exercise professional curiosity, looking beyond the visible evidence and questioning why a young person is behaving in concerning ways".⁵³

The Government must step up to increase public awareness programmes of child trafficking across the UK. Research from ECPAT UK and University of Nottingham Rights Lab reviewed and identified existing interventions to identify and prevent child modern slavery in the UK.⁵⁴ They found that just 48% of interventions focused on "education and the need to raise awareness of child exploitation and modern slavery". Many of these focused on educational programmes for children and young people and several for parents and carers to have greater awareness of indicators of exploitation.

Safeguarding professionals must have access to clear and consistent guidance – to help them identify child victims of modern slavery. As set out above, the definitions of child criminal exploitation (CCE) and child sexual exploitation (CSE) are inaccurate and unclear. There is also inconsistent use and understanding of terms like "trafficking" and "exploitation". The lack of clear statutory definitions and guidance alongside variations in interpretation by local agencies create gaps in early identification efforts, allowing many vulnerable children to remain unnoticed.⁵⁵

Strengthened social care systems

There must be strengthened social care systems with Government investment to enable local safeguarding partners to wrap care around the child. Long-term consistent support, safe and secure housing, access to education and healthcare, trauma-informed services, and safety from traffickers all help to prevent and protect individuals from harm and re-victimisation.⁵⁶

⁵³ HM Inspectorate of Probation. (2024). [Child Criminal Exploitation](#).

⁵⁴ Celiksoy, E. et al. (2024). [Prevention and identification of children and young adults experiencing, or at risk of, modern slavery in the UK](#).

⁵⁵ *Ibid.*

⁵⁶ *Ibid*; Hynes, P. et al. (2022). [Creating Stable Futures: Human Trafficking, Participation and Outcomes for Children](#).

Institutional challenges, including reduced budgets, heavy workloads, and assumptions or biases, further complicate the ability of local authorities and police forces to effectively prevent and identify cases of child exploitation. There is also a lack of direct engagement with children, meaning their perspectives are often missing from policy and practice. Comprehensive early identification efforts must focus on improving training and awareness, communication with children, and developing a more coordinated, resource-supported, multi-agency approach to ensure that all children, especially those from minority communities, are adequately protected.

Working with schools and educators

Early intervention in schools is needed to reduce children's risk to exploitation. Schools and educators must be aware of the risks of children being exploited. The IASC has heard from survivors of child exploitation that more interventions should focus on preventing children from being exploited from an early age. There is insufficient awareness of child trafficking and exploitation among educators, and often a lack of support available to return absent children to school who may be vulnerable to exploitation.⁵⁷

Children who are not in school are less likely to be around professionals who can identify exploitation and support them, and criminals can target this vulnerability. There are 1.4 million children persistently absent from school in England alone.⁵⁸ Concerningly, school exclusions and suspensions across England have increased by over a fifth in the last year.⁵⁹ Research has found that children with special educational needs and disabilities, as well as those outside of education including through school exclusion and dropout, are particularly vulnerable to exploitation. Furthermore, lack of access to legal aid in school exclusion appeals also hinders the ability to prevent exploitation.⁶⁰

A 2021 report looking at school exclusion and child exploitation found that "While some educators may be equipped to recognise the signs of potential child criminal involvement, they may be less able to identify exploitation, instead ascribing agency and choice to the child's involvement".⁶¹

It is important that any cross-government guidance, including statutory guidance on relationships, sex, and health education (RSHE) and the Modern Slavery Statutory Guidance, makes clear the role of educators to inform and spot signs of heightened vulnerabilities of children to exploitation.⁶² Additionally, it should include clear information about how children can be recruited into all forms of exploitation.

⁵⁷ Children's Commissioner. (2024). [Children Missing Education: The Unrolled Story](#).

⁵⁸ HM Government. (2024). [Pupil absence in schools in England: Autumn and Spring term 2023/2024](#).

⁵⁹ IPPR. (2024). [Revealed: School exclusions and suspensions rise by a fifth last year, finds new report](#).

⁶⁰ Celiksoy, E. et al. (2024). [Prevention and identification of children and young adults experiencing, or at risk of, modern slavery in the UK](#).

⁶¹ Graham, J. (2021). [Excluded or missing from education and child exploitation: literature review and stakeholder views on safeguarding practice](#).

⁶² Department for Education. (2021). [Relationships and sex education \(RSE\) and health education – GOV.UK \(www.gov.uk\)](#).

The Children's Wellbeing Bill is a chance for the Government to ensure that educators are aware of human trafficking risks and can intervene early to protect children at school against lower-level violations through to modern slavery.⁶³ Crucially, this requires a multi-agency response between schools, safeguarding teams, health and care services, and other relevant bodies to ensure particularly vulnerable children are protected from harm.

Government spending on prevention in the UK

While we know the UK Government has invested substantially in foreign aid to tackle modern slavery globally, albeit with "limited long-term impact",⁶⁴ it is less clear how it is investing in UK multi-agency efforts to prevent child exploitation. The Government's response to preventing child trafficking in the UK needs to reflect the NRM statistics which show that UK nationals, particularly children, are consistently one of the most common nationalities referred to the NRM. In 2023, British children accounted for 78% (3,350) of all UK nationals referred to the NRM.

