

1 April 2022

Rt Hon Priti Patel MP
Home Secretary
Home Office
2 Marsham Street
London
SW1P 4DF

By email: homesecretarycorrespondence@homeoffice.gov.uk

Dear Home Secretary,

On 23 December 2021 I published the report '[Child Trafficking in the UK in 2021: A Snapshot](#)' in collaboration with ECPAT UK which provides an outline of child trafficking between October 2020 and October 2021, including the latest data, policy developments, examples of promising practice and challenges faced by practitioners.

The report concluded with ten recommendations aimed at a range of stakeholders, two of which relate specifically to the Home Office:

Recommendation 6 for the Home Office - To commence full national roll-out of the Independent Child Trafficking Guardian (ICTG) service across England and Wales as soon as possible, and to consider the introduction of an inspection regime of the service by a regulatory body.

Recommendation 7 for the Home Office - To build on the devolved NRM decision making pilots and subject to a positive evaluation, commence UK wide rollout as soon as possible.

On recommendation 6, we are pleased that in the last year the ICTG provision has been rolled out to an additional one third of local authority areas and that three of the recommendations made by the Independent Review of the Modern Slavery Act 2015 are currently being tested. We appreciate the desire to test the various models for rolling out this provision nationally and take an evidence-based approach, however seven years on from the Modern Slavery Act 2015 this has taken far too long. In their third evaluation of the UK, the Group of Experts on Action against Trafficking in Human Beings (GRETA), echoed this position noting concerns that the ICTG service is still not fully operational across the whole of England and Wales despite the rising numbers of child victims being identified.¹ We therefore urge the Home Office to commence full national rollout of the ICTG service as a

¹Group of Experts on Action against Trafficking in Human Beings (2021), 'Evaluation Report United Kingdom: Third evaluation round: Access to justice and effective remedies for victims of trafficking in human beings': <https://rm.coe.int/greta-third-evaluation-report-on-the-united-kingdom/1680a43b36>.

priority, with consideration also given to introducing an inspection regime of the service as is now in place for the provision of support for adults through the Modern Slavery Victim Care Contract.

On recommendation 7, we welcome the efforts made over the past 12 months to provide funding to ten local authority areas to take part in a pilot to test devolving NRM decision making to local safeguarding partners and commend the Home Office for their meaningful engagement with stakeholders from the earliest stages of this project. Both of our offices have valued the opportunity to be part of the Expert Advisory Panel for the evaluation and have found this to be a helpful forum. We recognise the need to wait for the findings from the evaluation but have been pleased to hear the promising feedback that has been received so far from the pilot areas. Should the evaluation reach a positive conclusion, it is vital that those areas involved in the pilot are able to continue their work so that the skills and knowledge that they have developed are not lost, and that national roll-out is commenced as soon as possible so that all child potential victims of trafficking are able to experience the benefits brought by this alternative model.

I look forward to receiving your response. In the interests of transparency, I request that you respond in a way that enables me to publish your letter on my website.

Yours sincerely,



Independent Anti-Slavery Commissioner



Dame Sara Thornton DBE QPM
Independent Anti-Slavery Commissioner
5th Floor, Globe House
89 Eccleston Square
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SW1V 1PN

DECS Reference: MIN/0273550/22

26 April 2022

Dear Dame Sara,

Thank you for your letter of 1 April to the Home Secretary regarding the report 'Child Trafficking in the UK in 2021: A Snapshot' that you published in collaboration with ECPAT UK. I am responding as the Minister responsible for this issue. I welcome the research your office has done with ECPAT UK to outline the picture of child trafficking in the UK between October 2020 and October 2021.

The Government views modern slavery, including trafficking of children, as a very serious offence and recognises the vulnerabilities of child victims. Where children are found to be victims of modern slavery the Government is committed to protecting their safety and welfare.

Recommendation 6 for the Home Office on Independent Child Trafficking Guardians (ICTGs)

Where children are found to be potential victims of human trafficking or modern slavery, including child criminal exploitation, their safety and welfare are addressed as a priority. Local authorities are responsible for safeguarding and promoting the welfare of all children in their area, including child victims of modern slavery.

Independent Child Trafficking Guardians (ICTGs) provide an additional source of advice and support for all potentially trafficked children, irrespective of nationality, and is somebody who can advocate on their behalf. The ICTG service model provides one-to-one support for children who have no parental responsibility for them in the UK via an ICTG Direct Worker and an expert ICTG Regional Practice Co-ordinator for children where there is someone with parental responsibility for them in the UK.

The Government is committed to delivering the national rollout of the ICTG service. To date, a staggered approach to roll out has been adopted with robust built-in evaluations along the way to ensure the ICTG Service meets the needs of the vulnerable children it supports. In May 2021, we expanded the ICTG Service to cover in total two thirds of all local authorities across England and Wales, focusing on the areas of highest need. During this phase of the roll out, we are undertaking targeted testing of recommendations made by the Independent Review of the Modern Slavery Act 2015. An independent evaluation

will be carried out to look at the value added of these changes and consider appropriate next steps.

Recommendation 7 for the Home Office on the devolving National Referral Mechanism (NRM) decision making Pilot for child victims

As you know in June 2021, we launched a series of Pilot sites to test devolving the responsibility to make NRM decisions for child victims of modern slavery from the Home Office to local authorities. The Pilot programme is testing whether determining if a child is a victim of modern slavery within existing local safeguarding structures is a more appropriate model for making modern slavery decisions for children. This approach will enable decisions about whether a child is a victim of modern slavery to be made by those involved in their care and ensure the decisions made are closely aligned with the provision of local, needs-based support and any law enforcement response.

The Pilot is subject to a rigorous evaluation, which is being conducted jointly by Home Office Analysis and Insight (HOAI) and an external research contractor. We have appointed an Independent Expert Advisory Panel to provide oversight and ensure robust data is collected to determine whether the Pilot is effective. The evaluation of the Pilot will establish changes in the service due to the devolvement of decision-making regarding child victims of modern slavery to local authorities and their safeguarding partners.

The longer-term future of the Pilot will be based on robust evidence from the evaluation. We are working closely with local authorities and stakeholders to monitor the Pilot and will continue to assess our next steps. It is right that we wait for findings from the final evaluation report, which is due in summer 2022, to inform the evidence base and the long-term future of the Pilot.

As you are aware we are developing a revised Modern Slavery strategy and more details on our future plans for both ICTGs and the devolving NRM decision making Pilot for child victims will be provided in this when it is published.

Thank you for your engagement in the development of the strategy.

A handwritten signature in black ink, appearing to read 'Rachel Maclean', with a small flourish at the end.

Rachel Maclean MP