The UK Government's Serious Organised Crime strategy includes a commitment to spending £24 million to reduce modern slavery both in the UK and abroad but provides little detail on its financial response to modern slavery in the UK.⁶⁵ While law enforcement plays an important role in the response to serious organised crime, the Government needs to develop a comprehensive, multi-agency prevention strategy which considers how key safeguarding services—not just law enforcement—can intervene early to protect children from exploitation.

There is limited research available on the prevention methods currently being used in the UK and their effectiveness in protecting children from trafficking.⁶⁶ This knowledge gap presents the Government with a critical opportunity to increase its focus on child-centred prevention work in the UK. Currently, where evidence of prevention does exist, it largely pertains to upstream work in source countries with insufficient evidence of strategy or funds being put towards prevention in the UK.⁶⁷ This gap leaves children in the UK vulnerable to trafficking and exploitation.

⁶³ HM Government. (2024). [The King's Speech](#).

⁶⁴ Independent Commission for Aid Impact. (2020). [New ICAI review: The UK's approach to tackling modern slavery through the aid programme](#).

⁶⁵ HM Government. (2023). [No Place to Hide: Serious and Organised Crime Strategy 2023–2028](#); this strategy outlines the UK Government's law enforcement approach to tackling severe crimes, including modern slavery and human trafficking, which directly affect vulnerable children.

⁶⁶ Celiksoy, E. et al. (2024). [Prevention and identification of children and young adults experiencing, or at risk of, modern slavery in the UK](#).

⁶⁷ Independent Commission for Aid Impact. (2020). [New ICAI review: The UK's approach to tackling modern slavery through the aid programme](#).



Furthermore, the absence of an updated Modern Slavery Strategy leaves critical questions unanswered about how the Government intends to prevent child trafficking and protect vulnerable children from exploitation both at home and abroad.⁶⁸ By prioritising multi-agency collaboration and child-focused prevention efforts, the UK Government can make a meaningful difference in the fight against child trafficking.

The Government must do more to prevent exploitation and protect child victims of trafficking. It must commit to comprehensive long-term investment in prevention efforts including commissioning research to establish good practice in this area internationally and domestically. Crucially, it must develop a UK-wide child exploitation strategy which includes early intervention efforts, safe accommodation for all children, and clear guidance on Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE) and all forms of child trafficking and exploitation.

⁶⁸ Published in 2014, the Government's Modern Slavery Strategy aimed to significantly reduce the prevalence of modern slavery in the UK, as well as enhance the international response. At the time of writing, a revised strategy has not been published.

CHAPTER 4: PROTECTION

Independent Child Trafficking Guardians

Independent Child Trafficking Guardians (ICTGs) provide independent support and guidance to trafficked children, helping them navigate legal, social care, and immigration systems. The ICTG service is a key commitment of the Modern Slavery Act 2015, the Human Trafficking and Exploitation (Scotland) Act 2015, and the Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015.

England and Wales

In England and Wales, if a child is identified as a potential victim of trafficking in an area covered by the ICTG service and they are a child who has no one with parental responsibility for them, there is a duty for an ICTG 'Direct Worker' to make contact with the child within a maximum of 24 hours.⁶⁹ However, this provision is limited to potential child trafficking victims only, unlike the Scottish guardianship model which provides guardians for all unaccompanied children.⁷⁰ Home Office interim guidance outlines specific legislative

duties and support for trafficked children while acknowledging that the provision of ICTG support in section 48 of the Modern Slavery Act 2015 is yet to be commenced.⁷¹ *Currently, the ICTG Service is available in two-thirds of local authorities in England and Wales, leaving children in the remaining areas without access to this critical support.*

The ICTG Service also provides Indirect Support to children who have a figure of parental responsibility by offering expert advice and guidance to professionals and, where appropriate, parents, to ensure trafficked children's best interests are prioritised. This role includes promoting multi-agency collaboration, raising awareness of trafficking risks, sharing best practices, supporting legal compliance, and addressing gaps in services to improve safeguarding and support systems.

The Home Office provided data to the IASC on the number of children supported by the ICTG service in 2023, highlighting a clear need for this service. It showed that 1,042 children were referred for

⁶⁹ Home Office. (2024). [Interim guidance for independent child trafficking guardians](#); the ICTG service model provides ICTG Direct Support for children where there is no figure of parental responsibility for them in the UK, and ICTG Indirect Support to children who have a figure of parental responsibility for them in the UK.

⁷⁰ There may be exceptional circumstances which mean that a child with a figure of parental responsibility in the UK should be allocated direct support based on their vulnerability and risk factors. See Annex C of the [Interim guidance for independent child trafficking guardians](#).

⁷¹ *Ibid*; Public authorities are encouraged to give due regard to the ICTG Service, in alignment with the anticipated requirements under section 48 (6)(e)(i) and (ii) of the Act, to enable assessment of the service's processes.

Direct Workers as part of the ICTG service, and 1,541 children were referred for Indirect Workers. The number of children being referred has increased since 2021 when 732 children were referred for Direct Workers and 1,357 children were referred for Indirect Workers. However, the service's gap in coverage leaves many potential child victims without access to crucial support and at increased risk of harm and re-trafficking. This service must be expanded to all local authorities in England and Wales.

In early 2024, changes were made to the model in England and Wales, to stipulate that direct support should combine face-to-face and remote support to be delivered flexibly. This has led to children supported by a guardian receiving less face-to-face support and limited information and support. It is essential wherever possible that these children receive face-to-face support to help build their trust.

The Home Office has also terminated its pilot to support young people as they turn 18 despite a positive evaluation which found that the introduction of post-18 ICTG workers improved the transition from child to adult services for supported children and was seen as crucial for young

people to ensure consistent support, reducing the likelihood they would go missing and/or be re-trafficked.⁷²

Currently, the ICTG service in England and Wales is not inspected. There is neither an inspection framework in place nor a regulatory body appointed to oversee the service. The adult Modern Slavery Victim Care Contract is inspected by the Care Quality Commission (CQC) at the request of the Home Office but unlike registered services that the CQC regulates, it does not have the legal powers to require providers of safehouse or outreach services to make improvements.

Northern Ireland

In August 2023, the Department of Health issued new guidance which introduced a significant change to the referral process for the Independent Guardian Service (IGS).⁷³ Previously, all unaccompanied and separated young people were automatically referred to the service. However, under the new guidance, Health and Social Care Trust (HSCT) social workers are now responsible for determining, through their social work assessments, whether a young person meets the criteria for the service.

⁷² ECPAT UK. (2024). [Evaluation of the expanded Independent Child Trafficking Guardians \(ICTG\) roles published by the Home Office](#); Shrimpton, H. et al. (2024). [Independent Child Trafficking Guardian \(ICTG\) MSA evaluation](#).

⁷³ Department of Health. (2023). [Guidance on Section 21 of Human Trafficking and Exploitation \(Criminal Justice and Support for Victims\) Act \(Northern Ireland\) 2015](#).

The guidance specifies that to be eligible for the IGS, a young person must either be trafficked or potentially trafficked, aged under 18, and not in touch with those who have parental responsibility for them, or be separated, at risk of harm, and aged under 18. Provisions also extend to those aged under 21 in specific circumstances outlined in legislation.⁷⁴ Additionally, eligibility applies where those with parental responsibility are implicated in an offence or otherwise act against the child's best interests.

The IGS continues to serve as Northern Ireland's primary specialised support service for unaccompanied young people and those affected by trafficking and exploitation. The service remains committed to advocating for better mental health support, improved access to education, and appropriate placement options for young people in its care.

The revised criteria for the provision of Northern Ireland's guardians are still unfolding, but guardians have raised concerns that some vulnerable young people may be excluded from the service if their risk of harm is not formally identified. The growing demand for the IGS is reflected in its caseload. Open cases have fluctuated over time, with 148 cases recorded at the end of April to June 2022, increasing to 191 by January to March 2023. However, recent data show a decline to 154 open cases from October to December 2023. Between

April 2022 to December 2023 alone, the service received 144 referrals, demonstrating continued reliance on its expertise.

The most common nationalities of separated children accessing the service were Somali, Eritrean, Sudanese, Syrian, and Afghan. In addition, 44 cases during this period involved young people with an active referral under the National Referral Mechanism (NRM). These figures underscore the critical role of the IGS in safeguarding vulnerable children from diverse and often conflict-affected backgrounds.

Scotland

In Scotland, Guardianship Scotland provides vital support to all separated and unaccompanied children, including asylum-seeking children, victims of trafficking, and those vulnerable to exploitation.⁷⁵ Despite this comprehensive approach, the service continues to face significant challenges, particularly regarding delays in National Referral Mechanism (NRM) decision-making. These delays are especially problematic for young people transitioning to adulthood without receiving a decision, increasing the workload on an already under-resourced service. However, the Glasgow area, as a devolved child NRM pilot site, has managed to provide decisions within a reasonable timeframe, alleviating some of these pressures locally.⁷⁶

⁷⁴ Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015, Section 21.

⁷⁵ Aberlour. (2024). [Guardianship Scotland: National Child Trafficking Support Service](#).

⁷⁶ Home Office. (2023). [Devolving child decision making pilot programme: general guidance](#).

In 2023, Guardianship Scotland replaced the Scottish Guardianship Service and is now on a statutory footing delivered in partnership with Aberlour and the Scottish Refugee Council on behalf of the Scottish Government. Under Section 11 of the Human Trafficking and Exploitation Act 2015, all unaccompanied asylum-seeking and trafficked children in Scotland are entitled to be referred to the service, with local authorities required to do so promptly. Resources remain a persistent issue for Guardianship Scotland. The rising use of adult hotels and the National Transfer Scheme has led to an increase in the number of age-disputed children requiring support.⁷⁷ While recent funding increases from the Scottish Government have been welcomed, the number of Guardians remains insufficient to meet demand. A new tender for the service, set to take place within this financial year, could further impact delivery as resources are diverted to manage the tendering process.

Eligibility criteria for Guardianship Scotland include children under 18 who are separated from both parents and not being cared for by an adult with legal or customary responsibility and who are in the care of a Scottish Local Authority. However, unaccompanied children from Ukraine do not need to be in local authority care to qualify.⁷⁸ Young people can receive support until three months after they are granted leave to remain or receive a conclusive grounds trafficking decision and are over 18.

Guardians assist children and young people in settling into life in Scotland, offering practical and emotional support to navigate complex systems, including trafficking, asylum, welfare, and age assessments. They work to ensure that decisions are made in the child's best interests, build trusting relationships, and uphold children's rights by acting as their advocates. They also provide expert guidance to professionals, ensuring a collaborative approach to safeguarding. Despite these efforts, Guardianship Scotland continues to face systemic challenges, including resource shortages and delays in decision-making processes. However, its statutory status and comprehensive approach remain vital to supporting some of Scotland's most vulnerable young people.

The Home Office must commit to making the Independent Child Trafficking Guardians available across all local authorities in England and Wales to ensure every child victim of trafficking has an advocate supporting their needs. It should also consider expanding the Independent Child Trafficking Guardians to all unaccompanied children and ensure the service is regularly inspected by a body such as the Office for Standards in Education, Children's Services and Skills (OFSTED).

⁷⁷ The National Transfer Scheme is framework in the UK designed to distribute the responsibility for caring for unaccompanied children across local authorities more evenly.

⁷⁸ Previously, Guardianship Scotland operated a Ukraine Children and Host Family Service, which supported unaccompanied children arriving from Ukraine between September 2022 and September 2023. While this service has concluded, Ukrainian children are now supported through the main Guardianship Scotland program.

Immigration leave for child victims of trafficking

The Government's temporary permission to stay policy for victims of human trafficking (VTS) enables confirmed VTS and their children to remain in the UK following a positive National Referral Mechanism decision.⁷⁹ The requirements for a grant of immigration leave under this scheme are to aid their recovery, to enable them to seek compensation or to enable cooperation in any criminal justice proceedings relevant to the exploitation where appropriate.

In 2023, new guidance and regulations regarding 'Temporary Permission to Stay' (TPS) were introduced by primary legislation through the Nationality and Borders Act (2022) for victims of human trafficking and slavery.⁸⁰ Despite this provision and previous leave policy for victims outside of the immigration rules, very few children are granted this form of leave. Between 2020 and 2022, 5,266 children were confirmed as victims of trafficking, but fewer than 21 were granted trafficking leave.⁸¹ In the few cases leave was granted to children, it was extremely limited – with previous figures obtained by ECPAT UK for the years 2019/20 showing the average length of grant is short, suggesting that decisions are not being taken in their best interests as a primary consideration and as a result provide minimal stability.⁸²

Despite commitments from the Government to fulfil the UK's obligations under ECAT, this legislation and subsequent guidance ignores the specific standard for children. ECAT specifies in Article 14 (2) that "the residence permit for child victims, when legally necessary, shall be issued in accordance with the best interests of the child and, where appropriate, renewed under the same conditions". The explanatory report to ECAT goes on to state: "In the case of children, the child's best interests take precedence over the above two requirements. The words "when legally necessary" have been introduced to take into account the fact that certain States do not require for children a residence permit".⁸³ The 'temporary' nature of this form of leave and the additional burdens placed on children to access it have been developed without any consideration of a child's best interest.

All decision-making on this policy was temporarily paused in July and partly resumed in August whilst the policy was reviewed. On 24 October, the Home Office published updated caseworker guidance, which supports the resumption of all decision-making under the VTS policy. The revisions clarify the process decision-makers will undertake when assessing the availability and accessibility of the medical treatment for each victim including the provision of additional evidence to support their eligibility for TPS. It also addresses ongoing litigation in this policy area.

⁷⁹ Home Office. (2024). [Temporary permission to stay: consideration for victims of human trafficking and slavery. Version 4.0.](#)

⁸⁰ *Ibid.* Version 3.1.

⁸¹ Helen Bamber Foundation. (2023) [Leave in Limbo.](#)

⁸² ECPAT UK. (2022). [Nationality and Borders Bill: immigration outcomes for child victims of trafficking.](#)

⁸³ Council of Europe. (2005). [Explanatory Report to the Council of Europe Convention on Action against Trafficking in Human Beings.](#)

We urge the Home Office to provide confirmed child victims of trafficking, a grant of immigration leave of at least five years with a route to settlement, if in line with their best interests in compliance with the UK's international obligations.

Access to legal advice

The current civil legal aid landscape for child victims of human trafficking in England is dire, with children unable to find a legal representative to support them in their cases and sometimes waiting years while their claims are on hold to have legal representation—particularly for immigration and asylum matters.⁸⁴

Research from ECPAT UK, the University of Bedfordshire and Sheffield Hallam University found that young survivors of child trafficking emphasised their relationships with solicitors as key to obtaining good outcomes and highlighted the need for good quality legal advice, with some stating they could see the value of repeat appointments to ensure their cases were prepared well.⁸⁵ The emphasis for most young people was on their solicitor 'doing a good job' with their case. With some who had damaged cases and faced precarity, the discussions of quality solicitor representation evoked significant emotion. The importance of high-quality legal advice for children affected by trafficking was also highlighted in multiple submissions to the research project, with some addressing this need not solely in the realm of immigration but also in public law, community care and the criminal justice system regarding their trafficking determinations, criminal offences, and

age assessments. Young people placed a significant emphasis on the need for good quality, well-trained interpreters and, where possible, interpreters with child protection training.

We urge the Government to urgently address the crisis in legal aid funding to ensure all children have access to high-quality legal advice in their immigration, criminal and community care matters.

Criminalisation of children

Children who are exploited may commit criminal offences as a result of their exploitation. Concerningly, there is no published data, UK-wide, on the number of children considered under the non-punishment principle (Section 45 of the Modern Slavery Act 2015) which provides a statutory defence for victims who may have committed crimes because of their exploitation.

England and Wales

In England and Wales, the statutory defence under Section 45 of the Modern Slavery Act 2015 protects individuals compelled to commit a crime because they have been trafficked, so they are not prosecuted for their actions. This does not apply to the most serious crimes, including sexual offences, serious violence, or indeed modern slavery offences either. The burden of proof is on the prosecution to prove an individual is not a victim of modern slavery once the individual raises the defence. The Crown Prosecution Service (CPS) has published legal guidance on how section 45 should be applied.⁸⁶

⁸⁴ The Law Society. (2024). [Civil legal aid: millions still without access to justice.](#)

⁸⁵ Hynes, P. et al. (2022). [Creating Stable Futures: Human Trafficking, Participation and Outcomes for Children.](#)

⁸⁶ Crown Prosecution Service. (2024). [Modern Slavery and human trafficking: offences and defences, including the section 45 defence.](#)

Exploited children may still face criminalisation and are not consistently protected from further exploitation, even when recognised as victims. In February 2024, an inspection by His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) found the Metropolitan Police to be ineffective in its handling of sexual and criminal exploitation of children, with half of the investigations examined graded as inadequate – a concerning finding for a force handling the largest number of cases in the UK.⁸⁷ The report cites how officers often see children as offenders rather than victims.⁸⁸

There is currently no data available on how many children in the UK are criminalised for offences committed as a result of their exploitation. The Crown Prosecution Service does not publish the outcome of a case linked to the raising of the Section 45 defence. Home Office figures from December 2023 state that since the launch of the County Lines Programme in 2019, which includes the Metropolitan, Merseyside, West Midlands, Greater Manchester and British Transport Police forces, 5,165 county lines had been closed, with 15,623 people arrested and 8,011 (adults and children) referred for safeguarding.⁸⁹ Given the high proportion of child criminal exploitation (CCE) cases referred to the National Referral Mechanism (NRM), there are ongoing concerns that exploited children are still being criminalised and are not

receiving adequate safeguarding interventions to protect them from further harm, even when identified.

A call for evidence initiated by the previous IASC and collated in 2020, found there is evidence that children are being prosecuted for crimes while being criminally exploited.⁹⁰ An investigation by the Guardian in 2019 also found that children were being prosecuted for being forced to sell drugs despite being trafficked.⁹¹ The call for evidence also found that section 45 is most commonly used in drug-related charges. It also identified little evidence for the misuse of Section 45 as a defence. There is a need for further evidence on the use of Section 45 for child trafficking victims.

Scotland

Similarly, in Scotland, there is no data on the number of children considered under the non-punishment principle. The official guidance was refreshed in January 2024 produced under Section 8 of the Human Trafficking and Exploitation (Scotland) Act 2015, which requires the Lord Advocate to produce and publish guidance for prosecutors encountering potential victims of trafficking who may have committed crimes as a consequence of their exploitation.⁹² Amendments made to comply with the UNCRC are highly welcome, including new Annexes C and D, detailing indicators of criminal exploitation from the Scottish

⁸⁷ His Majesty's Inspectorate of Constabulary and Fire & Rescue Services. (2024). [The Metropolitan Police Service's handling of the sexual and criminal exploitation of children.](#)

⁸⁸ *Ibid.*

⁸⁹ Home Office. (2023). [County Lines Programme data.](#)

⁹⁰ Bristow, J. and Lomas, H. (2020). [The Modern Slavery Act 2015 Statutory Defence: A call for evidence.](#)

⁹¹ The Guardian. (2019). [Child victims of human trafficking prosecuted despite CPS rules.](#)

⁹² Crown Office and Procurator Fiscal Service. (2024). [Lord Advocate's instructions: Non-prosecution of victims of human trafficking.](#)

Government's Serious and Organised Crime (SOC) Taskforce's Criminal Exploitation Practitioners Guidance.⁹³ Annex D also provides examples from the Criminal Exploitation Practitioners' Guide illustrating scenarios relating to children.

Concerns remain regarding the training and awareness of key stakeholders responsible for implementing these instructions. While the duties of prosecutors and Police Scotland are clearly outlined, it is unclear to what extent these agencies are adequately trained or made aware of their obligations under the updated instructions. This issue is further complicated by some practitioners' experience showing an inconsistent approach to training police across Scotland on the National Referral Mechanism (NRM), which hinders the identification and protection of children.

Additionally, the process of overturning a conviction for victims remains lengthy and complex, requiring legal assistance through either an appeal or a review by the Scottish Criminal Case Review Commission. Challenges in securing legal aid add

further complications, and having a conviction in the interim can severely impact an individual's immigration status, recognition as a refugee, and access to compensation.

Northern Ireland

There is no comprehensive data regarding the number of children and young people subject to child criminal exploitation in Northern Ireland with on-going concerns over the application and understanding of the National Referral Mechanism and casework demonstrating a lack of understanding of when this could be used.⁹⁴ In some Trust areas there are specific representatives dealing with the issue of child sexual exploitation, but child criminal exploitation falls under teams with other responsibilities such as the Intensive Adolescent Support Teams.⁹⁵ Research has found that young people feel that paramilitary and organised crime groups provide a protective function yet, their presence also presents a threat to young people contributing towards cultures of criminality and violence.⁹⁶

⁹³ Serious Organised Crime Taskforce Scotland. (2023). [Practitioner guidance on criminal exploitation.](#)

⁹⁴ Northern Ireland Commissioner for Children and Young People. (2023). [Written Response to The Jay Review of Child Criminal Exploitation.](#)

⁹⁵ *Ibid.*

⁹⁶ Walsh, C. (2022). [From Contextual to Criminal Harm: Young People's Perceptions and Experiences of Child Criminal Exploitation in Northern Ireland.](#)

Transitions to adulthood

Child victims of human trafficking continue to face significant challenges as they transition to adulthood. Recent data obtained by the Anti-Trafficking Monitoring Group found that in 2022, 70% of children in the National Referral Mechanism either withdrew or had their cases suspended, making them ineligible for support. Only 13% of those who remained were referred for support under the Modern Slavery Victim Care Contract (MSVCC), and just 6% went on to receive it.⁹⁷

A lack of publicly available data on the outcomes of children turning 18 in the NRM complicates understanding of their situation. Additionally, the process for obtaining informed consent from children is fraught with issues. Many children turning 18 do not receive enough information or support to understand the implications of remaining in the NRM. Poor communication between professionals and the Home Office also results in delays and errors, further impacting young people's ability to access essential services.

The Home Office should review the policies for children transitioning into adulthood within the National Referral Mechanism (NRM) to ensure young people are supported to remain and access their entitlements. These should be incorporated into the Modern Slavery Statutory Guidance and in the operation of the Modern Slavery Victim Care Contract (MSVCC).



⁹⁷ Anti-Trafficking Monitoring Group. (2024). [Breaking Barriers: Supporting young victims of human trafficking transitioning to adulthood.](#)

CHAPTER 5: PROSECUTIONS FOR CHILD TRAFFICKING

Enforcement of the Modern Slavery Act 2015 is crucial to deliver justice for victims. The Home Affairs Committee 2023 report, *Human Trafficking*, noted that “the focus on identifying perpetrators of child trafficking “remains woefully inadequate”, with worryingly low levels of law enforcement responses to them in comparison to the number of children who are exploited”.⁹⁸

Child trafficking remains a low-risk, high-profit crime, and the persistently low prosecution and conviction rates for child trafficking and exploitation offences do not converge with the high numbers of children being referred into the NRM. Law enforcement representatives and the criminal justice system have acknowledged this is too low and cannot continue.⁹⁹ It is also acknowledged that individuals may be prosecuted for serious offences other than human trafficking when a plea is offered by defendants.¹⁰⁰

As has been persistently found in research, it is also often the case, that professionals and victims themselves are unable to recognise indicators of modern slavery and human trafficking. Additionally, many victims may be reticent to accept they

are victims and/or to engage with the criminal justice system for myriad reasons owing to the vulnerability factors previously mentioned.

Policing response: awareness and investigations

The Home Affairs Committee 2023 report, *Human Trafficking*, noted that “the focus on identifying perpetrators of child trafficking “remains woefully inadequate”, with worryingly low levels of law enforcement responses to them in comparison to the number of children who are exploited”.¹⁰¹

Inconsistency in police support for victims, lack of awareness and prevention of exploitation remains. A recent analysis of the testimony of survivors who have experienced forms of modern slavery in the UK found that the police were the most common policy actor where instances of misconduct and failure to act were found. Survivors in the study cited a ‘lack of compliance’ with law enforcement duties and legal obligations, including failure to adequately investigate their cases when exploitation was reported. This misconduct placed survivors at increased risk of exploitation.¹⁰²

⁹⁸ Home Affairs Committee. (2023). [Human trafficking](#).

⁹⁹ Modern Slavery and Organised Immigration Crime Unit. (2023). [Modern Slavery and Organised Immigration Crime Programme Annual Report 2022/2023](#).

¹⁰⁰ Crown Prosecution Service. (2011). [Policy for prosecuting cases of human trafficking](#).

¹⁰¹ [Human trafficking \(parliament.uk\)](#), para 284, 2023.

¹⁰² Eglén, L. et al. (2024). *Voices: Survivor Narratives for UK Policy and Practice*.

Recent data provided by some police forces to the Insight team of the Modern Slavery and Organised Immigration Crime Unit (MSOIC Unit)¹⁰³ showed that in October 2024,¹⁰⁴ police in England and Wales were dealing with at least 2612 live modern slavery investigations. Most of these investigations (59%) primarily involved tackling criminal exploitation while 19% of investigations were identified as primarily sexual exploitation, 14% as primarily labour exploitation and a smaller number identified as domestic servitude. In line with recent NRM data, live police investigations showed that British and Albanian nationals were the most frequently identified victim nationalities. Factors which could improve the number of prosecutions and convictions for child trafficking offences include law enforcement treating all reports of child trafficking as serious crimes and investigating them appropriately.¹⁰⁵

Data: prosecutions and convictions for child trafficking

Prosecutions and convictions for child trafficking remain woefully low as highlighted in our last Snapshot Report three years ago. Currently, the

Crown Prosecution Service (CPS) does not publish data on modern slavery–flagged offences crossed with child abuse–flagged offences. In consequence, this limits our understanding and monitoring of the prevalence of this horrific crime and efforts to reduce it. **The Crown Prosecution Service should ensure that it publishes data on the prosecution and conviction of child trafficking offences annually.**

In preparation for this report, the Independent Anti-Slavery Commissioner requested specific data from the CPS under her powers under Section 43 of the Modern Slavery Act 2015 on prosecutions for modern slavery offences committed against children in England and Wales.

In November, the CPS provided data on human trafficking flagged offences cross-referenced with child abuse–flagged offences for England and Wales which showed a decrease in prosecutions and convictions between 2021 and 2023. In 2021, there were 32 prosecutions and 23 convictions, this decreased to 19 prosecutions and 15 convictions in 2022. Prosecutions remained the same in 2023 with 13 convictions.

¹⁰³ Monthly snapshot of NON-LEA overview of live modern slavery investigations (MSID) in UK policing, Modern Slavery and Organised Crime Unit (MSOIC Unit), September 2024.

¹⁰⁴ Figures as of 8 November 2024. The total number of live investigations only includes investigations which have been uploaded by police forces who are utilising the PND DDE process for MSHT. Some forces are currently not engaged in this process, notably the big urban forces MET and GMP as well as Gloucester, Leicester, Lancashire, Lincolnshire, and Wiltshire. Data from the previous month can be updated following data quality checks.

¹⁰⁵ College of Policing. (2022) Modern slavery investigation.

Table 1: Human trafficking/child abuse flagged referrals, convictions and prosecutions, England and Wales¹⁰⁶

| Exploitation type | 2021 | 2022 | 2023 | 2024* |
|------------------------------|------|------|------|-------|
| Pre-charge decision receipts | 28 | 35 | 31 | 20 |
| Charge volume | 25 | 42 | 7 | 18 |
| Convictions | 23 | 15 | 13 | 23 |
| Non-convictions | 9 | 4 | 6 | 4 |
| Total completed prosecutions | 32 | 19 | 19 | 27 |

Table 2: Human trafficking/child abuse flagged offences, England and Wales

| Year | Offences |
|-------|----------|
| 2021 | 171 |
| 2022 | 115 |
| 2023 | 119 |
| 2024* | 204 |

*Data from January to June 2024

While data from January to June 2024 show an increase in both prosecutions and convictions, without complete data for 2024 it is not known whether convictions and prosecutions will remain the same or increase by the end of 2024.

¹⁰⁶ Data provided by the Crown Prosecution Service.

The Government must step up efforts to address the woefully low prosecution and conviction rates for child trafficking offences which have not improved since our last report, three years ago. The Government must work with the devolved governments, law enforcement partners, and criminal justice practitioners to review the barriers to bringing prosecutions for those who exploit children. This should include improving data collation and sharing, police awareness and training on investigating child trafficking, to ensure that child victims have access to redress and compensation.

Information Sharing

Some criminal justice practitioners, including Criminal Barrister Caroline Haughey OBE KC, have suggested that rates of prosecution and conviction are challenging to determine owing to complexities in data gathering, which could be addressed by improved data sharing between safeguarding partners. Such information could provide vital evidence to disrupt offenders and safeguard victims. In a recent interview, she said that pleas were often accepted for lesser offences, particularly in cases of sexual offending. She argued that among some stakeholders working in the criminal justice system was a "disproportionate reliance on

the threat of the Data Protection Act as a means of preventing the necessary exchange and sharing of material" – which may be creating more harm than good.¹⁰⁷

On this topic, the Home Office Child Exploitation Disruption toolkit, emphasises the importance of sharing information among safeguarding partners, noting that "data protection legislation can often, wrongly, be seen as a barrier to effectively safeguarding and protecting children". It states that safeguarding partners must be "clear about the legislative framework in which they operate and know their obligations".¹⁰⁸ Effective information sharing between safeguarding partners across law enforcement, local authorities, and health is essential to the protection of children and the prosecution of offenders. Data protection legislation provides a framework for safeguarding partners to support lawful, secure data sharing, which safeguarding partners must use more to help prevent and protect children from exploitation.

¹⁰⁷ Prison Service Journal. (2024). [Special Edition: Modern Slavery and Human Trafficking.](#)

¹⁰⁸ Home Office. (2022). [Child exploitation disruption toolkit.](#)

CHAPTER 6: RESEARCH

Evidence and data are essential to inform effective policymaking and practice in response to child trafficking. Notwithstanding a growth base of research, data, and evidence into human trafficking in the UK in recent years, significant gaps remain in our knowledge and understanding of modern slavery in the UK, including in the prevention of child trafficking. Some of these research gaps have been mapped to outline some potential priority areas of focus which are yet to be covered.¹⁰⁹

A key role of the IASC is to undertake and support the delivery of research and analysis. As such, the IASC will be maintaining historic research collaborations with the Rights Lab (University of Nottingham) and the Modern Slavery Policy Evidence Centre, as well as creating new partnerships with academics, government departments, other public bodies, charities, and industry to strengthen and improve understanding of human trafficking in the UK.

Through consultation in 2023 with academics, people with lived experience, and civil society across the anti-slavery sector, the IASC has identified some key gaps in our understanding and several data access challenges. The IASC will use their powers under the Modern Slavery Act 2015 to work with public bodies to improve the secure sharing of essential data and information. This is essential to help provide the evidence needed to inform policy development and for operational delivery and improvement of services. She will be working to deliver on these during her time in office.

¹⁰⁹ Balch, A. (2021). [Consultation on the Modern Slavery PEC's research priorities](#); Modern Slavery Policy and Evidence Centre. (2024). [Modern Slavery PEC Briefing: Priorities for Independent Anti-Slavery Commissioner's \(IASC's\) Strategic Plan](#); Independent Anti-Slavery Commissioner. (2022). [Annual Report 2021/22](#).

RECOMMENDATIONS

1. The UK Government should invest in long-term prevention efforts with a cross-departmental UK-wide Child Exploitation Strategy that prioritises early prevention, protection, and care in the UK to stop the exploitation of children.
2. The UK Government must urgently repeal the harmful provisions of recent legislation, particularly the Nationality and Borders Act 2022 and the Illegal Migration Act 2023, to remove barriers to protection and ensure all child victims of trafficking are identified and protected.
3. The Home Office must provide confirmed child victims of trafficking a grant of immigration leave if in line with their best interest of at least five years with a route to settlement to comply with the UK's international obligations.
4. The Department for Education and equivalent devolved bodies must commit to providing specialist support for child victims, including safe accommodation and adequate standards of care. The Government must increase ring-fenced funding for local authority children's services to meet the needs of all children, retain more social workers, and boost placement capacity, which is at a record low.
5. The Home Office should expand the National Referral Mechanism Devolving Child Decision-Making Pilot Programme across the UK and commit to making the Independent Child Trafficking Guardians available to all local authorities in England and Wales.
6. Public authorities, in particular, the Home Office and Crown Prosecution Service, must urgently improve the collation, standardisation and publication of child trafficking data, including immigration leave data for confirmed child victims of trafficking and prosecution and conviction data for child trafficking. The Crown Prosecution Service should ensure that it publishes data on the prosecution and conviction of child trafficking offences, including the use of the non-punishment principle are published annually. Limited transparency and delays in official responses to the IASC's request for data remain a barrier to comprehensive understanding and intervention.
7. The Government should conduct a statutory inquiry into the disappearance of children from Home Office-run hotels to ensure such a catastrophic child protection failure never happens again. Working closely with law enforcement partners, the Government must urgently step up efforts to locate the 90 missing children.

8. The Government must integrate child trafficking prevention into the delivery of its Safer Streets Programmes and in upcoming legislation to prevent exploitation, strengthen communities, and fulfil its responsibility to uphold the rights and well-being of all children—not just those at immediate risk of criminal exploitation.



9. The Government should introduce statutory definitions of Child Criminal Exploitation and a definition of Child Sexual Exploitation, which are compliant with international law to enable safeguarding professionals and law enforcement agencies to readily identify and protect victims. Any definition should make clear that a child cannot consent to their own exploitation.

10. We urge the Government to urgently address the legal aid funding crisis to ensure all children have access to high-quality legal advice in their immigration, criminal, public law, and community care matters.

11. The Government must step up efforts to address the low prosecution and conviction rates for child trafficking offences, which have not improved since our last report three years ago. The Government must work with the devolved governments, law enforcement partners, and criminal justice practitioners to review the barriers to bringing prosecutions for those who exploit children. This should include improving data collation and sharing, police awareness and training on investigating child trafficking to ensure that child victims have access to redress and compensation.

12. The Home Office should review the policies for children transitioning into adulthood within the National Referral Mechanism (NRM) to support young people to remain and access their entitlements.



by ECPAT UK youth programme member.



Every Child Protected
Against Trafficking

Independent
Anti-Slavery
Commissioner